



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3593

DATE FILMED 4-18-94 CAMERA NO. 2

CAMERAMAN JM/L

94030971398

Reinwald O'Connor Marrack Hoskins & Playdon

RECEIVED
FEDERAL ELECTION
COMMISSION

AUG 25 9 27 AM '92

Attorneys at Law

Grosvenor Center, PRI Tower
733 Bishop Street, 24th Floor
Honolulu, Hawaii 96813-4070

P.O. Box 3199
Honolulu, Hawaii 96801-3199
Telephone: (808) 524-8350
Telecopier: (808) 531-8628

Arthur B. Reinwald*
Dennis E. W. O'Connor*
Alexander C. Marrack*
John A. Hoskins*
Gilbert D. Buisson*

George W. Playdon, II*
Wesley H. H. Ching
Jerrold K. Cuban
W. Thomas Fagan
Dean T. Nagamine
Patricia Kahau Wall
Michael I. McGuigan

Cid H. Inouye
Mark C. Rutherford
Wayne S. Sakamoto
Kelvin H. Kaneshiro, D.M.D.
Stuart T. Feeley
Deborah C. Lacombe

Robert B. Fraz
Kathleen M. Douglas
Lindsay M. Watanabe
Jeffrey W. Juliano, LL.M.
John S. Muka
M. Loibena Uy
Mary Ann Knoeckel

*A Law Corporation

Since 1876

CONFIDENTIAL

August 5, 1992

MUR 3593

92 AUG 26 AM 10:50

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: Rick Reed for U.S. Senate

This constitutes a formal complaint pursuant to 2 U.S.C. 437 g(a) (1) and 11 C.F.R. §111.4 of a violation of the Federal Elections Law.

The enclosed Exhibit A was earlier submitted to you by myself as Chair of the Democratic Party of Hawaii, but I have been informed by you that Exhibit A does not comply with the statutory requirements and therefore a formal complaint is required.

The complainant is Dennis E.W. O'Connor, 733 Bishop Street, #2400, Honolulu, Hawaii 96813 (11 C.F.R. §111.4).

The respondent is Rick Reed candidate for the U.S. Senate from Hawaii who is alleged to have committed a violation (11 C.F.R. §111.4).

The source of information to complainant is Exhibit A, statements made by respondent to news media, personal information, and information obtained from third parties (11 C.F.R. §111.4).

The specific facts which constitute the violation are that Rick Reed produced a video tape at the end of 1991 titled "Christmas in the Philippines" showing himself visiting the Philippines and interacting with many Filipinos during that visit. The tape was then distributed to 30,000 of Filipino voters in Hawaii using the Hawaii voters list to obtain the names and addresses only of those voters with Filipino names on that list. Mr. Reed thereafter declared himself as a candidate for U.S. Senate. He has not reported this expenditure to the FEC and has stated that all of the money used to produce and mail the tape, approximately \$100,000, came from one person.

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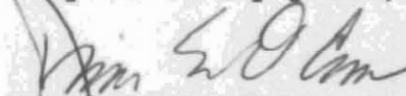
General Counsel
Federal Election Commission
Re: Rick Reed for U.S. Senate
August 5, 1992
Page 2

This is a violation of both reporting requirements and contribution restrictions.

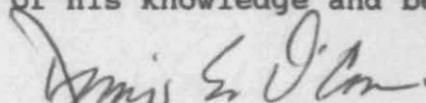
My telephone number is (808) 524-8350.

Respondent is Rick Reed, 31 South Beretania Street, Honolulu, Hawaii 96813.

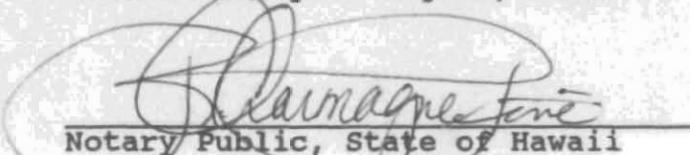
Very sincerely yours,


Dennis E.W. O'Connor

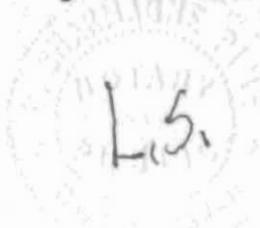
Comes now Dennis E.W. O'Connor and hereby swears and affirms that the facts stated above regarding the complaint are true and correct to the best of his knowledge and belief.


Dennis E.W. O'Connor

Subscribed and sworn to before me
this 14th day of August, 1992.


Notary Public, State of Hawaii

My commission expires: 6/18/95



94030971400

April 10, 1992

MEMORANDUM (Confidential)

TO : DENNIS O'CONNOR, Chairman
Democratic Party of Hawaii

FROM : BENJAMIN J. CAYETANO *BC*

SUBJ : CAMPAIGN COMPLAINT

Senator Rick Reed earlier this year mailed a videocassette to each family with a Filipino surname on the voter registration list--an estimated 29,000 households. This tape prominently portrayed Rick Reed as concerned about the victims of the Mount Pinatubo disaster.

At an estimated cost of \$4-5 each, these 29,000 videotapes cost between \$116,000 to \$145,000.

I believe the timing of the mailing of these tapes, shortly before Reed's announcement as a candidate for the U.S. Senate, can only be construed as a campaign-related expense. The content of the videotape is entirely self-serving, and there is nothing he has done, before or since, to actually assist the Mount Pinatubo victims.

The Democratic Party should file a complaint with the Federal Elections Commission on the expenditure of these funds without its required reporting as a campaign expense.

94030971401



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 28, 1992

Mr. Dennis E.W. O'Connor
733 Bishop Street, #2400
Honolulu, HI 96813

RE: MUR 3593

Dear Mr. O'Connor:

This letter acknowledges receipt on August 26, 1992, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by Richard Reed, Rick Reed for U.S. Senate and Jennifer Louise P. Reed, as treasurer. 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 3593. 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,

A handwritten signature in cursive script, appearing to read "Teresa A. Hennessy".

Teresa A. Hennessy
Assistant General Counsel

Enclosure
Procedures

94030971402



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 28, 1992

Rick Reed for U.S. Senate
Jennifer Louise P. Reed, Treasurer
Post Office Box 99
Honolulu, HI 96810

RE: MUR 3593

Dear Ms. Reed:

The Federal Election Commission received a complaint which indicates that Rick Reed for U.S. Senate ("Committee") 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 3593. 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 Committee 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.

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Rick Reed for U.S. Senate
Jennifer Louise P. Reed, Treasurer
Page 2

If you have any questions, please contact Joi L. Roberson, 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,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

Enclosures

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

94030971404



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 28, 1992

Mr. Richard Reed
55 South Kukui Street
Honolulu, HI 96813

RE: MUR 3593

Dear Mr. Reed:

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 3593. 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.

94030971405

Richard Reed
Page 2

If you have any questions, please contact Joi L. Roberson, 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,

Teresa A. Hennessy

Teresa A. Hennessy
Assistant General Counsel

Enclosures

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

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SEP 21 9 38 AM '92

JENNIFER PANGANIBAN-REED
Treasurer, Rick Reed for U.S. Senate
P.O. Box 99
Honolulu, HI 96810-0099

Teresa A. Hennessy
Assistant General Counsel
Federal Election Commission
Washington D.C. 20463

September 17, 1992

92 SEP 21 PM 3: 50

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE

Dear Ms. Hennessy:

I'm writing in response to a complaint (MUR 3593) against me and the Rick Reed for U.S. Senate Committee filed--not surprisingly since Rick Reed is a Republican--by the chairman of the Democratic Party of Hawaii.

The filing of this complaint is nothing more than political harassment by the supporters of incumbent U.S. Senator Daniel Inouye, whom Rick Reed is running against. The excuse for filing of said complaint is a business venture initiated by Rick Reed nearly two years prior to his becoming a candidate for the U.S. Senate. The business venture involved the production and dissemination of a travelogue/documentary of the Philippines at Christmas time. As Mrs. Rick Reed and Filipina by birth, I am personally familiar with the details of my husband's for-profit, yet altruistic, business venture.

The videotape, "Christmas in the Philippines", is the first of several to be produced by my husband's company, Community Productions, showcasing the beauty of the various cultures that comprise today's Hawaii.

My husband and I began planning "Christmas in the Philippines" in mid-1990. To finance this venture, my husband secured a business loan commitment from Mr. Richard Bellord of California in November of 1990. Mr. Bellord, who has two children from his former Filipina wife, was attracted to the idea of showcasing the Filipino culture. He also knew and respected Mr. Reed, and agreed that such a tape would be popular and therefore its production would be a profitable venture.

A number of marketing options were considered and rejected by my husband before deciding that the best way to generate interest for the tape was to do a mass free mailing of the tape to people of Filipino ancestry in Hawaii. The idea was that its popularity amongst these people would result in word quickly spreading to the millions of Americans of Filipino ancestry in other parts of the U.S.--Filipinos who have sentimental and

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familial ties to their native homeland.

My husband decided upon this marketing strategy in November of 1990, and toward this end, he secured a loan commitment from Mr. Bellord for \$90,000, which covered the cost of disseminating the tapes in Hawaii.

In December of 1990, my husband and I videotaped the travelogue/documentary in the Philippines. We returned to Hawaii shortly thereafter and coordinated the production of the tape in the Philippines by long distance.

Originally, our plan was to disseminate the tape in July of 1991--this was timed to generate interest and sales during the Christmas season. However, around mid-1991, we started receiving requests for the tapes from a number of Filipino organizations involved in assisting victims of the Mt. Pinatubo eruptions for their fund-raising purposes. Of course, we decided to accommodate these requests for free tapes, and accordingly, we postponed our free mass mailing of tapes until September.

We decided that September would be a good time to distribute the tape anyway since it was closer to Christmas and our feeling was that people would be more in the Christmas mood, more apt to sit down and enjoy the tape again and again rather than watch it once and put it away without ever looking at it again. We wanted the tape to be received as a gift near Christmas and in time to allow recipients to buy extra copies as gifts for friends and relatives.

So a combination of factors ultimately made us decide to market the tape in September rather than in July. Our plan was to follow up the Hawaii mailings with a major marketing push on the mainland but my husband's decision to run for the U.S. Senate in November sidetracked our efforts.

In early 1991, as part of our mainland U.S. marketing strategy, I had begun communication with the various Philippine embassies throughout the U.S., requesting the names of Filipino community organizations around the country. I have enclosed responses from some of the ambassadors and consuls general who received my letter and viewed the tape.

The enclosed letters are not only of interest because they substantiate, in part, the fact that the videotape was to be marketed on the mainland, but also because the responses make it quite clear that recipients did not see the tape as "self-serving" at all. All of the letters laud our efforts to distribute such a tape nationally. One--from attorney Claro

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Mamaril of San Francisco--requested 100 copies. Mr. Mamaril wrote that he had "shown it to friends and they have expressed great interest in buying it not only for themselves but for their relatives and friends as well." Mr. Mamaril added that he believes the tape will "sell not only to Filipinos but also to Americans."

If this tape is a campaign piece that promotes a U.S. Senate candidate from Hawaii, why in the world would people on the mainland be wanting to buy copies for their relatives and friends? The reason is simple: "Christmas in the Philippines" is not a campaign piece. It is a sincere attempt to capture and display the beauty and strength of a people who endure more than their share of economic difficulties and natural disasters. It is also a warm, sentimental travel through most of the Philippines at Christmas time--a time when the Filipino love for God and worship of Lord Jesus is most evident and inspiring.

In August of 1991, my husband and I showed a copy of "Christmas in the Philippines" to the board of directors of the National Filipino-American Council--a nationwide Filipino-American organization based in San Francisco with two million members. Four or five minutes into the viewing, my husband turned to make a comment to the sophisticated, successful attorney sitting next to him. The attorney was crying. For anyone born in the Philippines, it is obvious that our videotape is not self-serving; it promotes the Filipino people.

One American-Filipino who resides in Hawaii, Ms. Jo Farina, wrote to Rick after she received her copy of the tape. She wrote, "It's amazing that it took a 'kano' (slang for American) to show us how beautiful our culture is." A 13-year-old boy of Filipino ancestry who, in his determination to be "all-American", had always rejected anything "Filipino", reluctantly watched the tape and then looked at his mother with "new eyes" and announced that he'd like to visit the Philippines.

Since my husband is a state senator in Hawaii representing many Americans of Filipino ancestry, this tape was also a legitimate communication from him to his constituents. In short, the tape was educational, cultural, altruistic and seasonal.

In summary, the concept and marketing strategy was developed, the loan secured, the documentary taped and production begun on "Christmas in the Philippines" two years ago--long before my husband became a candidate for the U.S. Senate. The following are the relevant dates:

Conception of idea for "Christmas in the Phils." Jun. 1990

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Production and marketing strategy for tape developed	Nov. 1990
Business loan commitment secured from Richard Bellord	Nov. 1990
Videotaping in the Philippines	Dec. 1990
Production of "Christmas in the Philippines"	12/90-5/91
Community Productions formed	Jan. 1991
Community Productions trade name registered	Jun. 1991
Mass dissemination of tapes in Hawaii	Sep. 1991
Rick Reed decides to become U.S. Senate candidate and files	Nov. 1991

The dates outlined above make it clear that the activities complained by Inouye's supporters occurred well prior to my husband becoming a candidate for the U.S. Senate. As a result, none of the activities were campaign-related and therefore no reporting to the FEC was required, nor was Mr. Bellord's loan to Community Productions in any way a campaign contribution.

It is important to note that while Inouye and his supporters would like to have the activities of Community Productions seen as campaign activity, the Hawaii State Campaign Spending Commission thoroughly reviewed the tape and ruled it was not a campaign-related activity.

It is also interesting to note that one of the complainants--Ben Cayetano, Lt. Governor of Hawaii and second in command of the Democratic machine--makes it obvious in his memorandum that he never even viewed the tape and therefore cannot be objective in his assessment of whether the content of the tape had any cultural value. Cayetano states "This tape prominently portrayed Rick Reed as concerned about the victims of Mt. Pinatubo disaster." Our tape was filmed prior to the Mt. Pinatubo eruption and no footage of the eruption appeared anywhere on the tape. The single mention of the eruption was in the introduction to the tape (which was filmed after the fact) in which my husband mentioned the resiliency of the Filipino people in being able to bounce back in the face of economic hardship and devastating natural disasters.

Furthermore, Cayetano goes on to state that "nothing has been done, before or since, to actually assist the Mt. Pinatubo victims". This is a complete lie. As I stated, we made our tapes available at no cost to several Filipino organizations (Oahu Filipino Community Council, St. Catherine's Society, Kohala Visayan Club, and Sto. Nino Club, among others) which were involved in raising funds for the Mt. Pinatubo victims. I have enclosed a letter from the Secretary of the Oahu Filipino Community Council. She wrote, "It is indeed a blessing to have people like you in the community." She thanked us for making copies of "Christmas in the Philippines" available as a

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fundraising tool for the Council to help the victims of Mt. Pinatubo eruptions. Gerry Minoza, president of the St. Catherine's Society, was interviewed on television about his group's efforts in using the tape to raise funds for the Mt. Pinatubo victims. Said Mr. Minoza, "Most of our members are old people. They haven't seen the Philippines, and when they saw that (the tape), you could see tears rolling from their eyes." The fact is that Cayetano's allegation is a political complaint from a political machine not accustomed to being challenged.

If there is a need for any additional information, please let me know.

Sincerely,

Jennifer Louise Reed
Jennifer Louise P. Reed
Treasurer

Comes now Jennifer Louise P. Reed and hereby swears and affirms that the facts stated above regarding the complaint are true and correct to the best of her knowledge and belief.

Jennifer Louise Reed
Jennifer Louise P. Reed

Subscribed and sworn to before me
this 17 th day of September, 1992.

Sharon Reed
Notary Public, State of Hawaii

My commission expires: April 7, 1995

94030971411



25 November 1991

Dear Mrs. Panganiban-Reed:

On behalf of Ambassador Emmanuel Pelsam, I wish to acknowledge with appreciation the tape you have so kindly sent us. It has portrayed the best of Philippine culture and we wish there were more people like you and your husband who show such touching concern for the Philippines and its people.

I am sure that the Filipino community organizations here would be very interested in receiving copies of your tape. Listed below are some of the representative Filipino-American community organizations under our jurisdiction:

- 1) Philippine Heritage Federation
Maurese Owens - President
867 N. Madison Street
Arlington, VA 22205
- 2) Filipino-American Cultural Arts Society (FACAS)
Belen Dela Pena - President
245 Panorama Drive
Oxon Hill, MD 20745
- 3) Combined International Phil-Am Association (CIPAA)
Grace Pedery - President
305 Mecca Circle
Ft. Washington, MD 20744
- 4) Association of Philippine American Women (APAW)
Susan Fertig-Dyke - President
205 Yoakum Parkway, No. 1021
Alexandria, VA 21014
- 5) Council of United Filipino Organizations of Tidewater
Dick Dabu - President
P.O. Box 62272
Virginia Beach, VA 23462
- 6) Philippine American Association of Carolinas
Mr. Eli L. Espiritu - President
121 Twin Creek Drive
Spartanburg, South Carolina 29303
- 7) Filipino Community of Florida
Mr. Ted Ravelo - President
1160 NE 134th Street
N. Miami, Florida 33161
- 8) Fil-Am Association of Naples Florida
Donna Bobcock - President
3441 19th Avenue, SW
Naples, Florida 33964

Thank you, once again, here's wishing you all the best.

Sincerely yours,

Teresita V. G. Baresana
TERESITA V. G. BARESANA
First Secretary and Consul

94030971412

MISYON NG PILIPINAS SA MGA
NAGKAKAISANG BANSA



PHILIPPINE MISSION TO THE
UNITED NATIONS

556 FIFTH AVENUE
NEW YORK, N.Y. 10036
TEL. NO. (212) 761-1300

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 SEP 21 PM 3:56

24 October 1991

Ms. Jennifer Panganiban-Reed
Community Productions
55 So. Kukui St. #DH2613
Honolulu, HI 96813

Dear Mrs. Panganiban-Reed,

I wish to thank you for the copy of the video cassette entitled "Christmas in the Philippines" which I received at my office yesterday. It is very timely with the coming holiday season that you and your husband have taken on this project of distributing copies of this tape to the different Filipino Communities here in the United States. I am sure Filipino families will enjoy reliving the Christmas spirit so unique in the Philippines.

I have referred your request for a copy of all Filipino organizations to the Philippine Consulate here in New York.

Sincerely yours,

SEDFREY A. ORDÓÑEZ
Ambassador
Permanent Representative

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KONSULADO PANLAHAT NG PILIPINAS



CONSULATE GENERAL OF THE PHILIPPINES

SEATTLE

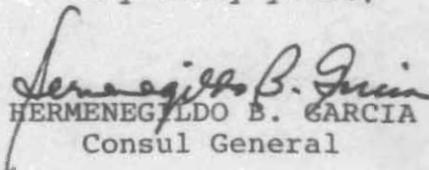
28 October 1991

Dear Mrs. Reed,

I wish to acknowledge with thanks and appreciation the receipt of the video tape on "Christmas in the Philippines," and to congratulate you for your laudable efforts to distribute this tape among our "kababayans" in the United States.

In this regard, I am enclosing a list of Fil-Am organizations within the consular jurisdiction of this Consulate for your reference.

Very truly yours,


HERMENEGILDO B. GARCIA
Consul General

Mrs. Jennifer Panganiban-Reed
Community Productions
55 So. Kukui St. #DH2613
Honolulu, HI 96813

94030971414



PHILIPPINE CONSULATE GENERAL

SAN FRANCISCO, CALIFORNIA

24 October 1991

Dear Mrs. Reed,

I wish to acknowledge with thanks the receipt of a copy of the video tape entitled "Christmas in the Philippines" which you and your husband produced and which you have so kindly sent me.

Attached is a copy of a list of Filipino organizations in our area of jurisdiction. It is by no means exhaustive because of periodical changes and growth. I am sure they will be delighted to view your tape.

Sincerely,

ALFREDO L. ALMENDRALA, JR.
Consul General

Mrs. Jennifer Panganiban-Reed
Community Productions
55 So. Kukui St. #DH2613
Honolulu, HI 96813

94030971415



LAW OFFICES
of
CLARO L. MAMARIL

Please Respond to:

- One Hallidie Plaza, Suite 460
At Fifth & Market Streets
San Francisco, CA 94102
Tel: (415) 986-8858
Fax No: (415) 986-3940
- 126 Tennessee St.
Vallejo, CA 94590
Tel: (707) 648-0748

October 17, 1991

Senator Rick Reed
55 South Kukui Street, #DH 2613
Honolulu, Hawaii 96813

Dear Rick,

Please send me 100 tapes on consignment at your earliest convenience to One Hallidie Plaza, Suite 460, San Francisco, California 94102.

St. Vincent's Church, of which I am a member, will have a Parish Day Celebration on November 24, 1991, and the Confraternity of Christian Doctrine (CCD) will sell the tapes to the public. Since Christmas will be just around the corner at that time, we believe that the tapes will sell not only to Filipinos but also to Americans. I think you mentioned that the cost per tape is \$8.00. Would you please confirm this to me.

There is a special request from my CCD friends that you and Jennifer autograph the tapes as you did with the copy you so kindly gave me. I have shown it to friends and they have expressed great interest in buying not only for themselves but for their relatives and friends as well.

Finally, I would like to express how happy and privileged I was to meet you and Jennifer. You struck me as someone who is not only capable but honest as well - two essential characteristics very rarely seen in a public servant. I strongly believe that you will go further in the political field and would hope to see you representing Hawaii in the U.S. Congress in the not too distant future. With Jennifer by your side, I do not see how you could lose or go wrong.

All for now and all the best to you and Jennifer.

Sincerely,

Claro L. Mamaril
CLARO L. MAMARIL, Esq.

CLM:mem

94030971416

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CHIEF COUNSEL
92 SEP 21 PM 3:36



Republic of the Philippines
Office of the Vice-President
Executive House

12 September 1991

Senator RICK REED
The Senate
The Sixteenth Legislature
State of Hawaii
State Capitol
Honolulu, Hawaii 96813

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 SEP 21 PM 3:36

Dear Senator Reed:

Thank you for your kind letter of 05 August 1991 and for the copy of the video tape of "Christmas in the Philippines" which I found highly interesting.

I am glad that you enjoyed your visit to the Philippines and I am sure the Filipino community in Hawaii appreciates what you have done.

It was indeed a pleasure meeting you and I look forward to seeing you on your next visit.

Best wishes and Mabuhay!

Sincerely,

Salvador H. Laurel
SALVADOR H. LAUREL

TAA/lvs

94030971417



OAHU FILIPINO COMMUNITY COUNCIL

P.O.Box 27871
Honolulu, Hawaii 96827

September 18, 1991

OFFICERS 1990 - 1992

Romualdo Agustin
President

Rey Custodio
1st Vice President

Mario Orbito
2nd Vice President

Letty Gaoing
Secretary

Ben Cabreros
Treasurer

Philip Alcain
Auditor

BOARD OF DIRECTORS

Larry Acidello
Lito Alcantara
Mydia Connie Coloma
Julio Flojo
Fred Galapate
Acela Garcia
Zachary Labez
Marlene Mansano
Julio Quiocho
Prudencio Rea
Mas Tabangcura

Immediate Past Presidents

* Maggie Domingo
Don Alvarez

* Resigned to become
UPCH President

Legal Advisor

Avelina Madrid Shaw

Senator and Mrs. Rick Reed
State Office Tower Rm. 308
235 South Beretania Street
Honolulu, Hawaii 96813

Dear Senator and Mrs. Reed:

It is indeed a blessing to have people like you in the community.

On behalf of the Oahu Filipino Community Council, its officers and members, we sincerely thank you for all the good things you have extended specifically for the "Christmas in the Philippines" video tapes.

We were able to support one of our major projects, the Mt. Pinatubo Relief Fund Drive.

We hope to be able to work hand in hand with you in your future endeavors.

Thank you and best wishes.

Sincerely yours,

OAHU FILIPINO COMMUNITY COUNCIL

Letty Gaoing
Letty Gaoing
Secretary

cc/ltg.

92 SEP 21 PM 3:37

RECEIVED
FEDERAL ELECTION COMMISSION



THE CENTER FOR FILIPINO STUDIES

September 16, 1991

Senator and Mrs. Rick Reed
State Office Tower, Rm. 308
235 S. Beretania Street
Honolulu, HI 96813

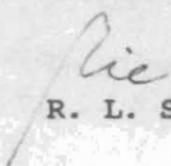
Dear Senator and Mrs. Reed,

Thank you for sending me a copy of your tape "Christmas in the Philippines". Its beautifully put together and certainly very professional in quality. I took a lot of video shots during my recent trip to the Philippines, but I do not have the talent to put it together the way you did.

We just formed a **Center for Filipino Studies** here at Cal State, Hayward. We hope to become the lead campus to promote Filipino studies within the California State University System. I plan to show your film to showcase the country to our Filipino students here who have never been to the Philippines. I hope that we can also call on you as a possible speaker here on our campus in the future.

Enclosed is my check for \$10.00. Thank you for sending the tape so promptly. Dios ti agina!

Sincerely yours,


R. L. Singson

94030971419

THE FOREIGN SERVICE OF THE PHILIPPINES



PHILIPPINE CONSULATE GENERAL
3660 WILSHIRE BOULEVARD, SUITE 900
LOS ANGELES, CALIFORNIA 90010
TEL. (213) 387-5321

November 7, 1991

Dear Mrs. Reed,

We wish to acknowledge, with thanks, receipt of the video tape featuring "Christmas in the Philippines." You will be pleased to know that the Consulate has begun showing the tape to the applicants who stay in the reception area while waiting for their documents.

This project which you chose to undertake is truly a commendable one, and it will certainly bring back fond memories of our special Christmas celebrations.

Enclosed, please find the list of Filipino organizations in Los Angeles which you requested. If we can be of further assistance, do not hesitate to contact our office at (213) 387-5321.

Very truly yours,
For the Consul General:

Melba S. Lim

MELBA S. LIM
Consul

Ms. Jennifer Panganiban-Reed
55 So. Kxkui St. #DH2613
Honolulu, HI 96813

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FEDERAL ELECTION COMMISSION

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COMMISSION
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MUR 3593

Ms. Joi Roberson
Federal Election Commission
999 E Street N.W.
Washington, D.C. 20463

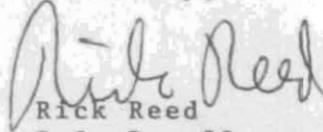
August 30, 1993

Dear Ms. Roberson:

This is to confirm that I intend to rely on the response already filed by my committee in the politically-motivated, bogus matter under review against the Rick Reed for U.S. Senate Committee.

Thank you.

Sincerely,



Rick Reed
P.O. Box 99
Honolulu, Hi. 96810
(808) 586-6970

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RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

RECEIVED
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OCT 8 10 52 AM '92

JENNIFER PANGANIBAN-REED

Treasurer, Rick Reed for U.S. Senate
P.O. Box 99
Honolulu, HI 96810-0099

September 29, 1992

Joy Roberson
999 E St. Northwest
Washington, D.C. 20463

Dear Ms. Roberson:

Re: MUR 3593

Enclosed is a copy of the "Christmas in the Philippines"
tape that you requested. I hope you find everything in order.

Sincerely,

Jennifer Reed
Jennifer Reed

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F.E.C.
SECRETARIAT

94 MAR -1 AM 9:34

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

FIRST GENERAL COUNSEL'S REPORT

MUR #3593
DATE COMPLAINT RECEIVED
BY OGC August 26, 1992
DATE OF NOTIFICATION TO
RESPONDENTS August 28, 1992
STAFF MEMBER Joi L. Roberson

COMPLAINANT: Mr. Dennis E. W. O'Connor

RESPONDENTS: Rick Reed
Rick Reed for U.S. Senate and
Jennifer Louise P. Reed, as treasurer

RELEVANT STATUTES: 2 U.S.C. § 431(2)(A)
2 U.S.C. § 431(8)
2 U.S.C. § 431(9)
2 U.S.C. § 431(11)
2 U.S.C. § 432(e)(1)
2 U.S.C. § 433(a)
2 U.S.C. § 434(a)
2 U.S.C. § 434(b)(4)(A)
2 U.S.C. § 441a(a)
2 U.S.C. § 441a(f)

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: none

I. GENERATION OF MATTER

On August 26, 1992, the Commission received a complaint from Dennis O'Connor ("Complainant") alleging that Rick Reed received a \$100,000 contribution and made an expenditure of \$100,000 before he declared his candidacy for the United States Senate seat from Hawaii in the 1992 election.^{1/} Complainant further alleges that the contribution and the expenditure were

^{1/} Rick Reed was the Republican candidate in the race.

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not reported to the Commission and that the contribution was an excessive contribution from one individual.

The Commission notified Rick Reed, Rick Reed for U.S. Senate and Jennifer Louise P. Reed,^{2/} as treasurer, ("Respondents") of the complaint on August 28, 1992. Rick Reed for U.S. Senate and Jennifer Louise P. Reed, as treasurer, ("the Committee") responded to the complaint notification on September 17, 1992, and sent additional information on September 29 and November 9, 1992. See Attachments 1, 2, and 3. In an August 30, 1993 letter, to this Office, Rick Reed stated that he is relying on the Committee's response. See Attachment 4.

II. FACTUAL AND LEGAL ANALYSIS

An individual becomes a candidate under the Federal Election Campaign Act of 1971, as amended, ("the Act") if such individual has received contributions aggregating in excess of \$5,000 or has made expenditures aggregating in excess of \$5,000. 2 U.S.C. § 431(2)(A). Within 15 days of becoming a candidate, an individual must designate in writing a principal campaign committee. 2 U.S.C. § 432(e)(1). A principal campaign committee must file a statement of organization within 10 days after such designation. 2 U.S.C. § 433(a). The treasurer of a principal campaign committee is required to file periodic reports of receipts and disbursements. 2 U.S.C. § 434(a)(1). Each report shall disclose for the reporting period and the

^{2/} Jennifer Louise P. Reed is married to Rick Reed.

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calendar year, the total amount of all expenditures made to meet candidate or committee operating expenses. 2 U.S.C. § 434(b)(4)(A).

An "expenditure" includes any purchase, payment, distribution, or anything of value made by any person for the purpose of influencing any election for Federal office. 2 U.S.C. § 431(9)(A). The term "person" includes an individual, corporation, or any other organization or group of persons. 2 U.S.C. § 431(11).

A "contribution" includes any loan made by any person for the purpose of influencing any election for Federal office. 2 U.S.C. § 431(8)(A). The Act limits the amount to an aggregate of \$1,000 that an individual can contribute to a candidate or a candidate's principal campaign committee with respect to any election for Federal office. 2 U.S.C. § 441a(a)(1)(A). In addition, no candidate or candidate's principal campaign committee shall knowingly accept any contribution from any person in excess of \$1,000 with respect to any election for Federal office. 2 U.S.C. § 441a(f).

Complainant alleges that Rick Reed produced a videotape, "Christmas in the Philippines," which shows him visiting the Philippines and interacting with Filipinos during the visit. According to Complainant, the videotape was then distributed to approximately 30,000 Hawaiian residents of Filipino ancestry

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whose names appeared on a registered voter list. Rick Reed subsequently declared his candidacy for the 1992 election to the United States Senate. The complaint estimated the cost of each videotape at \$4 to \$5, for a total cost of \$116,000 to \$145,000. A memorandum submitted with the complaint states "I believe the timing of the mailing of these tapes, shortly before Reed's announcement as a candidate for the United States Senate, can only be construed as a campaign-related expense."^{3/} Additionally, Complainant alleges that all of the money used to produce and distribute the videotape came from one individual, Richard Bellord.

In response to the complaint, Respondents claim that the making and dissemination of the videotape was a business venture initiated by Rick Reed nearly two years prior to his becoming a candidate for the United States Senate. In the alternative, Respondents claim that the videotape was a legitimate communication from Rick Reed to his constituents.^{4/} They provide a chronology of events in support of their contentions. See Attachment 1, pp. 1 and 3-4.

According to Respondents, the travelogue first developed as a for-profit venture in June 1990. In November 1990,

^{3/} The memorandum was written by Benjamin J. Cayetano to the chairman of the Democratic Party of Hawaii. Based upon this Office's investigation, it appears that Mr. Cayetano was the Lieutenant Governor of Hawaii at the time the memorandum was written.

^{4/} Rick Reed is a state senator in Hawaii.

Rick Reed's company, Community Productions,^{5/} secured a \$90,000 business loan commitment from Richard Bellord to finance the venture. See Attachment 1, p. 4. Respondents state that the production and marketing strategy were also developed in November 1990. Respondents assert that a free mass mailing to Hawaii residents of Filipino ancestry was part of the marketing strategy.

The idea was that its popularity amongst these people would result in word quickly spreading to the millions of Americans of Filipino ancestry in other parts of the U.S.--Filipinos who have sentimental and familial ties to their native homeland.

See Attachment 1, pp. 1-2.

The videotape was filmed and produced from December 1990 to May 1991. Respondents contend that the videotape was originally intended for distribution in July 1991, but was delayed until September in order to market the videotape for Christmas 1991. In addition, Respondents explain that the delay was also due to requests in mid-1991 to use the videotape for fundraisers to assist the victims of the Mount Pinatubo eruption. In order to accomodate these fundraising requests, Respondents' own distribution was postponed.

^{5/} According to the Hawaii Department of Commerce and Consumer Affairs, Community Productions is a sole proprietorship owned by Rick Reed.

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In September 1991, 30,000 free copies of the videotape were mailed to people of Filipino descent living in Hawaii. Filipino organizations on the mainland were also provided free copies of the videotape. According to Respondents, the "plan was to follow up the Hawaii mailings with a major marketing push on the mainland but [Rick Reed's] decision to run for the U.S. Senate in November sidetracked our efforts." See Attachment 1, p. 2. In November 1991, Rick Reed declared his candidacy for the United States Senate.^{6/}

As stated above, 2 U.S.C. § 431(9)(A)(i) defines the term "expenditure" to include anything of value made by any person for the purpose of influencing any election for Federal office. In this matter, there are two distinct expenditure issues raised by the complaint: (1) whether the costs incurred in the production of the videotape constitute expenditures under the Act; and (2) whether the costs incurred in the distribution of 30,000 free copies of the videotape constitute expenditures under the Act.^{7/}

Based upon this Office's review of the videotape, it appears to be a travelogue, as claimed by Respondents, and does not appear to be campaign-related. The videotape shows

^{6/} Rick Reed filed his statement of candidacy on November 21, 1991, and Rick Reed for U.S. Senate also filed its statement of organization on November 21, 1991.

^{7/} The Committee's disclosure reports for the 1992 election cycle do not reflect any expenditures or debts incurred in connection with the production or distribution of the videotape.

Rick Reed at local outdoor markets, visiting Filipino friends and politicians, giving awards on behalf of the State of Hawaii, and touring the site of a recent earthquake. A series of phone numbers are listed at the end of the videotape for viewers to call if they "need any kind of help." ^{8/} The videotape makes no reference to Rick Reed's bid for a United States Senatorial seat or to the 1992 election. Thus, the nature of the videotape supports Respondents' contention that its purpose was not to influence the election of Rick Reed to Federal office. See Advisory Opinion 1990-5.^{9/} Therefore, there is no reason to believe that the costs incurred with the production of the videotape were campaign-related.

Further, the free distribution of the videotape to the 30,000 Hawaiian voters does not appear to be campaign-related, but instead appears to have been part of Rick Reed's overall marketing scheme. Of particular significance, the Reeds distributed the videotape beyond Hawaii to the mainland--in other words, to persons who could not elect Rick Reed to the United States Senate from Hawaii. Mrs. Reed requested the names

^{8/} The phone numbers listed were the same phone numbers listed on the bottom of Rick Reed's federal campaign stationery two years later. It is not known if these were his home numbers or what numbers they were at the time the videotape was distributed.

^{9/} In Advisory Opinion 1990-5, the Commission determined that expenditures incurred in a candidate's ongoing business venture, a newsletter, would be considered campaign-related. While not directly on point, Advisory Opinion 1990-5 may be a useful guide in this case. In that Advisory Opinion, the Commission looked at whether "direct or indirect reference is made to the candidacy, campaign or qualifications for public office of the [candidate] or

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of mainland Filipino community organizations from various Philippine embassies throughout the United States. See Attachment 1, p. 2. The videotape was then distributed to mainland Filipino civic organizations in the fall of 1991. The cover jacket of the videotape also includes a solicitation for viewers to purchase more tapes for friends and relatives. See Attachment 5, p. 1.

As a result of the mainland distribution, Rick Reed received two orders for the videotape. One order was from a California attorney, Claro L. Mamaril, who ordered one hundred copies of the videotape on behalf of the Confraternity of Christian Doctrine which planned to resell the videotapes at a Parish Day Celebration. See Attachment 1, p. 9. Mr. Mamaril believed that "the tapes [would] sell not only to Filipinos but also to Americans." Id. The second order was from the California State University, Hayward, Center for Filipino Studies. See Attachment 1, p. 12. According to the Center's representative, the videotape was to be shown to mainland Filipino students to showcase the Philippines. Id.

In light of the Reeds' entire marketing scheme, the distribution to the Hawaiian residents of Filipino descent does not appear to be campaign-related. Thus, the costs of distribution do not appear to have been expenditures under the

(Footnote 9 continued from previous page)

[his] opponent." Advisory Opinion 1990-5. The Commission also looked at whether the "distribution of the newsletter is...in any manner that otherwise indicates utilization of the newsletter as a campaign communication." Id.

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Act. Accordingly, this Office recommends that the Commission find no reason to believe that Rick Reed for U.S. Senate Committee and Jennifer Louise P. Reed violated 2 U.S.C. §§ 434(a)(1) and 434(b)(4)(A).

Correspondingly, because the videotape was apparently a travelogue and was not campaign-related, the loan from Richard Bellord for the production and distribution of the videotape was not a contribution. As such, it appears that Richard Bellord did not make an excessive contribution, and the Committee did not receive an excessive contribution in connection with the production and distribution of the videotape. Thus, this Office recommends that the Commission find no reason to believe that Richard Bellord violated 2 U.S.C. § 441a(a)(1)(A) and that Rick Reed for U.S. Senate and Jennifer Louise P. Reed, as treasurer, violated 2 U.S.C. § 441a(f).

Further, because it appears that the videotape was not campaign-related, there is also no reason to believe Rick Reed violated 2 U.S.C. § 432(e)(1) by not declaring his candidacy and designating his principal campaign committee until November 1991. Correspondingly, there is no reason to believe the Committee violated 2 U.S.C. § 433(a) by not filing its statement of organization until November 1991.

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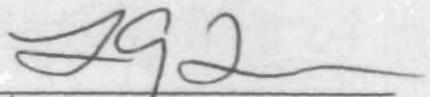
Therefore, this Office recommends the Commission find no reason to believe that Rick Reed for U.S. Senate and Jennifer Louise P. Reed, as treasurer, violated 2 U.S.C. §§ 433(a), 434(a)(1), 434(b)(4)(A), and 441a(f). This Office also recommends that the Commission find no reason to believe Rick Reed violated 2 U.S.C. § 432(e)(1) and Richard Bellord violated 2 U.S.C. § 441a(a)(1)(A). Additionally, this Office recommends that the file be closed.

IV. RECOMMENDATIONS

1. Find no reason to believe Rick Reed for U.S. Senate and Jennifer Louise P. Reed, as treasurer, violated 2 U.S.C. §§ 433(a), 434(a)(1), 434(b)(4)(A), and 441a(f).
2. Find no reason to believe Rick Reed violated 2 U.S.C. § 432(e)(1).
3. Find no reason to believe that Richard Bellord violated 2 U.S.C. § 441a(a)(1)(A).
4. Approve the appropriate letters.
5. Close the file.

Lawrence M. Noble
General Counsel

2/28/94
Date

BY: 
Lois G. Lerner
Associate General Counsel

Attachments

1. Response dated September 17, 1992
2. Letter from Respondents dated September 29, 1992
3. Letter from Respondents dated November 9, 1992
4. Letter from Rick Reed dated August 30, 1993
5. Videotape jacket

94030971432



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/BONNIE J. ROSS 
COMMISSION SECRETARY

DATE: MARCH 4, 1994

SUBJECT: MUR 3593 - FIRST GENERAL COUNSEL'S REPORT
DATED FEBRUARY 28, 1994.

The above-captioned document was circulated to the
Commission on Tuesday, March 1, 1994 at 4:00 p.m.

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

Commissioner Aikens _____
Commissioner Elliott _____
Commissioner McDonald _____
Commissioner McGarry _____
Commissioner Potter _____
Commissioner Thomas, XXX

This matter will be placed on the meeting agenda
for Tuesday, March 22, 1994

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

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Rick Reed;) MUR 3593
Rick Reed for U.S. Senate and)
Jennifer Louise P. Reed, as)
treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on March 22, 1994, do hereby certify that the Commission decided by a vote of 4-2 to take the following actions in MUR 3593:

1. Find no reason to believe Rick Reed for U.S. Senate and Jennifer Louise P. Reed, as treasurer, violated 2 U.S.C. §§ 433(a), 434(a)(1), 434(b)(4)(A), and 441a(f).
2. Find no reason to believe Rick Reed violated 2 U.S.C. § 432(e)(1).
3. Find no reason to believe that Richard Bellord violated 2 U.S.C. § 441a(a)(1)(A).
4. Approve the appropriate letters as recommended in the General Counsel's report dated February 28, 1994.

(continued)

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4. Close the file.

Commissioners Aikens, Elliott, McGarry, and Potter
voted affirmatively for the decision; Commissioners
McDonald and Thomas dissented.

Attest:

3-22-94
Date

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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

MARCH 30, 1994

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dennis E.W. O'Connor
733 Bishop Street, #2400
Honolulu, HI 96813

RE: MUR 3593

Dear Mr. O'Connor:

On March 22, 1994, the Federal Election Commission reviewed the allegations of your complaint received on August 26, 1992, and found that on the basis of the information provided in your complaint, and information provided by Rick Reed for U.S. Senate and Jennifer Louise P. Reed, as treasurer, there is no reason to believe Rick Reed for U.S. Senate and Jennifer Louise P. Reed, as treasurer, violated 2 U.S.C. §§ 433(a), 434(a)(1), 434(b)(4)(A), and 441a(f). Also on March 22, 1994, the Commission found there is no reason to believe Rick Reed violated 2 U.S.C. § 432(e)(1) and Richard Bellord violated 2 U.S.C. § 441a(a)(1)(A). Accordingly, on that same date, the Commission closed the file in this matter.

The Federal Election Campaign Act of 1971, as amended ("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,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

94030971436



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MARCH 30, 1994

Jennifer Louise P. Reed
Rick Reed for U.S. Senate
P.O. Box 99
Honolulu, HI 96810

RE: MUR 3593
Rick Reed for U.S.
Senate and Jennifer
Louise P. Reed, as
treasurer

Dear Ms. Reed:

On August 28, 1992, the Federal Election Commission notified Rick Reed for U.S. Senate and you, as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On March 22, 1994, the Commission found, on the basis of the information in the complaint, and information provided by you, that there is no reason to believe Rick Reed for U.S. Senate and you, as treasurer, violated 2 U.S.C. §§ 433(a), 434(a)(1), 434(b)(4)(A), and 441a(f). Accordingly, the Commission closed its file in this matter.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

94030971437



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MARCH 30, 1994

Richard Reed
55 South Kukui Street
Honolulu, HI 96813

RE: MUR 3593
Rick Reed

Dear Mr. Reed:

On August 28, 1992, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On March 22, 1994, the Commission found, on the basis of the information in the complaint, and information provided by Rick Reed for U.S. Senate and Jennifer Louise P. Reed, as treasurer, that there is no reason to believe you violated 2 U.S.C. § 432(e)(1). Accordingly, the Commission closed its file in this matter.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

MARCH 30, 1994

Richard Bellord
444 Las Palomas Drive
Port Hueneme, CA 93041

RE: MUR 3593
Richard Bellord

Dear Mr. Bellord:

In the normal course of carrying out its supervisory responsibilities, the Federal Election Commission considered the issue of whether you violated any provision of the Federal Election Campaign Act of 1971, as amended, ("the Act") by making a \$90,000 business loan to Community Productions, a sole proprietorship owned by Rick Reed. After considering all of the evidence, on March 22, 1994, the Commission found no reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A). Accordingly, the Commission has closed the file in this matter.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3593

DATE FILMED 4-13-94 CAMERA NO. 2

CAMERAMAN JM II

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