



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3870

DATE FILMED 12-14-54 CAMERA NO. 2

CAMERAMAN JMH

24043594534

BEFORE THE
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

CENTER FOR RESPONSIVE POLITICS

1320 19th Street, N.W.
Washington, D.C. 20036
(202) 857-0044

v.

Complainant,

Ian M. Cumming

Respondent,

COMPLAINT

MUR 3870

94 JAN 21 PM 4:31

RECEIVED
FEDERAL ELECTION COMMISSION

COMPLAINT OF CENTER FOR RESPONSIVE POLITICS

1. This complaint charges that the respondent has violated the Federal Election Campaign Act, 2 U.S.C. § 431 et seq., as amended ("FECA"), by making aggregate contributions in excess of the limits permitted by the FECA.

PARTIES

2. The complainant, the Center for Responsive Politics, is a nonprofit, nonpartisan research group incorporated in the State of Iowa and headquartered in Washington, D.C., that studies Congress and related issues. Founded in 1983, it was designed to research matters concerning the organization and operation of Congress as an institution and to examine potential reforms that could improve both its internal operation and its responsiveness to the American public. The patterns of contributions of money to federal candidates has been one of its chief areas of study.

3. The respondent is an individual contributor to various candidates and political committees.

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APPLICABLE STATUTES AND REGULATIONS

4. The FECA limits contributions by any one individual to an aggregate total of \$25,000 per calendar year. Contributions to a candidate or the candidate's authorized committee made in a year other than the calendar year of the election with respect to which the contribution is made are considered to be made during the calendar year in which such election is held. 2 U.S.C. § 441a(a)(3); 11 C.F.R. § 110.5.

GROUNDS FOR COMPLAINT

5. According to FEC records, respondent Ian M. Cumming made contributions subject to FECA in the amounts and to the persons identified in the list attached to this complaint as Exhibit 1. Attached as Exhibit 2 are copies of the FEC records for each contribution listed in Exhibit 1. All exhibits reflect the records on file at the FEC as of December 15, 1993.

6. On information and belief, respondent Ian M. Cumming made contributions attributed to the 1992 calendar year in the amount of \$33,468. These contributions exceeded by \$8,468 the \$25,000 contribution limit imposed by the FECA and Commission regulations on all contributions by any individual in a calendar year.

RELIEF

7. The Center for Responsive Politics respectfully urges the Commission to conduct a prompt and thorough investigation into the allegations in this Complaint, and to declare that the Respondent has violated the FECA and Commission regulations.

Respectfully submitted,



Ellen S. Miller
Executive Director
CENTER FOR RESPONSIVE POLITICS
1320 19th Street, N.W.
Washington, D.C. 20036
(202) 857-0044

Date: January 14, 1994

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CUMMING, IAN M
Contributions Attributed to 1992

Exhibit 1

Summary of FEC Data

24043594533

Recipient	Amount	Date	FEC Microfilm Location
Kerrey, Robert	\$500	11/18/91	92FEC/731/2058
Davis, Gray	\$1,000	03/31/92	92SEN/008/1655
Democratic National Cmte	\$7,000	08/26/92	92FEC/780/0494
Democratic State Central Cmte/California	\$5,000	09/04/92	92FEC/795/0433
Holt, Ron	\$500	06/01/92	92HSE/462/0287
Holt, Ron	\$400	12/21/92	93HSE/493/0178
Lehman, William	\$500	06/05/91	91HSE/430/0038
Lehman, William	\$500	12/16/91	92HSE/444/0922
Obey, David R	\$500	03/06/92	92HSE/450/2228
Orfins, Steve A	\$250	12/08/91	92HSE/439/4800
Orton, Bill	\$1,000	01/17/91	91HSE/432/4635
Orton, Bill	\$1,000	02/27/92	92HSE/447/4196
Owens, Wayne	\$1,000	07/09/92	92SEN/019/2324
Owens, Wayne	\$1,000	11/21/91	92SEN/006/0409
Owens, Wayne	\$1,000	11/21/91	92SEN/006/0409
Packwood, Bob	\$1,000	12/14/91	92SEN/004/0358
Participation 2000	\$2,500	05/14/92	92FEC/765/1755
Schumer, Charles E	\$1,000	09/11/92	92HSE/473/1837
Shepherd, Karen	\$275	06/10/92	92HSE/460/2441
Shepherd, Karen	\$224	06/13/92	92SEN/016/1572
Shepherd, Karen	\$987	10/29/92	92HSE/485/2226
Utah State Democratic Cmte	\$2,000	02/28/92	92FEC/750/3446
Utah State Democratic Cmte	\$1,166	03/24/92	93FEC/841/3988
Utah State Democratic Cmte	\$2,000	02/05/92	93FEC/841/3988
Utah State Democratic Cmte	\$1,166	04/02/92	92FEC/766/2378
Wirth, Timothy E	\$-500	06/24/92	92SEN/016/1572
Wirth, Timothy E	\$500	12/04/91	92SEN/003/4541

Total Contributions Attributed to 1992: \$33,468

SCHEDULE A-P
 CONTRIBUTIONS FROM INDIVIDUALS/PERSONS

PAGE 36 OF 355
 FOR LINE NUMBER 17(a)

NAME OF COMMITTEE (in Full)
 KERRY FOR PRESIDENT, INC. P20000675

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

Full Name Mailing Address	Name of Employer Occupation	Date MM/DD/YY	Amount
Lindsay Morgenthaler 13904 Edgewater Drive Lakewood, OH 44107-	N/A Homemaker	11/15/91	\$500.00
Receipt for <input checked="" type="checkbox"/> Primary		Aggregate YTD >	\$500.00
John D. Garson 4 Hampton Court Beachwood, OH 44122-	Information Requested Information Requested	11/15/91	\$1000.00
Receipt for <input checked="" type="checkbox"/> Primary		Aggregate YTD >	\$1000.00
Daniel R. Lewis 10 Daley Lane Pepper Pike, OH 44124-	Information Requested Information Requested	11/15/91	\$1000.00
Receipt for <input checked="" type="checkbox"/> Primary		Aggregate YTD >	\$1000.00
Constance Miller 4649 Ponce De Leon Boulevard Suite 304 Coral Gables, FL 33146-	Information Requested Information Requested	11/15/91	\$1000.00
Receipt for <input checked="" type="checkbox"/> Primary		Aggregate YTD >	\$1000.00
Sherman H. Starr 1280 Soldier's Field Road Boston, MA 02135-	Information Requested Information Requested	11/18/91	\$250.00
Receipt for <input checked="" type="checkbox"/> Primary		Aggregate YTD >	\$250.00
Jamie P. Gagarin 108 Gallows Lane PO Box 35 Litchfield, CT 06759-	N/A Homemaker	11/18/91	\$250.00
Receipt for <input checked="" type="checkbox"/> Primary		Aggregate YTD >	\$250.00
Ian M. Cumming 529 East South Temple Salt Lake City, UT 84102-	Leucadia National Corpora Chairman	11/18/91	\$500.00
Receipt for <input checked="" type="checkbox"/> Primary		Aggregate YTD >	\$500.00
SUBTOTAL of Receipts This Page..... >			\$4500.00
TOTAL This Period..... >			

205 / 312058

SC-BUDGET A FINANCED RECEIPTS UTAH STATE DEMOCRATIC COMMITTEE PAGE 1 OF 1 FOR LINE NUMBER 144

3038413988

not listed

LINE	FULL NAME	MAILING ADDRESS	CITY	STATE	ZIP	RESIDENTIAL	EMPLOYER	OCCUPATION	YR. TO DATE	DATE	AMOUNT
1	David J. Lusk	5500 South 1300 East	Salt Lake City	UT	84143			Agiculture	578.00	01/21/82	578.00
2	John Boney	1480 West 84th South	Spanish Fork	UT	84645			Agiculture	578.14	01/28/82	578.14
3	Paul Chapman	1800 So. University Blvd	Utah Valley City	UT	84143			Member	818.25	01/21/82	818.25
4	Don M. Gentry	800 E. South Temple	Salt Lake City	UT	84143			Businessman	82,000.00	02/05/82	82,000.00
5	John E. Smith	2207 West 3000 South	Utah Valley City	UT	84119			Executive Director	500.00	02/05/82	500.00
6	Pat Larson	600 East Low Drive	Ogden	UT	84403			Legislator	400.00	02/10/82	400.00
7	John E. Smith	2710 Dean Way	Utah Valley City	UT	84119			Director	500.00	02/17/82	500.00
8	James O. Brown	3202 South 700 West	Provo	UT	84601			Businessman	500.00	02/17/82	500.00
9	Ray Harris	428 North 180 East	North Salt Lake	UT	84054			Businessman	500.00	02/17/82	500.00
10	John H. Smith	2970 Lincoln Lane	Salt Lake City	UT	84119			Retired	500.00	02/17/82	500.00
11	Lawrence E. Thompson	2710 Douglas Blvd	Provo	UT	84601				110.00	02/17/82	110.00
12	John E. Smith	2207 West 3000 South	Utah Valley City	UT	84119				500.00	02/17/82	500.00
13	Richard Pennington	1807 So. Rowan	Salt Lake City	UT	84119			Member	500.00	02/17/82	500.00
14	John E. Smith	2207 West 3000 South	Salt Lake City	UT	84119			Businessman	500.00	02/17/82	500.00
15	Richard Pennington	4287 Alameda Blvd	Salt Lake City	UT	84119			Businessman	500.00	02/17/82	500.00
16	J.L. Day	1805 So. Rowan	Salt Lake City	UT	84119			Member	500.00	02/17/82	500.00
17	Richard A. Judd	1700 E. Grand Way	Provo	UT	84601			Member	500.00	02/17/82	500.00
18	David Wilson	1700 E. Grand Way	Provo	UT	84601			Member	500.00	02/17/82	500.00
19	John E. Smith	2207 West 3000 South	Salt Lake City	UT	84119				500.00	02/17/82	500.00
20	Larry A. Smith	2207 West 3000 South	Salt Lake City	UT	84119				500.00	02/17/82	500.00
21	Lawrence E. Thompson	2710 Douglas Blvd	Provo	UT	84601				500.00	02/17/82	500.00
22	John E. Smith	2207 West 3000 South	Salt Lake City	UT	84119				500.00	02/17/82	500.00
23	John E. Smith	2207 West 3000 South	Salt Lake City	UT	84119				500.00	02/17/82	500.00
24	John E. Smith	2207 West 3000 South	Salt Lake City	UT	84119				500.00	02/17/82	500.00
25	John E. Smith	2207 West 3000 South	Salt Lake City	UT	84119				500.00	02/17/82	500.00
26	John E. Smith	2207 West 3000 South	Salt Lake City	UT	84119				500.00	02/17/82	500.00
27	David Wilson	1700 E. Grand Way	Provo	UT	84601				500.00	02/17/82	500.00
28	John E. Smith	2207 West 3000 South	Salt Lake City	UT	84119				500.00	02/17/82	500.00
29	John E. Smith	2207 West 3000 South	Salt Lake City	UT	84119				500.00	02/17/82	500.00
30	John E. Smith	2207 West 3000 South	Salt Lake City	UT	84119				500.00	02/17/82	500.00
31	John E. Smith	2207 West 3000 South	Salt Lake City	UT	84119				500.00	02/17/82	500.00
32	John E. Smith	2207 West 3000 South	Salt Lake City	UT	84119				500.00	02/17/82	500.00
33	John E. Smith	2207 West 3000 South	Salt Lake City	UT	84119				500.00	02/17/82	500.00
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35	John E. Smith	2207 West 3000 South	Salt Lake City	UT	84119				500.00	02/17/82	500.00
36	John E. Smith	2207 West 3000 South	Salt Lake City	UT	84119				500.00	02/17/82	500.00
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51	John E. Smith	2207 West 3000 South	Salt Lake City	UT	84119				500.00	02/17/82	500.00
52	John E. Smith	2207 West 3000 South	Salt Lake City	UT	84119				500.00	02/17/82	500.00
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54	John E. Smith	2207 West 3000 South	Salt Lake City	UT	84119				500.00	02/17/82	500.00
55	John E. Smith	2207 West 3000 South	Salt Lake City	UT	84119				500.00	02/17/82	500.00
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64	John E. Smith	2207 West 3000 South	Salt Lake City	UT	84119				500.00	02/17/82	500.00
65	John E. Smith	2207 West 3000 South	Salt Lake City	UT	84119				500.00	02/17/82	500.00
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80	John E. Smith	2207 West 3000 South	Salt Lake City	UT	84119				500.00	02/17/82	500.00
81	John E. Smith	2207 West 3000 South	Salt Lake City	UT	84119				500.00	02/17/82	500.00
82	John E. Smith	2207 West 3000 South	Salt Lake City	UT	84119				500.00	02/17/82	500.00
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89	John E. Smith	2207 West 3000 South	Salt Lake City	UT	84119				500.00	02/17/82	500.00
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93	John E. Smith	2207 West 3000 South	Salt Lake City	UT	84119				500.00	02/17/82	500.00
94	John E. Smith	2207 West 3000 South	Salt Lake City	UT	84119				500.00	02/17/82	500.00
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96	John E. Smith	2207 West 3000 South	Salt Lake City	UT	84119				500.00	02/17/82	500.00
97	John E. Smith	2207 West 3000 South	Salt Lake City	UT	84119				500.00	02/17/82	500.00
98	John E. Smith	2207 West 3000 South	Salt Lake City	UT	84119				500.00	02/17/82	500.00
99	John E. Smith	2207 West 3000 South	Salt Lake City	UT	84119				500.00	02/17/82	500.00
100	John E. Smith	2									

Ian M. Cumming
Exhibit 2

24043594541

SCHEDULE A

FINANCED RECEIPTS

Contributions From Individuals/Persons

Information reported on this category of the financial summary page

94 191
11(2)(1)

Any information omitted from each receipt and statement may not be used or used by any person for the purpose of influencing contributions or for other similar purposes, other than using the name and address of any political committee to which contributions from such committee.

NAME OF CONTRIBUTOR TO FUND
STEVE ORLINS FOR CONGRESS SENATOR C 00252643

OCT 1994

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (this Period)
John R. Corripallo 23 Ontario Rd. Ballerose Village, NY 11001 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date > \$ 100.00	12/5/91	100.00
F de Saint Phalle 585 Madison Ave NY, NY 10022 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Dillon Read + Co. Occupation Vice Chairman Aggregate Year-to-Date > \$ 1,000.00	Date (month, day, year) 12/5/91	Amount of Each Receipt (this Period) 1000.00
Roz I. Gibbons 64 E 86 St NY, NY 10028 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$ 50.00	Date (month, day, year) 12/5/91	Amount of Each Receipt (this Period) 50.00
James D. Robinson III Amex Tower - World Fin. Cntr NY, NY 10285 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer American Express Co. Occupation Chairman Aggregate Year-to-Date > \$ 250.00	Date (month, day, year) 12/5/91	Amount of Each Receipt (this Period) 250.00
William C. McKeown 275 Glenwood Road Ridgewood, NJ 07450 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Sleason - Lehman Bros Occupation Managing Director Aggregate Year-to-Date > \$ 250.00	Date (month, day, year) 12/5/91	Amount of Each Receipt (this Period) 250.00
Mary B. Sykes 111 Fourth Ave NY, NY 10003 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Sleason - Lehman Bros Occupation Senior Vice Pres Aggregate Year-to-Date > \$ 250.00	Date (month, day, year) 12/5/91	Amount of Each Receipt (this Period) 250.00
Ian B. Cumming 529 East South Temple Salt Lake City, Utah 84102 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Leucadia Natl Corp. Occupation President Aggregate Year-to-Date > \$ 250.00	Date (month, day, year) 12/4/91	Amount of Each Receipt (this Period) 250.00
SUBTOTAL of Receipts This Page (optional)			2,150.00
TOTAL This Period (last page this line number only)			

Any information copied from such Reports and Statements may not be sold to 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.

Lebanon Campaign Fund--Coopers & Lybrand
8989 Blue Lagoon Drive Miami, FL 33163

Name and Address	Employer/Occupation	Date	Amount
Luther Cowpin C O Properties, LTL Partnership 7400 Baymeadows Way, Suite 300 Jacksonville, FL 32254	C O Properties Part. President & CEO	12/30/91	\$200.00
Receipt for: Primary-92		Aggregate Year to Date:	\$200.00
Frieda Cohen 600 N.E. 36th Street #208 Miami, FL 33137	Self Attorney	12/27/91	\$200.00
Receipt for: Primary-92		Aggregate Year to Date:	\$200.00
William Cohen 900 S. Biscayne Boulevard Miami Beach, FL 33131	Self Attorney	11/18/91	\$200.00
Receipt for: Primary-92		Aggregate Year to Date:	\$200.00
Barbara Cooper 1530 North Bay Road Miami Beach, FL 33140	Self Hotel Owner	11/13/91	\$500.00
Receipt for: Primary-92		Aggregate Year to Date:	\$500.00
Sam Canning 529 East South Temple Salt Lake City, UT 84102	Leocadia Natl Corp Businessman	12/16/91	\$500.00
Receipt for: Primary-92		Aggregate Year to Date:	\$1,000.00
Thomas Curtis 1211 Woodlark Avenue Miami Springs, FL 33166	Miami Battery & Elec President	11/30/91	\$500.00
Receipt for: Primary-92		Aggregate Year to Date:	\$2,000.00
Billy Cypress Micoosukee Tribe of Indians PO Box 440011 Tamiami Station Miami, FL 33144	Micoosukee Tribal Chairman	11/27/91	\$500.00
Receipt for: Primary-92		Aggregate Year to Date:	\$500.00
Linda Dachtler 4440 Westover Place Washington, DC 20016	An Anon Airport Exe VP	11/21/91	\$250.00
Receipt for: Primary-92		Aggregate Year to Date:	\$250.00

SUBTOTAL: Receipts this page

\$2,900.00

STATEMENT OF CONTRIBUTIONS

Any information reported from both Reports and Statements may not be 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.

CITIZENS FOR BATE AND CONSTITUTION C00017630

FULL MAILING ADDRESS, and ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT
David Bradley 1 Bennett's Drive Fredericksburg, VA 22401	Int'l. Community Action Fund. 800 First St. SE - Suite 530 Washington, DC 20002	02/01/92	100.00
RECEIPT FOR Primary Election CONTRIBUTION YEAR-TO-DATE 0500.00			
Robert Spindler 402 E Street SE Washington, DC 20003		02/01/92 02/01/92	100.00 50.00
RECEIPT FOR Primary Election			
FULL MAILING ADDRESS, and ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT
Robert Spindler 402 E Street SE Washington, DC 20003		02/01/92 02/01/92	100.00 50.00
RECEIPT FOR Primary Election			
FULL MAILING ADDRESS, and ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT
Robert Spindler 402 E Street SE Washington, DC 20003		02/01/92 02/01/92	100.00 50.00
RECEIPT FOR Primary Election			
FULL MAILING ADDRESS, and ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT
Lee Spindler 402 E Street SE Washington, DC 20003	Professional Corporation 402 E Street SE Suite 300 Washington, DC 20003	02/01/92	100.00
RECEIPT FOR Primary Election			
FULL MAILING ADDRESS, and ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT
Scott Gray 1304 E Arlington Drive SE Alexandria, VA 22314	Graybrick, Graybrick & Deacy 1304 E Mason Suite 600 Alexandria, VA 22302	02/01/92	100.00
RECEIPT FOR Primary Election			
FULL MAILING ADDRESS, and ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT
Scott Gray 1304 E Arlington Drive SE Alexandria, VA 22314	Graybrick, Graybrick & Deacy 1304 E Mason Suite 600 Alexandria, VA 22302	02/01/92	100.00
RECEIPT FOR Primary Election			

92014302220

90014302229

TOTAL of Receipts This Page 2220.00

SCHEDULE A ITEMIZED RECEIPTS

Use separate schedules for each category of the Detailed Summary Page
 Page 5 of 5
 FOR LINE NUMBER 19(a)(ii)

Any information copied from such Reports and Statements may not be 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)
 Office For Congress C0034429-61306-00

A. Full Name, mailing Address and ZIP Code	Name of Employer Self	Date (month, day, year)	Amount of Each Receipt This Period
Ms. Annette Cunningham 1470 Military Way Salt Lake City, UT 84103	Occupation	3-3-92	1,000.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Aggregate Year-to-Date	\$1,000.00	
B. Full Name, mailing Address and ZIP Code	Name of Employer Self	Date (month, day, year)	Amount of Each Receipt This Period
Ann Cunningham 529 East South Temple Salt Lake City, UT 84103	Occupation	2-27-92	1,000.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Aggregate Year-to-Date	\$1,000.00	
C. Full Name, mailing Address and ZIP Code	Name of Employer Self	Date (month, day, year)	Amount of Each Receipt This Period
Ms. Zella Lake 791 East 900 North Provo, UT 84601	Occupation	3-23-92	10.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Aggregate Year-to-Date	\$10.00	
D. Full Name, mailing Address and ZIP Code	Name of Employer Self	Date (month, day, year)	Amount of Each Receipt This Period
Mr. David Hild 220 Country Club Gate Center Pacific Grove, CA 93950	Occupation Real Estate	3-17-92	75.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Aggregate Year-to-Date	\$75.00	
E. Full Name, mailing Address and ZIP Code	Name of Employer Provo College	Date (month, day, year)	Amount of Each Receipt This Period
Dr. Kenneth Meier 1113 East 200 South Provo, UT 84606	Occupation Teacher	3-23-92	90.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Aggregate Year-to-Date	\$90.00	
F. Full Name, mailing Address and ZIP Code	Name of Employer Arthur Anderson	Date (month, day, year)	Amount of Each Receipt This Period
Mr. Stuart Leader 101 Lincoln Centre Dr. 6000 Pacifica City, CA 94064-1167	Occupation Real Estate	3-11-92	75.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Aggregate Year-to-Date	\$75.00	
G. Full Name, mailing Address and ZIP Code	Name of Employer Self	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Aggregate Year-to-Date	\$	
SUBTOTAL of Receipts This Page (optional)			2,210.00
TOTAL This Period (last page this line number only)			

24043594545

OWENS FOR SENATE COMMITTEE
P. O. BOX 959, SLC, UTAH 84110

INTENDED RECEIPTS

PAGE 9 OF 20
FOR LINE # 11a

PERIOD 07/01/91 TO 12/31/91

NAME AND ADDRESS	EMPLOYER AND OCCUPATION	DATE	AMOUNT	ELECTION
Suzanne Pincus 466 Lexington Ave, 10th Floor New York NY 10017 YEAR TO DATE \$1000.00	Homemaker	11/21/91 11/21/91	\$1000.00 \$1000.00	Primary-92 General-92
John D. Canning 1470 Military Way Salt Lake City UT 84103 YEAR TO DATE \$2000.00	Student	11/21/91 11/21/91	\$1000.00 \$1000.00	Primary-92 General-92
David Canning 529 East South Temple Salt Lake City UT 84102 YEAR TO DATE \$2000.00	Student	11/21/91 11/21/91	\$1000.00 \$1000.00	Primary-92 General-92
Arnette Canning 1470 Military Way Salt Lake City UT 84103 YEAR TO DATE \$2000.00	Homemaker	11/21/91 11/21/91	\$1000.00 \$1000.00	Primary-92 General-92
Ian Canning 1470 Military Way Salt Lake City UT 84102 YEAR TO DATE \$2000.00	Leucadia Corp. President	11/21/91 11/21/91	\$1000.00 \$1000.00	Primary-92 General-92
Arthur & Leslea Dummer 3005 Dickens Place Salt Lake City UT 84108 YEAR TO DATE \$200.00	Insurance Rep.	12/20/91	\$200.00	Primary-92
James & Helen Brown 275 East Mill Street Bountiful UT 84010 YEAR TO DATE \$200.00	Retired	12/20/91	\$200.00	Primary-92
Don & Lenore Searle 12702 South 900 East Crapier UT 84020 YEAR TO DATE \$200.00	Self Employed	12/20/91	\$200.00	Primary-92
Robert & Jennifer Swanson 1381 Butler Avenue Salt Lake City UT 84102 YEAR TO DATE \$200.00	U of U Professor	12/20/91	\$200.00	Primary-92
Thomas A. Barron 821 Mapleton Avenue Boulder CO 80304 YEAR TO DATE \$250.00	Venture Capital Executive	12/20/91	\$250.00	Primary-92

SCHEDULE A

ITEMIZED RECEIPTS
 (Contributions from Individuals/
 Persons Other Than Political Committees)

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

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)
 Gray Davis for U.S. Senate

Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Aggregate Year-to-Date	Date (month, day, year) Each Sample Receipt This Period	Amount of Receipt	Category
Cadlow, Lenore H 3245 Barbeyrell Dr Los Angeles CA 90024-	Business Aggregate Year-to-date \$200.00	07-16-92	200.00	Primary
Cohen, Bob H 951 N Alpine Dr Beverly Hills CA 90210-	Cohen & Sociobrooker Attorney Aggregate Year-to-date \$1,000.00	05-12-92	1,000.00	Primary
Colvin, Barry 1900 Av of Stars 0900 Los Angeles CA 90047-	Best Efforts Aggregate Year-to-date \$200.00	05-31-92	200.00	Primary
Cook, Ettrick H 5206 Colbeth Av Van Nuys CA 91401-	Retired Aggregate Year-to-date \$1,000.00	02-14-92	1,000.00	Primary
Cooper, Ronald H 1704 Chelsea Rd Palms Verdes CA 90274-	Continental Cablevision Manager Aggregate Year-to-date \$250.00	03-31-92	250.00	Primary
Crosley, Arthur J 9200 Sunset Bl 0309 Los Angeles CA 90069-	Arthur J Crosley Attorney Aggregate Year-to-date \$200.00	02-14-92	200.00	Primary
Cuming, Ian H 529 East South Temple Salt Lake City UT 84102-	Leucadia Board Member Aggregate Year-to-date \$1,000.00	03-31-92	1,000.00	Primary

SUBTOTAL of Receipts This Page (Optional)..... \$4,900.00

TOTAL This Period (last page this line number only).....

94043594547
9200001685

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedules for each category of the attached Summary Page

PAGE 1 OF 1
 CONTINUING NUMBER
 11. (a)(1)

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)

RON HOLT FOR CONGRESS

A Full Name, Mailing Address and ZIP Code
 IAN CUMMING
 529 EAST SOUTH TEMPLE
 SALT LAKE CITY, UT 84102



Name of Employer: SELF EMPLOYMENT
 Date (month, day, year): 12/21/92
 Amount of Each Receipt this Period: 400.00
 Occupation: BUSINESS MGMT
 Aggregate Year-to-Date: 0

Receipt For: Primary General
 Other (specify):

B Full Name, Mailing Address and ZIP Code

Name of Employer
 Date (month, day, year)
 Amount of Each Receipt this Period
 Occupation
 Aggregate Year-to-Date: 0

Receipt For: Primary General
 Other (specify):

C. Full Name, Mailing Address and ZIP Code

Name of Employer
 Date (month, day, year)
 Amount of Each Receipt this Period
 Occupation
 Aggregate Year-to-Date: 0

Receipt For: Primary General
 Other (specify):

D. Full Name, Mailing Address and ZIP Code

Name of Employer
 Date (month, day, year)
 Amount of Each Receipt this Period
 Occupation
 Aggregate Year-to-Date: 0

Receipt For: Primary General
 Other (specify):

E. Full Name, Mailing Address and ZIP Code

Name of Employer
 Date (month, day, year)
 Amount of Each Receipt this Period
 Occupation
 Aggregate Year-to-Date: 0

Receipt For: Primary General
 Other (specify):

F. Full Name, Mailing Address and ZIP Code

Name of Employer
 Date (month, day, year)
 Amount of Each Receipt this Period
 Occupation
 Aggregate Year-to-Date: 0

Receipt For: Primary General
 Other (specify):

G Full Name, Mailing Address and ZIP Code

Name of Employer
 Date (month, day, year)
 Amount of Each Receipt this Period
 Occupation
 Aggregate Year-to-Date: 0

Receipt For: Primary General
 Other (specify):

SUBTOTAL of Receipts This Page (attach):

400.00

TOTAL This Period (see page two for line number only)

400.00

2 9 1 4 2 3 0 1 7 8

**UNION REGISTERED
ONE SERVICES CORPORATION/DEMOCRATIC NATIONAL COMMITTEE
SCHEDULE A**

NAME ADDRESS CITY STATE ZIPCODE	OCCUPATION EMPLOYER	YTD AGGREGATE	DATE	AMOUNT PERIOD
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Ms. Annette Cuning 329 S. South Temple Salt Lake City, UT 84102	REQUESTED	0,000.00	0/26/92	0,000.00
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Mr. Ian Cuning 520 South Temple Salt Lake City, UT 84102	REQUESTED	7,000.00	0/26/92	7,000.00
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Mr. V Cunnico 220 Vallejo St. Berkeley, CA 94702	REQUESTED	200.00	0/26/92	200.00
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Mr. V Cunnico 8113 W. Ken Caryl Cir. 0 B Littleton, CO 80123	REQUESTED	250.00	0/27/92	200.00
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Mr. V Cunnico 3 Orchard Park Rd. Port Washington, NY 11050	REQUESTED	200.00	0/17/92	100.00
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34040594549
34040494

SCHEDULE A

ITEMIZED RECEIPTS

Amount of Political or Social Activity of the Donor Summary Page

Page 1 of 24
FOR LINE NUMBER 11a.

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NAME OF COMMITTEE (in Full)

Utah State Democratic Committee

3 / 5 6 2 3 / 8

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
D' Aray Diana Pignone III 908 W. Capitol Street Salt Lake City, UT 84108	REQUESTED	04/02/92	\$216.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date > \$			
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Ian R. Gunning ✓ 529 E. South Temple Salt Lake City, UT 84108	REQUESTED	04/02/92	\$1,105.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date > \$			
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
L.S. Borch 150 East 7000 South Midvale, UT 84047	REQUESTED	04/02/92	\$10.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date > \$			
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Man Blood 9 South 200 West Rayville, UT 84057	REQUESTED	04/02/92	\$210.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date > \$			
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Frank Bala 210 W. Fifth Avenue Salt Lake City, UT 84107	REQUESTED	04/22/92	\$250.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date > \$			
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Joseph Andrade 6809 Highland Drive Salt Lake City, UT 84121	REQUESTED	04/22/92	\$210.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date > \$			
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Justin C. Stewart 925 Second Avenue Salt Lake City, UT 84105	REQUESTED	04/22/92	\$52.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date > \$			

SUBTOTAL of Receipt This Page (initials)

TOTAL This Period (last page this line number only)

SCHEDULE A

ITEMIZED RECEIPTS

For this category of the Qualified Elective Pay

FOR LINE NUMBER

Any information copied from such Reports and Statements may not be told 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)

Participation 2000, Inc. 0021887

19-40034/3594551

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Jonathan Boucher 315 Park Avenue South New York, New York 10010	information requested	5-21-92	1,000.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 1,000.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
T.H. Quinn 1751 Lake Cook Road, suite Deerfield, IL 60015	Jordan Industries, 300	5-13-92	1,000.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation President & CEO	Aggregate Year-to-Date > \$ 1,000.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
G.C. Jordan 3904 West 80th Street Shawnee Mission, KS 66208	information requested	5-18-92	3,000.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 3,000.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Ian Cumming 529 East South Temple Salt Lake City, UT 84102	information requested	5-14-92	2,500.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 2,500.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Lawrence Glaubinger 154 North Euclid Avenue Westfield, NJ 07090	information requested	6-30-92	2,500.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 2500.00	
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):

10,000.00

TOTAL This Period (last page in this line number only)

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedules for each category of the Detailed Summary Page

PAGE 115
OF
FOR LINE NUMBER

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

NAME OF COMMITTEE (in Full)

UTAH STATE DEMOCRATIC COMMITTEE

9
2
0
3
7
5
0
3
4
4
6

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
L8 John Clark P.O. 236 State Capitol Salt Lake City, Utah 84143 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation	2-28-92	180.00
Aggregate Year-to-Date > 8			
L8 Barbara Daymaker 4904 A.S. Ave. 28 Salt Lake City, Ut. 84111 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer	2-28-92	Amount of Each Receipt this Period
Occupation	2-28-92	300.-	
Aggregate Year-to-Date > 8			
L8 Frank M. Lee 345 Columbus St Salt Lake City, Ut. 84111 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer	2-28-92	Amount of Each Receipt this Period
Occupation	2-28-92	130	
Aggregate Year-to-Date > 8			
L8 Norman W. Laboe 2900 Wash. Blvd. Ogden, Ut. 84401 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer	2-28-92	Amount of Each Receipt this Period
Occupation	2-28-92	300.-	
Aggregate Year-to-Date > 8			
L8 Van Comming 329 East So. Temple Salt Lake City, Utah 84143 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer	2-28-92	Amount of Each Receipt this Period
Occupation	2-28-92	2000.-	
Aggregate Year-to-Date > 8			
L8 Joseph Teach P.O. Box 3390 Park City, Ut. 84098 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer	2-28-92	Amount of Each Receipt this Period
Occupation	2-28-92	150.-	
Aggregate Year-to-Date > 8			
L8 Richard Wyss 2629 W. New York Dr. Sandy, Ut. 84097 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer	2-28-92	Amount of Each Receipt this Period
Occupation	2-28-92	75.-	
Aggregate Year-to-Date > 8			

SUBTOTAL of Receipts This Page (optional)

3125.00

TOTAL This Period (last page this line number only)

*** ITEMIZED RECEIPTS ***

Page 9

Schedule B (Line Number 20a) - Contribution Refunds
Committee for Tim Wirth, Inc.

Name	Address	City, State, Zipcode	Purpose of Disbursement	Amount of Disbursement	Date of Disbursement
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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 address of any political committee to solicit contributions from such committee.

Mr. R. Timothy Columbus 3050 K St. #400 Washington, DC 20007	06/24/92 \$1,000.00 Contribution Refund
Disbursement for General	

Mr. Anthony M. Combs 288 Clayton St Ste 305 Denver, CO 80206-4810	06/24/92 \$1,000.00 Contribution Refund
Disbursement for General	

Mrs. Noel R. Congdon 1300 E. 17th Ave. Denver, CO 80218	06/24/92 \$1,000.00 Contribution Refund
Disbursement for General	

Mr. Thomas E. Congdon 1300 E. 17th Ave. Denver, CO 80218	06/24/92 \$1,000.00 Contribution Refund
Disbursement for General	

Mr. Frederic Conover 370 17th St Denver, CO 80202-5656	06/24/92 \$ 500.00 Contribution Refund
Disbursement for General	

Mr. Curtis Cramer 1744 Concord Dr Fort Collins, CO 80526-1602	06/24/92 \$ 600.00 Contribution Refund
Disbursement for General	

Mr. James Crown 222 N La Salle St Chicago, IL 60601-1003	06/24/92 \$ 500.00 Contribution Refund
Disbursement for General	

Mr. Ian Cumming 529 E South Temple Salt Lake City, UT 84102-1004	06/24/92 \$ 500.00 Contribution Refund
Disbursement for General	

Mr. Marvin Davis 2121 Avenue of The Stars Los Angeles, CA 90067-5010	06/24/92 \$1,000.00 Contribution Refund
Disbursement for General	

	Subtotal	\$7,100.00
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7 2 0 3 0 1 6 1 5 7 2

*** ITEMIZED RECEIPTS ***

Schedule A (Line Number 11a) - Contributions From Individuals
COMMITTEE FOR TIM WIRTH, INC.

Donor Name
 Mailing Address
 City, State, Zipcode
 Year to Date Donations
 Primary/General/Debt Date of Receipt Amount of Receipt
 Employer/Occupation

 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.

CROSBY Mr. Stephen P. Crosby
 83 Penniman Place
 Brookline, MA 02146 YTD: \$ 500.00
 Primary 10/31/91 \$ 500.00
 S. P. Crosby's EMP./OCC.: Smart Route System/Chairman

CROWN Mr. James Crown
 222 N. LaSalle, Suite 2000
 Chicago, IL 60601 YTD: \$ 500.00
 General 08/15/91 \$ 500.00
 J. Crown's EMP./OCC.: Henry Crown & Company/Private Investments

CROWN Mr. Lester Crown
 222 No. LaSalle, #2000
 Chicago, IL 60601 YTD: \$ 500.00
 General 08/15/91 \$ 500.00
 L. Crown's EMP./OCC.: Henry Crown & Company/Executive

CRUM, JR. Mr. John L. Crum, Jr.
 1125 17th Street
 Denver, CO 80202 YTD: \$ 250.00
 Primary 12/16/91 \$ 250.00
 J. L. Crum, Jr.'s EMP./OCC.: Information Requested

CUMMING Mr. Ian Cumming
 529 East South Temple
 Salt Lake City, UT 84102 YTD: \$ 500.00
 General 12/04/91 \$ 500.00
 I. Cumming's EMP./OCC.: Leucadia National Corp./Chairman

CURRIER Michael S. Currier
 211 E. Berger
 Santa Fe, NM 87501 YTD: \$ 250.00
 Primary 08/16/91 \$ 250.00
 M. S. Currier's EMP./OCC.: Self-Employed/Investor

Subtotal: \$ 2,500.00

9 0 0 0 4 5 4 1

SCHEDULE A

ITEMIZED RECEIPTS

Contributions from Individuals/Partners

The amounts reported here should be included on the recipient's Form 1041 or Form 1041-EZ for the year in which the contributions were made.

PAGE 2
FOR LINE NUMBER 11(A)(1)

Any information concerning the donor's name and address may be obtained by the recipient for the purpose of verifying contributions or for verification of the donor's name and address.

Donor Name: [Redacted] Committee 00027700

A. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Eric Carson 515 Sumac Provo, UT 84604		Retired	10/27/92 10/29/92	500.00 500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (Specify):		Occupation: Retired Age - less than 65 > 80,000.00		
B. Full Name, Mailing Address and ZIP Code *This donor's aggregate general contributions total \$2,000.00 Refund of \$1,000.00 was sent back to donor on 11/27/92		Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (Specify):		Occupation: Aggregate Year-to-Date > 8		
C. Full Name, Mailing Address and ZIP Code Harry Lycott Harrison 2930 Hillcreek Road Salt Lake City, UT 84109		Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (Specify):		Self Occupation: Self Aggregate Year-to-Date > 8	10/19/92	500.00
D. Full Name, Mailing Address and ZIP Code *This donor's aggregate general contributions total \$1,250.00 Refund of \$250 was sent back to donor on 11/27/92		Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (Specify):		Occupation: Aggregate Year-to-Date > 8		
E. Full Name, Mailing Address and ZIP Code Ian H. Canning 1470 Military Way Salt Lake City, UT 84103		Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (Specify):		President Occupation: In-kind Financial Aggregate Year-to-Date > 8	10/29/92	987.07 in-kind
F. Full Name, Mailing Address and ZIP Code Donn Rotmansian 1400 South Pothall Drive SLC, UT 84107		Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (Specify):		Major I Occupation: In-kind Aggregate Year-to-Date > 8	10/21/92	550.00 in-kind
G. Full Name, Mailing Address and ZIP Code Peter Lawrence 1422 Military Way SLC, UT 84103		Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (Specify):		University of Utah Occupation: In-kind Aggregate Year-to-Date > 8	11/16/92	374.50 in-kind
Subtotal of Receipts This Page (attach)				3,411.57
TOTAL This Period (this page and the number only)				3,411.57

93014352226

PERIOD: 01/01/91 to 06/30/91

Name and Address	Employer/Occupation	Date	Amount	Election
James Copeland McAuliffe, Kelly, Raffaelli 1341 G Street, N.W. Washington, DC 20005 Year to Date: \$500.00	Gov Relia Consultant	05/30/91	\$500.00	Primary-92
Tony Costa 22290 SW 162nd Avenue Goulds, FL 33170 Year to Date: \$500.00	Nursery Farms Inc. President	05/30/91	\$500.00	Primary-92
Harry Crower Neill & Company 815 Connecticut Ave., N.W. Washington, DC 20006 Year to Date: \$500.00	Vice President	05/15/91	\$500.00	Primary-92
Ian Cumming 529 East South Temple Salt Lake City, UT 84102 Year to Date: \$500.00	Leucadia Natl Corp Businessman	06/05/91	\$500.00	Primary-92
Thomas Curtis 1211 Meadowlark Avenue Miami Springs, FL 33166 Year to Date: \$500.00	Self Executive	04/11/91	\$500.00	Primary-92
Beck DeRuisa 1076 N.W. 85th Street Miami, FL 33150 Year to Date: \$250.00	Retired	03/05/91	\$250.00	Primary-92
Atwood Dunvody 3810 Alhambra Circle Coral Gables, FL 33134 Year to Date: \$200.00	Self Attorney	04/22/91	\$200.00	Primary-92
Emanuel Edelstein 3475 Prairie Avenue Miami Beach, FL 33140 Year to Date: \$250.00	MG Investments Real Estate Investor	04/29/91	\$250.00	Primary-92
Eli Feinberg 8625 S.W. 80th Court Miami, FL 33142 Year to Date: \$500.00	E.M.F. Associates Gov. Affairs Cons.	04/15/91	\$500.00	Primary-92

SUBTOTAL: Receipts this page

\$3,700.00

MODULE A

ITEMIZED RECEIPTS

(Use separate schedules for each category of the attached Summary Page)

PAGE 1 6
FORM LINE NUMBER
11(a)(1)

Contributions from Individuals/Partners

Information obtained from such Reports and Statements may not be used or used by any person for the purpose of collecting 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)

Karen Shepherd for Congress CO12577hh

93014502441

A Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Lionel Frankel 3981 Mt. Olympus Way Salt Lake City, UT 84124 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Convention	University of Utah Occupation: Professor of Law Aggregate Year-to-Date: \$ 225.00	6/1/92	25.00
B Full Name, Mailing Address and ZIP Code Margarette Johnson 418 Douglas Street Salt Lake City, UT 84102 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Convention	Self Occupation: Housewife Aggregate Year-to-Date: \$ 550.00	6/10/92	500.00
C Full Name, Mailing Address and ZIP Code Ian Cumming 529 East South Temple Salt Lake City, UT 84102 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Convention	Leucadia Financial Occupation: Chairman Aggregate Year-to-Date: \$ 500.00	6/10/92 6/13/92	275.17 224.83 in-kind Postage
D Full Name, Mailing Address and ZIP Code Stephen D. Swindle, Esq. 50 South Main Street Suite 1600 Salt Lake City, UT 84144 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other (specify)	VanCott, Bagley, Cornwall & McCarthy Occupation: Attorney Aggregate Year-to-Date: \$ 1000.00	6/19/92	900.00
E Full Name, Mailing Address and ZIP Code Lola Van Wagenen 1901 Ave. of the Stars #1231 Los Angeles, CA 90067 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other (specify)	Self Occupation: Student Aggregate Year-to-Date: \$ 500.00	6/18/92	500.00
F Full Name, Mailing Address and ZIP Code Marjorie Thomas 1121 Augusta Way Salt Lake City, UT 84108 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other (specify)	Self Occupation: Domestic Engineer Aggregate Year-to-Date: \$ 1400.00	6/30/92	1000.00
G Full Name, Mailing Address and ZIP Code Boyer Jarvis 2357 Blaine Avenue Salt Lake City, UT 84108 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) Convention	Retired Occupation: Professor Aggregate Year-to-Date: \$ 475.00	6/20/92	25.00

TOTAL of Receipts This Page (attach)

\$7,050.00

TOTAL This Period (last page and line number only)

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedules for each category of the Detailed Summary Page
 Page 1 | 2
 FOR LINE NUMBER 11 (a) (1)

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)
Ron Holt for Congress



92014620281

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Ian M. Cumming 529 E. South Temple Salt Lake City UT 84102	Business Owner Occupation Business Management Aggregate Year-to-Date > \$ 500.00	6/1/92	500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
B. Full Name, Mailing Address and ZIP Code Douglas Anderson 5565 Walker Woods Lane Salt Lake City UT 84119	Business Owner Occupation Business Management Aggregate Year-to-Date > \$ 250.00	6/26/92	250.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):			
C. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Aggregate Year-to-Date > \$	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):			
D. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Aggregate Year-to-Date > \$	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):			
E. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Aggregate Year-to-Date > \$	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):			
F. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Aggregate Year-to-Date > \$	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):			
G. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Aggregate Year-to-Date > \$	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):			

SUBTOTAL of Receipts This Page (optional)	750.00
TOTAL This Period (for page this line number only)	2,750.00

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedules 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 collecting 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)

Re-Elect Congressman Chuck Schumor

A. Full Name, Mailing Address and ZIP Code	Name of Employer information requested	Date (month, day, year)	Amount of Each Receipt this Period
<input checked="" type="checkbox"/> Ian M. Cumming 529 E. South Temple Salt Lake City, UT 84102 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	9/11/92	\$1,000.00
Aggregate Year-to-Date > \$ 1,000.00			
<input type="checkbox"/> Gordon A. Keil 7 Cobblestone Ln. Morristown, NJ 07960 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Gordon's Deep Discount Occupation Retailer	9/11/92	\$1,000.00
Aggregate Year-to-Date > \$ 1,000.00			
<input type="checkbox"/> Jeffrey C. Keil 3 Pierrepont Place Brooklyn, NY 11201 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Republic N.Y. Corp. Occupation President	9/11/92	\$1,000.00
Aggregate Year-to-Date > \$ 1,000.00			
<input type="checkbox"/> Wendy Keil 7 Cobblestone Ln. Morristown, NJ 07960 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Homemaker	9/11/92	\$1,000.00
Aggregate Year-to-Date > \$ 1,000.00			
<input type="checkbox"/> Nina A. Weiner 876 Park Ave. New York, NY 10021 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Homemaker	9/11/92	\$1,000.00
Aggregate Year-to-Date > \$ 1,000.00			
<input type="checkbox"/> Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
<input type="checkbox"/> Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

\$5,000.00

OWENS FOR SENATE COMMITTEE
P. O. BOX 959, SLC, UTAH 84110

ITEMIZED RECEIPTS

PAGE 2 OF 19
FOR LINE # 11a

PERIOD 07/01/92 TO 08/19/92

NAME AND ADDRESS	EMPLOYER AND OCCUPATION	DATE	AMOUNT	ELECTION
Kevin & Alice Steiner 69 S Street Salt Lake City UT 84103 YEAR TO DATE \$1000.00	Steiner Corp. Bus Exec	08/06/92	\$1000.00	Primary-92
John D. Cumming 1470 Military Way Salt Lake City UT 84103 YEAR TO DATE \$1000.00	Student	07/09/92	\$1000.00	Primary-92
David Cumming 529 East South Temple Salt Lake City UT 84102 YEAR TO DATE \$1000.00	Student	07/09/92	\$1000.00	Primary-92
Arnette Cumming 1470 Military Way Salt Lake City UT 84103 YEAR TO DATE \$1000.00	Homemaker	07/09/92	\$1000.00	Primary-92
Ign Cumming 1470 Military Way Salt Lake City UT 84102 YEAR TO DATE \$1000.00	Leucadia Corp. President	07/09/92	\$1000.00	Primary-92
Strother B. Marshall 564 South Elizabeth Street Salt Lake City UT 84102 YEAR TO DATE \$200.00	PHP Doctor	08/17/92	\$100.00	Primary-92
Elizabeth W. Colton 1721 Bombrough Pl Salt Lake City UT 84108 YEAR TO DATE \$750.00	Retired	08/06/92	\$250.00	Primary-92
Don & Lanore Searle 12702 South 900 East Draper UT 84020 YEAR TO DATE \$600.00	Retired	8/14/92	\$200.00	Primary-92
Elizabeth Hulsh 392 East 5th South Peyson UT 84651 YEAR TO DATE \$300.00	Retired	7/09/92 08/17/92	\$100.00 \$100.00	Primary-92 Primary-92
Thomas A. Barron 821 Mapleton Avenue Boulder CO 80304 YEAR TO DATE \$1000.00	Venture Capital Executive	07/17/92	\$1000.00	Primary-92

SCHEDULE A

ITEMIZED RECEIPTS

Page 23 of 102
For the number 11a

RE-ELECT PACKWOOD COMMITTEE

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 and Address	Occupation	Date	Amount This Period	Aggregate Year-to-Date
F DAVID CROWELL P O BOX 7 MAPLETON OR 97453	DAVIDSON INDUSTRIES PRIMARY	19911012	\$1,000.00	
F DAVID CROWELL P O BOX 7 MAPLETON OR 97453	DAVIDSON INDUSTRIES GENERAL	19911012	\$1,000.00	\$2,000.00
MR THOMAS B. CROWLEY 155 GRAND AVE. 10TH FLOOR OAKLAND CA 94612	CHAIRMAN & CEO CROWLEY MARITIME CORP. PRIMARY	19910831	\$1,000.00	
MR THOMAS B. CROWLEY 155 GRAND AVE. 10TH FLOOR OAKLAND CA 94612	CHAIRMAN & CEO CROWLEY MARITIME CORP. PRIMARY	19910824	\$1,000.00	\$2,000.00
MS JOANNE CROWN 33 CANTERBURY CT. WILMETTE IL 60091	HOUSEWIFE PRIMARY	19911214	\$1,000.00	\$1,000.00
MR JOHN J CROWN 1418 N. LAKE SHORE DR. CHICAGO IL 60610	JUDGE COOK COUNTY CIRCUIT CT. PRIMARY	19911214	\$1,000.00	\$1,000.00
IAN M CUMMING 529 EAST SOUTH TEMPLE SALT LAKE CITY UT 84102	ATTORNEY HOOPER, HOOPER & OWIN PRIMARY	19911214	\$1,000.00	\$1,000.00
MS RACHEL CURIEL 200 FELTON ST SAN FRANCISCO CA 941341412	COUNSELOR YOUTH FOR SERVICE PRIMARY	19911231 19910808	\$500.00 \$500.00	\$500.00
MR RAYMOND CURTIS R R 3 BOX 315 HARRIMAN TN 377488803	INFORMATION REQ PRIMARY	19910817 19910812 19910726	\$35.00 \$35.00 \$35.00	\$230.00
G MICHAEL CUSICK 1211 S W. 5TH AVENUE STF. 600 PORTLAND OR 97204	INFORMATION REQ PRIMARY	19911224	\$250.00	\$250.00
MR CUTLER 155 BROOKLINE ST. CHESTNUT HILL MA 02167	INFORMATION REQ PRIMARY	19911113 19910820 19910830 19910815	\$50.00 \$50.00 \$50.00 \$50.00	\$250.00
MS NANCY M DALY 280 N CAROLWOOD DR LOS ANGELES CA 90077	INFORMATION REQ PRIMARY	19911026 19910824	\$500.00 \$500.00	

SCHEDULE A

ITEMIZED RECEIPTS

Any info. copied from such Reports or 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)
Democratic State Central Comm. of CA-Federal COO105668

Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Receipt this period
Ian Culling 529 E South Temple Salt Lake City, UT 84102	Leucadia National Corp Occupation Chairman	09/04/92	5000.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date \$		5000.00	
Annette Danning 529 E South Temple Salt Lake City, UT 84102-1009	Leucadia Financial Occupation Business Woman	09/04/92	5000.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date \$		5000.00	
James Curtis 1261 Colmar Ct Los Angeles, CA 90024	Tried Artists Occupation Agent	09/28/92	250.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date \$		250.00	
DONALD DALLIS 2671 CHRY CANYON RD SAN ANGELO, CA 94583	Information Requested-No Response Occupation Information Requested-No Response	09/28/92	600.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date \$		600.00	
ANN BAMPFORTH 4500 PLEASANT VALLEY CT S OAKLAND, CA 94611	Information Requested-No Response Occupation Information Requested-No Response	09/28/92	300.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date \$		300.00	
DEBORAH DAVID 363 S LAS PALMAS LOS ANGELES, CA 90020	LEBORITZ & DAVID Occupation ATTORNEY	09/28/92	1250.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Aggregate Year-to-Date \$		1250.00	

SUBTOTAL of Receipts This Page (optional)..... 12400.00

TOTAL This period (last page this line number only).....

02037950433

Contributions Form

Information on this form must be reported to the Internal Revenue Service by the person for the purpose of reporting contributions to a political campaign. See instructions for more details.

NAME OF CONTRIBUTOR (in Full)

Orton for Congress 000266190/100000

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Marilyn Malamandaris 21 third Street NE Washington DC 20002 Receipt For: <input type="checkbox"/> Primary 90 <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date > \$50.00	5-6-91	\$50.00
B. Full Name, Mailing Address and ZIP Code Wm Geoghegan 8008 Rising Ridge Bethesda MD 20817 Receipt For: <input type="checkbox"/> Primary 90 <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Self Occupation Attorney Aggregate Year-to-Date > \$50.00	Date (month, day, year) 5-7-91	Amount of Each Receipt this Period \$50.00
C. Full Name, Mailing Address and ZIP Code Marcus Faust 10232 Martinhoe DR Vienna VA 22180 Receipt For: <input type="checkbox"/> Primary 90 <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Attorney Aggregate Year-to-Date > \$500.00	Date (month, day, year) 5-7-91	Amount of Each Receipt this Period \$500.00
D. Full Name, Mailing Address and ZIP Code Ian Cumming 529 East South Temple Salt Lake City, Utah 84102 Receipt For: <input type="checkbox"/> Primary 90 <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Self Occupation Businessman Aggregate Year-to-Date > \$1,000.00	Date (month, day, year) 1-17-91	Amount of Each Receipt this Period \$1,000.00
E. Full Name, Mailing Address and ZIP Code Richard Miller 3225 W. California Ave Salt Lake City, Utah 84104 Receipt For: <input type="checkbox"/> Primary 90 <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Self Occupation Miller Associates Aggregate Year-to-Date > \$100.00	Date (month, day, year) 6-7-91	Amount of Each Receipt this Period \$100.00
F. Full Name, Mailing Address and ZIP Code Robert Jolley 1804 East 2700 South Salt Lake City, Utah 84106 Receipt For: <input type="checkbox"/> Primary 90 <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$100.00	Date (month, day, year) 6-7-91	Amount of Each Receipt this Period \$100.00
G. Full Name, Mailing Address and ZIP Code Barbara McCune 3470 Grandwood Dr. SLC Utah 84109 Receipt For: <input type="checkbox"/> Primary 90 <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year) 5-24-91	Amount of Each Receipt this Period \$50.00

TOTAL of Receipts This Page (optional)

\$1,650.00

TOTAL This Period (Use page this line number only)



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20663

January 28, 1994

Ellen S. Miller, Executive Director
Center for Responsive Politics
1320 19th Street, N.W.
Washington, D.C. 20036

RE: MUR 3870

Dear Ms. Miller:

This letter acknowledges receipt on January 21, 1994, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by Ian M. Cumming. The respondent 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 3870. Please refer to this number in all future communications. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosure
Procedures

24043594564



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20541

January 28, 1994

Ian M. Cumming
529 East South Temple
Salt Lake City, UT 84102

RE: MUR 3870

Dear Mr. Cumming:

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 3870. 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.

2 4 0 4 3 5 9 4 5 6 5

Ian M. Cumming
Page 2

If you have any questions, please contact Joan McEnery at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

24043594566



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

FEB 15 1994

Clay Newton, Treasurer
Owens for Senate Committee
P.O. Box 959
Salt Lake City, UT 84110

RE: MUR 3870

Dear Mr. Newton:

The Federal Election Commission received a complaint which indicates that the Owens for Senate Committee ("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 3870. 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.

24043594567

Clay Newton, Treasurer
Owens for Senate Committee
Page 2

If you have any questions, please contact Joan McEnery at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

24043594568



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

Warren Neusmeyer, Treasurer
Utah State Democratic Committee-Federal
453 West Bearcat Drive
Suite 101
Salt Lake City, UT 84115

RE: MUR 3870

Dear Mr. Neusmeyer:

The Federal Election Commission received a complaint which indicates that the Utah State Democratic Committee-Federal Committee ("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 3870. 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.

24043594569

Warren Neusmeyer, Treasurer
Utah State Democratic Committee-Federal
Page 2

If you have any questions, please contact Joan McEnery at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

240435945/0

**LAW OFFICES OF
VAN COTT, BAGLEY, CORNWALL & MCCOY**

A PROFESSIONAL CORPORATION

SUITE 1600

50 SOUTH MAIN STREET

SALT LAKE CITY, UTAH 84144

TELEPHONE (801) 532-3333

FACSIMILE (801) 534-0058

TELEX 483149

ADDRESS ALL CORRESPONDENCE TO

POST OFFICE BOX 45340

84145-0450

WRITER'S DIRECT DIAL NUMBER

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM
FEB 18 11 34 AM '94

DAVID E. SALISBURY
M. SCOTT WOODLAND
NORMAN S. JOHNSON
STEPHEN D. SWINOLE
ROBERT D. MERRILL
WILLIAM G. FOWLER
GREGORY P. WILLIAMS
ALAN F. MECNAM
BRENT J. GALOUPE
E. SCOTT SAWAGE
KENNETH W. YEATES
RAND L. COOK
JOHN A. SNOW
DAVID A. GREENWOOD
MARILAN A. FARSHMAN
ARTHUR B. RALPH
ALAN L. SULLIVAN
J. KEITH ADAMS
THOMAS T. BILLINGS
RICHARD C. SIZES
JOHN T. NELSEN
MICHAEL F. RICHMAN
DANNY C. KELLY
STEVEN D. WOODLAND
RICHARD H. JOHNSON, II
H. MICHAEL KELLER
BRENT D. CHRISTENSEN
JEFFREY E. NELSON
PATRICIA M. LEITH
R. STEPHEN MARSHALL
THOMAS G. BERGGREN
ERVIN R. HOLMES
RONALD G. MOFFITT
ERIC C. OLSON
PATRICK J. O'HARA
MATTHEW F. MCHEALTY, III
S. ROBERT BRADLEY
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JOHN A. ANDERSON
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DAVID L. ARRESTON
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SUSAN G. LAWRENCE
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NATHAN W. JONES
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DAVID E. SLOAN
SCOTT R. MAWEDA
BRADLEY R. CARMOON
DAVID E. ALLEN
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PAMELA MARTINSON
MATTHEW M. DURHAM
PRESTON C. REGENR
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SUTHERLAND & VAN COTT
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SHYERLAND, VAN COTT & ALLISON
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COTT, ALLISON & RITER
1507-1517
VAN COTT, RITER & FARNWORTH
1517-1517
2404 WASHINGTON BOULEVARD
OSDEK, UTAH 84401
(801) 384-5783
314 MAIN STREET
PARR CITY, UTAH 84080
(801) 649-3889
100 WEST LIBERTY
RENO, NEVADA 89501
(703) 333-6800
OF COUNSEL
LEONARD J. LEWIS
CLIFFORD L. ASHTON
DAVID L. GILLETTE
RICHARD K. SAGER
JAMES P. CONLEY
JOHN CRAWFORD, JR.
WILLIAM L. FLEMING
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GEORGE H. McMILLAN

February 15, 1994

Mary L. Taksar, Attorney
Central Enforcement Docket
Federal Election Commission
Washington, D.C. 20463

Re: Ian M. Cumming-MUR3870

Dear Ms. Taksar:

Enclosed for your files please find the original of the Statement of Designation of Counsel executed by Mr. Cumming which was faxed to you today.

Sincerely yours,

Thomas Berggren

TGB/lc

24043594571

STATEMENT OF DESIGNATION OF COUNSEL

NUR 3870

NAME OF COUNSEL: Primary contact: Stephen D. Swindle
Secondary contact: Tom Berggren

ADDRESS: VanCott, Bagley, Cornwall & McCarthy
50 South Main, Suite 1600
Salt Lake City, Utah 84144

TELEPHONE: (801) 532-3333

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.

2-11-94
Date


Signature

RESPONDENT'S NAME: Ian M. Cumming

ADDRESS: Leucadia National Corporation
529 East South Temple
Salt Lake City, Utah 84102

TELEPHONE: HOME(801) 364-2194

BUSINESS(801) 521-1001

34043594572

LAW OFFICES OF
VAN COTT, BAGLEY, CORNWALL & MCGEE
 A PROFESSIONAL CORPORATION
 SUITE 1600
 50 SOUTH MAIN STREET
 SALT LAKE CITY, UTAH 84144
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ADDRESS ALL CORRESPONDENCE TO
 POST OFFICE BOX 45340
 84145-0450

WRITER'S DIRECT DIAL NUMBER

By Facsimile

February 16, 1994

24043594573

Mary L. Taksar, Attorney
 Central Enforcement Docket
 Federal Election Commission
 Washington, D.C. 20463

Re: Ian M. Cumming-MUR3870

Dear Ms. Taksar:

Pursuant to our telephone conversation this afternoon, I am requesting a one week extension in the due date for our response to your letter dated January 28, 1994 which was received by Mr. Cumming on February 3, 1994, i.e. the response would be due no later than February 25, 1994. As we discussed, this extension will enable us to complete our investigation and research into the corrective action that Mr. Cumming would like to take and will give us adequate time to discuss any further questions we might have with your office relating thereto. I would appreciate your confirmation of the approval of this extension.

Sincerely yours,


 Thomas Berggren

TGB/lc

cc: Ian M. Cumming

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 2404 WASHINGTON BOULEVARD
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February 17, 1994

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Mary L. Taksar, Attorney
 Central Enforcement Docket
 Federal Election Commission
 Washington, D.C. 20463

Re: Ian M. Cumming—MUR3870

Dear Mary:

This is to confirm our telephone conversation this morning in which you said that if there was any problem with granting the approval of our request for the seven day extension for our response, you would let me know today. As it is nearing the end of business day here, and I have not heard from you, I am assuming that the extension has been approved. We will be filing our response next week.

Thank you very much for your consideration in this matter.

Sincerely yours,



Thomas Berggren

TGB/lc

24043594574

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 94 FEB 23 AM 10:14



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20543

FEBRUARY 28, 1994

Thomas Berggren, Esquire
Van Cott, Begley, Cornwall & McCarthy
50 South Main Street, Suite 1600
Salt Lake City, Utah 84144

MUR 3870
Ian M. Cumming

Dear Mr. Berggren:

This is to confirm in writing that, on February 17, 1994, the Office of General Counsel granted the requested extension until February 25, 1994 to respond to the complaint filed in the above-noted matter.

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

Sincerely,

Mary L. Taksar
Mary L. Taksar, Attorney
Central Enforcement Docket

240435945/5

LAW OFFICES OF
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 A PROFESSIONAL CORPORATION
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 (801) 264-5783
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 OF COURSE:
 LEONARD J. LEWIS
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February 25, 1994

Federal Election Commission
 Washington, D.C. 20463
 Attn: Mary L. Taksar, Attorney
 Central Enforcement Docket

VIA FEDERAL EXPRESS

Re: Ian M. Cumming - MUR 3870

Dear Ms. Taksar:

This is in response to your letter to Ian M. Cumming dated January 28, 1994, which was received in his office February 3, 1994. Mr. Cumming has designated this firm as his counsel in this matter. Pursuant to U.S.C. §437g(a)(1), I am writing on behalf of Mr. Cumming to request that no action be taken by the Commission against Mr. Cumming based on the complaint filed by the Center for Responsive Politics (the "CRP"). This request is justified because (1) two of the 1992 contributions referred to in the CRP's complaint reflect the double counting of certain contributions, and (2) \$5,666 of Mr. Cumming's 1992 contributions were made to organizations which he did not believe were federally reporting committees subject to the Campaign Finance Act. These contributions have now been refunded, which reduces the remaining total of Mr. Cumming's 1992 contributions to \$24,636. The combination of the inadvertence of the violations of the \$25,000 maximum contribution law and the prompt corrective action taken hopefully will cause the Commission to take no further action against Mr. Cumming.

The following is a more detailed explanation of these matters:

24043594576

FEB 28 PM 1:59

Mary L. Taksar, Attorney
February 25, 1993
Page 2

1. Utah State Democratic Committee Contributions.

First, the "Summary of FEC Data" in the complaint shows four contributions to the Utah State Democratic Committee in 1992, two of which are shown as \$2,000 each, and two of which are shown as \$1,166 each, for a total of \$6,332. While we can see why the CRP thought this was the case, Mr. Cumming in fact made only one \$2,000 and only one \$1,166 contribution which went to the Utah State Democratic Committee's federal account in 1992, for a total of \$3,166.

From the Executive Director of the Utah State Democratic Party, we have determined that this is what happened: In April of 1992, the Utah State Democratic Committee filed a report with the FEC for the period ending March 31, 1992 (the "Original April 1992 Report"), which showed receipt from Mr. Cumming of a \$2,000 contribution with a date of February 28, 1992, and in July of 1992, the Utah State Democratic Committee filed a report with the FEC for the period ending June 30, 1992 (the "Original July 1992 Report"), which showed receipt from Mr. Cumming of a \$1,166 contribution with a date of April 2, 1992. In 1993, the Utah State Democratic Committee filed an amended report for the period ending March 31, 1992 (the "Amended April 1992 Report"), and in such report apparently the Committee listed all of the contributions it received from all sources during the covered period, including those previously reported, such as the one from Mr. Cumming. The Amended April 1992 Report also included the \$1,166 contribution shown in the Original July 1992 Report. In the Amended April 1992 Report, the \$2,000 contribution has a date of February 5, 1992, which was the date of the deposit of that sum into the Committee's account, and the \$1,166 contribution has a date of March 24, 1992, which was the date of the check. In reality, these were the same two contributions from Mr. Cumming already disclosed in the Original April 1992 Report and in the Original July 1992 Report -- only the dates were different. In other words, the CRP's complaint included the same two contributions disclosed first in the Original April 1992 Report and the Original July 1992 Report and then again in the Amended April 1992 Report. Enclosed please find copies of the checks and the deposit slips with respect to these two contributions. (As noted below, the \$2,000 contribution actually reflects a portion of a \$5,000 check which was dated January 30, 1992 which the Committee (without authorization) split and deposited in both its federal and state accounts). In summary, the correct amount of contributions made by Mr. Cumming in 1992 which were credited to the Utah State

24043594517

Mary L. Taksar, Attorney
February 25, 1993
Page 3

Democratic Committee (as discussed below, without his knowledge) was \$3,166. This is the amount which should have been in the CRP's complaint.

Second, when he made these two contributions to the Utah Democratic Party in 1992, Mr. Cumming believed that he was contributing to a non-federal account. Please note that each of the checks was made out to the "Utah Democratic Party". In fact, he made several other contributions to the Utah Democratic Party in that year, all of which did go to the Party's state account. Mr. Cumming thought he was giving to the State Party, not to a committee as to which contributions would be included in calculating permissible contributions under the \$25,000 limit. Without asking his permission or notifying him, either before or after the fact, these two contributions were attributed to the Party's "Utah State Democratic Committee", which turns out to be a federal account. In fact, as noted above, the January 30, 1992 contribution Mr. Cumming made to the Party in the amount of \$5,000 was split by the Party, \$2,000 going into the federal account and \$3,000 into the State account. In determining his 1992 contributions subject to the law, Mr. Cumming did not know that the State had deposited this \$3,166 into its federal account. Upon learning of this following receipt of your letter, we asked for a refund in the amount of \$3,166 from the Party's federal account. A copy of the refund check is enclosed, together with a cover letter from the current Chair of the Utah Democratic Party. Also enclosed please find an affidavit signed by the Executive Director of the Utah Democratic Party stating that these contributions were deposited in the Party's federal account without the permission or knowledge of Mr. Cumming.

Mr. Cumming knows about the \$25,000 limit on an individual's contributions, but he firmly understood that his contributions to the Utah Democratic Party were not going to be included in this total. He was surprised, shocked and angry that the Party had deposited a portion of his contribution in its federal account without telling him. Because these contributions were not intended to constitute federal contributions, and because they have been refunded, we believe that the Commission should take no further action in this matter.

2. Participation 2000 Contribution.

Pursuant to a request from a friend and business associate, Mr. Cumming made a contribution of \$2,500 to Participation 2000 in 1992.

24043594518

Mary L. Taksar, Attorney
February 25, 1993
Page 4

Mr. Cumming was not told, and at that time he did not realize or have reason to believe, that this organization apparently is a federal political action committee subject to the Campaign Finance Act. When apprised of the situation by Mr. Cumming's assistant, a representative of Participation 2000 apologized for not making clear that contributions to that entity were subject to the Act, and agreed to refund the contribution. Enclosed please find a copy of a check from Participation 2000 in the amount of \$2,500. Also enclosed please find an affidavit from Mr. Cumming's assistant as to these matters.

Again, because the contribution was inadvertently made and a refund has been obtained, we request that the Commission take no further action in this matter.

To summarize, we believe we have demonstrated that the contributions referred to in the CRP's complaint in excess of \$25,000 were made inadvertently, and that corrective action has been taken. With these three contributions refunded, the total amount of Mr. Cumming's 1992 contributions was \$24,636. We believe no interest would be served by pursuing this matter any further.

This is to confirm that this matter will remain confidential in accordance with 2 U.S.C. §437g(a)(4)(B) and §437g(a)(12)(A).

If you have any questions or if we can provide any further information to you regarding this matter, please do not hesitate to call me.

Sincerely yours,


Thomas Berggren

TGB/lc

cc: Ian M. Cumming

24043594519

2046

UTAH STATE DEMOCRATIC COMMITTEE 5-88
FEDERAL ACCOUNT
453 W. BEARCAT DR.
SALT LAKE CITY, UTAH 84115



Key Bank of Utah
Key Bank Crossroads Office
80 South Main, Suite 1012
Salt Lake City, Utah 84101

31-73/1240

PAY Three Thousand One Hundred Sixty-Six and .66/1.00 Dollars-----

TO THE ORDER OF
Ian M. Cumming
529 East South Temple
Salt Lake City, Utah 84102

DATE AMOUNT

February 17, 1994 \$3,166.66
TWO SIGNATURES OVER 1000.00 DOLLARS

⑆002046⑆ ⑆124000737⑆ 580013688⑆

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

UTAH STATE
DEMOCRATIC COMMITTEE
FEDERAL ACCOUNT

DELUXE - FORM TWC-3 V-7

02-17-94

Ian M. Cumming
Refund of 1992 Federal Contributions

\$3,166.66

24043594

AFFIDAVIT OF TODD TAYLOR

STATE OF UTAH)
) : SS.
COUNTY OF SALT LAKE)

Todd Taylor, being first duly sworn and under oath, deposes and says:

1. I am the Executive Director of the Utah State Democratic Committee.

2. I have been furnished a copy of the complaint filed by the Center for Responsive Politics with the Federal Election Commission, MUR 3870, with respect to Ian Cumming.

3. The contribution of \$1,166 with the date of 03/24/92 and the contribution of \$2,000 with the date of 02/05/92 listed on lines 23 and 24 in the "Summary of FEC Data" in the complaint are duplicate references to the contributions of \$1,166 with the date of 04/02/92 and \$2,000 with the date of 02/28/92 listed on lines 25 and 22, respectively.

4. The \$2,000 contribution was disclosed in the original report filed by the Utah State Democratic Committee with respect to the period ending March 31, 1992, and the \$1,166 contribution was disclosed in the original report filed by the Utah State Democratic Committee with respect to the period ending June 30, 1992. In 1993, an amended report was filed for the time period ending March 31, 1992 that included all contributions received during that period including those which had been previously reported, although in some cases I used different dates for the contributions than the person who filed the original report. In the amended report, I included the \$2,000 contribution, using the date of deposit (February 5, 1992) rather than the date shown on the original report for this period. In addition, I included in the amended report the \$1,166 contribution using the date of the check (March 24, 1992) rather than the date of deposit (April 2, 1992).

5. The total amount of the contributions which were made by Mr. Cumming in 1992 which was deposited in the Utah State Democratic Committee's federal account was \$3,166, not the total of \$6,332 alleged in the complaint which would exceed the limit our Committee could accept from an individual donor.

6. The \$2,000 contribution of Mr. Cumming reported to the FEC was made by a check dated January 30, 1992 in the amount of \$5,000. This check was delivered to our bank with instructions to cause \$2,000 to be deposited into the Committee's federal account

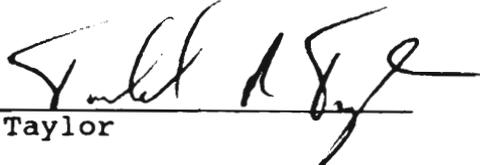
24043594531

and \$3,000 to be deposited into the Committee's State or non-federal account. A copy of this check and the two deposit slips is attached.

7. The \$1,166 contribution by a check dated March 24, 1992 was deposited in the Committee's federal account. A copy of this check and the deposit slip is attached.

8. I cannot find in our records any written documentation noting Mr. Cumming's consent or notification to Mr. Cumming that his contributions of either the \$2,000 or the \$1,166 were to be deposited in the Committee's federal account. Other contributions made by Mr. Cumming during 1992 were all credited to the Committee's State or non-federal account. To that end, on February 17, 1994 the Committee has refunded to Mr. Cumming the \$3,166.66 deposited in the Committee's federal account in 1992.

DATED this 24 day of February, 1994.



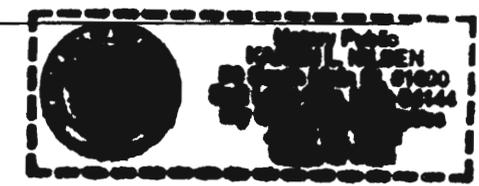
Todd Taylor

SUBSCRIBED AND SWORN before me this 24th day of February, 1994.



Notary Public
Residing in Lewis County

My Commission Expires:



24043594562

DATE	DOCUMENT	DESCRIPTION	ACCOUNT #	AMOUNT	NET
01-29-92	129	CONTRIBUTION	800.	5000.00	5000.00

24043594503

TO THE ORDER OF

THE SUM 5000 DOLLARS AND 00 CENTS

UTAH DEMOCRATIC PARTY
72 BEARCAT DRIVE
SALT LAKE CITY, UT 84115

2000 FIRST NATIONAL BANK
OF COLORADO, WESTERN

CHECK DATE: 01-30-92
CHECK NO: 13406

PAY THIS AMOUNT
\$5000.00

David L. Schaefer

DEPOSIT TICKET

UTAH STATE DEMOCRATIC COMMITTEE
STATE ACCOUNT

2000

DATE: Feb 5 1992

CHECK NO: 13406

AMOUNT: 2000 00

TOTAL: 2000 00

DEPOSIT TICKET

UTAH STATE DEMOCRATIC COMMITTEE
STATE ACCOUNT

2000

DATE: Feb 5 1992

CHECK NO: 13406

AMOUNT: 3000 00

TOTAL: 3000 00

ZIONS FIRST NATIONAL BANK
SALT LAKE CITY, UTAH 84108

Mr. M. G...
[Redacted]

CHECK DATE
03-24-92

CHECK NO.
13586

THE SUM 1166 DOLLARS AND 68 CENTS

O
HE
NDER
R

PAY THE AMOUNT
\$1,166.68

UTAH DEMOCRATIC PARTY
72 BEARCAT DRIVE
SALT LAKE CITY, UT 84115

[Handwritten Signature]

[Redacted]

24043594584

24043594585

Checks and other items are returned for deposit
according to procedure of the Uniform Commercial
Code or any applicable regulatory agreement.

DATE	AMOUNT	DESCRIPTION	CHECKS LISTED IN STATEMENT	COMM.	CURRENCY
4/10	1500.00	410			
4/10	454.50	81-7-820			
4/10	601.98	31-5-55			
4/10	1166.66	31-5-55			
4/10	1534.00	31-5-55			
4/10	4132.15	15-15-1			
4/10	57.00	31-1-1			
4/10	216.68	81-4			
4/10	10.00	97-154			
TOTAL FROM OTHER SIDES					
TOTAL FROM ATTACHED LIST					
TOTAL					

968377

⑈99910085 ⑆⑆⑆000121⑆⑆

10.00
+ 21.68
+ 57.00
+ 6132.15
+ 1544.00
+ 1166.66
+ 601.98
+ 454.50
+ 15140.10
+ 9603.77

DEPOSIT TICKET
UTAH STATE
DEMOCRATIC COMMITTEE
FEDERAL ACCOUNT
ONE THORN OFFICE
Commercial Security Bank
30 E. COURT, SUITE 1012 • P.O. BOX 10000
SALT LAKE CITY, UTAH 84102

31-7250

**Utah
Democrats**

February 17, 1994

Ian M. Cumming
Leucadia, Inc.
529 E. South Temple
Salt Lake City, Utah 84102

Dave Jones
Chair

Jill Remington
Vice Chair

Byron Anderson
Secretary

Warren Neumann
Treasurer

Louise Benson
National Committeewoman

J.D. Williams
National Committeeman

Executive Committee
Members:

Rep. Frank Figanselli

Sen. Millie Peterson

Cindy Ahawi

Tom Berggren

Rebecca Chavez-Houch

Todd R. Taylor
Executive Director

Paulette Blair
Office Administrator

Dear Ian,

As I have discussed with your attorney, Tom Berggren, enclosed please find a check in the amount of \$3,166.66 from the party's federal account. This is in respect of the two contributions you made to the party in 1992 which were deposited in our federal account.

While this was before my time, it is my understanding that these deposits were made into the federal account without your knowledge or approval, and I apologize for the inconvenience and embarrassment this has caused you as a result of the complaint filed with the Federal Election Commission. I hope that when the FEC finds out that this was done by the party without informing you, they will not proceed with the complaint.

You know we appreciate all that you do for our party and I am truly sorry for this problem.

Sincerely yours,



Dave Jones
Chair

Utah State
Democratic
Committee

453 West Bearcat Drive
Salt Lake City, Utah 84115
801/484-1200

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1563

"PARTICIPATION 2000"
322 MASSACHUSETTS AVENUE, NE. NO. 30
WASHINGTON, D.C. 20002

2-16 10 94 ^{7/8}

PAY
TO THE
ORDER OF

Jan Cummings

\$ 2000.00

two - thousand - five - hundred

10
DOLLARS

The Federal Central Bank
OF WASHINGTON
ON CAPITOL HILL
WASHINGTON D.C. 20003

Jan F...

FOR

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⑆ 006 8608⑆

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STATE OF UTAH)
) : ss.
COUNTY OF SALT LAKE)

Laura A. Schreiber, being first duly sworn and under oath, deposes and says:

1. I am the Administrative Assistant of Ian M. Cumming.

2. I have seen a copy of the complaint filed by the Center for Responsive Politics with the Federal Election Commission, MUR 3870, with respect to Mr. Ian M. Cumming.

3. I am aware of the \$25,000 limit on the total amount an individual may contribute in any one year with regard to federal campaigns.

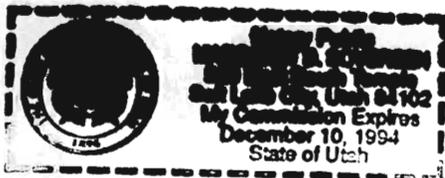
4. I processed the request from a business associate of Mr. Cumming's for a contribution of \$2,500 to Participation 2000 from Mr. Cumming. Neither I nor Mr. Cumming realized Participation 2000 was a federally oriented committee, contributions to which would count towards the \$25,000 limit.

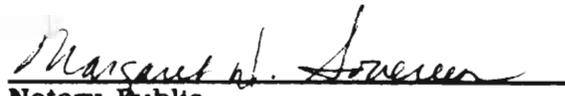
5. I have no record of receiving a form from Participation 2000 asking me for Mr. Cumming's occupation or employer, which I am often asked by campaign committees for federal reporting purposes. If I had been so asked, I would have probably inquired more about the organization to see if it was covered by the Federal law.

DATED this 24 day of February, 1994.


Laura A. Schreiber

SUBSCRIBED AND SWORN to before me this 24th day of February, 1994.




Notary Public
Residing in

My Commission Expires:
December 10, 1994

24043594588

00C 286

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

OWENS FOR SENATE COMMITTEE
P.O. BOX 989
SALT LAKE CITY, UT 84110

FEB 28 11 19 AM '94

FEDERAL RECEIVED
94 FEB 28 PM 3:36

February 24, 1994

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

re: MUR 3870

Gentlemen,

We have received your letter indicating that our Committee may have violated the Federal Election Campaign Act of 1971 ("the Act"), pursuant to a complaint filed with the Commission.

In accordance with 2 U.S.C. 441a(a)(1), "no person shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed \$1,000." During the 1992 election cycle, our Committee participated in 3 separate elections, (1) the party primary convention, (2) the primary election, and (3) the general election. Attached is a copy of Advisory Opinion 1992-25 which indicates that our Committee therefore had 3 contribution limits. In Mr. Cumming's case, this allowed him to contribute a total of \$3,000 (\$1,000 per election) to our Committee. The re-cap of his contributions included in the complaint indicates that he did, in fact, contribute \$3,000 to our Committee, all of which was properly received and designated.

Mr. Cumming's final contribution to our Committee was received on July 7, 1992. Further examination of the list of contributions included in the complaint clearly shows that if Mr. Cumming did, in fact, make excessive contributions, any amounts contributed in excess of the annual \$25,000 limit occurred after the final amount received by our Committee. Accordingly, all contributions received by our Committee appear to be legal contributions under the Act.

Notwithstanding the above, in the event the Commission decides to enter into a conciliation agreement with Mr. Cumming, our Committee would be willing, if necessary, to refund a pro-rata share of any amount deemed to be excessive to Mr. Cumming.

We trust that after a careful review of our response, you will find that there is no reason to believe that the complaint sets forth any possible violation of the Act on the part of our Committee, and you will close the file on our behalf.

24043594589

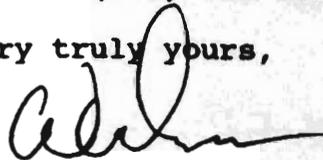
February 24, 1994

General Counsel's Office
Federal Election Commission

page two

I would be happy to speak with a representative from your office at their convenience. My telephone number is (801) 521-3515.

Very truly yours,



Clay Newton, CPA
Treasurer

CN:bg
enclosures

cc: Wayne Owens
Ian Cumming
Kay Christensen

24043594590



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 10, 1992

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

ADVISORY OPINION 1992-25

Clay Newton, CPA
Treasurer
Owens for Senate Committee
P.O. Box 959
Salt Lake City, UT 84110

Dear Mr. Newton:

This responds to your letters dated May 21 and May 12, 1992, requesting an advisory opinion on behalf of the Owens for Senate Committee ("the Committee") concerning the application of the Federal Election Campaign Act of 1971, as amended ("the Act"), and Commission regulations to the treatment of a state convention as a separate election.

The Owens for Senate Committee is the principal campaign committee of Congressman Wayne Owens for election to the United States Senate from the State of Utah. Under Utah law, a candidate for U.S. Senate runs for nomination at a state convention of a political party and, if necessary, in a primary election. If the candidate is the party's nominee after this process, he or she runs in the general election. You wish to know whether the state party convention is a separate election for determining contribution limits, thus enabling an individual to make three \$1,000 contributions to the Committee if Mr. Owens is involved in the convention, the primary election, and the general election.

The Act and regulations define "election" to include a general election, a primary election, and "a convention or caucus of a political party which has authority to nominate a candidate." 2 U.S.C. §431(1)(A) and (B); 11 CFR 100.2(b), (c), and (e). The Commission has previously stated that the question of whether a particular event is an election, or a convention or caucus which has authority to nominate a candidate, is determined by an analysis of relevant state law. Advisory Opinions 1986-17, 1984-16, and 1978-30.

24043594591

Under Utah law, the delegates at the party primary convention vote for their choice for U.S. Senate nominee. The two persons receiving the highest number of votes for an office are declared the party's nominees to run in the primary election. Utah Code Annotated ("UCA") §20-4-9(8)(g). If, however, a candidate receives 70 percent or more of the votes cast, he or she is the party's nominee without the necessity of running in the primary election. UCA §20-4-9(8)(h). Since the party primary convention has the authority to nominate a candidate by itself, the Commission concludes that it is an election. See Advisory Opinions 1986-21 and 1978-30 (both involving the 70 percent rule in Utah).

Mr. Owens received 69.7 percent of the delegates' votes at the June 13 convention and is a candidate in the primary to be held on September 8. The Committee may therefore accept contributions under a separate limit for the September 8 primary election. These contributions may be made by the same persons who may have already contributed up to the Act's limits for the June 13 convention. See 2 U.S.C. §441a(a)(6). If Congressman Owens receives the party's nomination in the September 8 primary, a separate limit will apply for the general election. The Commission cautions that the Committee should comply with the rules set out at 11 CFR 110.1 and 110.2 for the application of the limits per election and for the designation of contributions.

This response constitutes an advisory opinion concerning application of the Act, or regulations prescribed by the Commission, to the specific transaction or activity set forth in your request. See 2 U.S.C. §437f.

Sincerely,

Joan D. Aikens

Joan D. Aikens
Chairman for the
Federal Election Commission

Enclosures (AOs 1986-21, 1986-17, 1984-16, and 1978-30)

24043594592

CUMMING, IAN M
Contributions Attributed to 1992

Exhibit 1

Summary of FEC Data

2
4
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3

Recipient	Amount	Date	FEC Microfilm Location
Kerrey, Robert	\$500	11/18/91	92FEC/731/2058
Davis, Gray	\$1,000	03/31/92	92SEN/008/1855
Democratic National Cmte	\$7,000	08/26/92	92FEC/780/0494
Democratic State Central Cmte/California	\$5,000	09/04/92	92FEC/795/0433
Holt, Ron	\$500	06/01/92	92HSE/462/0287
Holt, Ron	\$400	12/21/92	93HSE/493/0178
Lehman, William	\$500	06/05/91	91HSE/430/0038
Lehman, William	\$500	12/16/91	92HSE/444/0922
Obey, David R	\$500	03/06/92	92HSE/450/2228
Orlins, Steve A	\$250	12/08/91	92HSE/439/4800
Orton, Bill	\$1,000	01/17/91	91HSE/432/4635
Orton, Bill	\$1,000	02/27/92	92HSE/447/4196
Owens, Wayne	\$1,000	07/09/92	92SEN/019/2324
Owens, Wayne	\$1,000	11/21/91	92SEN/006/0409
Owens, Wayne	\$1,000	11/21/91	92SEN/006/0409
Packwood, Bob	\$1,000	12/14/91	92SEN/004/0358
Participation 2000	\$2,500	05/14/92	92FEC/765/1755
Schumer, Charles E	\$1,000	09/11/92	92HSE/473/1837
Shepherd, Karen	\$275	06/10/92	92HSE/460/2441
Shepherd, Karen	\$224	06/13/92	92SEN/016/1572
Shepherd, Karen	\$987	10/29/92	92HSE/485/2226
Utah State Democratic Cmte	\$2,000	02/28/92	92FEC/750/3446
Utah State Democratic Cmte	\$1,166	03/24/92	93FEC/841/3988
Utah State Democratic Cmte	\$2,000	02/05/92	93FEC/841/3988
Utah State Democratic Cmte	\$1,166	04/02/92	92FEC/766/2378
Wirth, Timothy E	\$-500	06/24/92	92SEN/016/1572
Wirth, Timothy E	\$500	12/04/91	92SEN/003/4541

Total Contributions Attributed to 1992: \$33,468

- Contributions made after 7-9-92. Total of \$13,987.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)
) Enforcement Priority
)

GENERAL COUNSEL'S MONTHLY REPORT

SENSITIVE

I. INTRODUCTION

This report is the second Enforcement Priority System Monthly Report. The purpose of this September Monthly Report is to recommend that the Commission no longer pursue the identified lower priority and stale cases.

II. CASES RECOMMENDED FOR CLOSING

A. Cases Not Warranting Further Pursuit Relative to Other Cases Pending Before the Commission

A critical component of the Priority System is identifying those pending cases that do not warrant the further expenditure of resources. Each incoming matter is evaluated using Commission-approved criteria and cases that, based on their rating, do not warrant pursuit relative to other pending cases are placed in this category. By closing such cases, the Commission is able to use its limited resources to focus on more important cases.

Having evaluated incoming matters, this Office has identified 44 cases which do not warrant further pursuit

24043594594

relative to the other pending cases.¹ A short description of each case and the factors leading to assignment of a relatively low priority and consequent recommendation not to pursue each case is attached to this report. See Attachments 1-44. For the Commission's convenience, the narratives for the externally-generated matters are immediately followed by the complaint and response(s) and the narrative for the internally-generated matter is immediately followed by the referral.

B. Stale Cases

Investigations are severely impeded and require relatively more resources when the activity and evidence are old. Consequently, the Office of General Counsel recommends that the Commission focus its efforts on cases involving more recent activity. Such efforts will also generate more impact on the current electoral process and are a more efficient allocation of our limited resources. To this end, this Office has identified 2 cases that have remained inactive and assigned to the Central Enforcement Docket for one year and which it believes do not warrant further investment of significant Commission resources.² Since the recommendation not to pursue the identified cases is

1. These matters are: PM 299; MUR 3856; MUR 3859; MUR 3860; MUR 3861; MUR 3863; MUR 3864; MUR 3865; MUR 3868; MUR 3869; MUR 3870; MUR 3871; MUR 3872; MUR 3873; MUR 3874; MUR 3875; MUR 3877; MUR 3878; MUR 3880; MUR 3881; MUR 3882; MUR 3883; MUR 3884; MUR 3885; MUR 3887; MUR 3888; MUR 3889; MUR 3897; MUR 3900; MUR 3901; MUR 3906; MUR 3909; MUR 3910; MUR 3913; MUR 3914; MUR 3915; MUR 3916; MUR 4029; MUR 4030; MUR 4034; MUR 4035; MUR 4038; MUR 4039; and MUR 4040.

2. These matters are RAD 93L-66 and RAD 93L-69.

24043594595

based on staleness, this Office has not prepared separate narratives for these cases. However, the referrals for these internally-generated matters are attached. See Attachments 45-46.

This Office recommends that the Commission exercise its prosecutorial discretion and no longer pursue the cases listed below effective November 14, 1994. By closing the cases effective November 14, 1994, CED and the Legal Review Team will respectively have the additional time necessary for preparing the closing letters and the case files for the public record for this fairly large number of cases.

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III. RECOMMENDATIONS

A. Decline to open a MUR and close the file effective November 14, 1994 in RAD 93L-66 and RAD 93L-69.

B. Decline to open a MUR, close the file effective November 14, 1994, and approve the appropriate letter in PM 299.

C. Take no action, close the file effective November 14, 1994, and approve the appropriate letter in the following matters:

- 1) MUR 3856
- 2) MUR 3859
- 3) MUR 3860
- 4) MUR 3861
- 5) MUR 3863
- 6) MUR 3864
- 7) MUR 3865
- 8) MUR 3868
- 9) MUR 3869
- 10) MUR 3870
- 11) MUR 3871
- 12) MUR 3872
- 13) MUR 3873
- 14) MUR 3874
- 15) MUR 3875
- 16) MUR 3877
- 17) MUR 3878
- 18) MUR 3880
- 19) MUR 3881
- 20) MUR 3882
- 21) MUR 3883
- 22) MUR 3884
- 23) MUR 3885
- 24) MUR 3887
- 25) MUR 3888
- 26) MUR 3889
- 27) MUR 3897
- 28) MUR 3900
- 29) MUR 3901
- 30) MUR 3906
- 31) MUR 3909
- 32) MUR 3910
- 33) MUR 3913
- 34) MUR 3914
- 35) MUR 3915

24043594597

- 36) MUR 3916
- 37) MUR 4029
- 38) MUR 4030
- 39) MUR 4034
- 40) MUR 4035
- 41) MUR 4038
- 42) MUR 4039
- 43) MUR 4040

10'26'94
Date

Lawrence M. Noble
Lawrence M. Noble
General Counsel

Attachments

24043594598

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Ian M. Cumming.

)
)
)

MUR 3870

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 2, 1994, the Commission decided by a vote of 6-0 to take no action, close the file in MUR 3870 effective November 14, 1994, and approve the appropriate letter, as recommended in the General Counsel's Report dated October 26, 1994.

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

Attest:

11-3-94
Date

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

Received in the Secretariat: Thurs., Oct. 27, 1994 3:16 p.m.
Circulated to the Commission: Fri., Oct. 28, 1994 2:00 p.m.
Deadline for vote: Wed., Nov. 02, 1994 4:00 p.m.

bjr

24043594599



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

NOV 21 1994

Ellen S. Miller, Executive Director
Center for Responsive Politics
1320 19th Street, N.W.
Washington, D.C. 20036

RE: MUR 3870

Dear Ms. Miller:

On January 21, 1994, 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 respondents. See attached narrative. Accordingly, the Commission closed its file in this matter on November 14, 1994. 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 L. Taksar

Mary L. Taksar
Attorney

Attachment
Narrative

24043594600

MUR 3870
IAN M. CUMMING

The Center for Responsive Politics filed a complaint alleging that Ian Cumming exceeded his 1992 \$25,000 annual contribution limit by \$8,468 because the contributions which he made during 1991 and 1992 and which were attributable to 1992 totaled \$33,468. The contributions identified in the complaint raised the issue of whether two recipient committees, the Utah State Democratic Committee-Federal and the Owens for Senate Committee accepted contributions which exceeded FECA limits.

In response to the complaint, Mr. Cumming states that a \$2,000 and a \$1,166 contribution made to the Utah State Democratic Committee were each double-counted on the Committee's reports but that the Committee later corrected its reports. Mr. Cumming indicates that he later received a \$3,166 refund because the funds should have been deposited into the non-federal account. Mr. Cumming also states that he requested and received a refund of \$2,500 from Participation 2000 and that all of his actions bring his 1992 contribution total to \$24,636.

The Owens for Senate Committee responds that Mr. Cumming made three \$1,000 contributions for three different elections, the party primary convention, the primary election, and the general election and that the Owens Committee therefore did not accept excessive contributions.

Remedial action has been taken and this matter involves less significant issues relative to other matters pending before the Commission.

24043594601



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

NOV 21 1994

Stephen D. Swindle, Esq,
VanCott, Bagley, Cornwall & McCarthy
50 South Main, Suite 1600
Salt Lake City, UT 84144

RE: MUR 3870
Ian M. Cumming

Dear Mr. Swindle:

On January 28, 1994, the Federal Election Commission notified your client, Ian M. Cumming, 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 your client. See attached narrative. Accordingly, the Commission closed its file in this matter on November 14, 1994.

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 Alva E. Smith at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Attachment
Narrative

24043594602

MUR 3870
IAN M. CUMMING

The Center for Responsive Politics filed a complaint alleging that Ian Cumming exceeded his 1992 \$25,000 annual contribution limit by \$8,468 because the contributions which he made during 1991 and 1992 and which were attributable to 1992 totaled \$33,468. The contributions identified in the complaint raised the issue of whether two recipient committees, the Utah State Democratic Committee-Federal and the Owens for Senate Committee accepted contributions which exceeded FECA limits.

In response to the complaint, Mr. Cumming states that a \$2,000 and a \$1,166 contribution made to the Utah State Democratic Committee were each double-counted on the Committee's reports but that the Committee later corrected its reports. Mr. Cumming indicates that he later received a \$3,166 refund because the funds should have been deposited into the non-federal account. Mr. Cumming also states that he requested and received a refund of \$2,500 from Participation 2000 and that all of his actions bring his 1992 contribution total to \$24,636.

The Owens for Senate Committee responds that Mr. Cumming made three \$1,000 contributions for three different elections, the party primary convention, the primary election, and the general election and that the Owens Committee therefore did not accept excessive contributions.

Remedial action has been taken and this matter involves less significant issues relative to other matters pending before the Commission.

24043594603



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20461

NOV 21 1994

Clay Newton, Treasurer
Owens for Senate Committee
P.O. Box 959
Salt Lake City, UT 84110

RE: MUR 3870

Dear Mr. Newton:

On February 15, 1994, the Federal Election Commission notified the Owens for Senate Committee ("Committee") and you, 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 Committee and you, as treasurer. See attached narrative. Accordingly, the Commission closed its file in this matter on November 14, 1994.

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 Alva E. Smith at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Attachment
Narrative

24043594604

MUR 3870
IAN M. CUMMING

The Center for Responsive Politics filed a complaint alleging that Ian Cumming exceeded his 1992 \$25,000 annual contribution limit by \$8,468 because the contributions which he made during 1991 and 1992 and which were attributable to 1992 totaled \$33,468. The contributions identified in the complaint raised the issue of whether two recipient committees, the Utah State Democratic Committee-Federal and the Owens for Senate Committee accepted contributions which exceeded FECA limits.

In response to the complaint, Mr. Cumming states that a \$2,000 and a \$1,166 contribution made to the Utah State Democratic Committee were each double-counted on the Committee's reports but that the Committee later corrected its reports. Mr. Cumming indicates that he later received a \$3,166 refund because the funds should have been deposited into the non-federal account. Mr. Cumming also states that he requested and received a refund of \$2,500 from Participation 2000 and that all of his actions bring his 1992 contribution total to \$24,636.

The Owens for Senate Committee responds that Mr. Cumming made three \$1,000 contributions for three different elections, the party primary convention, the primary election, and the general election and that the Owens Committee therefore did not accept excessive contributions.

Remedial action has been taken and this matter involves less significant issues relative to other matters pending before the Commission.

24043594605



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20461

NOV 21 1994

Warren Neusmeyer, Treasurer
Utah State Democratic Committee-Federal
453 West Bearcat Drive, Suite 101
Salt Lake City, UT 84115

RE: MUR 3870

Dear Mr. Neusmeyer:

On February 15, 1994, the Federal Election Commission notified Utah State Democratic Committee-Federal ("Committee") and you, 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 Committee and you, as treasurer. See attached narrative. Accordingly, the Commission closed its file in this matter on November 14, 1994.

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 Alva E. Smith at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Attachment
Narrative

24043594606

**MUR 3870
IAN M. CUMMING**

The Center for Responsive Politics filed a complaint alleging that Ian Cumming exceeded his 1992 \$25,000 annual contribution limit by \$8,468 because the contributions which he made during 1991 and 1992 and which were attributable to 1992 totaled \$33,468. The contributions identified in the complaint raised the issue of whether two recipient committees, the Utah State Democratic Committee-Federal and the Owens for Senate Committee accepted contributions which exceeded FECA limits.

In response to the complaint, Mr. Cumming states that a \$2,000 and a \$1,166 contribution made to the Utah State Democratic Committee were each double-counted on the Committee's reports but that the Committee later corrected its reports. Mr. Cumming indicates that he later received a \$3,166 refund because the funds should have been deposited into the non-federal account. Mr. Cumming also states that he requested and received a refund of \$2,500 from Participation 2000 and that all of his actions bring his 1992 contribution total to \$24,636.

The Owens for Senate Committee responds that Mr. Cumming made three \$1,000 contributions for three different elections, the party primary convention, the primary election, and the general election and that the Owens Committee therefore did not accept excessive contributions.

Remedial action has been taken and this matter involves less significant issues relative to other matters pending before the Commission.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3870

DATE FILMED 12-14-94 CAMERA NO. 2

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