



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20461

THIS IS THE BEGINNING OF MUR # 3671

DATE FILMED 10/29/93 CAMERA NO. 2

CAMERAMAN MC

93040992308

National Republican Senatorial Committee

OGC 707P

SENATOR PHIL GRAMM
CHAIRMAN

October 23, 1992

JES HENSARLING
EXECUTIVE DIRECTOR

Mrs. Joan Aikens
Chairman
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

MUR 3671

92 OCT 27 10 56 AM '92
FEDERAL ELECTION COMMISSION

Dear Madame Chairman:

This letter constitutes a formal complaint pursuant to 2 U.S.C. 437g (a) of the Federal Election Campaign Act (the "Act") and sets forth reasons to believe that violations of the Act and Federal Election Commission (the "Commission") regulations have been committed by the People for Patty Murray, U.S. Senate Campaign (the "Murray Campaign"), a political committee registered with the Commission, and the Washington Chiropractic Trust, a non-profit corporation registered in the State of Washington.

A portion of the Murray Campaign FEC report reflects that the Murray Campaign is in violation of the Act for accepting a contribution from a corporation. The Washington Chiropractic Trust is in violation of the Act for making a contribution to the Murray Campaign.

Page 1 of 1 of Schedule A of the Murray Campaign FEC report (attached as Exhibit A) shows that on January 13, 1992, the Murray Campaign accepted a \$500 contribution from the Washington Chiropractic Trust. According to records on file with the Secretary of State's office of the State of Washington, the Washington Chiropractic Trust is a non-profit corporation which was incorporated August 17, 1990.

As the Commission knows, the Act prohibits a corporation, including a non-profit corporation, from making a contribution in connection with any Federal election. 2 U.S.C. 441b; 11 C.F.R. 114.2 (b); see Advisory Opinion 1982-26, Fed. Elec. Camp. Fin. Guide (CCH) para. 5672 (1982) and authority cited therein.

Subsequent FEC reports of the Murray Campaign do not reflect that the illegal contribution was ever refunded. This is because the illegal contribution was transferred to Murray's state senate campaign committee (the "State Committee"). This transfer occurred in violation of federal law since Commission regulations require that the illegal contribution be returned within thirty days of discovery that the contribution was illegal. 11 C.F.R. 103.3 (b)(2). The Murray Campaign's notation on its FEC report reflects that the campaign knew that the contribution at issue was from a prohibited source. Therefore, a refund should have been made to the Washington Chiropractic

RONALD REAGAN REPUBLICAN CENTER
425 SECOND STREET, N.E. • WASHINGTON, D.C. 20002 • (202) 675-6000

PAID FOR AND AUTHORIZED BY THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE.

93040992309

Trust rather than a transfer to the State Committee. A continuing violation exists because the prohibited funds have never been refunded.

Although the Murray Campaign transferred the illegal contribution to the State Committee on 2/10/92 as reflected on Schedule B of its FEC report (attached as Exhibit B), the unlawful contribution apparently was laundered back to the Murray Campaign from the State Committee by way of a subsequent transfer.

Evidence to support this can once again be found in a portion of the Murray Campaign FEC report (attached as Exhibit C). This portion of the FEC report reflects transfers of \$3,000 on 1/21/92 and \$5,727.44 on 3/10/92 from the State Committee back to the Murray Campaign.

First, it should be noted that the initial transfer from the State Committee was in violation of federal law because it involved more than \$1,000 and the State Committee did not timely register as a political committee with the Commission within ten days of the transfer. 11 C.F.R. 100.5 and 102.1 (d).

The treasurer of the State Committee attempted to rectify this violation by falsely dating the registration of the State Committee as 1/31/92 in violation of 2 U.S.C. 437g. However, the postmark of 2/11/92 on the State Committee's "Statement of Organization" and the Commission's "file stamp mark" of 2/18/92 (both attached as Exhibit D) reflect that the State Committee was not timely registered under federal law.

Because the State Committee was not timely filed the initial \$3,000 transfer was unlawful and constitutes a continuing violation.

Second, as alluded to above, it is reasonable to assume that the unlawful \$500 contribution made its way back to the Murray Campaign as part of \$5727.44 transfer that took place on 3/10/92 from the State Committee to the Murray Campaign. In this respect, the Commission should compel the Murray Campaign to produce records to support that the \$5727.44 transfer was in fact from "Funds Permissible Under The Act" as noted by the Murray Campaign on its FEC report (refer to Exhibit C).

The above-referenced documents show that the Murray Campaign accepted an illegal contribution and laundered the contribution through its state Committee in an effort to influence a federal election. This attempt to evade the law must be condemned. Accordingly, the NRSC asks that the Commission's Office of General Counsel expeditiously review this complaint and take appropriate action with regard to these apparent violations of the Act.

93040992310

The above is true and correct to the best of my knowledge, information and belief.

Respectfully,

Jay Velasquez
Jay Velasquez

Sworn to and subscribed
before me this 23 day
of October 1992.

Lana C. Guiler
Notary Public

Lana C. Guiler
Notary Public, District of Columbia
My Commission Expires July 14, 1999

93040992311



EXHIBIT "A"

SCHEDULE A

ITEMIZED RECEIPTS

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

NAME OF COMMITTEE (in Full) C00257642
PEOPLE FOR PATTY MURRAY, U.S. SENATE CAMPAIGN

9304090902723127

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
District 1 MERA/WMU Political Action Fund 444 N. Capitol St., Suite 800 Washington DC 20001		2-14-92	125.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 125.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Womens Campaign Fund 1601 Connecticut Ave N.W., #800 Washington DC 20009		3-17-92	1000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 1000.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
National Organization for Women P.O. Box 7157 Washington DC 20044		3-30-92	1000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 1000.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
<u>Washington Chiropractic Trust</u> P.O. Box 18588 Seattle WA 98118	<i>Please refer to "Itemized Disbursements" for final disposition of this contribution</i>	1-13-92	500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 500.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	

SUBTOTAL of Receipts This Page (optional)	
TOTAL This Period (last page this line number only)	2125.00

EXHIBIT 'B''

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

PAGE 2 OF 3
FOR LINE NUMBER 17

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

NAME OF COMMITTEE (in Full) C00257642
PEOPLE FOR PATTY MURRAY, U.S. SENATE CAMPAIGN

93040992313
9202007232

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A Better Telephone Store 16300 Aurora Ave N. Seattle WA 98133	Campaign Office Phone System Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3-19-92	4273.41
B. Full Name, Mailing Address and ZIP Code U.S. West P.O. Box 12480 Seattle WA 98191	PHONE LINES / DEPOSIT Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3-16-92	1550.00
C. Full Name, Mailing Address and ZIP Code <u>Patty Murray Campaign</u> 528 NW 203RD PL. Seattle WA 98177	Purpose of Disbursement <small>TRANSFER FROM RESIDENTIAL CAMPAIGN TRUST CONTRIBUTION INTO STATE SENATE ACCOUNT, NOT ELIGIBLE FOR FEDERAL CAMPAIGN</small> Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	2-10-92	500.00
D. Full Name, Mailing Address and ZIP Code Laura Hewitt 9433 N.E. 25th ST. Clyde Hill, WA 98004	Campaign Consultant Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	2-4-92 2-19-92	315.00 252.00
E. Full Name, Mailing Address and ZIP Code Same as above	Campaign Consultant Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3-5-92 3-23-92	252.00 266.00
F. Full Name, Mailing Address and ZIP Code Same as above	Reimbursement for miscellaneous Expenses Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	2-19-92 3-5-92 3-23-92	23.97 21.75 13.63
G. Full Name, Mailing Address and ZIP Code Labels and Lists 2500 116th Ave NE. Bellevue, WA 98004	Labels Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3-15-92	833.63
H. Full Name, Mailing Address and ZIP Code Shasha Richardson 1902 Franklin, Apt. 1 Olympia, WA 98501	Campaign Consulting Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3-31-92	600.00 in kind received
I. Full Name, Mailing Address and ZIP Code Teresa Purcell 1904 Franklin Olympia WA 98501	Campaign Consulting Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3-31-92	760.00 in kind received

SUBTOTAL of Disbursements This Page (optional)	9661.39
TOTAL This Period (last page this line number only)	

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

NAME OF COMMITTEE (in Full)

PEOPLE FOR PATTY MURRAY, U.S. SENATE CAMPAIGN C00257642

93040992314
9200072319

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
PATTY MURRAY CAMPAIGN 528 NW 203RD PL. SEATTLE WA 98177		1-21-92	3000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):	Occupation	Aggregate Year-to-Date > \$	FUNDS PERMISSIBLE UNDER THE ACT.
		3000.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
PATTY MURRAY CAMPAIGN 528 NW 203RD PL. SEATTLE WA 98177		3-10-92	5727.44
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):	Occupation	Aggregate Year-to-Date > \$	FUNDS PERMISSIBLE UNDER THE ACT.
		8727.44	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):	Occupation	Aggregate Year-to-Date > \$	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):	Occupation	Aggregate Year-to-Date > \$	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):	Occupation	Aggregate Year-to-Date > \$	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):	Occupation	Aggregate Year-to-Date > \$	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):	Occupation	Aggregate Year-to-Date > \$	

SUBTOTAL of Receipts This Page (optional)
TOTAL This Period (last page this line number only) 8727.44

EXHIBIT "D"

STATEMENT OF ORGANIZATION

(See reverse side for instructions)

(a) NAME OF COMMITTEE

The Patty Murray Campaign

(Check if name is changed)

DATE: Jan. 31, 1992

(b) Number and Street Address

528 NW 203 Pl NW

(Check if address is changed)

SECRETARY OF THE COMMITTEE

3 FEDERAL REGISTER NUMBER

92 FEB 14 AM 10:01

(c) City, State and ZIP Code

Seattle, Wash 98177

92 FEB 21 AM 10:01

4. IS THIS STATEMENT AN AMENDMENT?

YES NO

5. TYPE OF COMMITTEE (Check one)

HAND DELIVERED

- (a) This committee is a principal campaign committee. (Complete the candidate information below.)
 - (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)
- | Name of Candidate | Candidate Party Affiliation | Office State held | State District |
|-------------------|-----------------------------|------------------------------|----------------|
| Patty Murray | Democratic | State Senator | Wash: 1st Leg |
- (c) This committee supports/opposes only one candidate _____ and is NOT an authorized committee.
 - (d) This committee is a _____ committee of the _____ Party.
 - (e) This committee is a separate segregated fund.
 - (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund or a party committee.

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

Type of Connected Organization: Corporation Corporation with Capital Stock Labor Organization Membership Organization Trade Association Cooperative

7. List all records, items, by name, address, phone number, record, and position of the person in possession of committee books and records.

Full Name	Mailing Address	Title or Position
Don Chanley	1911 1st Ave N, Seattle 98177-4204	Treasurer

8. Treasurer (List the name and address of the treasurer of the committee, and the name and address of any other person acting as assistant treasurer.)

Full Name	Mailing Address	Title or Position
Don Chanley	1911 1st Ave N, Seattle 98177-4204	Treasurer

9. Bank (List all depositories, including all depository banks, in which the committee deposits funds, holds accounts, rents safe, or has bank deposits.)

Name of Bank Depository, etc.	Mailing Address and ZIP Code
Washington Mutual Bank - Idaho Falls, Idaho	Idaho Falls, Idaho 83401

10. Name and address of the person who prepared this statement.

Don Chanley
1911 1st Ave N, Seattle 98177-4204

11. Name and address of the person who prepared this statement.

Don Chanley
1911 1st Ave N, Seattle 98177-4204

93040992315

00002477

1992 FEB 18 PM 12:08

EXHIBIT "D" (cont'd)

Campaign
insurer
NW
98177



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

20463

RECEIVED
OFFICE OF RECORDS & COMM. DIV.
1992 FEB 18 PM 1:10

93040992316

02473



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 29, 1992

Jay Velasquez, Counsel
National Republican Senatorial Committee
425 Second Street, N.E.
Washington, DC 20002

RE: MUR 3671

Dear Mr. Velasquez:

This letter acknowledges receipt on October 23, 1992, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by People for Patty Murray U.S. Campaign and Eugenia S. Higgins, as treasurer, Patty Murray Campaign and Donn Charnley, as treasurer, and The Washington Chiropractic Trust and its 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 3671. 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,

Teresa A. Hennessy
Assistant General Counsel

Enclosure
Procedures

93040992317



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 29, 1992

Washington Chiropractic Trust
P.O. Box 18588
Seattle, WA 98118

RE: MUR 3671

Dear Treasurer:

The Federal Election Commission received a complaint which indicates that the Washington Chiropractic Trust ("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 3671. 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.

93040992318

Washington Chiropractic Trust
Page 2

If you have any questions, please contact Mary Ann Bumgarner, the attorney 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
Assistant General Counsel

Enclosures

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

93040992319



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 29, 1992

Donn Charnley, Treasurer
Patty Murray Campaign
528 N.W. 203rd Place
Seattle, WA 98177

RE: MUR 3671

Dear Mr. Charnley:

The Federal Election Commission received a complaint which indicates that the Patty Murray Campaign ("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 3671. 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.

93040992320

Donn Charnley, Treasurer
Patty Murray Campaign
Page 2

If you have any questions, please contact Mary Ann Bumgarner, the attorney 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

cc: Patty Murray

93040992321



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 29, 1992

Eugenia S. Higgins, Treasurer
People for Patty Murray U.S. Senate Campaign
528 N.W. 203rd Place
Seattle, WA 98177

RE: MUR 3671

Dear Ms. Higgins:

The Federal Election Commission received a complaint which indicates that the People for Patty Murray U.S. Senate Campaign ("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 3671. 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.

93040992322

Eugenia S. Higgins, Treasurer
People for Patty Murray U.S. Senate Campaign
Page 2

If you have any questions, please contact Mary Ann Bumgarner, the attorney 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

cc: Patty Murray

93040992323

MURRAY

PATTY

U.S. Senate • Democrat

P.O. Box 3662, Seattle, WA 98124 • Phone: (206) 621-0611

October 23, 1992

nur 3671

Lawrence E. Noble
General Counsel
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

Dear Mr. Noble,

I am writing in regard to a complaint filed with the Federal Election Commission by the National Republican Senatorial Committee (NRSC) on behalf of my opponent Representative Rod Chandler.

In the complaint, the NRSC alleges that I have violated FEC regulations governing campaign finance by accepting a \$500 contribution from a corporation, the Washington Chiropractic Trust.

After a thorough review of transactions involving the check in question, and extensive analysis of the state and federal campaign finance reports from that period, my campaign has found no truth in the NRSC's allegations.

I feel that the accusations made by the NRSC in the complaint represent a direct attack on my character, honesty and willingness to abide by campaign finance laws.

With this in mind, I ask you to take immediate action on the NRSC complaint, to provide an independent, bi-partisan judgment regarding its truth.

I wish to clear my name of these groundless charges before they damage my campaign for the U.S. Senate.

I have instructed my staff to comply fully and willingly with any requests for information or documentation during this investigation. I open to you, without qualification, all official documents involving my campaign finances.

I await your response to my request.

Sincerely,

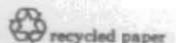
Patty Murray
Patty Murray

enclosures

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 OCT 29 PM 3:54

RECEIVED
FEDERAL ELECTION COMMISSION
MAIN CORRIDOR
OCT 29 10 14 AM '92

Paid for and authorized by People for Patty Murray U.S. Senate Campaign



PERKINS COIE

A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
1201 THIRD AVENUE, 40TH FLOOR • SEATTLE, WASHINGTON 98101-3099
(206) 583-8888 • FACSIMILE (206) 583-8500

DAVID J. BURMAN

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIN COPY ROOM

Nov 17 9 12-AM '92
(206) 583-8426 DIRECT

November 11, 1992

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

Attn: Mary Ann Bumgarner

Re: MUR 3671

Dear Ms. Bumgarner:

As we discussed on the telephone on November 10, respondents in this matter request a 20 day extension, until Monday, December 7, to respond to the Complaint. The reason for this request is that we have just recently been retained in this matter, and it will take some time to review the records and discuss them with campaign officials. I hasten to add that my review of the Complaint and the records I have received to date indicates that there is no reasonable argument that the Murray Committee violated the Act. Nothing in the Act or the Commission's regulations prohibit transfer of a contribution from a committee that could not properly receive it to one that could. The only apparently accurate allegation in the Complaint is that the state committee was a few days late in registering as a political committee with the Commission. This is not a violation of the Act, and when the state committee realized that its registration was going to be late, it called the Commission and was instructed to proceed in the fashion that it did.

Please notify me immediately if this request for extension is unacceptable.

Sincerely,



David J. Burman

DJB:jcm
Encl.

cc: Eugenia S. Higgins

[09901-0001/SL923160.087]

93040992325

RECEIVED
FEDERAL ELECTION
COMMISSION
NOV 17 AM 3:25

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3671

NAME OF COUNSEL: David J. Burman

ADDRESS: Perkins coie

1201 Third Avenue, 40th Floor

Seattle, WA 98101-3099

TELEPHONE: (206) 583-8426

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

11/4/92
Date

Eugenia S. Higgins
Signature

RESPONDENT'S NAME: Eugenia S. Higgins, Treasurer
Donn Charnley, Former Treasurer

ADDRESS: People for Patty Murray U.S. Senate Campaign

528 N.W. 203rd Place

Seattle, WA 98177

TELEPHONE: HOME (206) 524-7075

BUSINESS (206) 621-0611

93040992326



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 19, 1992

David J. Burman, Esquire
Perkins Coie
1201 Third Avenue, 40th Floor
Seattle, Washington 98101-3099

RE: MUR 3671
People for Patty Murray
U.S. Senate Campaign
and Eugenia S. Higgins,
as treasurer

Dear Mr. Burman:

This is in response to your letter dated November 11, 1992, which we received on November 17, 1992, requesting an extension until December 7, 1992 to respond to the complaint in this matter. After considering the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on December 7, 1992.

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

Sincerely,

Mary Ann Bumgarner
Attorney

93040992327

NAVRATIL & KEARNEY CLINIC



3079 156TH AVE. S.E.
BELLEVUE, WA 98007

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIN COPY ROOM

746-4205

Nov 19 11 13 AM '92

DR. EUGENE P. KEARNEY
DR. JIM D. NAVRATIL
DR. RICHARD J. WALING
CHIROPRACTIC PHYSICIANS

November 16, 1992

Federal Election Commission
Office of the General Counsel
Attn: MaryAnn Bumgarner
999 E Street NW
Washington, D.C. 20463

92 NOV 19 PM 3:12

RECEIVED
FEDERAL ELECTION COMMISSION

Dear Ms. Bumgarner,

As per our conversation today, I am responding on matter MUR 3671, the check for \$500 written to Sen. Patty Murray from the Washington Chiropractic Trust. As we discussed, the chiropractic Trust in this state is not a federally registered PAC and thus doesn't and has never made donations on Federal races. Patty Murray was a State Senator running for the U.S. Senate and our contribution was intended for her State account. One to two weeks after receiving our contribution, Ms. Murray thanked our lobbyist Steve Wehrly for the donation and it became apparent that she thought it was for her U.S. Senate campaign. As we understand it, she had deposited our check into her U.S. Senate campaign account and realizing the mixup, transferred the funds to her State Senate account. To reiterate, it was certainly not our intention to make a contribution to Ms. Murray's U.S. Senate campaign. We did intend to donate to her State Senate committee.

Thank you for your time, and for faxing me the enclosures which I hadn't received. If we need to provide any further information, please don't hesitate to call.

Sincerely,

Eugene P. Kearney
WCT President

EPK/ksm

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PERKINS COIE

A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

1201 THIRD AVENUE, 40TH FLOOR • SEATTLE, WASHINGTON 98101-3099

(206) 583-8888 • FACSIMILE (206) 583-8500

December 7, 1992

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DEC 11 2 23 AM '92

(206) 583-8426 DIRECT

DAVID J. BURMAN

CERTIFIED MAIL/RETURN RECEIPT REQUESTED

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

Attention: Mary Ann Bumgarner

Re: MUR 3671

Dear Ms. Bumgarner:

We are responding on behalf of the People for Patty Murray U.S. Senate Campaign (the "Federal Committee"), former Committee treasurer Donn Charnley, and current treasurer Eugenia S. Higgins to the complaint filed by the National Republican Senatorial Committee ("NRSC"). As is clear from the facts known to the NRSC at the time of its complaint, there is no reason for the Commission to believe that a violation of the Federal Election Campaign Act has occurred, and the Commission should close the file in this matter without further action.

The NRSC complaint deals with three items that are in fact separate but that all happened within a few months early in the U.S. Senate primary campaign.

Patty Murray is a member of the Washington Senate, and had a continuing state campaign committee (the "State Committee"). The NRSC is correct that the Federal Committee erroneously accepted a \$500 contribution that the Washington Chiropractic Trust, a corporation, intended for the State Committee. The reasons for that initial error are simple: The committee names are similar; the payee on the check was a shortened version of the State Committee's name that could easily be interpreted as a shortened version of the Federal Committee's name; the two committees had, at that time, the same person as treasurer; and the Federal Committee staff was inexperienced in federal campaigns. In short, the check was simply deposited in the wrong account. Within a few weeks that mistake was drawn to the attention of the Federal Committee by the Chiropractic Trust, which requested that the \$500 be transferred to the correct account--i.e., from the Federal Committee to the State Committee. That occurred, and the check making the transfer bears the notation "Deposited in Wrong Account." Exhibit A. This corrective transfer occurred within

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FEDERAL ELECTION COMMISSION

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30 days, long before any action by the NRSC or the Commission, and was fully disclosed.

As the NRSC basically admits, improper contributions are often innocently received, and the Commission's rules explicitly allow corrective transfers back to the donor. The donor would then be free to redirect the funds to any lawful recipient, including, as in this case, a state campaign committee. Thus, the NRSC complaint in this regard must be that the donor's explicit intention should have been accomplished through a two-part transfer (Federal Committee to donor to State Committee) rather than through the direct transfer from the Federal to the State Committee at the donor's direction. Nothing in the Commission's rules so exalts form over substance, and nothing in the Act provides any penalty for accomplishing a fully lawful result with one step rather than two.

Substituting loaded phrases for analysis, the NRSC next suggests that "the unlawful contribution apparently was laundered back to the [Federal Committee] from the State Committee by way of [two] subsequent transfer[s]."

The NRSC's complaint itself makes it clear that the first transfer could not have been an effort to transfer the \$500 from the State Committee back to the Federal Committee. The NRSC notes that the first transfer occurred on January 21. At that time the \$500 from the Chiropractic Trust was already in the Federal Committee, which had not yet discovered the fact that it had been deposited to the wrong account. Thus, the January 21 transfer could hardly amount to "laundering," and in fact the January 21 transfer was made up of other, earlier contributions to the State Committee.

The NRSC is correct, although it has nothing to do with the \$500 from the Chiropractic Trust, that the State Committee was late in registering with the Commission after the January 21 transfer. When the State Committee, which is not a respondent in this matter, realized that it had to make a filing with the Commission and was late, it called the Commission's toll-free number and was informed that it should go ahead and file and that the delay was insignificant. The State Committee was not informed that the lateness would invalidate the earlier transfer or that it should undo it, and nothing in the Commission's rules supports the NRSC's contention that the minor delay renders the prior contribution unlawful. Even if that were the case, the Federal Committee would simply have been required to refund the money to the State Committee, and the State Committee, by then registered with the Commission, could have immediately returned the funds to the Federal Committee. Once again, there is no substance whatsoever to the complaint.

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The third instance raised by the NRSC is not actually a complaint because the NRSC effectively disavows that it has sufficient information to "believe[]" that a violation...has occurred" 11 C.F.R. § 111.4. Instead, the NRSC states only that "it is reasonable to assume that the unlawful \$500 contribution made its way back to the [Federal Committee] as part of [a] \$5727.44 transfer that took place on 3/10/92 from the State Committee," and asks whether the \$500 from the Chiropractic Trust was in fact part of that transfer.

The NRSC's speculation can be easily dismissed. The Commission already asked the Federal Committee to clarify that the transfers from the State Committee were from permissible sources. Exhibit C. The Federal Committee did so, Exhibit D, and the Commission apparently was satisfied.

In sum, there is absolutely no substance to the complaint. The Federal Committee did erroneously accept a check that was intended for the State Committee, but the mistake was promptly and properly corrected, with full disclosure to the Commission. Exhibit I. The State Committee was a few weeks late in registering with the Commission, but once again the mistake was promptly and properly corrected--not just with full disclosure to the Commission but in the manner directed by Commission staff.

I trust that you will concur that there is no reason to believe that a violation of the Act has occurred. Please contact me if you need any additional information to close this file.

Sincerely,



David J. Burman

DJB:smf

Enclosures

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FEDERAL ELECTION COMMISSION
92 DEC 11 PM 3:36

107-00760-4

111

CAMPAIGN FUND OF PATTY MURRAY
528 NW 203RD PL. 542-2870
SEATTLE, WA 98177

PAY TO THE ORDER OF PATTY MURRAY CAMPAIGN FEB 10, 1992 \$ 500.00
FIVE HUNDRED + 00/100 DOLLARS

SECURITY PACIFIC BANK
Aurora Village Office 8094
20220 Aurora Ave North, Seattle, WA 98113
MEMO DEPOSITED IN ABBAND ACCOUNT, 110212709 92-11-22 99 1770109B4
⑆125000037⑆ 0640285668⑆ 0111⑆ ⑆00000050000⑆

93026604036

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

IF COMMITTEE (in Full) OPLE FOR PATTY MURRAY, U.S. SENATE CAMPAIGN C00257642

Full Name, Mailing Address and ZIP Code District 1 MEBA/WMU Political Action Fund 144 N. Capitol St., Suite 800 Washington DC 20001	Name of Employer	Date (month, day, year) 2-14-92	Amount of Each Receipt this Period 125.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 125.00	

Full Name, Mailing Address and ZIP Code Jones Campaign Fund 201 Connecticut Ave. N.W., #800 Washington DC 20009	Name of Employer	Date (month, day, year) 3-17-92	Amount of Each Receipt this Period 1000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 1000.00	

Full Name, Mailing Address and ZIP Code National Organization for Women P.O. Box 7157 Washington DC 20044	Name of Employer	Date (month, day, year) 3-30-92	Amount of Each Receipt this Period 1000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 1000.00	

Full Name, Mailing Address and ZIP Code Washington Chiropractic Trust P.O. Box 18588 Seattle WA 98118	Name of Employer * Please refer to "Itemized Disbursements" for final disposition of this contribution *** NOT ELIGIBLE FOR FEDERAL CAMPAIGN	Date (month, day, year) 1-13-92	Amount of Each Receipt this Period 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 500.00	

Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	

Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	

Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	

If Receipts This Page (optional)

Period (last page this line number only) EXHIBIT B 2125.00

NAME OF COMMITTEE (in Full) **PEOPLE FOR PATTY MURRAY, U.S. SENATE CAMPAIGN** C00257642

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A Better Telephone Store 16300 Aurora Ave N. Seattle WA 98133	Campaign Office Phone System Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3-19-92	4273.41
B. Full Name, Mailing Address and ZIP Code U.S. West P.O. Box 12480 Seattle WA 98191	Purpose of Disbursement PHONE LINES / DEPOSIT Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3-16-92	1550.00
C. Full Name, Mailing Address and ZIP Code Patty Murray Campaign 528 NW 20320 PL. Seattle WA 98177	Purpose of Disbursement TRANSFER TO ASSOCIATED CHARITABLE TRUST CONTRIBUTIONS INTO STATE SENATE ACCOUNT, NOT ELIGIBLE FOR FEDERAL CAMPAIGN. Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	2-10-92	500.00 *
D. Full Name, Mailing Address and ZIP Code Laura Hewitt 9433 N.E. 25th St. Clyde Hill, WA 98004	Purpose of Disbursement Campaign Consultant Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	2-4-92 2-19-92	315.00 252.00
E. Full Name, Mailing Address and ZIP Code 4 Same as above	Purpose of Disbursement Campaign Consultant Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3-5-92 3-23-92	252.00 266.00
F. Full Name, Mailing Address and ZIP Code 3 2 Same as above	Purpose of Disbursement Reimbursement for MISCELLANEOUS EXPENSES Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	2-19-92 3-5-92 3-23-92	23.97 21.75 13.63
2. Full Name, Mailing Address and ZIP Code Labels and Lists 2500 116th Ave N.E. Bellevue, WA 98004	Purpose of Disbursement Labels Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3-15-92	833.63
1. Full Name, Mailing Address and ZIP Code Shasha Richardson 1902 Franklin, Apt. 1 Olympia, WA 98501	Purpose of Disbursement Campaign Consulting Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3-31-92	600.00 in kind received
Full Name, Mailing Address and ZIP Code Teresa Purcell 1904 Franklin Olympia WA 98501	Purpose of Disbursement Campaign Consulting Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3-31-92	760.00 in kind received

*AL of Disbursements This Page (optional) **9661.39 ***

This Period (last page this line number only)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

92 DEC 11 PM 3:30

FEDERAL ELECTION COMMISSION

Eugenia S. Higgins, Treasurer
People For Patty Murray U.S. Senate
Campaign
528 N.W. 203RD PL
Seattle, WA 98177

SEP 1 1992

Identification Number: C00257642

Reference: April Quarterly Report (12/6/91-3/31/92)

Dear Ms. Higgins:

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

-Column A, Line 6(c) of the Summary Page should equal the difference of Line 6(a) and Line 6(b).

-Column A, Line 7(c) of the Summary Page should equal the difference of Line 7(a) and Line 7(b).

-Transfers in from state or local committees must be from sources permissible under the FECA, as amended. Specifically, the transfer may not consist of funds from corporate or union treasuries. Additionally, any contributor to the state committee who has contributed in excess of \$200 must be itemized on a Memorandum Schedule A. Contributors are subject to the limits of 2 U.S.C. §441(a). Please provide the necessary Memorandum Schedule A for the transfer from the Patty Murray Campaign and clarify if the funds were from permissible sources.

-Please be reminded that transfer to an authorized affiliated committee should be reported on Line 18, not 17, and itemized on a separate Schedule B.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Secretary of the Senate, 232 Hart Senate Office Building, Washington, DC 20510 within fifteen (15) days of the date of this letter. If you

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PEOPLE FOR PATTY MURRAY U.S. SENATE
CAMPAIGN
PAGE 2

need assistance, please feel free to contact me on our toll-free
number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Pat Sheppard

Pat Sheppard
Senior Reports Analyst
Reports Analysis Division

93040992336

PATTY MURRAY

U.S. Senate • Democrat

P.O. Box 3662, Seattle, WA 98124 • Phone 206-462-0611

September 9, 1992

RECEIVED
FEDERAL ELECTION COMMISSION
92 DEC 11 PM 3:30

Office of Public Records
Secretary of the Senate
232 Hart Office Building
Washington, D.C. 20510-7116

RE: FEC Identification Number: C00257642

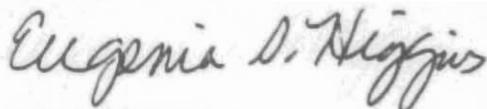
Dear Sir:

Please find enclosed an amended return for the April Quarterly Report in response to Ms. Pat Shepard's letter of September 1, 1992.

- The transfers on Line 12 are from Patty Murray's State Senate Campaign Fund. There are no memo entries on Schedule A because there were no large contributors meeting the \$200 threshold. All of the funds not permissible under the ACT were withheld and not transferred to the federal campaign.

Please let me know if you require further clarification. Thank you for your consideration.

Sincerely,



Eugenia S. Higgins
Treasurer

ESH:jds
Enclosures

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REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full) People for Patty Murray U.S. Senate Campaign		2. FEC IDENTIFICATION NUMBER C00257642
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported. 528 N.W. 203rd Place		3. IS THIS REPORT AN AMENDMENT? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
CITY STATE and ZIP CODE Seattle, WA 98177	STATE/DISTRICT Washington	

4. TYPE OF REPORT

April 15 Quarterly Report Twelfth day report preceding _____ (Type of Election) _____
 July 15 Quarterly Report election on _____ in the State of _____
 October 15 Quarterly Report Thirtieth day report following the General Election on _____
 January 31 Year End Report _____ in the State of _____
 July 31 Mid-Year Report (Non-election Year Only) Termination Report

This report contains activity for Primary Election General Election Special Election Runoff Election

SUMMARY

5. Covering Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
<u>12-6-91</u> through <u>3-31-92</u>		
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e))	30,512.24	
(b) Total Contribution Refunds (from Line 20(d))	-0-	
(c) Net Contributions (other than loans) (subtract Line 6(b) from 6(a))	30,512.24	
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	20,664.92	
(b) Total Offsets to Operating Expenditures (from Line 14)	-0-	
(c) Net Operating Expenditures (subtract Line 7(b) from 7(a))	20,664.92	
8. Cash on Hand at Close of Reporting Period (from Line 27)	18,574.76	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	-0-	For further information contact: Federal Election Comm. 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	-0-	

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

Type or Print Name of Treasurer
Eugenia S. Higgins

Signature of Treasurer *Eugenia S. Higgins* Date **9/9/92**

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 5437

9304092338

DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3)

Name of Committee (in full) _____ Report Covering the Period:
From: _____ To: _____

I. RECEIPTS		COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			
(i) Itemized (use Schedule A)		6,780.39	
(ii) Unitemized		15,604.00	
(iii) Total of contributions from individuals		22,384.39	
(b) Political Party Committees		-0-	
(c) Other Political Committees (such as PACs)		2,125.00	
(d) The Candidate		6,002.85	
(e) TOTAL CONTRIBUTIONS (other than loans) (add 11(a)(iii), (b), (c) and (d))		30,512.24	
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES.		8,727.44	
13. LOANS:			
(a) Made or Guaranteed by the Candidate		-0-	
(b) All Other Loans		-0-	
(c) TOTAL LOANS (add 13(a) and (b))		-0-	
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		-0-	
15. OTHER RECEIPTS (Dividends, Interest, etc.)		-0-	
16. TOTAL RECEIPTS (add 11(e), 12, 13(c), 14 and 15)		39,239.68	
II. DISBURSEMENTS			
17. OPERATING EXPENDITURES		20,164.92	
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES.		500.00	
19. LOAN REPAYMENTS:			
(a) Of Loans Made or Guaranteed by the Candidate		-0-	
(b) Of All Other Loans		-0-	
(c) TOTAL LOAN REPAYMENTS (add 19(a) and (b))		-0-	
20. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees		-0-	
(b) Political Party Committees		-0-	
(c) Other Political Committees (such as PACs)		-0-	
(d) TOTAL CONTRIBUTION REFUNDS (add 20(a), (b) and (c))		-0-	
21. OTHER DISBURSEMENTS		-0-	
22. TOTAL DISBURSEMENTS (add 17, 18, 19(c), 20(d) and 21)		20,664.92	

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD	\$ -0-
24. TOTAL RECEIPTS THIS PERIOD (from Line 16)	\$ 39,239.68
25. SUBTOTAL (add Line 23 and Line 24)	\$ 39,239.68
26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22)	\$ 20,664.92
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (subtract Line 26 from 25)	\$ 18,574.76

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SCHEDULE B

ITEMIZED DISBURSEMENTS

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

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

NAME OF COMMITTEE (in Full)

People for Patty Murray, U.S. Senate Campaign

C00257642

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A Better Telephone Store 16300 Aurora Ave. N. Seattle, WA 98133	Campaign Office Phone System	3-19-92	4,273.41
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
B. Full Name, Mailing Address and ZIP Code U.S. West P.O. Box 12480 Seattle, WA 98191	Phone Lines/Deposit	3-16-92	1,550.00
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
C. Full Name, Mailing Address and ZIP Code Laura Hewitt 9433 N.E. 25th Street Clyde Hill, WA 98004	Campaign Consultant	2-4-92	315.00
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	2-19-92	252.00
D. Full Name, Mailing Address and ZIP Code Same as above	Campaign Consultant	3-5-92	252.00
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3-23-92	266.00
E. Full Name, Mailing Address and ZIP Code Same as above	Reimbursement for misc. expenses	2-19-92	23.97
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	3-5-92	21.75
F. Full Name, Mailing Address and ZIP Code Labels and Lists 2500 116th Ave. N.E. Bellevue, WA 98004	Labels	3-15-92	833.63
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
G. Full Name, Mailing Address and ZIP Code ShaSha Richardson 1902 Franklin, Apt. 1 Olympia, WA 98501	Campaign Consulting	3-31-92	600.00 in kind received
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
H. Full Name, Mailing Address and ZIP Code Teresa Purcell 1904 Franklin Olympia, WA 98501	Campaign Consulting	3-31-92	760.00 in kind received
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		

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SUBTOTAL of Disbursements This Page (optional)	9,161.39
TOTAL This Period (last page this line number only)	

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

PAGE 3 OF 3
FOR LINE NUMBER 17

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

NAME OF COMMITTEE (in Full)

People for Patty Murray, U.S. Senate Campaign

C00257642

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Teresa Purcell 1904 Franklin Olympia, WA 98501	Copying Expense	1-9-92	21.72
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	1-24-92 1-29-92	6.47 14.69 in kind receive
B. Full Name, Mailing Address and ZIP Code Same as above	Printing Expense	3-20-92	49.77
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		in kind receive
C. Full Name, Mailing Address and ZIP Code Same as above	Campaign Organization Meal	3-31-92	16.79
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		in kind receive
D. Full Name, Mailing Address and ZIP Code Same as above	Postage	1-8-92	9.95
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		in kind receive
E. Full Name, Mailing Address and ZIP Code Patty Murray 528 N.W. 203rd Place Seattle, WA 98177	Cellular Phone Rental	3-23-92	429.00
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		in kind receive
F. Full Name, Mailing Address and ZIP Code Same as above	Travel Expense	12-6-91	573.85
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	to 3-31-92	in kind receive
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		

SUBTOTAL of Disbursements This Page (optional)

1,122.24

TOTAL This Period (last page this line number only)

19,858.30

93040992341

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

2A

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

NAME OF COMMITTEE (in Full)

People for Patty Murray, U.S. Senate Campaign

C00257642

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Per
Patty Murray Campaign 528 N.W. 203rd Place Seattle, WA 98177	see note Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	2-10-92	500.00
B. Full Name, Mailing Address and ZIP Code NOTE: Transfer back of Washington Charitable Trust Contribution of ineligible funds under the ACT.	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Per
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Per
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Per
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Per
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Per
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Per
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Per
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Per

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SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

500.00

DGC 8268

PERKINS COIE

A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
1201 THIRD AVENUE, 40TH FLOOR • SEATTLE, WASHINGTON 98101-3099
(206) 583-8888 • FACSIMILE (206) 583-8500

DAVID J. BURMAN

(206) 583-8426 DIRECT

January 14, 1993

RECEIVED
FEDERAL ELECTION COMMISSION
93 JAN 21 PM 1:35

Ms. Mary Ann Bumgarner
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

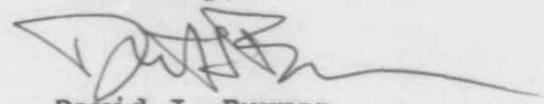
Re: MUR 3671

Dear Ms. Bumgarner:

This will confirm that Perkins Coie is the designated counsel for Patty Murray's State Committee, and its treasurer, as well as for the Federal Committee, People for Patty Murray U.S. Senate Campaign, and its treasurer.

Please call if you have any further questions.

Sincerely,


David J. Burman

DJB:lmr

93040992343

[00000-0000/SL930140.082]

MUR # 3471

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

93040992344



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

THIS IS THE End of MUR# 3671

DATE FILMED 10/29/93 CAMERA NO. 2

CAMERAMAN Mc

93040992345



FEDERAL ELECTION COMMISSION

WASHINGTON DC 20463

Microfilm
 Public Records
 Press

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 3671.

12/10/93

23043543457

**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.

23043543458



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jay Velasquez, Counsel
National Republican Senatorial
Committee
425 Second Street, N.E.
Washington, DC 20002

RE: MUR 3671

Dear Mr. Velasquez:

On October 23, 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 the Washington Chiropractic Trust, the People for Patty Murray U.S. Senate Campaign and Eugenia S. Higgins, as treasurer, and the Patty Murray Campaign and Donn Charnley, as treasurer. 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,

Mary Ann Bumgarner

Attachment
Narrative

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

23043543459

MUR 3671

People For Patty Murray

This matter was generated by a complaint from the National Republican Senatorial Committee alleging that the People for Patty Murray Committee accepted a \$500 corporate contribution from the Washington Chiropractic Trust. Complainant further alleges that after this contribution was transferred to the State Committee, it was laundered back to the Federal Committee. Complainant also alleges that the State Committee failed to file a timely Statement of Organization with the Commission after transferring \$3,000 to the Federal Committee. According to respondents, the Federal Committee erroneously deposited the corporate contribution from the Washington Chiropractic Trust into the Federal Account. Within a few weeks of the deposit, the Federal Committee was notified by the Washington Chiropractic Trust that the contribution was intended for the State Committee. The Federal Committee then transferred the corporate contribution to the State Committee. Respondents deny that the corporate funds were laundered back to the Federal Committee because the transfers from the State Committee to the Federal Committee were from permissible sources. Respondents concede that the State Committee failed to file a timely Statement of Organization with the Commission. However, Respondents state that when the State Committee realized it owed a filing to the Commission which was already late, it called the Commission's toll-free number and was informed that it should go ahead and file despite the delay.

This matter reflects no indication of serious intent by respondents to violate the FECA, involves no significant issue relative to the other issues pending before the Commission, involves insubstantial amounts of money, and reflects significant remedial action.

23043543460



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

David J. Burman, Esquire
Perkins Coie
1201 Third Avenue, 40th Floor
Seattle, WA 98101-3099

RE: MUR 3671
People for Patty Murray U.S.
Senate Campaign and Eugenia S.
Higgins, as treasurer
Patty Murray Campaign and
Donn Charnley, as treasurer

Dear Mr. Burman:

On October 29, 1992, the Federal Election Commission notified your clients, the People for Patty Murray U.S. Senate Campaign and Eugenia S. Higgins, as treasurer, and the Patty Murray Campaign and Donn Charnley, as treasurer, 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 People for Patty Murray U.S. Senate Campaign and Eugenia S. Higgins, as treasurer, and the Patty Murray Campaign and Donn Charnley, 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.

23043543461

Mr. Burman
Page 2

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

Sincerely,

Mary Ann Bumgarner
Mary Ann Bumgarner

Attachment
Narrative

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

73043543462

MUR 3671

People For Patty Murray

23043543463

This matter was generated by a complaint from the National Republican Senatorial Committee alleging that the People for Patty Murray Committee accepted a \$500 corporate contribution from the Washington Chiropractic Trust. Complainant further alleges that after this contribution was transferred to the State Committee, it was laundered back to the Federal Committee. Complainant also alleges that the State Committee failed to file a timely Statement of Organization with the Commission after transferring \$3,000 to the Federal Committee. According to respondents, the Federal Committee erroneously deposited the corporate contribution from the Washington Chiropractic Trust into the Federal Account. Within a few weeks of the deposit, the Federal Committee was notified by the Washington Chiropractic Trust that the contribution was intended for the State Committee. The Federal Committee then transferred the corporate contribution to the State Committee. Respondents deny that the corporate funds were laundered back to the Federal Committee because the transfers from the State Committee to the Federal Committee were from permissible sources. Respondents concede that the State Committee failed to file a timely Statement of Organization with the Commission. However, Respondents state that when the State Committee realized it owed a filing to the Commission which was already late, it called the Commission's toll-free number and was informed that it should go ahead and file despite the delay.

This matter reflects no indication of serious intent by respondents to violate the FECA, involves no significant issue relative to the other issues pending before the Commission, involves insubstantial amounts of money, and reflects significant remedial action.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1992

Dr. Eugene P. Kearney, President
Washington Chiropractic Trust
3079 156th Avenue, S.E.
Bellevue, WA 98007

RE: MUR 3671

Dear Dr. Kearney:

On October 29, 1992, the Federal Election Commission notified the Washington Chiropractic Trust 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 Washington Chiropractic Trust. 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,

Mary Ann Bumgarner
Mary Ann Bumgarner

Attachment
Narrative

Date the Commission voted to close the file: DEC 09 1992

93043543464

MUR 3671

People For Patty Murray

This matter was generated by a complaint from the National Republican Senatorial Committee alleging that the People for Patty Murray Committee accepted a \$500 corporate contribution from the Washington Chiropractic Trust. Complainant further alleges that after this contribution was transferred to the State Committee, it was laundered back to the Federal Committee. Complainant also alleges that the State Committee failed to file a timely Statement of Organization with the Commission after transferring \$3,000 to the Federal Committee. According to respondents, the Federal Committee erroneously deposited the corporate contribution from the Washington Chiropractic Trust into the Federal Account. Within a few weeks of the deposit, the Federal Committee was notified by the Washington Chiropractic Trust that the contribution was intended for the State Committee. The Federal Committee then transferred the corporate contribution to the State Committee. Respondents deny that the corporate funds were laundered back to the Federal Committee because the transfers from the State Committee to the Federal Committee were from permissible sources. Respondents concede that the State Committee failed to file a timely Statement of Organization with the Commission. However, Respondents state that when the State Committee realized it owed a filing to the Commission which was already late, it called the Commission's toll-free number and was informed that it should go ahead and file despite the delay.

This matter reflects no indication of serious intent by respondents to violate the FECA, involves no significant issue relative to the other issues pending before the Commission, involves insubstantial amounts of money, and reflects significant remedial action.

23043543465