FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3591

DATE FILMED 10-13-94 CAMERA NO. 2

CAMERAMAN JMH

94043590002

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
94 JAN 21 PM 4:34

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,

David Packard

Respondent,

COMPLAINT

MUR 3891

9404359000003

## 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.

## 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 David Packard 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 David Packard made contributions attributed to the 1992 calendar year in the amount of $50,450. These contributions exceeded by $25,450 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



9404359000004

## VERIFICATION

The undersigned complainant, on behalf of the Center for Responsive Politics, swears that the statements in this Complaint are based on the sources indicated, and as such, are true and correct to the best of her information and belief.

Ellen S. Miller

District of Columbia )
) ss

Subscribed and sworn before me this 14th day of January, 1994.

Notary Public

My Commission Expires: _____

Phyllis Landau
Notary Public District of Columbia
My Commission Expires May 14, 1998

9404350005

PACKARD, DAVID

Exhibit 1

Contributions Attributed to 1992

## Summary of FEC Data

| Recipient | Amount | Date | FEC Microfilm Location |
|---|---|---|---|
| Aspin, Les | $500 | 10/28/92 | 92HSE/487/4992 |
| Baker, Bill | $250 | 06/30/92 | 92HSE/459/1536 |
| Baker, Bill | $500 | 09/30/92 | 92HSE/473/2312 |
| Bush, George | $1,000 | 02/18/92 | 92FEC/739/3468 |
| California Republican Party | $10,000 | 06/12/92 | 92FEC/767/3963 |
| California Republican Party | $-5,000 | 06/12/92 | 92FEC/767/3963 |
| Campbell, Thomas J | $1,000 | 03/30/92 | 92SEN/009/1681 |
| Campbell, Thomas J | $1,000 | 06/04/91 | 91SEN/007/1174 |
| Campbell, Thomas J | $-1,000 | 07/13/92 | 92SEN/030/4467 |
| Considine, Terry | $500 | 08/06/92 | 92SEN/022/2269 |
| Herschensohn, Bruce | $500 | 10/29/92 | 92SEN/029/0922 |
| Hewlett-Packard Co. PAC | $5,000 | 10/09/92 | 92FEC/798/1358 |
| Huening, Tom | $500 | 05/20/92 | 92hse/460/0966 |
| Huening, Tom | $500 | 09/30/92 | 92HSE/475/4430 |
| Huening, Tom | $500 | 10/19/92 | 92HSE/487/2572 |
| Huening, Tom | $1,000 | 12/01/91 | 92HSE/440/0282 |
| Lincoln Club of Northern Calif | $1,200 | 01/16/92 | 92FEC/751/2363 |
| Lowery, William D | $500 | 08/14/91 | 92HSE/443/4162 |
| McCain, John | $1,000 | 06/19/92 | 92SEN/013/3508 |
| Packard, Ron | $1,000 | 05/31/91 | 91HSE/429/1335 |
| President's Dinner 1992 | $2,000 | 04/06/92 | 92FEC/766/4223 |
| Republican National Cmte | $20,000 | 10/29/92 | 92FEC/807/3089 |
| Riggs, Frank | $500 | 10/14/92 | 92HSE/477/4273 |
| San Francisco Republican Cty Cent Cmte | $500 | 10/27/92 | 93FEC/827/5209 |
| Santa Clara County Republican League | $5,000 | 05/27/92 | 92FEC/772/1056 |
| Seymour, John | $1,000 | 07/19/91 | 92SEN/004/1143 |
| Seymour, John | $1,000 | 08/18/92 | 92SEN/022/1093 |

**Total Contributions Attributed to 1992: $50,450**



9 4 0 4 3 5 9 0 0 0 6

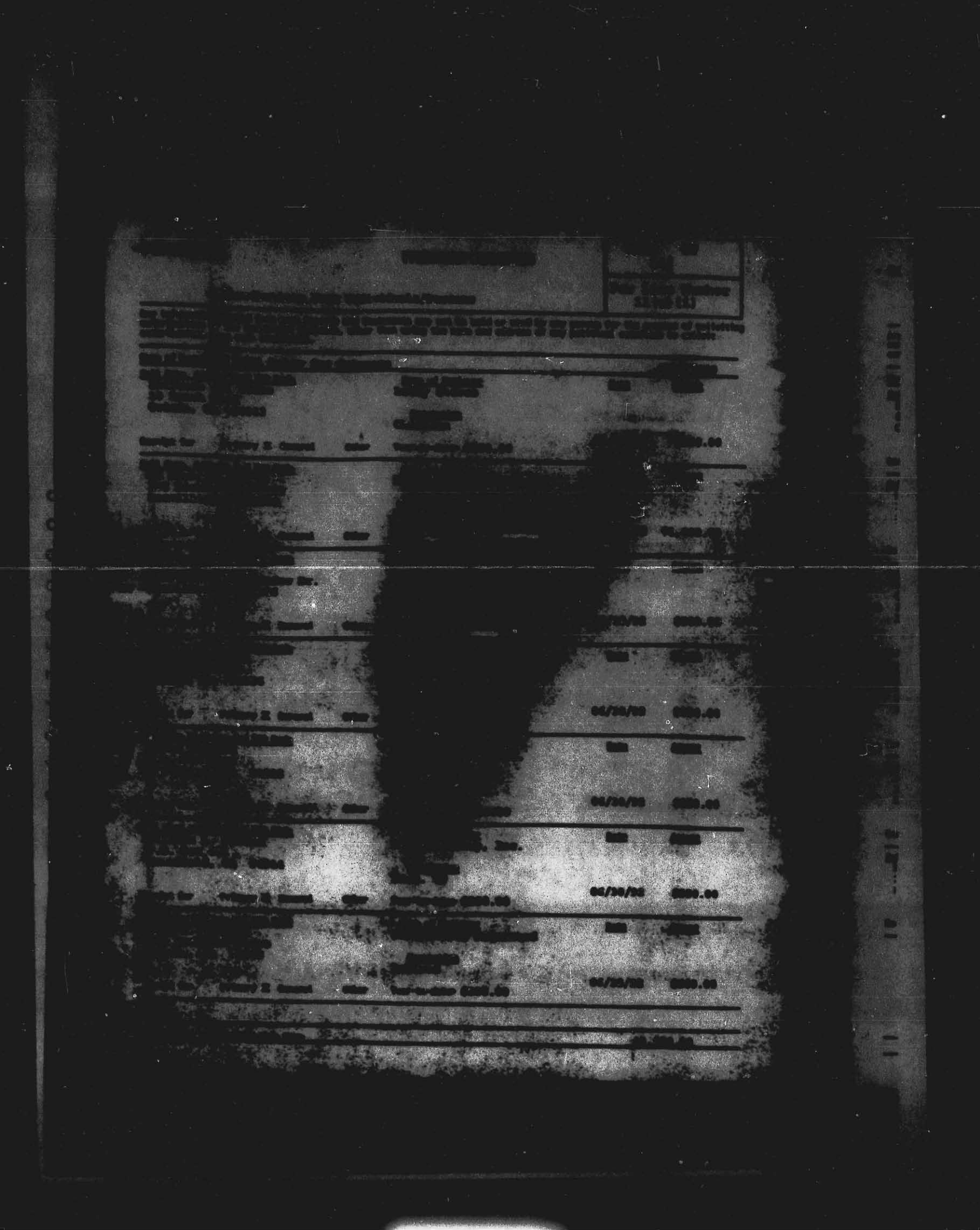
David Packard
Exhibit 2

9404359000007

Schedule A — Coloradans For Considine, Inc. — Page: 238 of 244
Itemized Receipts — Line Number 11a

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

| Name/Address | Employer/Occupation | Date | Amount |
|---|---|---|---|
| John Overturf<br>3006 Marilyn Road<br>Colorado Springs, CO 80909<br>Receipt for: G | Aggregate Year-To-Date: | 08/22/92<br>100.00 | 100.00 |
| James Owen<br>1524 E. Mountain Drive<br>Santa Barbara, CA 93108<br>Receipt for: G | MMQ Investment<br>Investment Advisor<br>Aggregate Year-To-Date: | 08/17/92<br>1000.00 | 1000.00 |
| Rose Owen<br>2800 S. University Blvd. No.<br>Denver, CO 80210<br>Receipt for: G | Aggregate Year-To-Date: | 09/14/92<br>100.00 | 100.00 |
| Harold Pabst<br>Post Office Box 1388<br>Carefree, AZ 85377-1388<br>Receipt for: G | Retired<br>Aggregate Year-To-Date: | 08/19/92<br>200.00 | 100.00 |
| David Packard<br>P.O. Box 1330<br>Los Altos, CA 94023<br>Receipt for: P | Information Requested<br>Aggregate Year-To-Date: | 08/06/92<br>500.00 | 500.00 |
| Manoel Page<br>746 Grand Ave., No. A<br>Grand Junction, CO 81501<br>Receipt for: G | Aggregate Year-To-Date: | 09/14/92<br>25.00 | 25.00 |
| James Palacas<br>11300 W. 27th Pl.<br>Lakewood, CO 80215<br>Receipt for: G | Aggregate Year-To-Date: | 08/27/92<br>40.00 | 20.00 |
| James Palenchar<br>1999 Broadway, Suite 4000<br>Denver, CO 80202<br>Receipt for: P | Attorney<br>Aggregate Year-To-Date: | 08/11/92<br>500.00 | 500.00 |
| SUBTOTAL of Receipts This Page . . . . . | | | 2345.00 |
| TOTAL this Period. . . . . | | | 244468.57 |



SCHEDULE A ITEMIZED RECEIPTS PAGE 41 OF 194

STATEMENT COVERS PERIOD FROM 7/01/92 TO 9/30/92

FOR LINE NUMBER 11A

NAME OF COMMITTEE: MS SENATOR JOHN SEYMOUR COMMITTEE

| FULL NAME<br>MAILING ADDRESS | | EMPLOYER<br>OCCUPATION | DATE | AMOUNT |
|---|---|---|---|---|
| Mr L Doradovich<br>c/o Community Bank<br>100 E. Green Blvd<br>Pasadena, CA 91103 | | Doradovich Investments<br>self-employed. | | |
| | | RECEIPT FOR: GENERAL | 7/16/92 | 250.00 |
| | | AGGREGATE YTD: 250.00 | | |
| Mr Peter Bakker<br>710 Bush St<br>San Francisco | CA 94108 | sole-proprietor<br>P.A. Bakker & Assoc. | | |
| | | RECEIPT FOR: GENERAL | 7/22/92 | 300.00 |
| | | AGGREGATE YTD: 300.00 | | |
| Jane Flynn<br>PO Box 955<br>Gerber | CA 96035 | Sole owner-Rocking Horse<br>Not a Corp | | |
| | | RECEIPT FOR: GENERAL | 9/04/92 | 300.00 |
| | | AGGREGATE YTD: 300.00 | | |
| Mr David Packard<br>PO Box 1330<br>Los Altos | CA 94023 | Hewlett-Packard Co<br>Chairman of the Board | | |
| | | RECEIPT FOR: GENERAL | 8/18/92 | 1,000.00 |
| | | AGGREGATE YTD: 1,000.00 | | |
| Mr Michael Padilla<br>PO Box 1861<br>Rancho Santa FE | CA 92067 | Attorney | | |
| | | RECEIPT FOR: GENERAL | 9/29/92 | 300.00 |
| | | AGGREGATE YTD: 300.00 | | |
| Mr Peter Pafel<br>1111 Foothard Street<br>Needles | CA 92363 | INFORMATION REQUESTED | | |
| | | RECEIPT FOR: GENERAL | 9/21/92 | 200.00 |
| | | AGGREGATE YTD: 200.00 | | |
| Mr G H Palmer<br>6001 Chevy Chase Way<br>Sacramento | CA 95823 | INFORMATION REQUESTED | | |
| | | RECEIPT FOR: GENERAL | 9/04/92 | 250.00 |
| | | AGGREGATE YTD: 250.00 | | |
| Ms Jean Ramsey Palmer<br>150 Fox Hollow Rd<br>Woodside | CA 94062 | Investor/Rancher | | |
| | | RECEIPT FOR: GENERAL | 9/04/92 | 63.00 |
| | | RECEIPT FOR: GENERAL | 9/11/92 | 250.00 |
| | | AGGREGATE YTD: 1,063.00 | | |
| Marcia H Palmer<br>300 Ross Way<br>Sacramento | CA 95864 | Palmer Real Estate<br>Realtor | | |
| | | RECEIPT FOR: GENERAL | 9/29/92 | 250.00 |
| | | AGGREGATE YTD: 250.00 | | |

SUBTOTAL OF RECEIPTS THIS PAGE.....: 3,413.00

9 2 1 0 0 4 1 1 4 3



SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

STATEMENT COVERS PERIOD FROM 7/01/91 THROUGH 1 /.1/-1

NAME OF COMMITTEE: U.S. SENATOR JOHN SEYMOUR COMMITTEE FED ID: C00250653

| | EMPLOYER/ OCCUPATION | SENT/ RECEIVED | DATE | AMOUNT |
|---|---|---|---|---|
| Mr. Robert George Verbica<br>PO Box 1277<br>San Jose CA 95106 | Verbica Realty<br>Self-Employed Realtor | | 11/01/91 | $500.00 |
| RECEIPT FOR: GENERAL | AGGREGATE YTD: $2,000.00 | | | |
| Mr. David Packard<br>PO Box 1330<br>Los Altos CA 94023 | Hewlett-Packard Co<br>CEO | | 7/19/91 | $1,000.00 |
| RECEIPT FOR: PRIMARY | AGGREGATE YTD: $1,000.00 | | | |
| Mr. C Lee Lowry<br>PO Box 13340<br>Sacramento CA 95813 | BEST EFFORT<br>Self-Employed Civil Engineer | | 12/19/91 | $500.00 |
| RECEIPT FOR: PRIMARY | AGGREGATE YTD: $500.00 | | | |
| Mr. Al Bara<br>PO Box 1409<br>Upland CA 91786 | A. Bea<br>BEST EFFORT | | 9/25/91 | $1,000.00 |
| RECEIPT FOR: PRIMARY | AGGREGATE YTD: $1,000.00 | | | |
| Mr. Richard M Vine<br>PO Box 1400<br>Orcas CA 92622 | Regent International<br>BEST EFFORT | | 11/25/91 | $250.00 |
| RECEIPT FOR: PRIMARY | AGGREGATE YTD: $250.00 | | | |

SUBTOTAL OF RECEIPTS THIS PAGE.....> $3,250.00

SCHEDULE A ITEMIZED RECEIPTS

For each receipt of the Detailed Summary Page | PAGE LINE NUMBER

May 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)
Hewlett-Packard Company Committee for Good Government

| Full Name, Mailing Address and ZIP Code | Name of Employer / Occupation | Date (month, day, year) | Amount of Each Receipt this Period |
|---|---|---|---|
| A. David Packard<br>P. O. Box 1330<br>Los Altos, CA 94023<br>Receipt For: [ ] Primary [x] General [ ] Other (specify): | Hewlett-Packard Co.<br>3000 Hanover St.<br>Palo Alto, CA 94304<br>Chairman of the Company<br>Aggregate Year-to-Date > $ 5,000.00 | 10-9-92 | 5,000.00 |
| B. Jerry L. Harmon<br>c/o HP, 3000 Hanover St., Stewart<br>Palo Alto, CA 94304<br>Receipt For: [ ] Primary [x] General [ ] Other (specify): | Hewlett-Packard Co.<br>20 AM 3000 Hanover<br>Palo Alto, CA 94304<br>Manager<br>Aggregate Year-to-Date > $ 300.00 | 10-9-92 | 200.00 |
| C. Robert P. Wayman<br>11975 Marietta Lane<br>Los Altos, CA 94022<br>Receipt For: [ ] Primary [x] General [ ] Other (specify): | Hewlett-Packard Co.<br>3000 Hanover St.<br>Palo Alto, CA 94304<br>Chief Financial Officer<br>Aggregate Year-to-Date > $ 500.00 | 10-12-92 | 500.00 |
| D. Full Name, Mailing Address and ZIP Code<br>Receipt For: [ ] Primary [ ] General [ ] Other (specify): | Name of Employer<br>Occupation<br>Aggregate Year-to-Date > $ | Date (month, day, year) | Amount of Each Receipt this Period |
| E. Full Name, Mailing Address and ZIP Code<br>Receipt For: [ ] Primary [ ] General [ ] Other (specify): | Name of Employer<br>Occupation<br>Aggregate Year-to-Date > $ | Date (month, day, year) | Amount of Each Receipt this Period |
| F. Full Name, Mailing Address and ZIP Code<br>Receipt For: [ ] Primary [ ] General [ ] Other (specify): | Name of Employer<br>Occupation<br>Aggregate Year-to-Date > $ | Date (month, day, year) | Amount of Each Receipt this Period |
| G. Full Name, Mailing Address and ZIP Code<br>Receipt For: [ ] Primary [ ] General [ ] Other (specify): | Name of Employer<br>Occupation<br>Aggregate Year-to-Date > $ | Date (month, day, year) | Amount of Each Receipt this Period |

SUBTOTAL of Receipts This Page (optional) ..... > $5,7[illegible]

TOTAL This Period (last page this line number only) ..... > $[illegible]

92037981358

[illegible]

[illegible] 11(a)(i)

[illegible] (in Full)
Frank Riggs for Congress [illegible]

[illegible]

| Full Name<br>Mailing Address | Name of Employer<br>Occupation | Date<br>MM/DD/YY | Amount |
|---|---|---|---|
| Edward Lewis<br>Box 96<br>Redcrest, CA 95569- | Self<br>Earl & Drift Novelty Shop | 10/[illegible]/92 | $500.00 |
| Receipt for [X]General | Aggregate YTD > $500.00 | | |
| Helen E. Marshall<br>2503 O Street<br>Eureka, CA 95501-0000 | Retired<br>Retired | 10/14/92 | $50.00 |
| Receipt for [X]General | Aggregate YTD > $340.00 | | |
| Mike Moore<br>[illegible] Redwood Dr.<br>Rohnert Park, CA 94920- | Self<br>Office Equipment<br>Office Supply | 10/01/92 | $50.00<br>IN-[illegible] |
| Receipt for [X]General | Aggregate YTD > $50.00 | | |
| Dennis Mosher<br>[illegible] Cabernet St.<br>Napa, CA [illegible]- | Bay-Tec Engr.<br>Company President | 10/14/92 | [illegible] |
| Receipt for [X]General | Aggregate YTD > [illegible] | | |
| David Packard<br>P. O. Box 1330<br>Los Altos, CA 94023- | Hewlett Packard<br>Chairman of the Board | 10/14/92 | [illegible] |
| Receipt for [X]General | Aggregate YTD > [illegible] | | |
| Alice Porsche<br>P.O. Box 11823<br>Santa Rosa, CA 95406- | Retired<br>Retired | 10/14/92 | [illegible] |
| Receipt for [X]General | Aggregate YTD > $400.00 | | |
| Julia Preisig<br>P.O. Box 193<br>Fort Bragg, CA 95437-0000 | Retired<br>Retired | 10/14/92 | $100.00 |
| Receipt for [X]General | Aggregate YTD > $300.00 | | |

SUBTOTAL of Receipts This Page.....> $1[illegible].00

TOTAL This Period.....>

9404350013

92[illegible]

SCHEDULE A

Friends of Ron Packard

| | | | |
|---|---|---|---|
| A. James F. McConnell<br>1730 Rhode Island Ave. N.W., Ste 400<br>Washington, DC 20036<br>Receipt For: X Primary ☐ General ☐ Other (specify): | Name of Employer: Self<br>Occupation: Attorney<br>Aggregate Year-to-Date > $ 1,000.00 | Date (month, day, year): 5/6/91 | Amount of Each Receipt this Period: 1,000.00 |
| B. Malcolm McQueen<br>1755 La Costa Meadows Dr.<br>San Marcos, CA 92069<br>Receipt For: X Primary ☐ General ☐ Other (specify): | Name of Employer: Fluid Components, Inc<br>Occupation: Engineer<br>Aggregate Year-to-Date > $ 500.00 | Date (month, day, year): 4/11/91 | Amount of Each Receipt this Period: 500.00 |
| C. James E. Mullen, M.D.<br>33911 Blue Lantern<br>Dana Point, CA 92629<br>Receipt For: X Primary ☐ General ☐ Other (specify): | Name of Employer: Self<br>Occupation: Physician<br>Aggregate Year-to-Date > $ 250.00 | Date (month, day, year): 4/15/91 | Amount of Each Receipt this Period: 250.00 |
| D. John R. O'Donnell<br>1640-C Beekman Pl. N.W.<br>Washington, DC 20009<br>Receipt For: X Primary ☐ General ☐ Other (specify): | Name of Employer: Self<br>Occupation: Lobbyist<br>Aggregate Year-to-Date > $ 500.00 | Date (month, day, year): 5/6/91 | Amount of Each Receipt this Period: 500.00 |
| E. David Packard<br>P.O. Box 1330<br>Los Altos, CA 94023<br>Receipt For: X Primary ☐ General ☐ Other (specify): | Name of Employer: Hewlitt Packard Co.<br>Occupation: Executive<br>Aggregate Year-to-Date > $ 1,000.00 | Date (month, day, year): 5/31/91 | Amount of Each Receipt this Period: 1,000.00 |
| F. E. S. & E. E. Pankey<br>320 W. Main St.<br>Tustin, CA 92680<br>Receipt For: X Primary ☐ General ☐ Other (specify): | Name of Employer:<br>Occupation: Retired<br>Aggregate Year-to-Date > $ 500.00 | Date (month, day, year): 5/20/91 | Amount of Each Receipt this Period: 500.00 |
| G. H. F. Jensen<br>2150 N. Centre City Pkwy., Ste C<br>Escondido, CA 92026<br>Receipt For: X Primary ☐ General ☐ Other (specify): | Name of Employer: RCJ Investments<br>Occupation: Investor<br>Aggregate Year-to-Date > $ 500.00 | Date (month, day, year): 5/2/91 | Amount of Each Receipt this Period: 500.00 |
| SUBTOTAL of Receipts This Page (optional) | | | |
| TOTAL This Period (last page this line number only) | | | |

9,4,0,4,3,5,9,8,8,1,4

SCHEDULE A - ITEMIZED RECEIPTS

PAGE: 20 OF 23

Individual Contribution

LINE NUMBER 11A

Name of Committee: TOM HUFFINS FOR CONGRESS

| Name and Address | | Date | Amount |
|---|---|---|---|
| Harry R. Hagey<br>100 Waverly Oaks<br>Palo Alto, CA 94301<br>Receipt for General 1992 | Employer: Dodge & Cox<br>Occupation: Investor<br>YTD amount: 1500.00 | 09/30/92 | 500.00 |
| John Dodsworth<br>1518 Pine Grove Way<br>San Jose, CA 95129<br>Receipt for General 1992 | Employer: California Accountants Mutual Ins. Co.<br>Occupation: President<br>YTD amount: 750.00 | 09/30/92 | 500.00 |
| Lawrence Owen Brown<br>19753 Farwell Avenue<br>Saratoga, CA 95070<br>Receipt for General 1992 | Employer: Migration Software<br>Occupation: Executive<br>YTD amount: 1100.00 | 09/30/92 | 500.00 |
| Donald L. Lucas<br>244 Park Lane<br>Atherton, CA 94027<br>Receipt for General 1992 | Employer: Self<br>Occupation: Venture Capitalist<br>YTD amount: 1600.00 | 09/30/92 | 100.00 |
| David Packard<br>1501 Page Mill Road<br>Palo Alto, CA 94304<br>Receipt for General 1992 | Employer: Hewlett Packard<br>Occupation: Chairman<br>YTD amount: 1000.00 | 09/30/92 | 500.00 |
| Dan Day<br>1045 Cascade Drive<br>Menlo Park, CA 94025<br>Receipt for General 1992 | Employer: BFI<br>Occupation: Assit. District Manager<br>YTD amount: 750.00 | 09/30/92 | 250.00 |
| Marvin D. Dennis<br>372 Poett Road<br>Hillsborough, CA 94010<br>Receipt for General 1992 | Employer: TransOcean<br>Occupation: Executive<br>YTD amount: 800.00 | 09/30/92 | 250.00 |

Sub-total receipts this pg: 2600.00

9404359001 5

[redacted]

| [redacted] | [redacted] | [redacted] | [redacted] | [redacted] |
|---|---|---|---|---|
| [redacted] | [redacted] | [redacted] | [redacted] | [redacted] |
| Mr. James J. Pace<br>2870 San Pablo Road<br>Jacksonville FL 32224 | [redacted]<br>10/15/92 | 10/15/92 | $5.00 | $205.00 |
| Mr. John C. Pace Jr.<br>Apt. 1008<br>615 Bayshore Drive<br>Pensacola, FL 32507 | [redacted]<br>10/15/92 | 10/15/92 | $115.00 | $227.00 |
| Mr. & Mrs. Joseph L. Pace Jr.<br>1776 Oakdale Avenue<br>Richmond VA 23227 | [redacted]<br>10/20/92 | 10/15/92<br>10/15/92<br>10/20/92 | $25.00<br>$25.00<br>$75.00 | $125.00 |
| Mr. John A. Pace<br>2720 Fairmont<br>Dallas TX 75201 | Attorney<br>Pace & Bishop | 10/20/92<br>11/10/92 | $1.00<br>[redacted] | $1,101.00 |
| Ms. Marian E. Pace<br>7130 Morningside Dr.<br>Loomis CA 95650 | [redacted] | 10/20/92 | $100.00 | $200.00 |
| Mr. & Mrs. Arthur Pacheco Jr.<br>201 Golf View Drive<br>Tucson AZ 85737 | Parent<br>Self-employed | 10/15/92 | $300.00 | $300.00 |
| Dr. Albert D. Pacifico<br>272 Valley View Lane<br>Pelham AL 35124 | Physician<br>Univ. of Alabama at Birmingham | 10/15/92 | $100.00 | $1,000.00 |
| The Honorable David Packard<br>26500 Toaffe Road<br>Los Altos CA 94022 | Chairman of Board<br>Hewlett Packard | 10/23/92 | [redacted],000.00 | $20,000.00 |
| Colonel W. L. Packett<br>5120 Briar Creek Drive<br>Annandale VA 22003 | CONSULTANT | 10/19/92<br>10/20/92 | $75.00<br>$75.00 | $275.00 |
| Mr. William Packham<br>Apartment 4<br>2800 E. Sunrise Blvd.<br>Fort Lauderdale FL 33304 | INFORMATION REQUESTED<br>10/22/92 | 10/21/92<br>10/22/92 | $15.00<br>$60.00 | $298.00 |

940435900916

SCHEDULE A ITEMIZED RECEIPTS

| Use separate schedule(s) for each category of the Detailed Summary Page | Page 17 of 42 (2) |
|---|---|
| | Any Line Number 11a(i) |

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 for such committee.

NAME OF COMMITTEE (In Full)
FRIENDS OF LEE ASPIN

| Full Name, Mailing Address and Zip Code | Name of Employer | Date(Month, Day, year) | Amount of Each Receipt This Period |
|---|---|---|---|
| James L. Packard<br>7613 McCurry<br><br>Roscoe, IL 61073 | Rockwell-Collins Corp<br><br>Occupation | 10/20/92 | 500.00 |
| Receipt for: ☐ Primary ☐ General ☐ Other (specify) | CEO<br>Aggregate Year To Date $ 1000.00 | | |

| Full Name, Mailing Address and Zip Code | Name of Employer | Date(Month, Day, year) | Amount of Each Receipt This Period |
|---|---|---|---|
| David Packard<br>PO Box 1339<br><br>Los Altos, CA 94023 | Hewlett Packard<br><br>Occupation | 10/20/92 | 500.00 |
| Receipt for: ☐ Primary ☐ General ☐ Other (specify) | Owner<br>Aggregate Year To Date $ 500.00 | | |

| Full Name, Mailing Address and Zip Code | Name of Employer | Date(Month, Day, year) | Amount of Each Receipt This Period |
|---|---|---|---|
| John E. Packard<br>7609 30th Ave.<br><br>Kenosha, WI 53142 | Lakeland Corporation<br><br>Occupation | 11/25/92 | 100.00 |
| Receipt for: ☐ Primary ☐ General ☐ Other (specify) | Executive<br>Aggregate Year To Date $ 200.00 | | |

| Full Name, Mailing Address and Zip Code | Name of Employer | Date(Month, Day, year) | Amount of Each Receipt This Period |
|---|---|---|---|
| Jack Packard<br>2151 19th Ave<br><br>San Francisco, CA 94116 | California Pacific Assoc.<br><br>Occupation | 10/20/92 | 500.00 |
| Receipt for: ☐ Primary ☐ General ☐ Other (specify) | Owner<br>Aggregate Year To Date $ 500.00 | | |

| | |
|---|---|
| SUBTOTAL of Receipts This Page (optional) | $ 1100.00 |
| TOTAL This Period(last page this line number only) | $ 10500.00 |

SCHEDULE A - ITEMIZED RECEIPTS

PAGE: 4 OF 17

LINE NUMBER 11A

Individual Contribution

Name of Committee: TOM HERRING FOR CONGRESS

| Name and Address | | Date | Amount |
|---|---|---|---|
| David W. Packard, Jr.<br>PO Box 1330<br>Los Altos, CA 94023 | Employer: Ibycus Co.<br>Occupation: Executive | 10/19/92 | 500.00 |
| Receipt for General 1992 | YTD amount: 500.00 | | |
| David D. Bohannon, II<br>102 Copley Avenue<br>Woodside, CA 94062 | Employer: David D. Bohannon Organization<br>Occupation: Executive | 10/19/92 | 500.00 |
| Receipt for General 1992 | YTD amount: 500.00 | | |
| Cameron Schmidt<br>130 Wessel<br>Los Gatos, CA 95030 | Employer: Hoover Consulting Group<br>Occupation: Managing Director | 10/19/92 | 30.00 |
| Receipt for General 1992 | YTD amount: 330.00 | | |
| George P. Shultz<br>776 Dolores Street<br>Stanford, CA 94305 | Employer: Hoover Institute<br>Occupation: Fellow | 10/19/92 | 500.00 |
| Receipt for General 1992 | YTD amount: 500.00 | | |
| Shirley M. Koening<br>718 N. Prospect Avenue<br>Park Ridge, IL 60068 | Employer: N/A<br>Occupation: Homemaker | 10/19/92 | 100.00 |
| Receipt for General 1992 | YTD amount: 300.00 | | |
| Dan Tompkins<br>2370 Friars Lane<br>Los Altos, CA 94022 | Employer: DSC<br>Occupation: Venture Capital | 10/19/92 | 200.00 |
| Receipt for General 1992 | YTD amount: 900.00 | | |
| William A. Preston<br>1230 Hamilton Avenue<br>Palo Alto, CA 94301 | Employer: AFM Inc.<br>Occupation: CEO | 10/19/92 | 500.00 |
| Receipt for General 1992 | YTD amount: 500.00 | | |
| Sub-total receipts this pg: | | | 2430.00 |

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SCHEDULE A ITEMIZED RECEIPTS Page 1 of [illegible] for Line Number 11a

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Full Name of Committee: The John McCain Re-Election Committee

| A. Full Name, Address, Zip | Employer/Occupation | Date | Receipts |
|---|---|---|---|
| David Packard<br>1501 Page Mill Road<br>Palo Alto CA 94304 | Hewlett- Packard Compa<br>CHRM. OF THE BD | 05/19/92 | 1000.00 |
| Receipt for: Primary | Year-to-Date Total: $ | 1000.00 | |

| B. Full Name, Address, Zip | Employer/Occupation | Date | Receipts |
|---|---|---|---|
| Philip T. Paris<br>4616 E. White Drive<br>Paradise Valley AZ 85253 | Self<br>Attorney | 05/27/92 | 300.00 |
| Receipt for: Primary | Year-to-Date Total: $ | 300.00 | |

| C. Full Name, Address, Zip | Employer/Occupation | Date | Receipts |
|---|---|---|---|
| Don G. Parlett<br>3158 E Rose Lane<br>Phoenix AZ 85016 | Salt River Project<br>Asst. Gen. Mng. | 05/19/92 | 500.00 |
| Receipt for: Primary | Year-to-Date Total: $ | 500.00 | |

| D. Full Name, Address, Zip | Employer/Occupation | Date | Receipts |
|---|---|---|---|
| David E. Passey<br>1919 N. Calle Maderas<br>Mesa AZ 85213 | Passey Bond Company, I<br>INS. EXECUTIVE | 05/22/92 | 500.00 |
| Receipt for: Primary | Year-to-Date Total: $ | 500.00 | |

| E. Full Name, Address, Zip | Employer/Occupation | Date | Receipts |
|---|---|---|---|
| James F. Polese<br>5924 E. Calle Del Norte<br>Phoenix AZ 85018 | McCabe,Polese,Pietzsch<br>info requested | 05/26/92 | 300.00 |
| Receipt for: Primary | Year-to-Date Total: $ | 300.00 | |

| F. Full Name, Address, Zip | Employer/Occupation | Date | Receipts |
|---|---|---|---|
| J. D. Pruitt<br>3702 E. Garden Dr.<br>Phoenix AZ 85028 | Sundt Corp.<br>EXEC. | 05/26/92 | 300.00 |
| Receipt for: Primary | Year-to-Date Total: $ | 300.00 | |

SUBTOTAL of Receipts This Page ..... 2500.00

TOTAL This Period .....

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9202013350 8

SCHEDULE A - ITEMIZED RECEIPTS

PAGE: 18 OF 25

Individual Contributions

LINE NUMBER 11A

Name of Committee: TOM HAYDEN FOR CONGRESS

| Name and Address | | Date | Amount |
|---|---|---|---|
| Mr. Raymond P. O'Brien<br>26347 Hapgerman Drive<br>Los Altos Hills, CA 94022<br><br>Receipt for P92 | Employer: Consolidated Freightways<br><br>Occupation: Chairman<br><br>YTD amount: 500.00 | 09/19/91 | 500.00 |
| Mr. David Packard<br>1501 Page Mill Road<br>Palo Alto, CA 94304<br><br>Receipt for P92 | Employer: Hewlett Packard<br><br>Occupation: Chairman of the Board<br><br>YTD amount: 1000.00 | 13/01/91 | 1000.00 |
| Mr. Howard D. Palefsky<br>124 Patricia Drive<br>Atherton, CA 94027<br><br>Receipt for P92 | Employer: Collagen Corporation<br><br>Occupation: President<br><br>YTD amount: 750.00 | 08/05/91<br>10/02/91 | 500.00<br>250.00 |
| Mrs. Marianne W. Palefsky<br>124 Patricia Drive<br>Atherton, CA 94027<br><br>Receipt for P92 | Employer: N/A<br><br>Occupation: Homemaker<br><br>YTD amount: 500.00 | 12/07/91 | 500.00 |
| Mr. J. Michael Patterson<br>17286 Clearview Drive<br>Los Gatos, CA 95030<br><br>Receipt for P92 | Employer: Price Waterhouse<br><br>Occupation: Executive<br><br>YTD amount: 250.00 | 12/14/92 | 250.00 |
| Mr. Lisle Payne<br>3616 Jackson Street<br>San Francisco, CA 94118<br><br>Receipt for P92 | Employer: Self-employed<br><br>Occupation: Investor<br><br>YTD amount: 250.00 | 12/07/91 | 250.00 |
| Mr. Robert A. Peterson<br>3000 Sand Hill Road<br>Building 1, Suite 140<br>Menlo Park, CA 94025<br><br>Receipt for P92 | Employer: Peterson/Gilmar Inc.<br><br>Occupation: CPA<br><br>YTD amount: 250.00 | 10/09/91 | 250.00 |
| Sub-total receipts this pg: | | | 3500.00 |

SCHEDULE A - ITEMIZED RECEIPTS PAGE: 107 OF 174

Individual Contributions LINE NUMBER 11b

Name of Committee: CRANSTON FOR U.S. SENATE

| Name and Address | | Date | Amount |
|---|---|---|---|
| N. Kenneth Oshman<br>215 Atherton Avenue<br>Atherton CA 94027<br><br>Receipt for GENERAL.92 | Employer: Rohelon Corporation<br><br>Occupation: executive<br><br>YTD amount:1000.00 | 03/30/92 | 1000.00 |
| Joseph F. Ouellette, CLU<br>25 Windsor Drive<br>Hillsborough CA 94025<br><br>Receipt for PRIMARY.92 | Employer: Equitable Life<br><br>Occupation: Insurance sales<br><br>YTD amount:250.00 | 03/31/92 | 250.00 |
| Willard J. Overlock, Jr.<br>1125 Fifth Avenue<br>New York NY 10128<br><br>Receipt for PRIMARY.92 | Employer: information requested<br><br>Occupation: information requested<br><br>YTD amount:500.00 | 03/16/92 | 500.00 |
| DAVID PACKARD<br>1501 Page Mill Road<br>Palo Alto CA 94304<br><br>Receipt for GENERAL.92 | Employer: Hewlett-Packard<br><br>Occupation: Chairman<br><br>YTD amount:1000.00 | 03/30/92 | 1000.00 |
| Eileen E. Padberg<br>23271 Pompeii<br>Monarch Beach CA 92677<br><br>Receipt for PRIMARY.92 | Employer: self-employed<br><br>Occupation: consultant<br><br>YTD amount:300.00 | 03/23/92<br>03/27/92 | 150.00<br>150.00 |
| Raymond J. Paige<br>1251 Montalvo Way, Suite K<br>Palm Springs CA 92262<br><br>Receipt for PRIMARY.92 | Employer: Information requested<br><br>Occupation: Information requested<br><br>YTD amount:500.00 | 03/31/92 | 500.00 |
| Sub-total receipts this pg: | | | 3600.00 |

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SCHEDULE A ITEMIZED RECEIPTS

Page 119 of 295

Contributions from Individuals/Persons Other Than Political Committees

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

NAME OF COMMITTEE (In Full)
Nonchalantin for U.S. Senate 1992

| A. Full Name,Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt this period |
|---|---|---|---|
| Mrs. Grace V. Osberg<br>26939 Leonard Dr.<br>Agoura, CA 91301 | None | 10/22/92 | 200.00 |
| Receipt For: ☐ Primary ☑ General<br>☐ Other (specify): | Occupation<br>Retired | | |
| | Aggregate Year-to-Date >$ | | 200.00 |

| B. Full Name,Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt this period |
|---|---|---|---|
| Mr. David H. Osborne<br>258 Kings Mountain Rd.<br>Woodside, CA 94062 | Requested | 10/24/92 | 250.00 |
| Receipt For: ☐ Primary ☑ General<br>☐ Other (specify): | Occupation<br>Requested | | |
| | Aggregate Year-to-Date >$ | | 250.00 |

| C. Full Name,Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt this period |
|---|---|---|---|
| Mr. Richard C. Overby<br>932 West Park Lane<br>Santa Ana, CA 92706 | None | 10/20/92 | 200.00 |
| Receipt For: ☐ Primary ☑ General<br>☐ Other (specify): | Occupation<br>Retired | | |
| | Aggregate Year-to-Date >$ | | 200.00 |

| D. Full Name,Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt this period |
|---|---|---|---|
| Mr. Richard D. Oxford<br>2248 N. New Hampshire Ave.<br>Los Angeles, CA 90027 | Requested | 11/02/92 | 100.00 |
| Receipt For: ☐ Primary ☑ General<br>☐ Other (specify): | Occupation<br>Requested | | |
| | Aggregate Year-to-Date >$ | | 600.00 |

| E. Full Name,Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt this period |
|---|---|---|---|
| Mr. David Packard<br>PO Box 1330<br>Los Altos, CA 94023 | Requested | 10/27/92 | 500.00 |
| Receipt For: ☐ Primary ☑ General<br>☐ Other (specify): | Occupation<br>Requested | | |
| | Aggregate Year-to-Date >$ | | 500.00 |

| F. Full Name,Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt this period |
|---|---|---|---|
| Mr. Patrick E. Peddon<br>2020 E. First Street, #401<br>Santa Ana, CA 92705 | | 11/06/92 | 1000.00 |
| Receipt For: ☐ Primary ☑ General<br>☐ Other (specify): | Occupation | | |
| | Aggregate Year-to-Date >$ | | 1000.00 |

| G. Full Name,Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt this period |
|---|---|---|---|
| Mr. William Ross Palmer<br>2809 Pacific View Trail<br>Hollywood, CA 90068 | None | 10/29/92 | 250.00 |
| Receipt For: ☐ Primary ☑ General<br>☐ Other (specify): | Occupation<br>Retired | | |
| | Aggregate Year-to-Date >$ | | 250.00 |

| | |
|---|---|
| SUBTOTAL of Receipts This Page (optional) | 2500.00 |
| SUBTOTAL This Period (last page this line number only) | |

SCHEDULE B - ITEMIZED DISBURSEMENTS PAGE: 31 OF 27

REFUNDS TO INDIVIDUALS LINE NUMBER 20A

Name of Committee: CAMPBELL FOR U.S. SENATE

| Name and Address | | Date | Amount |
|---|---|---|---|
| David Packard<br>Hewlett-Packard<br>1501 Page Mill Road<br>Palo Alto CA 94304 | PRIMARY.92 | 07/13/92 | 1000.00 |
| F. Ward Paine<br>290 Mapache Drive<br>Portola Valley CA 94028 | PRIMARY.92 | 07/13/92 | 1000.00 |
| Howard D. Palefsky<br>124 Patricia Drive<br>Atherton CA 94027 | PRIMARY.92 | 07/13/92 | 1000.00 |
| Joan Ramsay Palmer<br>150 Fox Hollow Road<br>Woodside CA 94062 | PRIMARY.92 | 07/13/92 | 1000.00 |
| Robert A. Petersen<br>13039 Palermo Court<br>Saratoga CA 95070 | PRIMARY.92 | 07/13/92 | 1000.00 |
| Thomas P. Pike<br>1475 Circle Drive<br>San Marino CA 91108 | PRIMARY.92 | 07/13/92 | 500.00 |
| Joan R. Platt<br>685 San Martin Place<br>Los Altos CA 94024 | PRIMARY.92 | 07/13/92 | 500.00 |
| Robert R. Pralle<br>Rondell Homes<br>P.O. Box 96<br>Stanton CA 90680 | PRIMARY.92 | 07/13/92 | 1000.00 |
| Joe D. Putnam<br>55 Mission Trail Road<br>Woodside CA 94062 | PRIMARY.92 | 07/13/92 | 1000.00 |
| Mary Lou Putnam<br>55 Mission Trail<br>Woodside CA 94062 | PRIMARY.92 | 07/13/92 | 1000.00 |
| Anita Sue Qureshey<br>7 Foxboro<br>Irvine CA 92714 | PRIMARY.92 | 07/13/92 | 1000.00 |
| Sub-total disbursements this pg: | | | 10000.00 |

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SCHEDULE A ITEMIZED RECEIPTS

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NAME OF COMMITTEE (in Full)

San Francisco Republican County Central Committee Federal Fund

| A. Full Name, Mailing Address and ZIP Code | Name of Employer / Occupation | Date (month, day, year) | Amount of Each Receipt this Period |
|---|---|---|---|
| Helen W O'Hanlon<br>219 States St.<br>San Francisco, Ca 94114<br>Receipt For: ☐ Primary ☑ General ☐ Other (specify) | Aggregate Year-to-Date > $ 250 | 9/20/92 | 250 |
| B. Full Name, Mailing Address and ZIP Code<br>David Packard<br>PO Box 1330<br>Los Altos, Ca 94023<br>Receipt For: ☐ Primary ☑ General ☐ Other (specify) | Aggregate Year-to-Date > $ 500 | 10/27/92 | 500 |
| C. Full Name, Mailing Address and ZIP Code<br>JD Putnam<br>3 California Drive<br>Burlingame, Ca 94010<br>Receipt For: ☐ Primary ☑ General ☐ Other (specify) | Aggregate Year-to-Date > $ 250 | 10/7/92 | 250 |
| D. Full Name, Mailing Address and ZIP Code<br>Toby Rosenblatt<br>3407 Pacific Ave<br>San Francisco, Ca 94118<br>Receipt For: ☐ Primary ☑ General ☐ Other (specify) | Aggregate Year-to-Date > $ 350 | 10/15/92 | 350 |
| E. Full Name, Mailing Address and ZIP Code<br>Charles Schwab<br>101 Montgomery St<br>San Francisco, Ca 94104<br>Receipt For: ☐ Primary ☑ General ☐ Other (specify) | Name of Employer: Charles Schwab, Co<br>Occupation: Investor<br>Aggregate Year-to-Date > $ 500 | 10/28/92 | 125 |
| F. Full Name, Mailing Address and ZIP Code<br>Eugene A Shurtleff<br>1070 Green St. #1402<br>San Francisco, Ca 94133<br>Receipt For: ☐ Primary ☑ General ☐ Other (specify) | Name of Employer: retired<br>Occupation<br>Aggregate Year-to-Date > $ 250 | 10/20/92 | 250 |
| G. Full Name, Mailing Address and ZIP Code<br>James Stanhope<br>2346 East Liego Way<br>Fremont, Ca 94539<br>Receipt For: ☐ Primary ☑ General ☐ Other (specify) | Aggregate Year-to-Date > $ 500 | 10/27/92 | 500 |

SUBTOTAL of Receipts This Page (optional) ..... > 2225

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

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SCHEDULE A — ITEMIZED RECEIPTS

PAGE 1 OF 2

NAME OF COMMITTEE (In Full)
Santa Clara County Republican League Voter Guide (Federal)

| | | | |
|---|---|---|---|
| A. Full Name, Mailing Address and ZIP Code<br>Andrew J. Preston, Jr.<br>1455 Barton Drive<br>Sunnyvale, CA 94087 | Name of Employer<br>T Maker Company | Date (month, day, year)<br>5/26/92 | Amount of Each Receipt this Period<br>550.00 |
| Receipt For: ☒ Primary ☐ General ☐ Other (specify): | Occupation<br>President | Aggregate Year-to-Date $ | 550.00 |
| B. Full Name, Mailing Address and ZIP Code<br>Douglas E. McLean<br>217 Valley Street<br>Los Altos, CA 94022 | Name of Employer<br>Apple Computer | Date (month, day, year)<br>5/24/92 | Amount of Each Receipt this Period<br>1,000.00 |
| Receipt For: ☒ Primary ☐ General ☐ Other (specify): | Occupation<br>Product Manager | Aggregate Year-to-Date $ | 1,000.00 |
| C. Full Name, Mailing Address and ZIP Code<br>Leon T. Hirshon<br>17694 John Telfer Drive<br>Morgan Hill, CA 95037 | Name of Employer<br>Sinsaeum Labs, Inc. | Date (month, day, year)<br>5/23/92 | Amount of Each Receipt this Period<br>450.00 |
| Receipt For: ☐ Primary ☐ General ☐ Other (specify): | Occupation<br>President | Aggregate Year-to-Date $ | 450.00 |
| D. Full Name, Mailing Address and ZIP Code<br>David Packard<br>P.O. Box 1330<br>Los Altos, CA 94023 | Name of Employer<br>Hewlett-Packard Co. | Date (month, day, year)<br>5/27/92 | Amount of Each Receipt this Period<br>5,000.00 |
| Receipt For: ☒ Primary ☐ General ☐ Other (specify): | Occupation<br>Chairman of the Board | Aggregate Year-to-Date $ | 5,000.00 |
| E. Full Name, Mailing Address and ZIP Code<br>Jon Glidden<br>2898 Bryant Street<br>Palo Alto, CA 94306 | Name of Employer<br>Self | Date (month, day, year) | Amount of Each Receipt this Period<br>200.00 |
| Receipt For: ☒ Primary ☐ General ☐ Other (specify): | Occupation<br>Attorney | Aggregate Year-to-Date $ | 200.00 |
| F. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt this Period |
| Receipt For: ☐ Primary ☐ General ☐ Other (specify): | Occupation | Aggregate Year-to-Date $ | |
| G. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt this Period |
| Receipt For: ☐ Primary ☐ General ☐ Other (specify): | Occupation | Aggregate Year-to-Date $ | |
| SUBTOTAL of Receipts This Page (optional) | | | |
| TOTAL This Period (from page 2) | | | |

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| | | | |
|---|---|---|---|
| E. Full Name, Mailing Address and ZIP Code<br>Mr. [redacted]<br>P.O. Box [redacted]<br>Los Altos, CA [redacted] | Name of Employer<br>Federal Express Company<br>Occupation<br>Clerk | Date Issued<br>mo. day, year<br>6/10/95 | Amount of Gift<br>(Amount for Aggregate Year-to-Date)<br>$25.00 |
| Receipt For: ☐ Primary ☐ General<br>☐ Other (specify): | Aggregate Year-to-Date ≥ $ | | |
| E. Full Name, Mailing Address and ZIP Code<br>Mr. [redacted]<br>See attached 17a | Name of Employer<br>Occupation | Date Issued<br>mo. day, year | Amount of Gift<br>(Amount for Aggregate Year-to-Date) |
| Receipt For: ☐ Primary ☐ General<br>☐ Other (specify): | Aggregate Year-to-Date ≥ $ | | |
| E. Full Name, Mailing Address and ZIP Code<br>Intentionally omitted | Name of Employer<br>Occupation | Date Issued<br>mo. day, year | Amount of Gift<br>(Amount for Aggregate Year-to-Date) |
| Receipt For: ☐ Primary ☐ General<br>☐ Other (specify): | Aggregate Year-to-Date ≥ $ | | |
| E. Full Name, Mailing Address and ZIP Code<br>Mr. [redacted]<br>P.O. Box [redacted]<br>Los Altos, CA [redacted] ✓ | Name of Employer<br>Federal Express Company<br>Occupation<br>Clerk | Date Issued<br>mo. day, year<br>6/10/95 | Amount of Gift<br>(Amount for Aggregate Year-to-Date)<br>$25.00 |
| Receipt For: ☐ Primary ☐ General<br>☐ Other (specify): | Aggregate Year-to-Date ≥ $ | | |
| E. Full Name, Mailing Address and ZIP Code<br>Mr. [redacted]<br>See attached 17b | Name of Employer<br>Occupation | Date Issued<br>mo. day, year | Amount of Gift<br>(Amount for Aggregate Year-to-Date) |
| Receipt For: ☐ Primary ☐ General<br>☐ Other (specify): | Aggregate Year-to-Date ≥ $ | | |
| E. Full Name, Mailing Address and ZIP Code<br>Intentionally omitted | Name of Employer<br>Occupation | Date Issued<br>mo. day, year | Amount of Gift<br>(Amount for Aggregate Year-to-Date) |
| Receipt For: ☐ Primary ☐ General<br>☐ Other (specify): | Aggregate Year-to-Date ≥ $ | | |
| E. Full Name, Mailing Address and ZIP Code<br>Mr. [redacted]<br>[redacted]<br>[redacted] | Name of Employer<br>Occupation<br>Retired | Date Issued<br>mo. day, year<br>6/10/95 | Amount of Gift<br>(Amount for Aggregate Year-to-Date)<br>$25.00 |
| Receipt For: ☐ Primary ☐ General<br>☐ Other (specify): | Aggregate Year-to-Date ≥ $ | | |
| SUBTOTAL of Receipts This Page (optional) | | | |
| SUBTOTAL This Period (last page this line number only) | | | |

[illegible]

[illegible] OF ANY POLITICAL [illegible]

| NAME, ADDRESS, CITY, STATE, ZIP | EMPLOYER AND OCCUPATION | RECEIPT DATE | [illegible] |
|---|---|---|---|
| PC [illegible] MRS STEWART W. [illegible] CO 81052 | INFORMATION REQUESTED<br>AGGREGATE YTD 3,000.00 | 04/10/92 | 3,000.00 |
| PC [illegible] JAMES A. [illegible] STREET NY 10014 | INFORMATION REQUESTED<br>AGGREGATE YTD 6,000.00 | 04/27/92 | 6,000.00 |
| PC [illegible] [illegible] BLVD APT [illegible] FL 34242 | RETIRED<br>AGGREGATE YTD 1,000.00 | [illegible] | [illegible] |
| PC [illegible] [illegible] ROBERT W [illegible] TN 38120 | INFORMATION REQUESTED<br>AGGREGATE YTD 1,000.00 | 04/13/92 | 1,000.00 |
| PC [illegible] [illegible] PAUL A. [illegible] FL 34229 | INFORMATION REQUESTED<br>AGGREGATE YTD 550.00 | 04/20/92 | 100.00 |
| PC 000152043 PACIFICO, MR. ALBERT D. [illegible] VALLEY VIEW LANE PELHAM AL 35124 | INFORMATION REQUESTED<br>AGGREGATE YTD 225.00 | 06/25/92 | 25.00 |
| PC 000142750 [illegible] DAVID [illegible] MILL RD PALO ALTO CA 94304 | INFORMATION REQUESTED<br>AGGREGATE YTD 2,000.00 | 04/06/92 | 2,000.00 |

SUBTOTAL OF RECEIPTS THIS PAGE RECEIPT AMOUNT 12,625.00

9 4 0 4 3 5 9 0 0 2 7

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SCHEDULE A - ITEMIZED RECEIPTS



LINE NUMBER 11A

Individual Contributions

Name of Committee: CAMPBELL FOR U.S. SENATE

| Name and Address | | Date | Amount |
|---|---|---|---|
| Mr. David H. Osborne<br>258 Kings Mountain Road<br>Woodside CA 94062<br><br>Receipt for PRIMARY.92 | Employer: Bechtel Investments<br><br>Occupation: Managing Dir.<br><br>YTD amount:750.00 | 04/22/91<br>05/28/91 | 500.00<br>250.00 |
| Ms. Barbara Oshman<br>215 Atherton Avenue<br>[illegible]<br><br>Receipt for PRIMARY.92 | Employer: N/A<br><br>Occupation: volunteer<br><br>YTD amount:1000.00 | 05/02/91 | 1000.00 |
| Mr. M. Kenneth Oshman<br>215 Atherton Avenue<br>Atherton CA 94027<br><br>Receipt for PRIMARY.92 | Employer: Echelon Corporation<br><br>Occupation: executive<br><br>YTD amount:1000.00 | 05/02/91 | 1000.00 |
| Mr. Chuck W. Ott<br>60 Flood Circle<br>Atherton CA 94027<br><br>Receipt for PRIMARY.92 | Employer: McCracken Boeddiker & Ott<br><br>Occupation: Insur. Broker<br><br>YTD amount:1000.00 | 04/23/91<br>05/16/91 | 500.00<br>500.00 |
| Ms. Barbara B. Packard<br>12840 La Vida Real<br>Los Altos Hills CA 94022<br><br>Receipt for PRIMARY.92 | Employer: Hewlett-Packard<br><br>Occupation: engineer<br><br>YTD amount:1000.00 | 04/17/91 | 1000.00 |
| Mr. David Packard<br>Hewlett-Packard<br>1501 Page Mill Road<br>Palo Alto CA 94304<br><br>Receipt for PRIMARY.92 | Employer: Hewlett-Packard<br><br>Occupation: Chairman<br><br>YTD amount:1000.00 | 06/04/91 | 1000.00 |
| Sub-total receipts this pg: | | | 5750.00 |

SCHEDULE A-P

## ITEMIZED RECEIPTS

| Use separate schedule(s) for each category of the Detailed Summary Page | PAGE 3rd | OF THIS PAGE 4th |
|---|---|---|
| | FULL NAME (Last, First, Middle Initial) Ellis | |

NAME OF COMMITTEE (In Full)
BASS-CASTLE '92 PRIMARY 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, ADDRESS, CITY, STATE, ZIP CODE | NAME OF EMPLOYER / OCCUPATION / AGGREGATE YEAR-TO-DATE | RECEIPT FOR: Primary / General | DATE (MO., DAY, YEAR) | AMOUNT OF EACH RECEIPT THIS PERIOD |
|---|---|---|---|---|
| Patel, Mr. Bhaskar J.<br>3420 Marina Parkway, Ste. 19<br>New Port Richey, FL 34652 | Info Requested<br>Info Requested<br>$1,000.00 | | 02/20/92 | $1,000.00 |
| Mr. Rose, Ms. Elaine<br>2200 Baldwin Avenue<br>Hillsborough, CA 94010 | Info Requested<br>Info Requested<br>$1,000.00 | | 02/10/92 | $1,000.00 |
| Smith, Mr. Richard D.<br>1100 Kenny Building<br>120 North Market<br>Wichita, KS 67202 | Range Oil Co.<br>President<br>$1,000.00 | | 02/10/92 | $1,000.00 |
| Laughlin, Mr. William P.<br>720 Mountain View Road<br>Woodside, CA 94062 | Info Requested<br>Info Requested<br>$1,000.00 | | 02/10/92 | $1,000.00 |
| Reid, Mr. Robert G.<br>4001 Stark Systems Drive<br>Charlotte, NC 28226 | Republic<br>President<br>$1,000.00 | | 02/10/92 | $1,000.00 |
| Wilson, Mrs. D.<br>965 Green St.<br>San Francisco, CA 94133 | Info Requested<br>Info Requested<br>$1,000.00 | | 02/10/92 | $1,000.00 |
| [illegible], Mr. [illegible]<br>P.O. Box 1330<br>Los Altos, CA 94023 | Info Requested<br>Info Requested<br>$1,000.00 | | 02/10/92 | $1,000.00 |
| [illegible], Mr. Gary F.<br>140 S. Greenfield<br>Los Angeles, CA 90049 | Info Requested<br>Info Requested<br>$1,000.00 | | 02/10/92 | $1,000.00 |
| SUBTOTAL OF RECEIPTS THIS PAGE (optional) | | | | $8,000.00 |
| TOTAL THIS PERIOD (last page this line number only) | | | | |

*=Contribution or Redesignation Requested

9404359003029

22-37393468

SCHEDULE A — ITEMIZED RECEIPTS — Form Number 11A

Statement Covers Period from 01/01/91 through [illegible]

Name of Committee: FRIENDS OF CONGRESSMAN BILL LOWERY

| | Employer | Date | Amount |
|---|---|---|---|
| Jon E. Norby<br>P. O. Box 155<br>North Fork CA 93643<br>Receipt For: Primary | North Lumber Co., Inc.<br>Occupation: L.P. Executive<br>Aggregate YTD: $ 250.00 | 08/14/91 | $ [illegible] |
| David Huffer<br>874 Cordova Street<br>San Diego CA 92107<br>Receipt For: Primary | Employer<br>Huffer, Smith, Tucker<br>Occupation: CEO<br>Aggregate YTD: $ 500.00 | Date<br>11/14/91 | Amount<br>$ 500.00 |
| William W. Osborne<br>8110 Vista de la Mesa<br>La Jolla CA 92037<br>Receipt For: Primary | Employer<br>Self<br>Western Data Products<br>Occupation: Consultant<br>Aggregate YTD: $ 250.00 | Date<br>11/22/91 | Amount<br>$ 250.00 |
| David Packard<br>[illegible] Teaffe Road<br>Los Altos Hills CA 94022<br>Receipt For: Primary | Employer<br>Hewlett-Packard Company<br>Occupation: Chairman<br>Aggregate YTD: $ 500.00 | Date<br>08/14/91 | Amount<br>$ 500.00 |
| Jean W. Farms<br>5316 Calle Mejorca<br>La Jolla CA 92037<br>Receipt For: Primary | Employer<br>Coast Distributing Company<br>Occupation: Administrator<br>Aggregate YTD: $ 1,000.00 | Date<br>11/22/91 | Amount<br>$ 1,000.00 |
| Steven R. Pingel<br>1810 S. Folkstone Avenue<br>Hacienda Heights CA 91745<br>Receipt For: Primary | Employer<br>Self<br>Steven R. Pingel, Law Off.<br>Occupation: Attorney<br>Aggregate YTD: $ 1,000.00 | Date<br>11/19/91 | Amount<br>$ 800.00 |
| Steven R. Pingel<br>1810 S. Folkstone Avenue<br>Hacienda Heights CA 91745<br>Receipt For: General | Employer<br>Self<br>Steven R. Pingel, Law Off.<br>Occupation: Attorney<br>Aggregate YTD: $ 1,200.00 | Date<br>11/19/91 | Amount<br>$ 200.00 |
| Mrs. Judith Powell<br>2005 Paloma Circle<br>La Jolla CA 92037<br>Receipt For: Primary | Employer<br>N/A<br>Occupation: Housewife<br>Aggregate YTD: $ 250.00 | Date<br>12/03/91 | Amount<br>$ 250.00 |

SUBTOTAL of Receipts This Page..... $ 3,750.00

SCHEDULE A - ITEMIZED RECEIPTS PAGE: 1 OF 14

Individual Contribution LINE NUMBER 11A

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

Name of Committee: TOM HUENING FOR CONGRESS

| Name and Address | | Date | Amount |
|---|---|---|---|
| David Packard<br>1501 Page Mill Road<br>Palo Alto, CA 94304<br>Receipt for General 1992 | Employer: Hewlett Packard Company<br>Occupation: Executive<br>YTD amount: 500.00 | 06/20/92 | 500.00 |
| Kenneth Fisher<br>301 Emerik Ibsen Road<br>Woodside, CA 94062<br>Receipt for General 1992 | Employer: Fisher Investments<br>Occupation: Investment Advisor<br>YTD amount: [illegible] | 06/03/92 | 1000.00 |
| Sherrilyn Fisher<br>301 Emerik Ibsen Road<br>Woodside, CA 94062<br>Receipt for General 1992 | [illegible] | 06/03/92 | 1000.00 |
| Kathryn Hungy<br>410 Remillard Drive<br>Millsborough, CA 94010<br>Receipt for General 1992 | Employer: N/A<br>Occupation: Homemaker<br>YTD amount: 1000.00 | 06/03/92 | 1000.00 |
| Joseph Toma<br>410 Remillard Drive<br>Millsborough, CA 94010<br>Receipt for General 1992 | Employer: Fisher Investments<br>Occupation: Investment Advisor<br>YTD amount: 1000.00 | 06/03/92 | 1000.00 |
| Jeff Silk<br>13000 Skyline Blvd.<br>Woodside, CA 94062<br>Receipt for General 1992 | Employer: Fisher Investments<br>Occupation: Investment Advisor<br>YTD amount: 1000.00 | 06/03/92 | 1000.00 |

Sub-total receipts this pg: $5500.00

92014600966

SCHEDULE A — ITEMIZED RECEIPTS

PAGE 20 OF

For Line Number 11(a)(i)

Contributions From Individuals/Persons

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

Name of Committee: Bill Baker for Congress — C00256599

| Full Name, Address and ZIP Code | Name of Employer / Occupation | Date | Amount |
|---|---|---|---|
| F. Allan Chapman<br>3471 Skylane<br>Lafayette, CA 94549 | Chapman & Wilson, Inc.<br>Real Estate | 09/19/92 | $250.00 |
| Receipt for: Primary X General Other — Year-to-date: $790.00 | | 07/17/92 | $1,000.00 |
| Pattie Scarbrough<br>P.O. Box 1547<br>San Ramon, CA 94583 | Burger King Franchise<br>Owner | 09/19/92<br>09/19/92 | $125.00<br>$125.00 |
| Receipt for: Primary X General Other — Year-to-date: $875.00 | | | |
| David Packard<br>P.O. Box 1330<br>Los Altos, CA 94023 | Hewlett-Packard Co.<br>Chmn Of Board | 09/30/92 | $500.00 |
| Receipt for: Primary X General Other — Year-to-date: $750.00 | | | |
| Ori Eliahu<br>165 Wilson Rd.<br>Alamo, CA 94507 | Bogeo, Inc.<br>Engineer | 07/11/92 | $250.00 |
| Receipt for: Primary X General Other — Year-to-date: $250.00 | | | |
| Raymond R. Galvin<br>83 Sandara Ranch Rd.<br>Moraga, CA. 94556 | Chevron<br>Management | 07/11/92 | $500.00 |
| Receipt for: Primary X General Other — Year-to-date: $500.00 | | | |
| Bruce Frolich<br>37 Bear Ridge Rd.<br>Orinda, CA 94563 | Chevron<br>Manufacturing | 07/11/92 | $500.00 |
| Receipt for: Primary X General Other — Year-to-date: $500.00 | | | |

SUBTOTAL of Receipts this Page — $3,250.00

940436900132

SCHEDULE A — ITEMIZED RECEIPTS

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)

THE LINCOLN CLUB OF NORTHERN CALIFORNIA

| 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 |
|---|---|---|---|
| A. J. DENNIS MC QUAID<br>1 MARITIME PLAZA, STE 2300<br>SAN FRANCISCO, CA<br>Receipt For: ☐ Primary ☐ General ☒ Other (specify) | KELLE MAHIN & CATE<br>ATTORNEY<br>$ 1200.00 | 01/10/92 | 1200.00 |
| B. BRAYTON WILBUR, JR<br>320 CALIFORNIA ST<br>SAN FRANCISCO, CA 94104<br>Receipt For: ☐ Primary ☐ General ☒ Other (specify) | WILBUR-ELLIS CO<br>BUSINESSMAN<br>$ 1200.00 | 01/10/92 | 1200.00 |
| C. TED J BALESTRERI<br>765 WAVE STREET<br>MONTEREY CA 93940<br>Receipt For: ☐ Primary ☐ General ☒ Other (specify) | SELF<br>REAL ESTATE DEVELOP<br>$ 1200.00 | 01/10/92 | 1200.00 |
| D. CHARLES N HUGGINS<br>350 FAMILY FARM ROAD<br>WOODSIDE CA 94062<br>Receipt For: ☐ Primary ☐ General ☒ Other (specify) | SEAS CANDY SHOPS<br>PRESIDENT & CEO<br>$ 1200.00 | 01/10/92 | 1200.00 |
| E. W S LOWENBERG<br>44 MONTGOMERY<br>SAN FRANCISCO CA 94104<br>Receipt For: ☐ Primary ☐ General ☒ Other (specify) | LOWENBERG CORP<br>REAL ESTATE<br>$ 1200.00 | 01/10/92 | 1200.00 |
| F. DAVID PACKARD<br>501 PAGE MILL ROAD<br>PALO ALTO CA 94304<br>Receipt For: ☐ Primary ☐ General ☒ Other (specify) | HEWLETT-PACKARD<br>CHM OF THE BOARD<br>$ 1200.00 | 01/10/92 | 1200.00 |
| G. JAMES E WICKERSHAM<br>15 GLEN ALPINE ROAD<br>PIEDMONT CA 94611<br>Receipt For: ☐ Primary ☐ General ☒ Other (specify) | TRIANGLE T RANCH<br>RANCHER<br>$ 1200.00 | 01/10/92 | 1200.00 |
| SUBTOTAL of Receipts This Page (optional) | | | 8,400.00 |
| TOTAL This Period (last page this line number only) | | | |

0 0 4 0 4 3 5 0 0 0 2 3 3 7 5 1 4 3 6 3

SCHEDULE A ITEMIZED RECEIPTS

Contributions from Individuals/Persons Other Than Political Committees

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

NAME OF COMMITTEE (in Full)
CALIFORNIA REPUBLICAN PARTY/VICTORY'92 [illegible]

| | | | |
|---|---|---|---|
| A. Full Name, Mailing Address and ZIP Code<br>Mr. PACKARD, DAVID<br>P.O. Box 1330<br>Los Altos, CA 94023<br>Receipt For: ☐ Primary ☐ General ☐ Other (specify): | Name of Employer<br>Hewlett Packard Company<br>Occupation<br>Chairman<br>Aggregate Year-to-Date >0 | Date (month, day, year)<br>06/12/92<br>$[illegible] | Amount of Each Receipt this period<br>$[illegible] |
| B. Full Name, Mailing Address and ZIP Code<br>Restribution<br>SEE ATTACHED 17a<br>Receipt For: ☐ Primary ☐ General ☐ Other (specify): | Name of Employer<br>Occupation<br>Aggregate Year-to-Date >0 | Date (month, day, year) | Amount of Each Receipt this period |
| C. Full Name, Mailing Address and ZIP Code<br>INTENTIONALLY OMITTED<br>Receipt For: ☐ Primary ☐ General ☐ Other (specify): | Name of Employer<br>Occupation<br>Aggregate Year-to-Date >0 | Date (month, day, year) | Amount of Each Receipt this period |
| D. Full Name, Mailing Address and ZIP Code<br>Mr. PACKARD, DAVID<br>P.O. Box 1330<br>Los Altos, CA 94023<br>Receipt For: ☐ Primary ☐ General ☐ Other (specify): | Name of Employer<br>Hewlett Packard Company<br>Occupation<br>Chairman<br>Aggregate Year-to-Date >0 | Date (month, day, year)<br>06/12/92<br>$[illegible] | Amount of Each Receipt this period<br>$[illegible] |
| E. Full Name, Mailing Address and ZIP Code<br>Restribution<br>SEE ATTACHED 17b<br>Receipt For: ☐ Primary ☐ General ☐ Other (specify): | Name of Employer<br>Occupation<br>Aggregate Year-to-Date >0 | Date (month, day, year) | Amount of Each Receipt this period |
| F. Full Name, Mailing Address and ZIP Code<br>INTENTIONALLY OMITTED<br>Receipt For: ☐ Primary ☐ General ☐ Other (specify): | Name of Employer<br>Occupation<br>Aggregate Year-to-Date >0 | Date (month, day, year) | Amount of Each Receipt this period |
| G. Full Name, Mailing Address and ZIP Code<br>Mr. PALMER, [illegible]<br>[illegible] Sand Dune Road<br>Rancho Mirage, CA [illegible]<br>Receipt For: ☐ Primary ☐ General ☐ Other (specify): | Name of Employer<br>Occupation<br>Retired<br>Aggregate Year-to-Date >0 | Date (month, day, year)<br>06/15/92<br>$[illegible] | Amount of Each Receipt this period<br>$[illegible] |
| SUBTOTAL of Receipts This Page (optional) | | | $[illegible] |
| SUBTOTAL This Period Sent page this line number only | | | |

9404359003

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 28, 1994

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

RE: MUR 3891

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 David Packard, California Republican Party/Victory '92 and Paul Hancock, as treasurer, the San Francisco Republican County Central Committee and Stephen Mayer, as treasurer, Campbell for U.S. Senate and Robert Petersen, as treasurer, and Tom Huening for Congress and Robert Petersen, as treasurer. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 3891. 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

9404359003 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 28, 1994

David Packard
P.O. Box 1330
Los Altos, CA 94023

RE: MUR 3891

Dear Mr. Packard:

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 3891. 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.

9404350600316

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. Takaar

Mary L. Takaar, Attorney
Central Enforcement Docket

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

9404359000037

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 28, 1994

Paul Hancock, Treasurer
California Republican Party/Victory '92
1903 West Magnolia Blvd.
Burbank, CA 91506

RE: MUR 3891

Dear Mr. Hancock:

The Federal Election Commission received a complaint which indicates that the California Republican Party/ Victory '92 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 3891. 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 California Republican Party/Victory '92 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.

9404359003 8

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

9404359039

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

January 28, 1994

Stephen Mayer, Treasurer
San Francisco Republican
County Central Committee
540 Van Ness Avenue
San Francisco, CA 94102

RE: MUR 3891

Dear Mr. Mayer:

The Federal Election Commission received a complaint which indicates that the San Francisco Republican County Central 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 3891. 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.

9404359040

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

9404359004 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 28, 1994

Robert Petersen, Treasurer
Campbell for U.S. Senate
3000 Sand Hill Road
Building 3, Suite 140
Menlo Park, CA 94025

RE: MUR 3891

Dear Mr. Petersen:

The Federal Election Commission received a complaint which indicates that Campbell for US Senate 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 3891. 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 Campbell for US Senate 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.

9404359004 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

9404359600043

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 28, 1994

Robert Petersen, Treasurer
Tom Huening for Congress
3000 Sand Hill Road
Building 3, Suite 140
Menlo Park, CA 94025

RE: MUR 3891

Dear Mr. Petersen:

The Federal Election Commission received a complaint which indicates that Tom Huening for Congress 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 3891. 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 Tom Huening for Congress 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.

9404359004

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, Attorney
Central Enforcement Docket

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

9404359004S

LAW OFFICES OF
NIELSEN, MERKSAMER,
PARRINELLO, MUELLER & NAYLOR
A PARTNERSHIP INCLUDING A PROFESSIONAL CORPORATION
591 REDWOOD HIGHWAY, #4000
MILL VALLEY, CALIFORNIA 94941
TELEPHONE (415) 389-6800

SAN FRANCISCO
[illegible] CALIFORNIA STREET, SUITE [illegible]
SAN FRANCISCO, CALIFORNIA [illegible]
TELEPHONE (415) [illegible]

February 11, 1994

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
94 FEB 14 PM 12:17

VIA FAX

Joan McEnery
General Counsel's Office
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: MUR 3891

Dear Ms. McEnery::

We represent the California Republican Party ("CRP") in matters relating to political and election law. On February 3, 1994, the CRP received a letter from your office regarding a complaint against David Packard for possibly violating the annual limitation on contributions to federal candidates. The letter asks for our response within 15 days of its receipt, or by February 18, 1994.

Although the CRP did in fact receive a contribution from Mr. Packard during the year in question, we do not understand why you have asked us to respond to a complaint against Mr. Packard for his alleged violation of the FECA. We have tried to contact the FEC attorney in charge of this MUR on several occasions, but have been unable to reach him or her.

We would very much appreciate hearing from the appropriate attorney by Tuesday, February 15, to explain how we are implicated in this MUR, so that we will have adequate time to prepare a response by the 18th.

Thank you very much for your cooperation,

Sincerely,

James R. Sutton

James R. Sutton

JRS/dc
Enclosure
5363.01

cc: Michael Schroeder, Esq.
CRP Treasurer

9404359004 6

FPPC 3831

NAME OF COUNSEL: James R. Sutton

ADDRESS: Nielsen, Merksamer, Parrinello, Mueller & Naylor
591 Redwood Highway, #4000
Mill Valley, CA 94941

TELEPHONE: ( 415 ) 389-6800

94 FEB 14 PM 12:

FILED
FAIR POLITICAL PRACTICES COMMISSION
OFFICE OF GENERAL COUNSEL

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

James R. Sutton
Signature

RESPONDENT'S NAME: California Republican Party

ADDRESS: 1903 W. Magnolia Blvd.
Burbank, CA 91506

TELEPHONE: HOME( ) n/a
BUSINESS( 818 ) 841-5210

9404359000047

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

PETERSEN/GINNER, INC.
CERTIFIED PUBLIC ACCOUNTANTS

RECEIVED
FEDERAL ELECTION COMMISSION
94 FEB 16 PM 2:27

February 12, 1994

Federal Election Commission
Washington, D.C. 20463

Certified Mail -
Return Receipt Requested

Attention: Mary L. Taksar, Attorney
Central Enforcement Docket

RE: MUR 3891

I am responding to your letter of January 28, 1994, addressed to me as Treasurer of the Tom Huening For Congress committee. Your letter, which was received by me on February 3, 1994, suggests that the Commission had received a complaint that the committee, and I as its treasurer, may have violated the Federal Campaign Act of 1971. The complaint which was enclosed with the Commission's letter of January 28, 1994, was a complaint against David Packard as respondent, not the Tom Huening For Congress committee, or me as its Treasurer. The complaint against David Packard suggests that aggregate contributions were made in excess of the limits permitted by the FEC.

Neither I or the Tom Huening For Congress committee represent David Packard. I have carefully reviewed the listing of contributions attributed to 1992 for David Packard. The only contributions which the Tom Huening For Congress committee received from David Packard were a $1,000 contribution received on December 1, 1991, for the primary campaign, and two contributions of $500 each received on May 20, 1992, and September 30, 1992, for the general campaign. These receipts were timely disclosed in reports previously filed with the Commission.

The complaint against David Packard also shows a $500 contribution being received by the Tom Huening For Congress committee on October 19, 1992. This was not received from David Packard (employed by Hewlett-Packard Co.). It was received from David W. Packard, Jr. (employed by Ibycus, Inc.) and was correctly reported for the general election in prior submissions filed with the FEC.

3000 Sand Hill Road, Bldg. 3, Suite 140, Menlo Park, CA 94025
Telephone: 415/854-8080 FAX: 415/854-9354

9404359004 8

I have also carefully reviewed the other recipients as listed on Exhibit 1 of the complaint filed against David Packard. None of the other organizations were controlled directly, or indirectly, by Tom Huening, the Tom Huening For Congress committee, or myself.

Respectfully submitted,

Robert A. Petersen, Treasurer
Tom Huening For Congress

CC: Tom Huening, Esquire
with copy of FEC submission
of January 28, 1994

9404359000049

STRATHMORE PRINTING
25% COTTON FIBER

RECEIVED
FEDERAL ELECTION COMMISSION
94 FEB 16 PM 2:23

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

PETERSEN/GINNER, INC.
CERTIFIED PUBLIC ACCOUNTANTS

February 12, 1994

Federal Election Commission
Washington, D.C. 20463

Certified Mail -
Return Receipt Requested

Attention: Mary L. Taksar, Attorney
Central Enforcement Docket

RE: MUR 3891

I am responding to your letter of January 28, 1994, addressed to me as Treasurer of the Campbell for U.S. Senate committee. Your letter, which was received by me on February 3, 1994, suggests that the Commission had received a complaint that the committee, and I as its treasurer, may have violated the Federal Campaign Act of 1971. The complaint which was enclosed with the Commission's letter of January 28, 1994, was a complaint against David Packard as respondent, not the Campbell for U.S. Senate committee, or me as its Treasurer. The complaint against David Packard suggests that aggregate contributions were made in excess of the limits permitted by the FEC.

Neither I or the Campbell for U.S. Senate committee represent David Packard. I have carefully reviewed the listing of contributions attributed to 1992 for David Packard. The only contribution which the Campbell for U.S. Senate committee received and retained was a $1,000 contribution received on June 4, 1991, for the primary campaign. We did receive a second contribution of $1,000 on March 30, 1992 for the general election, and this was returned to David Packard on July 13, 1992, when it was determined that Thomas J. Campbell would not be a candidate in the general election. These receipts and the refund were timely disclosed in reports previously filed with the Commission.

I have also carefully reviewed the other recipients as listed on Exhibit 1 of the complaint filed against David Packard. None of the other organizations were controlled directly, or indirectly, by Thomas J. Campbell, the Campbell for U.S. Senate committee, or myself.

Respectfully submitted,

Robert A. Petersen, Treasurer
Campbell for U.S. Senate

CC: Thomas J. Campbell, Esquire
with copy of FEC submission
of January 28, 1994

3000 Sand Hill Road, Bldg. 3, Suite 140, Menlo Park, CA 94025
Telephone: 415/854-8060 FAX: 415/854-9354

9404350050

RECEIVED
FEDERAL ELECTION
COMMISSION
ADMINISTRATIVE DIVISION
FEB 22 10 58 AM '94

LAW OFFICES OF
PILLSBURY MADISON & SUTRO
POST OFFICE BOX 7880
SAN FRANCISCO, CALIFORNIA 94120
TELEPHONE (415) 983-1000
TELECOPIER (415) 398-2096

LOS ANGELES
SAN JOSE
WASHINGTON, D.C.
SAN DIEGO
ORANGE COUNTY
SACRAMENTO
MENLO PARK
TOKYO

WRITER'S OFFICE AND
DIRECT DIAL NUMBER

235 Montgomery Street
(415) 983-1968

February 18, 1994

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF
94 FEB 22 PM 5:07

VIA FEDERAL EXPRESS

Ms. Mary L. Taksar
Attorney
Central Enforcement Docket
999 E Street, N.W.
Federal Election Commission
Washington, D.C. 20463

Re: Matter Under Review Number 3891

Dear Ms. Taksar:

This firm represents David Packard. I have enclosed a Statement of Designation of Counsel designating Fred Lowell and the undersigned to act as counsel on behalf of Mr. Packard.

This letter responds to your letter dated January 28, 1994, as well as the Complaint filed by the Center for Responsive Politics against Mr. Packard (the "Complaint") for violation of the $25,000 annual limit for 1992. 2 U.S.C. § 441a(a)(3).

We have reviewed Mr. Packard's records with respect to campaign contributions attributable to the 1992 election year, as well as the "Summary of FEC Data" (Complaint Exhibit 1). With respect to the contributions listed on Exhibit 1, we draw your attention to the following:

1. Santa Clara County Republican League. Mr. Packard made a campaign contribution in the amount of $5,000 to the "Santa Clara Republican League Voter Guide" on May 27, 1992. Neither the solicitation letter nor the acknowledgment letter from the committee contained any notice that the contribution would be used in connection with a federal election. The solicitation included the identification number for a state committee, and Mr. Packard included that state identification number on his contribution check.



9404359005 1

Attorneys for the Santa Clara Republican League Voter Guide have informed me that since the committee supported both state and federal candidates, some receipts from individuals were allocated to a "federal" account. Both the federal and state accounts of this committee have been terminated. Therefore, it has been impossible to obtain a reimbursement for the contribution paid to this committee.

I have enclosed copies of the solicitation letters, the acknowledgment letter and the campaign contribution check. (See Exhibit A.)

2. San Francisco Republican County Central Committee--Federal Fund. On October 19, 1992, Mr. Packard made a campaign contribution in the amount of $1,000 to the "San Francisco Republican Party". Again, neither the solicitation nor the acknowledgment letter contained any reference to the fact that the contribution would be used in connection with federal elections. The solicitation material only included a state identification number, and Mr. Packard included that state identification number on his contribution check.

In subsequent conversations with the committee, I have been informed that $500 of Mr. Packard's $1,000 contribution was allocated to the "federal" committee of the county central party. The other $500 was allocated to the "state" committee. Subsequently, the committee has amended its reports to reflect that the total $1,000 should have been allocated to the state committee.

I am including the original correspondence between Mr. Packard and the committee, as well as a letter from the committee, discussing the subsequent reallocation. (See Exhibit B.)

3. President's Dinner. On October 26, 1992, Mr. Packard made a campaign contribution in the amount of $20,000 to "The Presidential Trust". When it came to Mr. Packard's attention that this contribution had been allocated to the federal account of the Republican National Committee, instead of the state elections account (a non-federal account), he requested and received reimbursement therefor.

I enclose correspondence from the Republican National Committee along with a copy of the reimbursement check. (See Exhibit C.)



9404359005 2

If we may be of any further assistance to you on this matter, please do not hesitate to contact me.

Very truly yours,

Teresa Craigie Lahaderne

cc: Mr. David Packard

Mr. F. H. Roberts
Mr. F. K. Lowell

9404359000053

# STATEMENT OF DESIGNATION OF COUNSEL

MUR: 3891

NAME OF COUNSEL: Teresa C. Lahaderne
Frederick K. Lowell

ADDRESS: 225 Bush Street
San Francisco, CA 94104

TELEPHONE: (415) 983-1968
(415) 983-1585

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

Date Feb 9, 1994 Signature David Packard

RESPONDENT'S NAME: David Packard

ADDRESS: 26580 Taaffe Road
Los Altos Hills, CA 94022

BUSINESS PHONE: (415) 857-2627

9404359005 4

11583214

IN RE CENTER FOR RESPONSIVE POLITICS V. DAVID PACKARD

MUR NO. 3891

EXHIBITS A THROUGH C

9404359000555

February 18, 1994

[illegible] on State List for '92

[illegible] 2256

May 27, [illegible] 92

[illegible] League Voter | $ 5,000.00

[illegible]

[illegible]

[illegible]

# California Legislature

STATE SENATOR
REBECCA Q. MORGAN
ELEVENTH DISTRICT

Kirkwood

May 15, 1992

Mr. David Packard
26580 Taaffe Road
Los Altos Hills, California 94022

Dear David,

Two years ago in the Republican primary election in San Diego, a small group of religious right and anti-choice activists took control of the San Diego Republican Party in a stunning upset. Their strategy -- using "stealth candidates" to win in low visibility races -- is now being attempted in Santa Clara County.

First, let me remind you that the Santa Clara County Republican Central Committee is our official Republican Party here in Santa Clara County. In recent years, it has operated one of the state's most successful Republican voter registration programs. It provides the heart of our local GOP absentee ballot and voter turn-out activities.

Now a narrow group of religious right and anti-choice activists seeks to control our Party in Santa Clara County. You and I know that this would be a disaster, since it would discourage participation by the pro-choice Republican majority we have in the County.

To prevent this takeover, I have joined with Congressmen Tom Campbell, former Congressman Ed Zschau, and Assemblyman Chuck Quackenbush in endorsing the attached group of 20 candidates for Republican County Committee. They will work to include the diverse Republican constituencies of Santa Clara County in a broad-based Republican Party.

However, we need your help to get word out to the voters. Please send your most generous contribution to the Santa Clara Republican League Voter Guide, a slate mail organization (ID# 590015) that will publicize our endorsements in this important election. With your help we can build a Republican Party we can be proud of.

Sincerely,

Becky

Rebecca Q. Morgan
State Senator

I look forward to seeing you on Sunday and hope you can help. Becky

Paid for by Morgan for Senate '92 ID [illegible]

MAY 1 8 1992

9 4 0 4 3 5 9 0 0 5 6

# Senate
# California Legislature

STATE SENATOR
REBECCA Q. MORGAN
ELEVENTH DISTRICT

5.21

Kitimood

May 15, 1992

Mr. David Packard
26580 Taaffe Road
Los Altos Hills, California 94022

Dear David,

Two years ago in the Republican primary election in San Diego, a small group of religious right and anti-choice activists took control of the San Diego Republican Party in a stunning upset. Their strategy -- using "stealth candidates" to win in low visibility races -- is now being attempted in Santa Clara County.

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Sincerely,

Becky

Rebecca Q. Morgan
State Senator

I look forward to seeing you on Sunday & hope you can help. Becky

Paid for by Morgan for Senate '92 ID #890213

MAY

9 4 0 4 3 5 9 0 0 5 7

# Santa Clara County Republican Central Committee Candidates

## 1st District

Judy Purrington—Chair, Santa Clara County Young Republicans. Member, Santa Clara County Republican Central Committee.

Egon Jensen—Vice Chairman, Santa Clara County Republican Central Committee. Former Los Gatos Town Councilman.

Bob Booth—Chairperson, North Valley Private Industry Council (NOVA PIC). Past Member, Personnel Board for Town of Los Gatos. Past Chair, Industrial Advisory Board, Center for Employment Training. Served as Loaned Executive to United Way of Santa Clara County. Member, Republican Presidential Task Force.

Steve Blanton—Los Gatos Town Councilman. Member, Santa Clara County Republican Central Committee. Instructor, West Valley Community College.

## 2nd District

Maggie Bludau—Former Director, San Jose Downtown Association. Commercial Real Estate Agent, Ritchie & Ritchie. Alternate Member, Santa Clara County Republican Central Committee.

Mike Rothenberg—Chemical Engineer. Technical Staff Member, Bay Area Air Quality Management District. Santa Clara County Transportation Commissioner. Member, Jacob Javits Republican Club.

## 3rd District

Reynold Schweickhardt—Project Manager, Hewlett-Packard Co. Past President, California Republican League. Member/Parliamentarian, Santa Clara County Republican Central Committee.

M. Phyllis Parks—Businesswoman. Former Chapter President, National Association of Women in Construction. Experienced Campaign Treasurer. Active with California Republican League and Libertarian Republicans. Alternate Member, Santa Clara County Republican Central Committee.

Sheila Scobba—Marketing Projects Coordinator, San Jose Convention Center. Former Project Manager for new park development for San Jose Recreation, Parks and Community Services Department. Alternate Member, Santa Clara County Republican Central Committee.

Lori Kennedy—Principal, Kennedy Financial. Executive Vice President, California Republican League. Member, Santa Clara County Republican Central Committee.

## 4th District

Val Smullen—Accountant. Chair, Santa Clara County Republican Central Committee. Member, Cupertino/Santa Clara Republican Women Federated.

Brian Sloan—District Manager, Kinder Care, Inc., a national child care service provider. Former Member, West Valley Community College Board of Trustees. Region Vice President, California Young Republicans. Executive Committee, Young Republican National Federation. Treasurer, Santa Clara County Republican Central Committee.

Chris Reynolds—Field Representative, Assemblyman Chuck Quackenbush.

Stacy Bloom—Board of Directors & Officer, Santa Clara County Young Republicans. Alternate Member, Santa Clara County Republican Central Committee.

## District 5

Roger Riffenburgh—Software Engineer. Secretary, Santa Clara County Republican Central Committee. Former Executive Vice President, California Republican League. Santa Clara County Steering Committee, Pete Wilson for Governor.

Andrew J. Preston, Jr.—President and Chief Operating Officer, T/Maker Company, a Silicon Valley software development firm. Board of Directors & Officer, Santa Clara County Young Republicans. Member, Santa Clara County Republican Central Committee.

Gloria Hom—Economics Professor, Mission College. Member, California State University Board of Trustees. Member, Santa Clara County Republican Central Committee.

Luis Buhler—Treasurer, Trans Ocean Ltd., an international transportation equipment leasing company. Executive Committee, Lincoln Club of Northern California. Chairman, California Republican League Committee of 100. Santa Clara County Co-Chair, Pete Wilson for Governor.

Linda Weinstein—Registered Nurse at Santa Clara County Jail. Activities include Girl Scouts of America and programs to prevent sexual assault. Member, Jacob Javits Republican Club. Associate Member, California Republican Party.

John Williams—President, Woodside Consulting Group. Projects include Peninsula and Southern California commuter rail service. Member, Regional Railroads of America. Member, Transportation Research Forum. Active financial supporter of State and National Republican Party, and numerous GOP candidates including Pete Wilson, Tom Campbell, John Seymour and Becky Morgan.

94043590058

# California Republican League

7/10

July 6, 1992

David Packard
1501 Page Mill Road
Palo Alto, CA 94304

Dear Mr. Packard:

Thank you very much for your generous help with the Santa Clara Republican League Voter Guide. The results from around the State make clear that without our active candidate recruitment and campaign efforts the local Republican party would have been overwhelmingly controlled by the narrow ideological forces. In neighboring counties where a campaign such as ours was not attempted, very few mainstream Republicans were elected. In Santa Clara County, ten of our endorsed candidates will take office in January.

It was your efforts that made possible this effective campaign. I am very grateful to you for your dedication and commitment which enabled us to reach the voter with slate mail and newspaper advertisements. The battle for the soul of our party continues. Thank you again for your contribution.

Sincerely,

Luis Buhler

Luis Buhler

940435900059

989 Edgewater Boulevard #274, Foster City, CA 94404

2360

92

1,000.00

Campaign Finance Laws Require the Following Information:

Name DAVID PACKARD

Address 1501 PAGE MILL ROAD

City/State/Zip PALO ALTO, CA 94304

Home Phone _____ Business 415-857-2627

Occupation CHAIRMAN OF THE BOARD

Employer HEWLETT-PACKARD COMPANY

Please make checks payable to the San Francisco Republican Party.

Contributions to the San Francisco Republican Party are not deductible as charitable contributions for federal or state income tax purposes. I.D. #[illegible]

For additional information, please contact: Mary Lewis at 415/[illegible].

9 4 0 4 3 5 9 0 0 6 0

Report Address -

540 Van Ness Avenue
94102

Fourth Annual Republican

"Hall of Fame"

Wednesday, October 21, 1992

At the home of Mrs. Jaquelin H. Hume
3555 Pacific Avenue, San Francisco

6:00 p.m. – 8:00 p.m.

_____ Yes, I/we have enclosed a check for $1000 for 2 tickets as a sponsor.

_____ Yes, I/we would like to attend the reception honoring our fellow Republicans. Enclosed is my/our check for _____ tickets at $250.00 per guest.

X Unfortunately, I/we are unable to attend. However, enclosed is a contribution to further the efforts of the San Francisco Republican Party.

9404359000961

9404359000 62

To Honor the Distinguished New Members
of the San Francisco Republican
"Hall of Fame"

The Honorable Shirley Temple Black
The Honorable L. W. "Bill" Lane, Jr.
George H. Pfau, Jr.
R. E. Trefethen, Jr.
Dr. John B. Tsu

Special Guest
William H. T. Bush
Younger Brother of President George Bush

Anne & Sen Biaggini
Donna & Ken Derr

Gretchen & Richard Leach
David Packard

Host Committee

Jonathan Bulkley
J. Peter Cahill
Karin & David Chamberlain
Rosemary & Harry Conger
Supervisor Annemarie Conroy
Phoebe & Jack Cooke
Louise Davies
Lee Emerson
Florence Fang
Mortimer Fleishhacker, Jr.
Peggy & Jim Gilleran
Jean & E. C. Grayson
Richard Guggenhime
John Hamot
Yasuko & Jun Hatoyama

Clifford Hendrix, Jr.
Susan & Mark Hill
Patti & Jerry Hume
Edward Jaw
Jonnie & Jim Johnson
Woodward Kingman
Mal Lane
Marie & Ivy Lee
Dr. Rosa Mei Lee
Pari & Putnam Livermore
Peg & Jim Love
Lisa & Fred Lowell
Fern & Bill Lowenberg
Cristina Mack
Cornell Maier
Carol Mayer Marshall

Fred Martin
Shirley & Duncan Matteson
Nancy & Bill May
Laurie & Warren Merrill
Kirk Miller
Gladys & Joe Moore
Edgar Osgood
Emily Pike
Toby Rosenblatt
Leslie & Andy Schilling
William Terhoyden
Richard Wall
Wendell Witter
Margot & Clarence Woodard
Dennis Wu

9404359 0063

Dear Mr. Packard — Thank you for allowing me to list you as a Co. Chairman of our event on Oct. 21. If you can join me that evening, we would like you to introduce Shirley Temple Black or Bill Love. We also hope you can support us financially as a sponsor.

Many Thanks!

Wendy Kingon

Friends of the San Francisco Republican Party
cordially invite you to the

Looks like we need to send $1000.

Fourth Annual Republican
"Hall of Fame" Reception

Wednesday, October 21, 1992

At the home of Mrs. Jaquelin H. Hume
3355 Pacific Avenue, San Francisco

6:00 p.m. – 8:00 p.m.

$1000 for sponsor
$250.00 per person

valet parking
reply card enclosed

San Francisco
Republican
County Central
Committee

December 20th., 1993

David Packard
Hewlett/Packard
3000 Hanover St.
Palo Alto, CA 94304

Dear Mr. Packard,

This letter is in response to an inquiry made by Terresa Lahadern of Pilsbury, Madison and Sutro. Ms. Lahadern informed me that $500 of a $1,000 donation which you made to the Republican County Central Committee of San Francisco on October 19th., 1992, had inadvertently been deposited into the bank account reserved by the Committee for its federal elections activities. It should have been deposited into the Committee's state account. However when your contribution was received the Committee was engaged almost single mindedly with the party's campaign for the reelection of President Bush. I feel that it was this single mindedness which led to a certain confusion when your contribution was received, and that the confusion in turn resulted in a portion of your contribution being allocated to the Committee's federal account.

I would like to apologize on behalf of the Committee for the inconvenience that we may have caused by this error. Realizing the importance of this situation we are transferring the money back to the state account.

The San Francisco Republican County Central Committee has amended its Fair Political Practices Commission (FPPC) fourth quarter 1992 reports to reflex the transfer of five hundred dollars to our state bank account. We have also amended our Federal Elections Commission reports to reflect the removal of this same five hundred dollars. I am forwarding a copy of each of these amendment for your records.

540 Van Ness Avenue • San Francisco, CA 94102 • (415) 255-7668 • FAX (415) 255-6854

San Francisco
Republican
County Central
Committee

Again I thank you for your continued generosity to the Republican Party, and I do assure you that it has been very much appreciated on the part on this Committee. Should you have any questions, concerns, or anything that this office might be able to help you with, please do not hesitate to call us at (415) 255-7668.

Best holiday wishes,

Kristine Zaback

Kristine Zaback, Deputy Director
San Francisco Republican
County Central Committee

Enclosures
CC: Terresa Lahaderm; Pilsbury, Madison & Sutro

540 Van Ness Avenue • San Francisco, CA 94102 • (415) 255-7668 • FAX (415) 255-6854

TO: FEDERAL ELECTIONS COMMISSION

FROM: SAN FRANCISCO REPUBLICAN COUNTY CENTRAL COMMITTEE
FEDERAL FUND #C00236505

RE: FEC FORM 3X 10/01/92 to 11/23/92

This form is being amended to reflect the fact that the Asian Voter Project loan was repaid in the prior period of 01/01/92 to 03/31/92 and that the figures that correspond to the year-to-date columns must be adjusted to accurately report the prior period changes.

Also being amended in this period is Schedule A to properly report that a contribution by David Packard in the amount of $500 on 10/27/92 should not be in the Federal account. It was to be for the State account. The other $500 was already properly reported from the total $1000 sent from Mr. Packard.

Sincerely,

Mark D. Hill
Treasurer

9404359000666

USE FEC MAILING LABEL OR TYPE OR PRINT

FEC Office Use Only

(Summary Page)

1. NAME OF COMMITTEE (in full)
SAN FRANCISCO REPUBLICAN COUNTY
CENTRAL COMMITTEE FEDERAL FUND

ADDRESS (number and street) ☐ Check if different than previously reported
540 VAN NESS AVENUE

CITY, STATE and ZIP CODE
SAN FRANCISCO, CA 94102

2. FEC IDENTIFICATION NUMBER
C00236505

3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).

## 4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☐ Termination Report

Monthly Report Due On:

| | | |
|---|---|---|
| ☐ February 20 | ☐ June 20 | ☐ October 20 |
| ☐ March 20 | ☐ July 20 | ☐ November 20 |
| ☐ April 20 | ☐ August 20 | ☐ December 20 |
| ☐ May 20 | ☐ September 20 | ☐ January 31 |

☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____

☒ Thirtieth day report following the General Election on 11/3/92 in the State of CA

(b) Is this Report an Amendment? ☒ YES ☐ NO

| SUMMARY | COLUMN A This Period | COLUMN B Calendar Year-to-Date |
|---|---|---|
| 5. Covering Period 10/01/92 through 11/23/92 | | |
| 6. (a) Cash on Hand January 1, 19____ | | $ ( 138.00 ) |
| (b) Cash on Hand at Beginning of Reporting Period | $ 2,414.00 | |
| (c) Total Receipts (from Line 19) | $ 55,040.00 | $ 104,375.00 |
| (d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B) | $ 57,454.00 | $ 104,237.00 |
| 7. Total Disbursements (from Line 30) | $ 55,540.00 | $ 102,323.00 |
| 8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) | $ 1,914.00 | $ 1,914.00 |
| 9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) | $ -0- | |
| 10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) | $ 2,320.00 | |

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

For further information contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-376-3120

Type or Print Name of Treasurer
MARK D. HILL

Signature of Treasurer

Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3X
(revised 4/1/91)

9 4 0 4 3 5 9 0 0 6 7

(revised 1/1/92)

NAME OF COMMITTEE: SAN FRANCISCO REPUBLICAN COUNTY CENTRAL COMMITTEE FEDERAL FUND

REPORT COVERING PERIOD FROM: 10/01/82 TO: 11/23/92

| | COLUMN A Total This Period | COLUMN B Calendar Year |
|---|---|---|
| **I. Receipts** | | |
| 11. Contributions (other than loans) From: | | |
| a. Individual/Persons Other Than Political Committees | | |
| i. Itemized (use Schedule A) | 13,564.00 | 26,864.00 |
| ii. Unitemized | 13,476.00 | 22,277.00 |
| iii. Total (add i and ii) ➤ | 27,040.00 | 49,141.00 |
| b. Political Party Committees | | |
| c. Other Political Committees (such as PACs) | | |
| d. Total Contributions (add a iii, b and c) ➤ | 27,040.00 | 49,141.00 |
| 12. Transfers From Affiliated/Other Party Committees | | |
| 13. All Loans Received | | |
| 14. Loan Repayments Received | -0- | 2,500.00 |
| 15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) | -0- | 1,156.00 |
| 16. Refunds of Contributions Made to Federal Candidates and Other Political Committees | | |
| 17. Other Federal Receipts (Dividends, Interest, etc.) | | |
| 18. Transfers from Nonfederal Account for Joint Activity | 28,000.00 | 51,578.00 |
| 19. Total Receipts (add 11d, 12, 13, 14, 15, 16, 17, and 18) ➤ | 55,040.00 | 104,375.00 |
| 20. Total Federal Receipts (subtract line 18 from line 19) ➤ | 27,040.00 | 52,797.00 |
| **II. Disbursements** | | |
| 21. Operating Expenditures: | | |
| a. Shared Federal/Non-Federal Activity (from Schedule H4) | | |
| i. Federal Share | 27,470.00 | 50,861.50 |
| ii. Non-Federal Share | 27,470.00 | 50,861.50 |
| b. Other Federal Operating Expenditures | | |
| c. Total Operating Expenditures (Add a i, a ii, and b) ➤ | 54,940.00 | 101,723.00 |
| 22. Transfers to Affiliated/Other Party Committees | | |
| 23. Contributions to Federal Candidates/Committees and Other Political Committees | 600.00 | 600.00 |
| 24. Independent Expenditures (use Schedule E) | | |
| 25. Coordinated Expenditures Made by Party Committees (2 U.S.C. 441a(d)) (use Schedule F) | | |
| 26. Loan Repayments Made | | |
| 27. Loans Made | | |
| 28. Refunds of Contributions To: | | |
| a. Individuals/Persons Other Than Political Committees | | |
| b. Political Party Committees | | |
| c. Other Political Committees (such as PACs) | | |
| d. Total Contribution Refunds (Add a, b and c) ➤ | | |
| 29. Other Disbursements | | |
| 30. Total Disbursements (add 21c, 22, 23, 24, 25, 26, 27, 28d, and 29) ➤ | 55,540.00 | 102,323.00 |
| 31 Total Federal Disbursements (subtract line 21 a ii from line 30) ➤ | 28,070.00 | 51,461.50 |
| **III. Net Contributions/Operating Expenditures** | | |
| 32. Total Contributions (other than loans)(from line 11d) | 27,040.00 | 49,141.00 |
| 33. Total Contribution Refunds (from line 28d) | | |
| 34. Net Contributions (other than loans)(subtract line 33 from 32) | 27,040.00 | 49,141.00 |
| 35. Total Federal Operating Expenditures (add 21 a i and 21 b) ➤ | 27,470.00 | 50,861.50 |
| 36. Offsets to Operating Expenditures (from line 15) | | |
| 37. Net Operating Expenditures (subtract line 36 from 35) ➤ | 27,470.00 | 50,861.50 |

9404359 0068

Name of Committee (In Full)
SAN FRANCISCO REPUBLICAN COUNTY CENTRAL COMMITTEE FEDERAL FUND

| A. Full Name, Mailing Address and ZIP Code of Loan Source | Original Amount of Loan | Cumulative Payment To Date | Balance Outstanding at Close of This Period |
|---|---|---|---|
| | | | |

Election: ☐ Primary ☐ General ☐ Other (specify):

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

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

| | | |
|---|---|---|
| 1. Full Name, Mailing Address and ZIP Code | Name of Employer<br>Occupation<br>Amount Guaranteed Outstanding: $ | |
| 2. Full Name, Mailing Address and ZIP Code | Name of Employer<br>Occupation<br>Amount Guaranteed Outstanding: $ | |
| 3. Full Name, Mailing Address and ZIP Code | Name of Employer<br>Occupation<br>Amount Guaranteed Outstanding: $ | |

| B. Full Name, Mailing Address and ZIP Code of Loan Source | Original Amount of Loan | Cumulative Payment To Date | Balance Outstanding at Close of This Period |
|---|---|---|---|
| | | | |

Election: ☐ Primary ☐ General ☐ Other (specify):

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

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

| | | |
|---|---|---|
| 1. Full Name, Mailing Address and ZIP Code | Name of Employer<br>Occupation<br>Amount Guaranteed Outstanding: $ | |
| 2. Full Name, Mailing Address and ZIP Code | Name of Employer<br>Occupation<br>Amount Guaranteed Outstanding: $ | |
| 3. Full Name, Mailing Address and ZIP Code | Name of Employer<br>Occupation<br>Amount Guaranteed Outstanding: $ | |

| | |
|---|---|
| SUBTOTALS This Period This Page (optional) | -0- |
| TOTALS This Period (last page in this line only) | -0- |

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

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NAME OF COMMITTEE (In Full)

San Francisco Republican County Central Committee Federal Fund

| | Name of Employer | Date (month, day, year) | Amount of Each Receipt this Period |
|---|---|---|---|
| A. Full Name, Mailing Address and ZIP Code<br>Helen W O'Hanlon<br>219 States St.<br>San Francisco, Ca 94114 | | 9/20/92 | 250 |
| Receipt For: ☐ Primary ☑ General ☐ Other (specify): | Occupation | | |
| | Aggregate Year-to-Date > $ 250 | | |
| B. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt this Period |
| Receipt For: ☐ Primary ☐ General ☐ Other (specify): | Occupation | | |
| | Aggregate Year-to-Date > $ | | |
| C. Full Name, Mailing Address and ZIP Code<br>JD Putnam<br>3 California Strive<br>Burlingame, Ca 94010 | Name of Employer | Date (month, day, year)<br>10/7/92 | Amount of Each Receipt this Period<br>250 |
| Receipt For: ☐ Primary ☑ General ☐ Other (specify): | Occupation | | |
| | Aggregate Year-to-Date > $ 250 | | |
| D. Full Name, Mailing Address and ZIP Code<br>Toby Rosenblatt<br>3409 Pacific Ave<br>San Francisco, Ca 94118 | Name of Employer | Date (month, day, year)<br>10/15/92 | Amount of Each Receipt this Period<br>350 |
| Receipt For: ☐ Primary ☑ General ☐ Other (specify): | Occupation | | |
| | Aggregate Year-to-Date > $ 350 | | |
| E. Full Name, Mailing Address and ZIP Code<br>Charles Schwab<br>101 Montgomery St<br>San Francisco, Ca 94104 | Name of Employer<br>Charles Schwab Co | Date (month, day, year)<br>10/28/92 | Amount of Each Receipt this Period<br>125 |
| Receipt For: ☐ Primary ☑ General ☐ Other (specify): | Occupation<br>Investor | | |
| | Aggregate Year-to-Date > $ 500 | | |
| F. Full Name, Mailing Address and ZIP Code<br>Eugene A Shurtleff<br>1070 Green St. #1402<br>San Francisco, Ca 94133 | Name of Employer<br>retired | Date (month, day, year)<br>10/20/92 | Amount of Each Receipt this Period<br>250 |
| Receipt For: ☐ Primary ☑ General ☐ Other (specify): | Occupation | | |
| | Aggregate Year-to-Date > $ 250 | | |
| G. Full Name, Mailing Address and ZIP Code<br>James Stanhope<br>2346 Castillejo Way<br>Fremont, Ca 94539 | Name of Employer | Date (month, day, year)<br>10/27/92 | Amount of Each Receipt this Period<br>500 |
| Receipt For: ☐ Primary ☑ General ☐ Other (specify): | Occupation | | |
| | Aggregate Year-to-Date > $ 500 | | |
| SUBTOTAL of Receipts This Page (optional) | | | 1725 |
| TOTAL This Period (last page this line number only) | | | |

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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 and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

San Francisco Republican County Central Committee Federal Fund

| A. 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 |
|---|---|---|---|
| EE Trefethen, Jr.<br>1177 California St #1700<br>San Francisco, Ca 94108<br>Receipt For: ☐ Primary ☒ General ☐ Other (specify): | Trefethen Winery<br>Owner<br>Aggregate Year-to-Date > $ 1250 | 10/23/92 | 500 |
| B. 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 |
| Richard J. Wall<br>2660 Chestnut Street<br>San Francisco, Ca 94123<br>Receipt For: ☐ Primary ☒ General ☐ Other (specify): | Aggregate Year-to-Date > $ 250 | 10/23/92 | 250 |
| 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 |
| Clarence Woodard<br>7 Oak Arbor Road<br>Orinda, CA 94563<br>Receipt For: ☐ Primary ☒ General ☐ Other (specify): | Aggregate Year-to-Date > $ 750 | 11/17/92 | 250 |
| 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 |
| Kay Harrigan Woods<br>3570 Jackson St<br>San Francisco, Ca 94118<br>Receipt For: ☐ Primary ☒ General ☐ Other (specify): | Aggregate Year-to-Date > $ 250 | 10/23/92 | 250 |
| 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 |
| James T. Love<br>3035 Pacific Ave<br>San Francisco, Ca 94115<br>Receipt For: ☐ Primary ☒ General ☐ Other (specify): | Aggregate Year-to-Date > $ 350 | | 250 |
| 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: ☐ Primary ☐ General ☐ Other (specify): | Aggregate Year-to-Date > $ | | |
| 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: ☐ Primary ☐ General ☐ Other (specify): | Aggregate Year-to-Date > $ | | |

| | |
|---|---|
| SUBTOTAL of Receipts This Page (optional) | 1500 |
| TOTAL This Period (last page this line number only) | 13564 |

9404359007I

Exhibit C

TO: FAIR POLITICAL PRACTICES COMMISSION

FROM: SAN FRANCISCO REPUBLICAN COUNTY CENTRAL COMMITTEE
ADMIN FUND #890605

RE: FPPC FORM 420 10/01/92 to 12/31/92

This form is being amended to reflect the fact that David Packard contributed $1,000.00 in this period. (not the $500 as originally filed).

Also, the loan from Benny Yee to the Committee was repaid by $1000 and the other $1000 has been correctly classified as a contribution. Only the payment of $1000 was originally filed. As amended, the balance of the loan is zero.

Sincerely,

Mark D. Hill
Treasurer

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REPUBLICAN NATIONAL FINANCE COMMITTEE
310 FIRST STREET, SOUTHEAST WASHINGTON, D.C. 20003 (202) 863-8700 FAX: (202) 863-8834

November 30, 1993

Mr. Frederick K. Lowell
Pillsbury Madison & Sutro
235 Montgomery Street
San Francisco, California 94120

Dear Mr. Lowell:

Pursuant to your letter of November 23rd on behalf of The Honorable David Packard, enclosed please find a refund check in the amount of $20,000 made out to David Packard.

This is a refund check for a 1992 Federal contribution Mr. Packard made to the Presidential Trust.

Sincerely,

Nancy Brelsford Thawley
Director, Republican Eagles

Enclosure

NBT:anw

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PAID FOR BY THE REPUBLICAN NATIONAL COMMITTEE

2763

REPUBLICAN NATIONAL FINANCE COMMITTEE
310 FIRST STREET, SE.
WASHINGTON, D.C. 20003

NOVEMBER 30 19 93 1475

PAY TO THE ORDER OF MR. DAVID PACKARD $ 20,000.00***

***TWENTY THOUSAND AND 00/100*** DOLLARS

SIGNET BANK
Virginia
Arlington, VA.

FOR 1992 REFUND

⑈00002763⑈ ⑆056004089⑆ 651⑈7220643⑈

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DGC 591

Law Offices of
PILLSBURY MADISON & SUTRO
POST OFFICE BOX 7880
SAN FRANCISCO, CALIFORNIA 94120
TELEPHONE (415) 983-1000
TELECOPIER (415) 983-2099

LOS ANGELES
SAN JOSE
WASHINGTON, D.C.
SAN DIEGO
ORANGE COUNTY
SACRAMENTO
MENLO PARK
TOKYO

WRITER'S OFFICE AND
DIRECT DIAL NUMBER

235 Montgomery Street
(415) 983-1968

March 18, 1994

94 MAR 21 AM 10:00
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

**VIA FEDERAL EXPRESS**

Jose Rodriguez, Esq.
Attorney
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Matter Under Review No. 3891

Dear Mr. Rodriguez:

Further to our discussion of last week, I am enclosing herewith the following documents:

1. A letter dated November 23, 1993, from Fred Lowell of this firm to Thomas Josefiak, Deputy Chief Counsel of the Republican National Committee, requesting reimbursement of Mr. Packard's $20,000 contribution.

2. Letters dated October 6, 1992 and October 14, 1992, from Robert A. Mosbacher, General Chairman, Finance, of the Republican National Committee, requesting a contribution from Mr. Packard.

Mr. Lowell's November 23rd letter requesting reimbursement of Mr. Packard's $20,000 contribution states that at the time the contribution was made, it was Mr. Packard's impression that it was made to support the non-federal activities of the Republican National Party. Mr. Packard routinely makes contributions to candidates for state and federal offices, as well as to party committees supporting such candidates, including the state and federal accounts of national and state political parties. Mr. Packard incorrectly assumed that his contribution to the Presidential Trust was similar to a contribution which he made on June 10, 1991 to the "Presidential Dinner Trust," a non-federal fund established by the National Republican Senatorial Committee and the National Republican Congressional Committee for non-direct support of candidates.

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With regard to the foregoing, I note that the legal distinctions between the building funds, "state" elections funds, House campaign committees, Senate campaign committees and national committees of the national political parties are confusing for most contributors. The fundraising letter from Mr. Mosbacher requesting contributions to the 1992 Presidential Trust was especially confusing because it indicated that contributions could be used in connection with federal elections, or in connection with the state elections fund of the Republican National Party. When Mr. Packard discovered that there was a question regarding the legality of the contribution, he requested and received reimbursement therefor.

If I may be of any further assistance to you on this matter, please do not hesitate to contact me. In this regard, I will be out of the office from March 22 through April 4. In my absence, please feel free to contact my partner, Fred Lowell (415-983-1585).

Very truly yours,

Teresa Craigie Lahaderne

Encs.

cc: Mr. David Packard

Mr. F. H. Roberts
Mr. F. K. Lowell

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LAW OFFICES OF
PILLSBURY MADISON & SUTRO
POST OFFICE BOX 7880
SAN FRANCISCO, CALIFORNIA 94120
TELEPHONE (415) 983-1000
TELECOPIER (415) 398-2096

LOS ANGELES
SAN JOSE
WASHINGTON, D.C.
SAN DIEGO
ORANGE COUNTY
SACRAMENTO
MENLO PARK
TOKYO

WRITER'S OFFICE AND
DIRECT DIAL NUMBER

235 Montgomery Street
(415) 983-1585

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
94 MAR 21 AM 10:00

November 23, 1993

**VIA FEDERAL EXPRESS**

Thomas J. Josefiak, Esq.
Deputy Chief Counsel
Republican National Committee
310 First Street, S.E.
Washington, D.C. 20003

Re: Mr. David Packard

Dear Mr. Josefiak:

This firm is counsel to David Packard. As we discussed last week, Mr. Packard made a $20,000 contribution to "The Presidential Trust" of the Republican National Committee ("RNC") on October 26, 1992. At the time the contribution was made, it was Mr. Packard's impression that the contribution would be used to support non-federal activities of the Republican Party.

It has recently come to our attention that The Presidential Trust, the account to which Mr. Packard's 1992 contribution was allocated, is a "federal" account of the RNC. We believe that this allocation occurred due to a miscommunication, and accordingly, we are now requesting a reimbursement of the $20,000.

Thank you for your attention to this matter. If I may be of any further assistance, please do not hesitate to contact me.

Very truly yours,

Frederick K. Lowell

Frederick K. Lowell

cc: Mr. David Packard

Mr. F. H. Roberts

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REPUBLICAN NATIONAL COMMITTEE
310 FIRST STREET, SOUTHEAST WASHINGTON, D.C. 20003 (202) 863-8720 FAX: (202) 863-8834

ROBERT A. MOSBACHER
General Chairman
Finance

October 6, 1992

Mr. David Packard
501 Pagemill Road
Palo Alto, CA 94304

Dear David:

It was good to talk with you two weeks ago. As you remember, I mentioned our critical need for additional funds.

The Republican Party, through The Presidential Trust, may spend $10.3 million federal campaign dollars on behalf of the President's campaign for advertising and other campaign priorities. An individual may contribute a maximum of $20,000 per person to The Presidential Trust and a PAC may contribute $15,000. Additionaly, either an individual or corporation may contribute unlimited amounts to the Republican National States Election Committees (RNSEC) for use on the non-federal parts of the election process.

Our polls and focus groups indicate that the electorate is largely uncommitted, and will not make that final decision until very late -- certainly after the debates. When you compare the President's plan for private sector led initiatives in economic growth, health care and welfare reform, along with myriad other issues, to the Clinton/Gore approach of more spending, higher taxes, and government incursion into everyday life from health care to additional regulation, it becomes imperative to re-elect George Bush.

You have done so much for our country and have always been helpful to our President. I hate to ask you again, but the alternative to not re-electing the President is too devastating to contemplate.

Should you decide to send money, and I fervently hope you will, please mail it to me at the above address. Again, $20,000 is the maximum per person, subject to the $25,000 per person overall limitation, for The Presidential Trust, PACs may contribute $15,000 per year, but there is no legal limit to the amount that may be made out to the RNSEC.

Thanks for your help.

Sincerely,

Robert A. Mosbacher

PAID FOR BY THE REPUBLICAN NATIONAL COMMITTEE

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REPUBLICAN NATIONAL COMMITTEE
310 FIRST STREET, SOUTHEAST WASHINGTON, D.C. 20003 (202) 863-8720

ROBERT A. MOSBACHER
General Chairman
Finance

October 14, 1992

Mr. David Packard
Chairman
Hewlett-Packard Company
P.O. Box 10301
300 Hanover Street
Palo Alto, CA 94303

Dear Mr. Packard:

You have been a valued member of our Bush-Quayle '92 team, and I want you to know how much the President and I appreciate everything you've done for him this year. You've given so much in so many ways, and just knowing of your loyal commitment has been a great source of strength to the President throughout this very tough campaign.

As I'm sure you know, the most critical days for us lie ahead. Polls and focus groups indicate the electorate is largely uncommitted and won't make a final decision as to which Party to support until after the debates. That means we have ample opportunity in the final two weeks before Election Day to swing this election in our favor. But we absolutely must have the resources to mount an unprecedented blitz of advertising and get-out-the-vote efforts to get every one of our supporters to the polls.

We clearly cannot count on the media to report our side of the campaign fairly. If we want the voters to hear the true story of what the President and Republicans intend to accomplish in the future, versus the billions of dollars a Clinton/Democrat government will cost us, we're going to have to buy the air time and pound the neighborhood streets ourselves.

Mr. Packard, you've done so much already that, if there were anyone else I could turn to, I would not ask again for your help. But you are one of a very small group of people whom the President and I and our Party can count on to understand the disaster it would be for American business if Bill Clinton and the Democrats win this election. Mr. Packard, can I count on you again for a contribution to the Republican National Committee to help fund our final campaign blitz to get our voters to the polls?

I am deeply grateful, as is the President, for your continued support. I have great faith we can depend on you now, and I look forward to sharing with you a great victory for the President and our Party on November 3.

Sincerely,

Robert A. Mosbacher

PAID FOR BY THE REPUBLICAN NATIONAL COMMITTEE

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RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

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

5 DEC 94

FIRST GENERAL COUNSEL'S REPORT **SENSITIVE**

MUR 3891
DATE COMPLAINT FILED: January 21, 1994
DATE OF NOTIFICATION: January 28, 1994
DATE ACTIVATED: February 4, 1994
STAFF MEMBER: Jose M. Rodriguez
Deborah Rice

COMPLAINANTS: Center for Responsive Politics

RESPONDENTS: David Packard
California Republican Party/Victory 92 and Paul Hancock, as Treasurer
San Francisco Republican County Central Committee and John Sidline, as Treasurer
Campbell for U.S. Senate and Robert Petersen, as Treasurer
Tom Huening for Congress and Robert Petersen, as Treasurer
Santa Clara County Republican League and Carey Heckman, as Treasurer

RELEVANT STATUTES: 2 U.S.C. § 441a(a)(3)
2 U.S.C. § 441a(a)(1)
2 U.S.C. § 441a(f)
11 C.F.R. § 102.5(a)(2)

INTERNAL REPORTS CHECKED: Disclosure reports; FEC indices

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The matter arises from a complaint filed by the Center for Responsive Politics ("complainant") alleging that David Packard ("respondent") exceeded the $25,000 annual limit on federal contributions at 2 U.S.C. § 441a(a)(3).[1] See Attachment 1.

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1. The present matter was also referred to this Office under Directive Six and designated Pre-MUR 297. Because the Pre-MUR does not raise any additional substantive issues, it is not discussed separately. Moreover, this Office includes a recommendation that it be merged into this matter -- MUR 3891.

Information included with the complaint also indicated that the above listed recipient committees accepted excessive contributions from Mr. Packard. These two issues are addressed separately below. The above listed respondents were notified of the complaint and all, except for the San Francisco Republican County Central Committee, have responded to the allegations in the complaint.[2]

II. FACTUAL AND LEGAL ANALYSIS

A. Contributions in Excess of Aggregate Annual Limit

2 U.S.C. § 441a(a)(3) limits total contributions by an individual in any calendar year to $25,000. Under this section, any contribution to a candidate or authorized committee with respect to a particular election made in a non-election year shall be considered to be made during the calendar year in which such election is held.

According to 11 C.F.R. § 102.5(a)(2), only contributions meeting all of the following requirements may be deposited into a committee's federal account: 1) those which are designated for the federal account; 2) those which result from a solicitation which expressly states that the contribution will be used in connection with a federal election; and 3) those from contributors who are informed that all contributions are subject to the prohibitions and limitations of the Act.

9404359008 1

2. A representative of the San Francisco Republican County Central Committee did on two occasions attempt to contact this Office by telephone. However, despite several attempts, this Office has been unable to reach the committee.

The complaint specifically alleges that David Packard exceeded the $25,000 annual aggregate limit on contributions, by $25,450, with respect to the 1992 calendar year. To support these allegations, complainant has provided an itemized list of contributions for respondent, and copies of the Schedules A itemizing each contribution. See Complaint at Exhibits 1 and 2. As discussed below, three of the contributions listed by complainant are no longer at issue. However, this Office's examination of the disclosure indices and reports revealed an additional contribution by respondent during the period at issue.

In response, counsel for Mr. Packard challenges three of the contributions listed in the complaint. These three are a $5,000 contribution to the Santa Clara County Republican League, a $500 contribution to the San Francisco Republican County Central Committee, and a $20,000 contribution to the Presidential Trust.

Concerning both the Santa Clara County Republican League and the San Francisco Republican County Central Committee contributions, counsel explains that the contributions should not count towards Mr. Packard's aggregate federal contributions as they were intended for each organization's non-federal account. Counsel has submitted materials supporting this contention. As concerns the $5,000 contribution to the Santa Clara County Republican League, counsel submits copies of the solicitation letter and the committee's acknowledgment letter. Attachment 1, at 6-9. As noted by counsel, neither of these

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communications contain any indication that the solicited contribution was intended for federal purposes. Instead, these communications address the local Republican party's concerns. In fact, the solicitation letter is on a State Senator's letterhead and identifies the committee by its state registration number. It is the state registration number that appears on the copy of the contribution check submitted. See Id. at 6.

Counsel similarly submits a copy of the solicitation letter/event literature concerning the $500 San Francisco Republican County Central Committee contribution. See Id. at 10-13. The letter makes no mention of federal elections, and identifies the committee by its state registration number. Again, it is this number that appears on the copy of Mr. Packard's contribution check. See Id. at 10. Indeed, submitted with the response is a letter from the recipient committee acknowledging that Mr. Packard's contribution was misdeposited into the federal account. See Id. at 14 and 15.

These circumstances suggest that Mr. Packard did not intend to make a federal contribution to these committees. Therefore, these two contributions, totaling $5,500, are no longer at issue in calculating Mr. Packard's total federal contributions for the year 1992. However, the recipient committees' deposit of these contributions into their federal accounts is in violation of 11 C.F.R. § 102.5(a)(2). Accordingly, this Office recommends that the Commission find reason to believe the Santa Clara County Republican League and

9404359008 3

the San Francisco Republican County Central Committee violated 11 C.F.R. § 102.5(a)(2). Because the Santa Clara County Republican League is now defunct and the San Francisco Republican County Central Committee has taken corrective action by transferring the misdeposited funds into the proper account, this Office also recommends that the Commission take no further action as concerns these respondents. This Office will include language in the notification letter admonishing the San Francisco Republican County Central Committee that the deposit of non-federal contributions in the committee's federal account is a violation of 11 C.F.R. § 102.5(a)(2).

Concerning Mr. Packard's $20,000 contribution to the Presidential Trust, counsel next points out that "[w]hen it came to Mr. Packard's attention that this contribution had been allocated to the federal account . . . he requested and received reimbursement therefore." Id. at 2. Concerning this explanation, counsel submitted only a copy of the refund check and the committee letter accompanying the refund. In response to this Office's request, counsel made another submission, including, inter alia, copies of the solicitation letters. See Attachment 2.

Counsel specifically argues that Mr. Packard's $20,000 contribution to The Presidential Trust was intended for the recipient committee's (Republican National Committee) state account and not its federal account. Noting that Mr. Packard often makes contributions to both federal and state political causes, counsel argues that respondent "incorrectly assumed

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that his contribution to the Presidential Trust was similar to a [previous] contribution . . . to the 'Presidential Dinner Trust,' a non-federal fund." Attachment 2, at 1. Counsel also reiterates that upon learning that the contribution had been allocated to the federal account, respondent requested and received a refund.

With her second response, counsel submits copies of two solicitation letters (dated October 6 and 14, 1992) concerning the contribution at issue. These solicitation letters focused on the re-election of President Bush, making it clear that the requested contribution would be used in a federal election. The October 6, 1992 letter notes that the "Presidential Trust, may spend $10.3 million federal campaign dollars on behalf of the President's campaign," adding that it is "imperative to re-elect George Bush." Attachment 2, at 4. The communication does make brief mention of a separate non-federal account, noting that an individual may "additionaly [sic] . . . contribute unlimited amounts to the Republican National States Election Committee (RNSEC)." Id. However, the communication specifically states that "[a]n individual may contribute a maximum of $20,000" to the Presidential Trust and closes by clarifying that contributions to The Presidential Trust are restricted by federal contribution limits -- to the amount

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contributed by respondent -- and that contributions to the RNSEC are unrestricted. See Id.

Referencing the General Election, the second communication, dated October 14, 1992, specifically notes that Mr. Packard is a "valued member of [the] Bush-Quayle '92 team," that funds are needed to advertise the "true story of what the President and Republicans intend to accomplish in the future, versus the billions of dollars a Clinton/Democrat government will cost us," and that Mr. Packard is one of a small group of individuals that can be counted on to "understand the disaster it would be for American business if Bill Clinton and the Democrats win this election." Id. at 5. The letter continues by asking: "can I count on you again for a contribution to the Republican National Committee to help fund our final campaign blitz to get our voters to the polls?" Id. This communication concludes by stating that the solicitor "looks forward to sharing with [Mr. Packard] a great victory for the President and our Party on November 3." Id.

These communications make it clear that contributions to the Presidential Trust would be used to further federal election activity, contradicting counsel's unsupported contention that Mr. Packard was not aware that the contribution would be used for federal purposes.[3] Similarly, although a refund of this contribution was requested and received, such

3. This Office notes that a copy of the contribution check has not been provided and thus neither the check data nor the manner in which the payee line was made out is known.

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request did not come until after the violative activity was reported in a story in The Los Angeles Times and does not excuse the violation. Accordingly, this contribution remains at issue in calculating respondent's aggregate contributions for 1992.

As previously noted, this Office conducted its own search of the Commission disclosure databases. This search clarified that an October 19, 1992 contribution in the amount of $500 to Tom Huening for Congress attributed by complainant to respondent Packard was not in fact made by respondent. Rather, the contribution was from another individual of the same name. Accordingly, this contribution is no longer at issue. (This contribution is discussed in greater detail in the next section of this report.) This search also identified an additional $1,000 contribution -- to Dreier for Congress Committee -- by Mr. Packard for the year 1992. This contribution is included in calculating Mr. Packard's aggregate contributions for the year at issue.

Based on the preceding, Mr. Packard made $45,450 in federal contributions for the 1992 calendar year. The contributions at issue are the following:

| DATE | AMT | PGI | CMTE NAME |
|---|---|---|---|
| 05/31/91 | 1000 | P | FRIENDS OF ROM PACKARD |
| 06/04/91 | 1000 | P | CAMPBELL FOR U S SENATE |
| 07/19/91 | 1000 | P | U S SENATOR JOHN SEYMOUR COMM |
| 08/14/91 | 500 | P | CONGRESSMAN BILL LOWERY |
| 12/01/91 | 1000 | P | TOM HUENING FOR CONGRESS |
| 01/16/92 | 1200 | P | LINCOLN CLUB OF NO CALIFORNIA |
| 02/18/92 | 1000 | P | BUSH - QUAYLE '92 PRIMARY COMM |
| 04/06/92 | 2000 | P | PRESIDENT'S DINNER |

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| | | | |
|---|---|---|---|
| 05/19/92 | 1000 | P | MCCAIN REELECTION COMMITTEE |
| 05/20/92 | 500 | G | TOM HUENING FOR CONGRESS |
| 06/05/92 | 1000 | G | DREIER FOR CONGRESS COMMITTEE |
| 06/12/92 | 5000[4] | P | CALIFORNIA REPUB PARTY/VICTORY '92 |
| 06/30/92 | 250 | G | BILL BAKER FOR CONGRESS |
| 08/06/92 | 500 | P | COLORADANS FOR CONSIDINE |
| 08/18/92 | 1000 | G | U S SENATOR JOHN SEYMOUR COMMITTEE |
| 09/30/92 | 500 | G | TOM HUENING FOR CONGRESS |
| 09/30/92 | 500 | G | BILL BAKER FOR CONGRESS |
| 10/09/92 | 5000 | P | HEWLETT-PACKARD COMPANY COMM |
| 10/14/92 | 500 | G | FRANK RIGGS FOR CONGRESS |
| 10/28/92 | 500 | G | FRIENDS OF LES ASPIN |
| 10/29/92 | 500 | G | HERSCHENSOHN FOR U S SENATE-1992 |
| 10/29/92 | 20000 | P | REPUBLICAN NATIONAL COMMITTEE |

TOTAL: $45,450

Accordingly, respondent exceeded the $25,000 annual aggregate limit on contributions by $20,450 (not $25,450 as alleged by complainant), with respect to the 1992 calendar year. Therefore, this Office recommends that the Commission find reason to believe that David Packard violated 2 U.S.C. § 441a(a)(3).

B. Receipt of Excessive Contributions

2 U.S.C. § 441a(a)(1)(A) limits contributions by an individual to a federal candidate to $1,000 per election. 2 U.S.C. § 441a(a)(1)(C) limits contributions by an individual to political committees, which are not political committees established and maintained by a national political party or authorized political committees, to $5,000 in the aggregate in any calendar year. Moreover, contributions received by more than one affiliated committee are considered to be received by a single committee for purpose of the contributions limits.

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4. The complaint listed this contributions as a $10,000 receipt and accompanying $5,000 debit. This contribution is discussed further infra, pp. 11-12.

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11 C.F.R. § 110.3(a)(1). 2 U.S.C. § 441a(f) provides that "[n]o candidate or political committee shall knowingly accept any contribution . . . in violation of the [above] provisions."

As previously noted, information included with the complaint suggested that four of the recipient committees may have accepted excessive contributions from Mr. Packard. Specifically, complainant's schedule of contributions listed the Tom Huening for Congress committee as having accepted four contributions for both the primary and general elections from Mr. Packard, totaling $2,500. In response, the committee notes that one of the listed contributions was not in fact from respondent David Packard chairman of Hewlett-Packard Co. in Palo Alto, California, but from a separate individual, David W. Packard, Jr., employed by Ibycus, Inc. in Los Altos, California.[5] See Attachment 3. A review of the committee's disclosure reports substantiates this explanation. Accordingly, this Office recommends that the Commission find no reason to believe that Tom Huening for Congress and its treasurer violated 2 U.S.C. § 441a(f) by accepting excessive contributions from David Packard.

With regard to the Campbell for U.S. Senate Committee, the disclosure reports indicate that Mr. Packard made a $1,000 contribution on June 4, 1991 for the primary election and a $1,000 contribution on March 30, 1992 for the general election. The committee refunded the March 30, 1992

5. It is presently not clear if these individuals are related.

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contribution on July 13, 1992. Because the refund occurred more than sixty days from receipt, it initially appears that the committee accepted an excessive contribution. See 2 U.S.C. § 103.3(b)(3). However, because this was a general election contribution made prior to the primary election, the committee would only have to refund the contribution if the candidate lost the primary election. See 11 C.F.R. § 110.1(b)(3). If so, the committee would have sixty days from the date of the primary election to effectuate the refund. See A.O. 1992-15, 2 Fed. Election Camp. Guide (CCH) ¶ 6057, at pp. 11,809-10. The candidate lost the June 2, 1992 primary election, and subsequently refunded Mr. Packard's general election contribution on July 13, 1992, forty-one days after the election.[6] Because this refund was timely, this Office recommends that the Commission find no reason to believe the Campbell for U.S. Senate Committee violated 2 U.S.C. § 441a(f) by accepting an excessive contribution from David Packard.

Information included in the complaint also suggested that the California Republican Party may have accepted a $10,000 contribution from Mr. Packard, $5,000 in excess of the prescribed limit. An examination of the committee's disclosure reports clarifies that although a single $10,000 contribution check was received, only $5,000 of the amount was allocated to the federal account. The balance was transferred into its non-federal account. Specifically, the entire $10,000 check,

6. The committee incorrectly reported all general election contribution refunds as for the "Primary 92."

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made out to "California Republican Party," was deposited into the committee's federal account. See Attachment 5, at 2. On the same date of deposit, $5,000 of this amount was transferred to the committee's non-federal account and reported as a debit on the committee's disclosure report. The committee's deposit memorandum explicitly allocates $5,000 for the federal account and $5,000 for the state account, and identifies the event code for the contribution as "Bush." See Id. Mr. Packard received two letters from the committee separately acknowledging receipt of the state contribution and the federal contribution. See Id. at 3-4. Although the circumstances surrounding the solicitation of this $10,000 contribution are unclear, because the excessive portion of the contribution appears to have never been used for federal election purposes and to keep the focus in this matter limited to the Section 441a(a)(3) issue, this Office does not recommend any further inquiry into this separate issue. Instead, this Office recommends that the Commission find no reason to believe that the California Republican Party and its treasurer violated 2 U.S.C. § 441a(f) by accepting excessive contributions from David Packard.

Information in the complaint further suggested a possible affiliation between the San Francisco Republican County Central Committee and some of the other listed California Republican committees. Because affiliated committees share a single contribution limit pursuant to 11 C.F.R. § 110.3(a)(1), if affiliated with any other committees to which Mr. Packard had already contributed the full prescribed amount, this

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committee's receipt of a $500 contribution from Mr. Packard would result in the acceptance of an excessive contribution. As noted in subsection A of this report, Mr. Packard's contribution to the San Francisco Republican County Central Committee was not intended for the committee's federal account and, despite the committee's misdeposit, should not be considered as a federal contribution. However, even assuming that the contribution was federal, because the San Francisco Republican County Central Committee has consistently both in its disclosure reports and responses to Reports Analysis Division inquiries claimed no affiliation with any other California Republican committee, and because there is no indication of affiliation aside from its party connection, the contribution does not appear to exceed the prescribed limit at 2 U.S.C. § 441a(a)(1)(C). See Attachment 6. Accordingly, this Office recommends that the Commission find no reason to believe that the San Francisco Republican County Central Committee violated 2 U.S.C. § 441a(f) by accepting excessive contributions from David Packard.[7]

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7. Because this Office recommends finding no reason to believe these committees accepted excessive contributions from Mr. Packard, and consistently makes no recommendations concerning Mr. Packard's making of individual excessive contributions, the foregoing "recipient committee" analysis will not be included in the Factual and Legal Analysis addressed to Mr. Packard.

## III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

## IV. RECOMMENDATIONS

1. Open a MUR in Pre-MUR 297.

2. Merge Pre-MUR 297 into MUR 3891, and hereafter refer to this matter as MUR 3891.

3. Find reason to believe that David Packard violated 2 U.S.C. § 441a(a)(3), and enter into conciliation with respondent prior to a finding of probable cause to believe.

4. Find reason to believe the Santa Clara County Republican League and Carey Heckman, as treasurer, and the San Francisco Republican County Central Committee and John Sidline, as treasurer, violated 11 C.F.R. § 102.5(a)(2), but take no further action as concerns these respondents and close the file as to them.

5. Find no reason to believe Tom Muening for Congress and Robert Petersen, as treasurer, the California Republican Party and Paul Hancock, as treasurer, the San Francisco Republican County Central Committee and Stephen Mayer, as treasurer, or the Campbell for U.S. Senate Committee and Robert Petersen, as treasurer, violated 2 U.S.C. § 441a(f) and close the file as to these respondents.

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6. Approve the attached factual and legal analyses and conciliation agreement, and the appropriate letters.

Lawrence M. Noble
General Counsel

Date 7/1/94 BY: Lois G. Lerner
Associate General Counsel

Attachments

1. Packard response dated February 18, 1994.
2. Packard response dated March 18, 1994.
3. Tom Huening for Congress response.
4. Campbell for U.S. Senate response.
5. California Republican Party response and disclosure filings.
6. San Francisco Republican County Central Committee disclosure filings.
7. Factual and Legal Analyses (3)
8. Conciliation Agreement (1)

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

**MEMORANDUM**

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

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

DATE: JULY 11, 1994

SUBJECT: MUR 3891 - FIRST GENERAL COUNSEL'S REPORT DATED JULY 1, 1994.

The above-captioned document was circulated to the Commission on Tuesday, July 5, 1994 at 4:00 p.m.

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

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

This matter will be placed on the meeting agenda for Tuesday, July 19, 1994.

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

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BEFORE THE FEDERAL ELECTION COMMISSION

| | |
|---|---|
| In the Matter of | |
| | MUR 3891 |
| David Packard; | |
| California Republican Party/Victory 92 and Paul Hancock, as treasurer; | |
| San Francisco Republican County Central Committee and John Sidline, as treasurer; | |
| Campbell for U.S. Senate and Robert Petersen, as treasurer; | |
| Tom Huening for Congress and Robert Peterson, as treasurer; | |
| Santa Clara County Republican League and Carey Heckman, as treasurer | |

## CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on July 19, 1994, do hereby certify that the Commission decided by a vote of 5-1 to take the following actions in MUR 3891:

1. Open a MUR in Pre-MUR 297.

2. Merge Pre-MUR 297 into MUR 3891, and hereafter refer to this matter as MUR 3891.

3. Find reason to believe that David Packard violated 2 U.S.C. § 441a(a)(3), and enter into conciliation with respondent prior to a finding of probable cause to believe.

(continued)

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4. Find reason to believe the Santa Clara County Republican League and Carey Heckman, as treasurer, and the San Francisco Republican County Central Committee and John Sidline, as treasurer, violated 11 C.F.R. § 102.5(a)(2), but take no further action and close the file as to them.

5. Find no reason to believe Tom Huening for Congress and Robert Petersen, as treasurer, the California Republican Party and Paul Hancock, as treasurer, the San Francisco Republican County Central Committee and Stephen Mayer, as treasurer, or the Campbell for U.S. Senate Committee and Robert Petersen, as treasurer, violated 2 U.S.C. § 441a(f) and close the file as to these respondents.

6. Approve the factual and legal analyses and conciliation agreement, and the appropriate letters as recommended in the General Counsel's July 1, 1994 report, subject to amendment of the factual and legal analysis for the San Francisco Republican County Central Committee and John Sidline, as treasurer, as agreed during the meeting discussion.

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

Attest:

7-21-94
Date

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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 28, 1994

John Sidline, Treasurer
San Francisco Republican
County Central Committee
540 Van Ness Avenue
San Francisco, CA 94102

RE: MUR 3891

Dear Mr. Sidline:

On January 28, 1994, the Federal Election Commission ("Commission") notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. On July 19, 1994, the Commission found no reason to believe that the San Francisco Republican County Central Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 441a(f). Also, on the same date, the Commission did find reason to believe that the Committee and you, as treasurer, violated 11 C.F.R. § 102.5(a)(2), a provision of the Commission's Regulations. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed its file as it pertains to the Committee and you, as treasurer. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

The Commission reminds you that only contributions designated for the committee's federal account may be deposited into the committee's federal account. The deposit of any contributions not so designated into the federal account is a violation of 11 C.F.R. § 102.(5)(a)(2). You should take steps to ensure that this activity does not occur in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) still apply with respect to all respondents still involved in this matter.

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

For the Commission,

Trevor Potter
Chairman

Enclosure
Factual and Legal Analysis

9404359000099

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: San Francisco Republican County Central Committee and John Sidline, as treasurer

MUR: 3891

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("Commission") in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2). This matter was also generated by a complaint filed with the Commission by the Center for Responsive Politics, alleging that David Packard exceeded the $25,000 annual limit on federal contributions at 2 U.S.C. § 441a(a)(3). See 2 U.S.C. § 437g(a)(1). Information brought to the Commission's attention in connection with the above captioned matter indicates that the San Francisco Republican County Committee and John Sidline, as treasurer, ("respondents") misdeposited non-federal contributions into its federal account in violation of 11 C.F.R. § 102.5(a)(2).

II. FACTUAL AND LEGAL ANALYSIS

According to 11 C.F.R. § 102.5(a)(2), the only contributions that may be deposited into a committee's federal account are: 1) those which are designated for the federal account; 2) those which result from a solicitation which expressly states that the contribution will be used in connection with a federal election; or 3) those from

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contributors who are informed that all contributions are subject to the prohibitions and limitations of the Act.

The San Francisco Republican County Central Committee received and accepted a $500 contribution from David Packard on October 27, 1992. The available information makes clear that this contribution was neither solicited as a federal contribution, nor intended by the contributor as a federal contribution. Specifically, the solicitation letter/event literature concerning this contribution makes no mention of federal elections, and identifies the committee by its state registration number. It is this number that appears on the contribution check. Indeed, respondents by letter have acknowledged that the contribution was misdeposited into the federal account. See Letter from Kristine Zaback to David Packard dated December 20, 1993.

This information evidences that this contribution was not for federal purposes. Therefore, respondents' deposit of this contribution into the federal account is in violation of 11 C.F.R. § 102.5(a)(2). Accordingly, there is reason to believe the San Francisco Republican County Central Committee and John Sidline, as treasurer, violated 11 C.F.R. § 102.5(a)(2). However, the Commission has decided to take no further action in this matter as concerns this violation.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 28, 1994

James R. Sutton, Esq.
Nielsen, Merksamer, Parrinelo,
Mueller & Naylor
591 Redwood Highway #4000
Mill Valley, CA 94941

RE: MUR 3891
California Republican
Party/Victory '92 and
Paul Mancock, as treasurer

Dear Mr. Sutton:

On January 28, 1994, the Federal Election Commission notified your clients of a complaint alleging violations of certain sections the Federal Election Campaign Act of 1971, as amended.

On July 19, 1994, the Commission found, on the basis of the information in the complaint, and information provided by your clients, that there is no reason to believe your clients violated 2 U.S.C. § 441a(f). Accordingly, the Commission closed its file in this matter as it pertains to your clients.

This matter will become a part of the public record within 30 days after the file has been closed with respect to all other respondents involved. The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 28, 1994

Robert A. Petersen, Treasurer
Campbell for U.S. Senate
3000 Sand Hill Road
Bldg. 3, Suite 140
Menlo Park, CA 94025

RE: MUR 3891

Dear Mr. Petersen:

On January 28, 1994, the Federal Election Commission notified Campbell for U.S. Senate ("Committee") and you, as treasurer, of a complaint alleging violations of certain sections the Federal Election Campaign Act of 1971, as amended.

On July 19, 1994, the Commission found, on the basis of the information in the complaint, and information provided by you, that there is no reason to believe the Committee and you, as treasurer, violated 2 U.S.C. § 441a(f). Accordingly, the Commission closed its file in this matter as it pertains to the Committee and you.

This matter will become a part of the public record within 30 days after the file has been closed with respect to all other respondents involved. The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 28, 1994

Robert A. Petersen, Treasurer
Tom Huening for Congress
3000 Sand Hill Road
Bldg. 3, Suite 140
Menlo Park, CA 94025

RE: MUR 3891

Dear Mr. Petersen:

On January 28, 1994, the Federal Election Commission notified Tom Huening for Congress ("Committee") and you, as treasurer, of a complaint alleging violations of certain sections the Federal Election Campaign Act of 1971, as amended.

On July 19, 1994, the Commission found, on the basis of the information in the complaint, and information provided by you, that there is no reason to believe the Committee and you, as treasurer, violated 2 U.S.C. § 441a(f). Accordingly, the Commission closed its file in this matter as it pertains to the Committee and you.

This matter will become a part of the public record within 30 days after the file has been closed with respect to all other respondents involved. The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 28, 1994

Carey Heckman, Treasurer
Santa Clara County
Republican League
186 Park Avenue
Palo Alto, CA 94306

RE: MUR 3891

Dear Mr. Heckman:

On July 19, 1994, the Federal Election Commission found reason to believe that the Santa Clara County Republican League ("Committee") and you, as treasurer, violated 11 U.S.C. § 102.5(a)(2), a provision of the Commission's Regulations. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed its file as it pertains to the Committee and you, as treasurer. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) still apply with respect to all respondents still involved in this matter.

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

For the Commission,

Trevor Potter
Chairman

Enclosure
Factual and Legal Analysis

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Santa Clara County Republican League and Carey Heckman, as treasurer

MUR: 3891

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("Commission") in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2). This matter was also generated by a complaint filed with the Commission by the Center for Responsive Politics, alleging that David Packard exceeded the $25,000 annual limit on federal contributions at 2 U.S.C. § 441a(a)(3). See 2 U.S.C. § 437g(a)(1). Information brought to the Commission's attention in connection with the above captioned matter indicates that the Santa Clara County Republican League and Carey Heckman, as treasurer, ("respondents") misdeposited non-federal contributions into its federal account in violation of 11 C.F.R. § 102.5(a)(2).

II. FACTUAL AND LEGAL ANALYSIS

According to 11 C.F.R. § 102.5(a)(2), the only contributions that may be deposited into a committee's federal account are: 1) those which are designated for the federal account; 2) those which result from a solicitation which expressly states that the contribution will be used in connection with a federal election; or 3) those from

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contributors who are informed that all contributions are subject to the prohibitions and limitations of the Act.

The Santa Clara County Republican League received and accepted a $5,000 contribution from David Packard on May 27, 1992. The available information makes clear that this contribution was neither solicited as a federal contribution, or intended by the contributor as a federal contribution. Specifically, neither the solicitation letter nor the acknowledgment letter for this contribution contains any indication that the solicited contribution was intended for federal purposes. See Letter from Rebecca Q. Morgan to David Packard dated May 15, 1992, and Letter from Luis Buhler to David Packard dated July 6, 1992. Instead, these communications address the local Republican party's concerns. In fact, the solicitation letter is on a State Senator's letterhead and identifies the committee by its state registration number. It is the state registration number that appears on the contribution check.

This information evidences that the contribution was not for federal purposes. Therefore, respondents' deposit of this contribution into the federal account is in violation of 11 C.F.R. § 102.5(a)(2). Accordingly, there is reason to believe the Santa Clara County Republican League and Carey Heckman, as treasurer, violated 11 C.F.R. § 102.5(a)(2). However, the Commission has decided to take no further action in this matter as concerns this violation.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 28, 1994

Teresa Craigie Lahaderne, Esq.
Pillsbury, Madison & Sutro
P.O. Box 7880
San Francisco, CA 94120

RE: MUR 3891
David Packard

Dear Ms. Lahaderne:

On July 19, 1994, the Federal Election Commission found that there is reason to believe your client David Packard violated 2 U.S.C. § 441a(a)(3), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath. In the absence of additional information, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

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

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

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

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

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

For the Commission

Trevor Potter
Chairman

Enclosures
Factual and Legal Analysis
Conciliation Agreement

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: David Packard MUR: 3891

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("Commission") in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2). This matter was also generated by a complaint filed with the Commission by the Center for Responsive Politics ("complainant"), alleging that David Packard ("respondent") exceeded the $25,000 annual limit on federal contributions at 2 U.S.C. § 441a(a)(3). See 2 U.S.C. § 437g(a)(1).

II. FACTUAL AND LEGAL ANALYSIS

2 U.S.C. § 441a(a)(3) limits total contributions by an individual in any calendar year to $25,000. Under this section, any contribution to a candidate or authorized committee with respect to a particular election made in a non-election year shall be considered to be made during the calendar year in which such election is held.

The complaint specifically alleges that David Packard exceeded the $25,000 annual aggregate limit on contributions, by $25,450, with respect to the 1992 calendar year. To support these allegations, complainant has provided an itemized list of contributions for respondent, and copies of the Schedules A

itemizing each contribution. See Complaint at Exhibits 1 and 2. As discussed below, three of the contributions listed by complainant are no longer at issue. However, the Commission's examination of the disclosure indices and reports revealed an additional contribution by respondent during the period at issue.

In response, counsel for Mr. Packard challenges three of the contributions listed in the compleint. These three are a $5,000 contribution to the Santa Clara County Republican League, a $500 contribution to the San Francisco Republican County Central Committee, and a $20,000 contribution to the Presidential Trust.

Concerning both the Santa Clara County Republican League and the San Francisco Republican County Central Committee contributions, counsel explains that the contributions should not count towards Mr. Packard's aggregate federal contributions as they were intended for each organization's non-federal account. Counsel has submitted materials supporting this contention. As concerns the $5,000 contribution to the Santa Clara County Republican League, counsel submits copies of the solicitation letter and the committee's acknowledgment letter. See Response dated February 18, 1994, at Exhibit A. As noted by counsel, neither of these communications contain any indication that the solicited contribution was intended for federal purposes. Instead, these communications address the local Republican party's concerns. In fact, the solicitation letter is on a State Senator's letterhead and identifies the

9404359011

committee by its state registration number. It is the state registration number that appears on the copy of the contribution check submitted. See Id.

Counsel similarly submits a copy of the solicitation letter/event literature concerning the $500 San Francisco Republican County Central Committee contribution. See Id. at Exhibit B. The letter makes no mention of federal elections, and identifies the committee by its state registration number. Again, [redacted] Mr. Packard's contribution check. See Id. Indeed, submitted with the response is a letter from the recipient committee acknowledging that Mr. Packard's contribution was misdeposited into the federal account. See Id.

These circumstances suggest that Mr. Packard did not intend to make a federal contribution to these committees. Therefore, these two contributions, totaling $5,500, are no longer at issue in calculating Mr. Packard's total federal contributions for the year 1992.

Concerning Mr. Packard's $20,000 contribution to the Presidential Trust, counsel next points out that "[w]hen it came to Mr. Packard's attention that this contribution had been allocated to the federal account . . . he requested and received reimbursement therefore." Response dated February 18, 1994, at 2. Concerning this explanation, counsel submitted only a copy of the refund check and the committee letter accompanying the refund. In response to the Office of the General Counsel's request, counsel made another submission,

9404359011 2

including, inter alia, copies of the solicitation letters. See Response dated March 18, 1994.

Counsel specifically argues that Mr. Packard's $20,000 contribution to The Presidential Trust was intended for the recipient committee's (Republican National Committee) state account and not its federal account. Noting that Mr. Packard often makes contributions to both federal and state political causes, counsel argues that respondent "incorrectly assumed that his contribution to the Presidential Trust was similar to a [previous] contribution . . . to the 'Presidential Dinner Trust,' a non-federal fund." Id. at 1. Counsel also reiterates that upon learning that the contribution had been allocated to the federal account, respondent requested and received a refund.

With her second response, counsel submits copies of two solicitation letters (dated October 6 and 14, 1992) concerning the contribution at issue. These solicitation letters focused on the re-election of President Bush, making it clear that the requested contribution would be used in a federal election. The October 6, 1992 letter notes that the "Presidential Trust, may spend $10.3 million federal campaign dollars on behalf of the President's campaign," adding that it is "imperative to re-elect George Bush." Id. at Exhibit 2. The communication does make brief mention of a separate non-federal account, noting that an individual may "additionaly [sic] . . . contribute unlimited amounts to the Republican National States Election Committee (RNSEC)." Id. However, the communication

9404359013

specifically states that "[a]n individual may contribute a maximum of $20,000" to the Presidential Trust and closes by clarifying that contributions to The Presidential Trust are restricted by federal contribution limits -- to the mount contributed by respondent -- and that contributions to the RNEC are unrestricted. See Id.

Referencing the General Election, the second communication, dated October 14, 1992, specifically notes that Mr. Packard is a "valued member of [the] Bush-Quayle '92 team," that funds are needed to advertise the "true story of what the President and Republicans intend to accomplish in the future, versus the billions of dollars a Clinton/Democrat government will cost us," and that Mr. Packard is one of a small group of individuals that can be counted on to "understand the disaster it would be for American business if Bill Clinton and the Democrats win this election." Response dated March 18, 1994, at Exhibit 3. The letter continues by asking: "can I count on you again for a contribution to the Republican National Committee to help fund our final campaign blitz to get our voters to the polls?" Id. This communication concludes by stating that the solicitor "looks forward to sharing with [Mr. Packard] a great victory for the President and our Party on November 3." Id.

These communications make it clear that contributions to the Presidential Trust would be used to further federal election activity, contradicting counsel's unsupported contention that Mr. Packard was not aware that the contribution

9404359011 4

would be used for federal purposes.[1] Similarly, although a refund of this contribution was requested and received, such request did not come until after the violative activity was reported in a story in The Los Angeles Times and does not excuse the violation. Accordingly, this contribution remains at issue in calculating respondent's aggregate contributions for 1992.

As previously noted, the Commission conducted its own search of the Commission disclosure databases. This research clarified that an October 19, 1992 contribution in the amount of $500 to Tom Huening for Congress attributed by complainant to respondent Packard was not in fact made by respondent. Rather, the contribution was from another individual of the same name.[2] Accordingly, this contribution is no longer at issue. This search also identified an additional $1,000 contribution -- to Dreier for Congress Committee -- by Mr. Packard for the year 1992. This contribution is included in calculating Mr. Packard's aggregate contributions for the year at issue.

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1. The Commission notes that a copy of the contribution check has not been provided and thus neither the check date nor the manner in which the payee line was made out is known.

2. The contribution was from David W. Packard, Jr., employed by Ibycus, Inc. in Los Altos California.

Based on the preceding, Mr. Packard made $45,450 in federal contributions for the 1992 calendar year. The contributions at issue are the following:

| DATE | AMT | PGI | CMTE NAME |
|---|---|---|---|
| 05/31/91 | 1000 | P | FRIENDS OF RON PACKARD |
| 06/04/91 | 1000 | P | CAMPBELL FOR U S SENATE |
| 07/19/91 | 1000 | P | U S SENATOR JOHN SEYMOUR COMM |
| 08/1[illegible]/91 | 500 | P | CONGRESSMAN BILL LOWERY |
| 12/01/91 | 1000 | P | TOM HUENING FOR CONGRESS |
| 01/16/92 | 1200 | P | LINCOLN CLUB OF NO CALIFORNIA |
| 02/18/92 | 1000 | P | BUSH - QUAYLE '92 PRIMARY COMM |
| 04/06/92 | 2000 | P | PRESIDENT'S DINNER |
| 05/19/92 | 1000 | P | MCCAIN REELECTION COMMITTEE |
| 05/20/92 | 500 | G | TOM HUENING FOR CONGRESS |
| 06/05/92 | 1000 | G | DREIER FOR CONGRESS COMMITTEE |
| 06/12/92 | 5000 | P | CALIFORNIA REPUB PARTY/VICTORY '92 |
| 06/30/92 | 250 | G | BILL BAKER FOR CONGRESS |
| 08/06/92 | 500 | P | COLORADANS FOR CONSIDINE |
| 08/18/92 | 1000 | G | U S SENATOR JOHN SEYMOUR COMMITTEE |
| 09/30/92 | 500 | G | TOM HUENING FOR CONGRESS |
| 09/30/92 | 500 | G | BILL BAKER FOR CONGRESS |
| 10/09/92 | 5000 | P | HEWLETT-PACKARD COMPANY COMM |
| 10/14/92 | 500 | G | FRANK RIGGS FOR CONGRESS |
| 10/28/92 | 500 | G | FRIENDS OF LES ASPIN |
| 10/29/92 | 500 | G | HERSCHENSOHN FOR U S SENATE-1992 |
| 10/29/92 | 20000 | P | REPUBLICAN NATIONAL COMMITTEE |
| TOTAL: | $45,450 | | |

Accordingly, respondent exceeded the $25,000 annual aggregate limit on contributions by $20,450 (not $25,450 as alleged by complainant), with respect to the 1992 calendar year. Therefore, there is reason to believe that David Packard violated 2 U.S.C. § 441a(a)(3).

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LAW OFFICES OF
PILLSBURY MADISON & SUTRO
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TELEPHONE (415) 983-1000
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SAN JOSE
WASHINGTON, D.C.
SAN DIEGO
ORANGE COUNTY
SACRAMENTO
MENLO PARK
TOKYO
HONG KONG
NEW YORK

WRITER'S OFFICE AND
DIRECT DIAL NUMBER

235 Montgomery Street
(415) 983-1968

August 9, 1994

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
AUG 10 12 12 PM '94

VIA FEDERAL EXPRESS

Jose Rodriguez, Esq.
Attorney
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Matter Under Review No. 3891

Dear Mr. Rodriguez:

As we discussed, this letter sets forth the facts which we believe the Commission should consider in determining the amount of the fine in the above-referenced matter.

Preliminarily, we would like to emphasize that Mr. Packard did not knowingly violate the $25,000 limit of 2 U.S.C. § 441a(a)(3) with respect to the 1992 calendar year. Rather, this was the result of an inadvertent error.

Mr. Packard first became aware of this issue when an article naming him as one of several individuals who had violated the $25,000 limit with respect to the 1992 calendar year was published in the Los Angeles Times on November 15, 1993. Mr. Packard immediately retained counsel and took steps to determine whether there had been a violation of the Federal Election Campaign Act of 1971, as amended.

As we discussed in our previous correspondence, we were able to determine that several contributions had been improperly allocated to the federal accounts of state committees. With respect to the $20,000 contribution to The Presidential Trust, we requested, and received, reimbursement from the Republican National Committee. This reimbursement was received on November 30, 1993--before the Commission notified Mr. Packard that a Complaint had been filed. Although this does not change the fact that during 1992 there was a technical violation of the Act, the Commission should treat this as evidence of



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Mr. Packard's good faith compliance with the Act. In addition, this reimbursement preserves the integrity of the contribution limitation provisions of the Act because, ultimately, no committee benefitted from the "excess" contributions.

Mr. Packard has changed his campaign contribution procedures so that one individual is now responsible for all contributions to candidates for state or federal offices. In addition, all contributions to candidates for federal office are now specifically monitored by outside counsel for compliance with the limitation provisions of the Act.

If you have any further questions, please do not hesitate to contact me.

Very truly yours,

Teresa Craigie Lahaderne

cc: Mr. David Packard

Mr. F. H. Roberts
Mr. F. K. Lowell
Mr. E. C. Stanton

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

9/6/94

RECEIVED
FEDERAL ELECTION
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OFFICE OF GENERAL
COUNSEL

SEP 7 9 55 AM '94

**TWO WAY MEMORANDUM**

TO: OGC, Docket

FROM: Rosa E. Swintos
Accounting Technician

SUBJECt: Account Determination for Funds Received

We recently received a check from David Packard, Trustee, URT DTD, check number 7034, dated 8/31/94, and in the amount of $18,000.00. Attached is a copy of the check and any correspondence that was forwarded. Please indicate below the account into which it should be deposited, and the MUR number and name.

---

TO: Rosa E. Swinton
Accounting Technician

FROM: OGC, Docket By aa

In reference to the above check in the amount of $18,000.00 the MUR number is 3891 and in the name of David Packard. The account into which it should be deposited is indicated below:

✓ Budget Clearing Account (OGC), 95F3875.16

__ Civil Penalties Account, 95-1099.160

__ Other: _____

Anita Alexander
Signature

9-7-94
Date

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RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

BEFORE THE FEDERAL ELECTION COMMISSION SEP 13 5 01 PM '94

In the Matter of )
)
David Packard ) MUR 3891 **SENSITIVE**

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Benjamin M. Vandegrift, counsel for respondent David Packard.

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Based on the foregoing, this Office recommends that the Commission accept the attached conciliation agreement with David Packard in settlement of this matter. A check for the full amount of the civil penalty has been received.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with David Packard.
2. Close the file.
3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

Date 9/13/94

BY: _____
Lois G. Lerner
Associate General Counsel

Attachments
1. Conciliation Agreement
2. Photocopy of civil penalty check

Staff Assigned: Jose M. Rodrigues

9404359012

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )
)
David Packard. ) MUR 3891

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 19, 1994, the Commission decided by a vote of 6-0 to take the following actions in MUR 3891:

1. Accept the conciliation agreement with David Packard, as recommended in the General Counsel's Report dated September 13, 1994.

2. Close the file.

3. Approve the appropriate letter, as recommended in the General Counsel's Report dated September 13, 1994.

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

Attest:

9-19-94
Date

Delores Hardy
for Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Tues., Sept. 13, 1994 5:01 p.m.
Circulated to the Commission: Wed., Sept. 14, 1994 11:00 a.m.
Deadline for vote: Mon., Sept. 19, 1994 4:00 p.m.

esh

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 23, 1994

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

RE: MUR 3891

Dear Ms. Miller:

This is in reference to the complaint you filed with the Federal Election Commission on January 21, 1994, concerning David Packard's contributions in excess of the annual limit at 2 U.S.C. § 441a(a)(3).

The Commission found that there was reason to believe Mr. Packard violated 2 U.S.C. § 441a(a)(3). On the same date the Commission also found that there was reason reason to believe two of the recipient committees -- the Santa Clara County Republican League and Carey Heckman, as treasurer, and the San Francisco Republican County Central Committee and John Sidline, as treasurer, violated 11 C.F.R. § 102.5(a)(2), but took no further action as concerned these violations. Last, the Commission found that there was no reason to believe Tom Huening for Congress and Robert Petersen, as treasurer, the California Republican Party and Paul Hancock, as treasurer, the San Francisco Republican County Central Committee and John Sidline, as treasurer, or the Campbell for U.S. Senate Committee and Robert Petersen, as treasurer, violated 2 U.S.C. § 441a(f) in connection with the receipt of contributions from Mr. Packard.

On September 19, 1994, a conciliation agreement signed on behalf of respondent David Packard was accepted by the Commission. Accordingly, the Commission closed the file in this matter on September 19, 1994. A copy of this agreements is enclosed for your information.

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

Sincerely,

Jose A. Rodriguez
Attorney

Enclosure
Conciliation Agreement

9404359001 24

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 23, 1994

Robert A. Petersen, Treasurer
Campbell for U.S. Senate and
Tom Huening for Congress
3000 Sand Hill Road
Bldg. 3, Suite 140
Menlo Park, CA 94025

RE: MUR 3891

Dear Mr. Petersen:

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

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

Sincerely,

Jose M. Rodriguez
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 23, 1994

Carey Heckman, Treasurer
Santa Clara County
Republican League
186 Park Avenue
Palo Alto, CA 94306

RE: MUR 3891

Dear Mr. Heckman:

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

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

Sincerely,

Jose M. Rodrigues
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 23, 1994

John Sidline, Treasurer
San Francisco Republican
County Central Committee
540 Van Ness Avenue
San Francisco, CA 94102

RE: MUR 3891

Dear Mr. Sidline:

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

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

Sincerely,

Jose M. Rodriguez
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 23, 1994

James R. Sutton, Esq.
Nielsen, Merksamer, Parrinelo,
Mueller & Naylor
591 Redwood Highway #4000
Mill Valley, CA 94941

RE: MUR 3891
California Republican Party/Victory '92 and Paul Hancock, as treasurer

Dear Mr. Sutton:

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

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

Sincerely,

Jose M. Rodriguez
Attorney

9404359012 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 23, 1994

Benjamin M. Vandegrift, Esq.
Pillsbury, Madison & Sutro
Suite 1100
1667 K. Street, N.W.
Washington, D.C. 20006

RE: MUR 3891
David Packard

Dear Mr. Vandegrift:

On September 19, 1994, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your client's behalf in settlement of a violation of 2 U.S.C. § 441a(a)(3), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). Accordingly, the file has been closed in this matter.

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

Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

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

Sincerely,

Jose M. Rodriguez
Attorney

Enclosure
Conciliation Agreement

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RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
SEP 6 4 12 PM '94

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )
)
David Packard ) MUR 3891

CONCILIATION AGREEMENT

This matter was generated based on information ascertained by the Federal Election Commission ("Commission") in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2). This matter was also generated by a signed, sworn, and notarized complaint by Ellen S. Miller on behalf of the Center for Responsive Politics. The Federal Election Commission ("Commission") found reason to believe that David Packard ("Respondent") violated 2 U.S.C. § 441a(a)(3).

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

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

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

III. Respondent enters voluntarily into this agreement with the Commission.

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

1. Respondent, David Packard, is an individual contributor.

2. 2 U.S.C. § 441a(a)(3) limits total contributions by an individual in any calendar year to $25,000. Under this section, any contribution to a candidate or authorized committee with respect to a particular election made in a non-election year shall be considered to be made during the calendar year in which such election is held.

3. With respect to the 1992 calendar year, Respondent made contributions totaling $45,450 to political committees.

V. 1. Respondent made contributions to federal committees which exceeded by $20,450 the permissible contribution limit with respect to the 1992 calendar year, in violation of 2 U.S.C. § 441a(a)(3).

2. Respondent contends that the violations were not knowing and willful. Moreover, as soon as Respondent became aware through a newspaper article of the violation, and before notification from the FEC that his contributions exceeded the annual limit, he sought and received reimbursement of those contributions identified in the article as having caused the violation.

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of Eighteen Thousand Dollars ($18,000), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement.

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If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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

IX. Respondent shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

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

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY: _____ Date 9-22-94
Lois G. Lerner
Associate General Counsel

FOR THE RESPONDENT:

Pillsbury Madison & Sutro
Name

By Bryan M. Vandegrift
Attorneys for Respondent

September 6, 1994
Date

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3891

DATE FILMED 10-13-94 CAMERA NO. 2

CAMERAMAN JMN

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