FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3911

DATE FILMED 10-25-94 CAMERA NO. 4

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FEDERAL ELECTION COMMISSION
94 JAN 21 PM 4:33

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, William C. W. Mow Respondent,	**COMPLAINT** MUR 3911

9404359063 7

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 William C. W. Mow 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 William C. W. Mow made contributions attributed to the 1992 calendar year in the amount of $66,100. These contributions exceeded by $41,100 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

2404359063 8

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

Ellen S. Miller

District of Columbia)
) ss

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

Phyllis Landon

Notary Public

My Commission Expires:

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

9404352906 39

MOW, WILLIAM C

Contributions Attributed to 1992

Exhibit 1

Summary of FEC Data

Recipient	Amount	Date	FEC Microfilm Location
Bush, George	$-1,000	01/18/92	92FEC/739/0586
Bush, George	$1,000	02/25/92	92FEC/739/3707
Bush, George	$2,000	11/20/91	92FEC/731/0757
Dannemeyer, William E	$1,000	03/28/91	91SEN/007/2700
Gallegly, Elton	$1,000	04/26/91	91HSE/431/3759
Gallegly, Elton	$500	11/22/91	92HSE/439/3076
Herschensohn, Bruce	$1,000	09/14/92	92SEN/022/0816
National Republican Congressional Cmte	$10,000	01/09/92	92HSE/446/2304
National Republican Congressional Cmte	$1,000	01/20/92	92HSE/446/2354
National Republican Congressional Cmte	$1,000	08/24/92	92HSE/469/4464
National Republican Congressional Cmte	$10,000	09/22/92	92HSE/469/4464
National Republican Congressional Cmte	$-2,000	09/30/92	92HSE/477/1788
National Republican Senatorial Cmte	$750	01/17/92	92HSE/438/1235
National Republican Senatorial Cmte	$13,000	02/10/92	92SEN/007/0625
National Republican Senatorial Cmte	$760	02/10/92	92SEN/007/0625
National Republican Senatorial Cmte	$505	03/03/92	92SEN/009/3780
National Republican Senatorial Cmte	$750	03/30/92	92SEN/009/3780
National Republican Senatorial Cmte	$250	06/18/92	92SEN/016/0759
National Republican Senatorial Cmte	$750	06/30/92	92SEN/016/0759
National Republican Senatorial Cmte	$1,125	07/20/92	92SEN/018/3955
National Republican Senatorial Cmte	$250	07/24/92	92SEN/018/3955
National Republican Senatorial Cmte	$250	07/27/92	92SEN/018/3955
National Republican Senatorial Cmte	$210	08/21/92	92SEN/020/2685
President's Dinner 1992	$1,500	02/10/92	92FEC/753/0330
Republican Leader's Fund	$1,000	07/29/92	92HSE/464/1172
Republican National Candidate Trust	$1,000	08/24/92	92FEC/786/3415

7 4 0 4 3 5 9 0 6 4 0

Republican National Cmte	$10,000	07/27/92	92FEC/774/1222
Republican National Cmte	$2,500	09/04/92	92FEC/792/4156
Republican National Cmte	$5,000	10/02/92	92FEC/797/0500
Seymour, John	$500	04/29/91	91SEN/008/2095
Seymour, John	$-500	06/17/92	92SEN/015/1188
Seymour, John	$-1,000	06/17/92	92SEN/015/1188
Seymour, John	$1,000	09/27/91	92SEN/004/1324
Seymour, John	$1,000	12/16/91	92SEN/004/1324

Total Contributions Attributed to 1992: $66,100

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William C. Mow
Exhibit 2

2404359064 2

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

REPORT COVERING PERIOD FROM 1/ 1/92 THRU 1/31/92 OVER $[illegible].00

NAME AND ADDRESS/OCCUPATION	DATE	THIS PERIOD	CALENDAR YR-TO-DATE
MR. LEWIS B. MOORE 166 TAMELWOOD DRIVE UPLAND, OH 43078			$240.00
EXECUTIVE	1/16/92	$240.00	
MRS. EVELYN G. [illegible] 10060 [illegible] TERRACE LOS [illegible], CA 90030			$215.00
RETIRED	1/13/92 1/16/92	$190.00 $25.00	
[illegible], MARK M. [illegible] [illegible] MAGNOLIA [illegible] W. [illegible], MA [illegible]			$500.00
[illegible] EXECUTIVE	1/31/92	$500.00	
MS. JANET A. [illegible] [illegible] WILSWOOD HARPER WOODS, MI 48225			$320.00
RETIRED	1/10/92 1/15/92	$120.00 $200.00	
MRS. MARION A. [illegible] 1040 LOS OLIVOS LANE LA CRESCENTA, CA 91214			$281.00
RETIRED	1/13/92 1/21/92	$100.00 $181.00	
MR. WILLIAM C. MOW 2900 MADERA ROAD SIMI, CA 93065			$750.00
EXECUTIVE	1/17/92	$750.00	
MR. WILLIAM MULY 6825 CAMPFIELD ROAD #8G BALTIMORE, MD 21207-4672			$550.00
RETIRED	1/10/92 1/29/92	$500.00 $50.00	
RADM ALBERT G. MURGIA 69 MOUNTAIN LAKE LAKE WHALES, FL 33859-0832			$270.00
MGT. CONSULTANT	1/15/92 1/22/92	$150.00 $120.00	

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

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REPORT COVERING PERIOD FROM 3/ 1/92 THRU 3/31/92 OVER $200.00

NAME AND ADDRESS/OCCUPATION	DATE	THIS PERIOD	CALENDAR YR-TO-DATE
MR. CARL E. MOSES 100 BAYVIEW AVE. UNALASKA, AK 99685			$240.00
	3/ 9/92	$120.00	
MERCHANT			
MR. DONALD R MOSSBY 23310 SHORELANE ELKHART, IN 46514			$320.00
	3/ 9/92	$120.00	
	3/10/92	$200.00	
PRESIDENT			
MR. WILLIAM J. MOTTEL [illegible]6 COUNTRY CLUB DRIVE WILMINGTON, DE 19803			$290.00
	3/30/92	$10.00	
INFORMATION REQUESTED			
MR. HAROLD W. MOUN 709 MEADOWBROOK DR. SPARTANBURG, SC 29302			$240.00
	3/ 2/92	$10.00	
INFORMATION REQUESTED	3/ 3/92	$25.00	
	3/16/92	$20.00	
	3/26/92	$35.00	
MRS. JOHN H. MOUNT 811-A TIFFANY LANE LAKEHURST, NJ 08733			$461.00
	3/ 2/92	$256.00	
	3/ 4/92	$15.00	
RETIRED			
DR. ROBERT E. MOUNTAIN 2005 S. ATLANTIC STREET MELBOURNE BEACH, FL 32951			$342.50
	3/ 2/92	$15.00	
	3/17/92	$70.00	
RETIRED	3/25/92	$7.50	
	3/31/92	$45.00	
	3/31/92	$50.00	
MR. WILLIAM C. W. MOW 2900 MADERA ROAD SIMI VALLEY, CA 93065			$16000.00
	3/ 3/92	$505.00	
INFORMATION REQUESTED	3/30/92	$750.00	
	3/31/92	$120.00	

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REPUBLICAN NATIONAL COMMITTEE

PAGE 641

ITEMIZED REPORT COVERING PERIOD FROM 9/01/92 THRU 9/30/92 OVER $200.00

NAME AND ADDRESS	OCCUPATION/PLACE OF BUSINESS	DATE	THIS PERIOD	CALENDAR YR-TO-DTE
Mr. George B. Hatheral 300 S. Linden Avenue Pittsburgh PA 15208	Publisher L. C. Marina and Company	09/09/92	$100.00	$300.00
Mr. Anthony Rotta Box 376 Port Jefferson Sta. NY 11776	INFORMATION REQUESTED 09/04/92	09/04/92	$250.00	$250.00
Mr. Vincent J. Rotto 84 Village Avenue Elmont NY 11003	EXECUTIVE	09/04/92 09/18/92 09/28/92	$50.00 $50.00 $50.00	$325.00
Mr. Irving V. Gamlin 80 Mount Tiburon Tiburon CA 94920	Retired	09/16/92	$500.00	$500.00
Mr. G. S. Hamisfale P. O. Box 518 Aberdeen MD 21001	Retired	09/15/92 09/15/92 09/30/92 09/30/92	$25.00 $50.00 $25.00 $50.00	[illegible]
Mr. Donald E. Gunn R.R. 1, Box 68 Buffalo MO 65011	Retired	09/03/92	$225.00	$375.00
Mr. Robert E. Mountain Apartment 422, The Breakers 2005 S. Atlantic Street Melbourne Beach FL 32951	Self-employed	09/01/92	$100.00	$632.00
Mr. William C. W. Row 9723 Eton Avenue Chatsworth CA 91311	Self-employed Bugle Boy Industries	09/04/92	$2,500.00	$2,500.00
Mrs. Ray Rowicki 20 Dewey Street St. Paul MN 55104	retired	09/21/92	$25.00	$201.00

SCHEDULE A-P

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

ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the detailed summary page

PAGE 7/6 OF [illegible]

LINE NUMBER [illegible]

NAME OF COMMITTEE (In Full)

[illegible] '92 PRIMARY COMMITTEE

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NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER / OCCUPATION / AGGREGATE YEAR-TO-DATE	RECEIPT FOR	DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH RECEIPT THIS PERIOD
Justice, Miss Rosana 5911 Edmund, Apt. 112 Waco, TX 76710	NAME OF EMPLOYER: Info Requested OCCUPATION: Info Requested AGGREGATE YEAR-TO-DATE: $250.00	[X] Primary [ ] General	12/31/91	$150.00
Boynton, Mr. Edwin L. 6296 Tecate Drive Riverside, CA 92506	NAME OF EMPLOYER: OCCUPATION: Retired AGGREGATE YEAR-TO-DATE: $250.00	[X] Primary [ ] General	12/31/91	$200.00
Lee, Mr. George T. Jr. 3101 Greenbrier Dallas, TX 75225	NAME OF EMPLOYER: Info Requested OCCUPATION: Info Requested AGGREGATE YEAR-TO-DATE: $1,000.00	[X] Primary [ ] General	10/31/91	$1,000.00
Gordon, Ms. Nancy R. 600 Travis St. Suite 2045 Houston, TX 77002	NAME OF EMPLOYER: OCCUPATION: Homemaker AGGREGATE YEAR-TO-DATE: $1,000.00	[X] Primary [ ] General	10/31/91	$1,000.00
Cook, Mrs. Susan 6315 Campbell Rd. No. 412 Dallas, TX 75248	NAME OF EMPLOYER: Info Requested OCCUPATION: Info Requested AGGREGATE YEAR-TO-DATE: $1,000.00	[X] Primary [ ] General	10/31/91	$1,000.00
Velde, Ms. Gretchen S. 8605 Indian Hills Dr. Omaha, NE 68114	NAME OF EMPLOYER: Info Requested OCCUPATION: Info Requested AGGREGATE YEAR-TO-DATE: $1,000.00	[X] Primary [ ] General	11/19/91	$1,000.00
Napier, Mr. John L. Box 1013 Bennettsville, SC 29512	NAME OF EMPLOYER: Info Requested OCCUPATION: Info Requested AGGREGATE YEAR TO DATE: $1,000.00	[X] Primary [ ] General	11/19/91	$100.00
Now, Mr. William C. 2900 Madera Rd S[illegible] CA 93065	NAME OF EMPLOYER: Info Requested OCCUPATION: Info Requested AGGREGATE YEAR-TO-DATE: $2,000.00	[X] Primary [ ] General	11/20/91	$2,000.00 /*
SUBTOTAL OF RECEIPTS THIS PAGE (optional)				$6,450.00
TOTAL THIS PERIOD (last page this line number only)				

*—Reattribution or Redesignation Requested

SCHEDULE A [illegible] RECEIPTS
PERIOD [illegible] 07/01/92 THRU 09/30/92

LINE [illegible] 34 [illegible]

ANY INFORMATION COPIED FROM SUCH REPORTS OR STATEMENTS MAY NOT BE USED OR SOLD BY ANY PERSON FOR ANY PURPOSE OTHER THAN TO PROMOTE THE CANDIDACY OF ANY POLITICAL COMMITTEE TO SOLICIT CONTRIBUTIONS FROM SUCH COMMITTEE.

NAME,ADDRESS,CITY,STATE,ZIP	EMPLOYER AND OCCUPATION	DATE	RECEIPT AMOUNT
MOORE, MR. JOSEPH A. [illegible] WASHINGTON STREET SAN FRANCISCO CA 94109	INFORMATION REQUESTED AGGREGATE YTD 251.00	08/04/92	251.00
MURALT, MRS. JULIA 17952 GARFIELD DRIVE VILLA PARK CA 92667	INFORMATION REQUESTED AGGREGATE YTD 1,000.00	08/13/92	1,000.00
MURPHY, MR. J. WISTAR JR [illegible] RD VILLANOVA PA 19085	INFORMATION REQUESTED AGGREGATE YTD 250.00	08/21/92	250.00
MURPHY, MR ROBERT M [illegible] ST BILLIS MA 02054	INFORMATION REQUESTED AGGREGATE YTD 500.00	09/10/92	500.00
NOW, MR WILLIAM C. 575 NO ROCKINGHAM AVE LOS ANGELES CA 90049	INFORMATION REQUESTED AGGREGATE YTD 1,000.00	08/24/92	1,000.00
MILLER, MR ALBERT E 8637 SYCAMORE DR PHILADELPHIA PA 19136	RETIRED AGGREGATE YTD 1,155.00	08/03/92 08/[illegible]/92 08/[illegible]/92 08/[illegible]/92 08/[illegible]/92 08/[illegible]/92 09/28/92	1,000.00 [illegible] [illegible] 1[illegible] [illegible] 1[illegible] 50.00
MURGALL, MR WILLIAM 6937 LIMESTONE LN PORT RICHEY FL 34668	RETIRED AGGREGATE YTD 300.00	08/11/92 08/31/92 09/16/92	100.00 100.00 100.00

SUBTOTAL OF RECEIPTS THIS PAGE RECEIPT AMOUNT 4,456.00

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REPUBLICAN NATIONAL COMMITTEE

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ITEMIZED REPORT COVERING PERIOD FROM 7/01/92 THRU 7/31/92 OVER $200.00

NAME AND ADDRESS	OCCUPATION/PLACE OF BUSINESS	DATE	THIS PERIOD	CALENDAR YR-TO-DATE
Mr. Robert S. Moses 15 Bissell Avenue Richmond CA 94801	INFORMATION REQUESTED 07/27/92	07/22/92 07/27/92	$65.00 $90.00	$297.00
Mr. Barry L. Moss 855 Sheridan Road Highland Park IL 60035	INFORMATION REQUESTED 07/05/92	07/05/92	$225.00	$225.00
Mr. Ronald R. Mostero 505 Chiswick Road Palos Verdes Est CA 90274	Sales	07/27/92	$400.00	$400.00
Mr. Donald J. Moulin 11000 Stonmere Drive Potomac MD 20854	Retired K P M G Peat Marwick	07/31/92	$100.00	$300.00
Mr. William C.H. Mow 575 N. Rockingham Ave. Los Angeles CA 90049	Chairman & CEO Eagle Bay, Inc.	07/27/92	$10,000.00	$10,000.00
Mrs. Helen P. Mueller 4851 Gulf Shore Blv N Naples FL 33940	Retired	07/01/92 07/27/92	$25.00 $200.00	$250.00
Mr. & Mrs. Lawrence T. Mueller 2012 Miller Drive Clovis NM 88101	Retail Clerk	07/14/92 07/23/92 07/30/92	$20.00 $200.00 $10.00	$230.00
Mr. Truman Mueller 2040 South Race Street Wichita KS 67213	Retired	07/10/92 07/17/92 07/22/92 07/30/92	$10.00 $25.00 $25.00 $50.00	$550.00
Mr. Murley Mulkey 219 Latta Road Durham NC 27712	Retired	07/20/92	$100.00	$212.00

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[illegible]

[illegible] COMMITTEE TO SOLICIT CONTRIBUTIONS FROM SUCH COMMITTEE.

NAME,ADDRESS,CITY,STATE,ZIP	EMPLOYER AND OCCUPATION	RECEIPT DATE	RECEIPT AMOUNT
FC 00006[illegible] [illegible] WILLIAM G [illegible] FRANKLIN TN 37064	INFORMATION REQUESTED AGGREGATE YTD 250.00	03/31/92	250.00
FC 00015611 [illegible] AL [illegible] PALATINE IL 60067	INFORMATION REQUESTED AGGREGATE YTD 250.00	03/30/92	250.00
FC 00016846 [illegible] YVONNE [illegible] NJ 07760	[illegible] ASSOCIATES OWNER AGGREGATE YTD 300.00	03/31/92 03/31/92	[illegible]
FC 00000001 [illegible] L [illegible] FL 33156	INFORMATION REQUESTED AGGREGATE YTD 300.00	03/31/92 03/31/92	[illegible]
FC 00015973 [illegible] WILLIAM [illegible] CA 93065	INFORMATION REQUESTED AGGREGATE YTD 1,500.00	02/10/92	1,500.00
FC 00015210 [illegible] WILLIAM F. [illegible] LYME RD. HANOVER NH 03755	INFORMATION REQUESTED AGGREGATE YTD 850.00	02/10/92 02/10/92	150.00 500.00
FC 00015924 [illegible] CARL H [illegible] CEDAR FALLS IA 50613	RETIRED AGGREGATE YTD 250.00	03/30/92	250.00
SUBTOTAL OF RECEIPTS THIS PAGE	RECEIPT AMOUNT		3,700.00

92U37530330

SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

STATEMENT COVERS PERIOD FROM 1/01/91 THROUGH 6/30/91

NAME OF COMMITTEE: SEYMOUR VICTORY '92 FED ID# C00250480

	EMPLOYER/ OCCUPATION	SENT/ RECEIVED	DATE	AMOUNT
Mr. Robert A Imhoff 573 S Van Ness Ave San Francisco CA 94110	N/A Self-Empl Real Estate Develop		5/14/91	$500.00
RECEIPT FOR: PRIMARY	AGGREGATE YTD: $500.00			
Mr. William C H Mow 575 N Rockingham Ave Los Angeles CA 90049	BEST EFFORT BEST EFFORT		4/29/91	$500.00
RECEIPT FOR: PRIMARY	AGGREGATE YTD: $500.00			
Mr. Kenneth H Kazarian 58 Dappleyray Rolling Hills Est CA 90274	BKK Corporation Vice Chairman		6/26/91	$1,000.00
RECEIPT FOR: PRIMARY	AGGREGATE YTD: $1,000.00			
Mr. Kris L Kazarian 5639 Ocean Terr Dr Rancho Palos Verdes CA 90274	BKK Corporation Executive Vice President		6/28/91	$1,000.00
RECEIPT FOR: PRIMARY	AGGREGATE YTD: $1,000.00			
Mrs. Julie E Kazarian 5639 Ocean Terrace Dr Rancho Palos Verdes CA 90274	BEST EFFORT BEST EFFORT		6/28/91	$1,000.00
RECEIPT FOR: PRIMARY	AGGREGATE YTD: $1,000.00			

SUBTOTAL OF RECEIPTS THIS PAGE.....> $4,000.00

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me of Committee (in full): Dannemeyer for Senate '92

Full Name, Address and ZIP Code	Name of Employer	Date	Amount
William Mow Rocking Arm Ave. Angeles, CA 90049	Occupation Unknown	03/28/91	1,000.00

Receipt for: [X]Primary [ ]General
[ ]Other (specify): | Aggr YTD >$ 1,000.00

Full Name, Address and ZIP Code	Name of Employer	Date	Amount
William Mow 900 Madera Rd. Simi, CA 93065	Bugle Boy Ind., Inc. Occupation Unknown	03/28/91	1,000.00

Receipt for: [X]Primary [ ]General
[ ]Other (specify): | Aggr YTD >$ 1,000.00

Full Name, Address and ZIP Code	Name of Employer	Date	Amount
Harold Muckenthaler P.O. Box 5744 Fullerton, CA 92635	Occupation Unknown	05/03/91	1,000.00

Receipt for: [X]Primary [ ]General
[ ]Other (specify): | Aggr YTD >$ 1,000.00

Full Name, Address and ZIP Code	Name of Employer	Date	Amount
Shirley Muckenthaler P.O. Box 5744 Fullerton, CA 92635	Occupation Unknown	05/03/91	1,000.00

Receipt for: [X]Primary [ ]General
[ ]Other (specify): | Aggr YTD >$ 1,000.00

Full Name, Address and ZIP Code	Name of Employer	Date	Amount
Robyn Murphy 4 Calle De Princesa Trabuco Canyon, CA 92679	Occupation Unknown	04/09/91	500.00

Receipt for: [X]Primary [ ]General
[ ]Other (specify): | Aggr YTD >$ 500.00

Subtotal of Receipts This Page (optional).....$ 4,500.00
Total This Period (last page this line number only).....$

[redacted]

[redacted] DISBURSEMENTS

[redacted]

[redacted] - [redacted] '92 PRIMARY COMMITTEE, INC.

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NAME, ADDRESS, CITY, STATE, ZIP CODE	PURPOSE OF DISBURSEMENT / DISBURSEMENT FOR	[redacted]	[redacted]
Mr. William G. Rea 2400 Madera Rd. Simi, CA 93065	Contribution Refund DISBURSEMENT FOR: [X] Primary [ ] General [ ] Other (specify)	10-JAN-92	$1,000.00
NAME, ADDRESS, CITY, STATE, ZIP CODE	PURPOSE OF DISBURSEMENT / DISBURSEMENT FOR	[redacted]	[redacted]
Mrs. Christina E. Rose 1900 Burlington Rd. Bethlehem, PA 18015	Contribution Refund DISBURSEMENT FOR: [X] Primary [ ] General [ ] Other (specify)	10-JAN-92	$1,000.00
NAME, ADDRESS, CITY, STATE, ZIP CODE	PURPOSE OF DISBURSEMENT / DISBURSEMENT FOR	[redacted]	[redacted]
Mr. Hugh Sullock 1000 Fifth Ave. New York, NY 10028	Contribution Refund DISBURSEMENT FOR: [X] Primary [ ] General [ ] Other (specify)	10-JAN-92	$1,000.00
NAME, ADDRESS, CITY, STATE, ZIP CODE	PURPOSE OF DISBURSEMENT / DISBURSEMENT FOR	[redacted]	[redacted]
Mr. Jean E. Schiffle 3900 Cambridge Rd. Louisville, KY 40202	Contribution Refund DISBURSEMENT FOR: [X] Primary [ ] General [ ] Other (specify)	20-JAN-92	$1,000.00
NAME, ADDRESS, CITY, STATE, ZIP CODE	PURPOSE OF DISBURSEMENT / DISBURSEMENT FOR	[redacted]	[redacted]
Mrs. Alexis S. Stephens 10000 Whitebrook Dr. Potomac, MD 20854	Contribution Refund DISBURSEMENT FOR: [X] Primary [ ] General [ ] Other (specify)	20-JAN-92	$1,000.00
NAME, ADDRESS, CITY, STATE, ZIP CODE	PURPOSE OF DISBURSEMENT / DISBURSEMENT FOR	[redacted]	[redacted]
Mr. Joshua I. Smith 5016 Tudor Lane Rockville, MD 20852	Contribution Refund DISBURSEMENT FOR: [X] Primary [ ] General [ ] Other (specify)	20-JAN-92	$1,000.00
NAME, ADDRESS, CITY, STATE, ZIP CODE	PURPOSE OF DISBURSEMENT / DISBURSEMENT FOR	[redacted]	[redacted]
Mr. Donald V. Moorehead 3505 Riverwood Rd. Alexandria, VA 22309	Contribution Refund DISBURSEMENT FOR: [X] Primary [ ] General [ ] Other (specify)	20-JAN-92	$1,000.00
NAME, ADDRESS, CITY, STATE, ZIP CODE	PURPOSE OF DISBURSEMENT / DISBURSEMENT FOR	[redacted]	[redacted]
Mr. Dilip V. Kulkarni 3 Gulston Drive W. Windsor, NJ 08691	Contribution Refund DISBURSEMENT FOR: [X] Primary [ ] General [ ] Other (specify)	20-JAN-92	$1,000.00
SUBTOTAL OF DISBURSEMENTS THIS PAGE (optional)			$8,000.00
TOTAL THIS PERIOD (last page this line number only)			

92373905586

SCHEDULE A-P

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

ITEMIZED RECEIPTS

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

PAGE 9 OF 22

LINE NUMBER 17b

NAME OF COMMITTEE (In Full)

BURR-GERALD '92 COMPLIANCE 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 (MONTH, DAY, YEAR)	AMOUNT OF EACH RECEIPT THIS PERIOD
Irani, Dr. Ray R. 10889 Wilshire Blvd. Suite 1500 Los Angeles, CA 90024	Info Requested Info Requested $1,000.00	Primary: [ ] General: [X]	02/28/92	$1,000.00
Wade, Mrs. Jill R. 1796 River Heights Lane Ville Hills, KY 41017	Info Requested Info Requested $1,000.00	Primary: [ ] General: [X]	02/25/92	$1,000.00
Rosco, Mr. Gary P.O. Box 8 Anwville, KY 40402	Info Requested Info Requested $1,000.00	Primary: [ ] General: [X]	02/04/92	$1,000.00
Fenjul, Mr. Alexander L. 321 Osceola Way Palm Beach, FL 33480	Info Requested Info Requested $1,000.00	Primary: [ ] General: [X]	02/25/92	$1,000.00
Long, Mr. John R. 1100 Pleasant View Rd. London, KY 40741	Info Requested Info Requested $1,000.00	Primary: [ ] General: [X]	02/04/92	$1,000.00
Fenjul, Ms. Nicole 221 Osceola Way Palm Beach, FL 33480	Info Requested Info Requested $1,000.00	Primary: [ ] General: [X]	02/25/92	$1,000.00
Rau, Mr. William C. M. 2900 Madera Rd. Simi, CA 93065	Info Requested Info Requested $1,000.00	Primary: [ ] General: [X]	02/25/92	$1,000.00
Vest, Mr. Ronald C. 21515 Hawthorne Blvd., #840 Torrance, CA 90503	Info Requested Info Requested $1,000.00	Primary: [ ] General: [X]	02/28/92	$1,000.00
SUBTOTAL OF RECEIPTS THIS PAGE (optional)				$8,000.00
TOTAL THIS PERIOD (last page this line number only)				

*--Reattribution or Redesignation Requested

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SCHEDULE A ITEMIZED RECEIPTS
FOR THE PERIOD 01/01/92 THRU 03/31/92 NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE LINE NUMBER 106 PAGE 106 OF 116 155

ALL INFORMATION COPIED FROM FECA REPORTS OR STATEMENTS MAY NOT BE SOLD OR USED BY ANY PERSON FOR THE PURPOSE OF SOLICITING CONTRIBUTIONS OR COMMERCIAL PURPOSES, OTHER THAN USE THAT IS DIRECTLY ASSOCIATED WITH A NEWS STORY, BROADCAST OR PUBLICATION BY THE MEDIA OF ANY POLITICAL COMMITTEE TO SOLICIT CONTRIBUTIONS FROM SUCH COMMITTEE.

NAME, ADDRESS, CITY, STATE, ZIP	EMPLOYER AND OCCUPATION	RECEIPT DATE	RECEIPT AMOUNT
[illegible], MRS VERA [illegible] AVE ST PAUL MN 55105	INFORMATION REQUESTED AGGREGATE YTD 5,000.00	03/19/92	5,000.00
[illegible], MRS VIRGINIA D. [illegible] AVE [illegible] PA 16735	INFORMATION REQUESTED AGGREGATE YTD 300.00	01/14/92 03/18/92	100.00 100.00
[illegible], MR WILLIAM F. [illegible] [illegible] NH 03755	RETIRED AGGREGATE YTD 600.00	[illegible] [illegible]	[illegible] [illegible]
[illegible], MR WALTER [illegible] AVE COLCHESTER CT 06415	SELF EMPLOYED AGGREGATE YTD 250.00	03/27/92	250.00
[illegible], MR WILLIAM L. [illegible] MORGANTOWN WV 26505	SELF EMPLOYED RETIRED AGGREGATE YTD 275.00	01/13/92 01/30/92	150.00 125.00
[illegible], MR WALTER D. [illegible] HILL DR KENSINGTON MD 20895	RETIRED AGGREGATE YTD 355.00	02/11/92 02/28/92 03/09/92	100.00 155.00 100.00
[illegible], MR WILLIAM C W [illegible] RD SIMI CA 93065	SELF EMPLOYED AGGREGATE YTD 10,000.00	01/09/92	10,000.00

SUBTOTAL OF RECEIPTS THIS PAGE RECEIPT AMOUNT 16,780.00

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92014462304

[redacted] COMMITTEE LINE [redacted] 184 OF 184 150

[redacted] OR [redacted] OF ANY POLITICAL [redacted] TO REPORT CONTRIBUTIONS FROM SUCH COMMITTEE.

NAME,ADDRESS,CITY,STATE,ZIP	EMPLOYER AND OCCUPATION	RECEIPT DATE	RECEIPT AMOUNT
[redacted] JR WALTER G. JR [redacted] NJ 07009	SELF EMPLOYED	02/13/92	225.00
	AGGREGATE YTD 225.00		
[redacted] WILLIAM [redacted] VA 23609	INFORMATION REQUESTED	01/07/92	250.00
	AGGREGATE YTD 250.00		
[redacted] CA 90069	SELF EMPLOYED	02/19/92	300.00
	AGGREGATE YTD [redacted]		
[redacted] CA 90069	[redacted]	01/20/92	1,000.00
	AGGREGATE YTD 1,000.00		

920 [redacted] 2354

[redacted] OF RECEIPTS THIS PAGE 1,975.00

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REPORT COVERING PERIOD FROM 7/ 1/92 THRU 7/31/92 OVER $200.00

NAME AND ADDRESS/OCCUPATION	DATE	THIS PERIOD	CALENDAR YR-TO-DATE
MR. BREED O. MOUNGER, JR. POST OFFICE BOX 231 TYLERTOWN, MS 39667			$1441.00
ATTORNEY	7/23/92 7/23/92 7/23/92	$1000.00 $426.00 $15.00	
DR. ROBERT E. MOUNTAIN 2005 S. ATLANTIC STREET MELBOURNE BEACH, FL 32951			$937.50
RETIRED	7/27/92 7/28/92 7/28/92	$7.50 $70.00 $25.00	
MR. CLAUDE L. MOUTOUSSAMY 9352 N.W. 48TH DORAL TERRACE MIAMI, FL 33178			$350.00
INFORMATION REQUESTED	7/24/92	$350.00	
DR. WILLIAM C. W. MOW 575 NORTH ROCKINGHAM AVENUE LOS ANGELES, CA 90049			$18625.00
CHEIF EXECUTIVE OFFICER	7/20/92 7/24/92 7/27/92	$1125.00 $250.00 $250.00	
MR. SVEN K. MOXNESS 100 MOORINGS PARK DRIVE NAPLES, FL 33942-2164			$312.50
RETIRED	7/ 2/92 7/14/92 7/20/92	$15.00 $60.00 $12.50	
MR. JOHN MOXON P.O. BOX 275 OLEY, PA 19547			$435.00
INFORMATION REQUESTED	7/ 2/92 7/21/92	$100.00 $100.00	
MS. ELSA L. MOY 206 CHENERY STREET SAN FRANCISCO, CA 94131-2711			$560.00
INFORMATION REQUESTED	7/17/92 7/24/92	$160.00 $210.00	

SCHEDULE A

ITEMIZED RECEIPTS

Contributions from Individuals/Persons

For Line Number P 11(a)(i)

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NAME OF COMMITTEE (In Full)
Gallegly for Congress C-00194803

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this period
Lee Bolin 6148 Edinburgh Court Agoura Hills, CA 91301 Receipt for: [ ] Primary [X] General [ ] Other (specify):	Lee Bolin & Assoc PRESIDENT Aggregate Year-to-Date $2,000.00	11/22/91	$1,000.00
Mickey Bolin 6148 Edinburgh Court Agoura Hills, CA 91301 Receipt for: [ ] Primary [X] General [ ] Other (specify):	Name of Employer HOMEMAKER Aggregate Year-to-Date $2,000.00	11/22/91	$1,000.00
C. M. Caldwell 2501 Goodenough Road Fillmore, CA 93015 Receipt for: [X] Primary [ ] General [ ] Other (specify):	Name of Employer Giant Truck Stops Occupation SMALL BUSINESS Aggregate Year-to-Date $240.00	10/21/91 11/22/91	$240.00 $100.00
Rose Row 2900 Madera Road Simi Valley, CA 93065 Receipt for: [ ] Primary [X] General [ ] Other (specify):	Name of Employer Occupation HOMEMAKER Aggregate Year-to-Date $1,000.00	11/22/91	$1000.00
William Row 2900 Madera Road Simi Valley, CA 93065 Receipt for: [ ] Primary [X] General [ ] Other (specify):	Name of Employer Eagle Bay Industries Occupation EXECUTIVE Aggregate Year-to-Date $1,500.00	11/22/91	$500.00
Charles Peters 10360 Lorwin Avenue Chatsworth, CA 91311 Receipt for: [X] Primary [ ] General [ ] Other (specify):	Name of Employer Adftech California Occupation SMALL BUSINESS Aggregate Year-to-Date $200.00	7/10/91 11/22/91	$100.00 $100.00
Dexter Sergent 571 Calle Del Norte Camarillo, CA 93010 Receipt for [X] Primary [X] General [ ] Other (specify):	Name of Employer Sergent Mechanical Occupation SELF EMPLOYED Aggregate Year-to-Date $1,450.00	7/10/91 11/26/91 11/26/91 10/8/91	$350.00-P $50.00-P $450.00-G $100.00-P

SUBTOTAL of Receipts This Page (optional) ..... $4,[illegible].00

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

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REPORT COVERING PERIOD FROM 8/ 1/92 THRU 8/31/92 OVER $200.00

NAME AND ADDRESS/OCCUPATION	DATE	THIS PERIOD	CALENDAR YR-TO-DATE
MR. GRANT E. MOUSER III 104 CLARA CROKER WILLIAMSBURG, VA 23185-6504			$315.00
	8/ 5/92	$35.00	
INFORMATION REQUESTED	8/14/92	$35.00	
MR. JOSEPH IVERSE MOUSSIGNAC 660 WASHINGTON AVENUE BROOKLYN, NY 11238			$500.25
	8/20/92	$435.25	
WORKER	8/26/92	$65.00	
DR. WILLIAM C. W. MOW 995 NORTH ROCKINGHAM AVENUE LOS ANGELES, CA 90049			$18935.00
	8/21/92	$210.00	
CHIEF EXECUTIVE OFFICER	8/25/92	$100.00	
MRS. GEORGE L. MOWRY 10608 BROWNIE DRIVE AUSTIN, TX 78753-3404			$220.44
	8/11/92	$15.00	
RETIRED	8/20/92	$15.00	
MR. SVEN K. MOXNESS 100 MOORINGS PARK DRIVE NAPLES, FL 33942-2164			$460.25
	8/ 4/92	$15.00	
RETIRED	8/20/92	$12.50	
	8/24/92	$120.25	
MS. ELSA L. MOY 206 CHERRY STREET SAN FRANCISCO, CA 94131-2711			$930.00
	8/18/92	$210.00	
INFORMATION REQUESTED	8/19/92	$160.00	
MR. KENNETH L. MOYER 32 COBBLESTONE COURT SCHNECKSVILLE, PA 18078			$243.00
	8/ 4/92	$10.00	
SELF EMPLOYED			
MAJOR BENNETT O. MOYLE, RET. 41 W. CHISHOLM ST DULUTH, MN 55803			$255.00
	8/ 3/92	$120.00	
CORRECTIONS AGENT			

SCHEDULE A ITEMIZED RECEIPTS

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

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Full Legal Name of Filer(s)

Contributions from Individuals/Persons Other Than Political Committees

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NAME OF COMMITTEE (In Full)

Rorscharach for U.S. Senate 1992 C00231702

Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this period
A. Ms. Edna R. Moore 28190 Westover Way Sun City, CA 92381	None	07/30/92	50.00
Receipt For: Primary [X] General [ ] Other (specify):	Occupation: Retired	Aggregate Year-to-Date >$ 300.00	
B. Ms. Edna R. Moore 28190 Westover Way Sun City, CA 92381	None	08/18/92	100.00
Receipt For: Primary [X] General [ ] Other (specify):	Occupation: Retired	Aggregate Year-to-Date >$ 300.00	
C. Ms. Edna R. Moore 28190 Westover Way Sun City, CA 92381	None	09/30/92	100.00
Receipt For: Primary [X] General [ ] Other (specify):	Occupation: Retired	Aggregate Year-to-Date >$ 300.00	
D. Mr. Chase Harvey 250 N. Carolwood Dr. Los Angeles, CA 90077	Requested	09/29/92	500.00
Receipt For: Primary [X] General [ ] Other (specify):	Occupation: Requested	Aggregate Year-to-Date >$ 500.00	
E. Mr. William S. Hartmann 599 Alamitos Dr. Pacific Palisades, CA 90272	First Federal Bank of CA.	09/04/92	500.00
Receipt For: Primary [X] General [ ] Other (specify):	Occupation: Chairman of the Board	Aggregate Year-to-Date >$ 500.00	
F. Mr. Ronald R. Rostow 585 Chiswick Rd. Palos Verdes, CA 90274	Jeffries & Co.	09/04/92	250.00
Receipt For: Primary [X] General [ ] Other (specify):	Occupation: Sales	Aggregate Year-to-Date >$ 250.00	
G. Mr. William C.V. Raw 2980 Madera Rd. Simi Valley, CA 93065	Requested	09/14/92	1000.00
Receipt For: Primary [X] General [ ] Other (specify):	Occupation: Executive	Aggregate Year-to-Date >$ 1000.00	

SUBTOTAL of Receipts This Page (optional)..... 2500.00

SUBTOTAL This Period Sent page this line number only).....

NATIONAL [illegible]

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REPORT COVERING PERIOD FROM 2/ 1/92 THRU 2/29/92 OVER $200.00

NAME AND ADDRESS/OCCUPATION	DATE	THIS PERIOD	CALENDAR YR-TO-DATE
MR. WILLIAM J. MOTTEL 116 COUNTRY CLUB DRIVE WILMINGTON, DE 19803			$280.00
	2/ 5/92	$260.00	
INFORMATION REQUESTED	2/20/92	$10.00	
MR. PAUL G. MOULTON 14040-221ST AVENUE, N.E. WOODINVILLE, WA 98072			$2512.00
	2/21/92	$2000.00	
V.P., TREASURER	2/21/92	$512.00	
MR. WILLIAM C. MOW 2900 MADERA ROAD SIMI, CA 93065			$16625.00
	2/10/92	[illegible]	
EXECUTIVE	2/10/92	$1[illegible]	
	2/10/92	[illegible]	
	2/12/92	$1[illegible]	
MR. J. G. MOSON 1215 S. E. 22ND AVENUE OCALA, FL 32670			$200.00
	2/20/92	$200.00	
INFORMATION REQUESTED			
MR. TRUMAN P. MUELLER 2047 SOUTH WARD STREET WICHITA, KS 67213-4966			$255.00
	2/ 4/92	$70.00	
RETIRED	2/ 4/92	$10.00	
	2/ 4/92	$15.00	
	2/11/92	$25.00	
	2/12/92	$35.00	
	2/18/92	$25.00	
	2/20/92	$10.00	
	2/21/92	$35.00	
	2/27/92	$25.00	
MR. ADITYA MUKERJI 327 BONITA AVENUE PIEDMONT, CA 94611			$250.00
	2/28/92	$250.00	
INFORMATION REQUESTED			

REPUBLICAN NATIONAL COMMITTEE

PAGE [illegible]

ITEMIZED REPORT REVIEWED PERIOD FROM 10/01/92 THRU 10/14/92 OVER $200.00

NAME AND ADDRESS	OCCUPATION/PLACE OF BUSINESS	DATE	THIS PERIOD	CALENDAR YR-TO-DATE
Mrs. Belle Ross 309 Maple Avenue Horse Cave KY 42749	Housewife	10/05/92	$5.00	$205.00
Mrs. Annie Fossett 175 Red Bridge Road Gettysburg PA 17325	INFORMATION REQUESTED 10/02/92	10/02/92	$100.00	$200.00
Mrs. Elizabeth Hostetler 617 Woodland Drive Rockville IN 47872	Retired	10/05/92	$25.00	$250.00
Mr. Jack Hotzing Jr. R.R. 2 Chickasaw PA 15914	Self-employed	10/13/92	[illegible]	[illegible]
Ms. Hattie Sue Hanson Apartment 8 [illegible] Abbott Avenue Dallas TX 75205	INFORMATION REQUESTED 10/13/92	10/13/92 10/13/92	[illegible] [illegible]	[illegible]
Mr. Robert E. Hamblin Apartment 402, The Breakers 2005 S. Atlantic Street Melbourne Beach FL 32951	Self-employed	10/01/92	[illegible]	$570.00
Mr. William C. H. Hsu 2500 North Hudson Road Simi Valley CA 93065	Self-employed Eagle Bay, Inc.	10/02/92	$5,000.00	$7,000.00
Mr. Douglas H. Hunt 683 18th St Marysville KS 66940	C.E.O. London's Pure Dairy, Inc.	10/07/92 10/13/92	$100.00 $75.00	$425.00
Mr. Robert T. Hussey 7401 Hundley Blvd Dallas TX 75231	INFORMATION REQUESTED 10/01/92	10/01/92	$250.00	$250.00
Mr. James T. Royers 3017 Royer Road Powhatan VA 23139	Machine Operator Philip Morris	10/02/92	$200.00	$200.00

SCHEDULE A ITEMIZED RECEIPTS
Gallegly for Congress
1791 Erringer Rd., Simi Valley, CA 93065

NAME AND ADDRESS	EMPLOYER AND OCCUPATION	DATE	AMOUNT	E
Frank McDonald 425 Rimrock Road Thousand Oaks, CA 91361 YEAR TO DATE $500.00	Self-McDonald Entarp Manufacturer	05/06/91	$500.00	P
Patricia McDonough 4245 Hunt Club Lane Westlake Village, CA 91361 YEAR TO DATE $649.00	J. M. McDonough Investor	05/01/91 06/24/91	$600.00 $49.00	P P
Rosa Mow Bugle Boy Industries 2900 Madera Road Simi Valley, CA 93065 YEAR TO DATE $1000.00	housewife	04/26/91	$1000.00	P
William Mow Bugle Boy Industries 2900 Madera Road Simi Valley, CA 93065 YEAR TO DATE $1000.00	Bugle Boy Industries Chairman of Board	04/26/91	$1000.00	P
Fred Ockrim 24202 Park Athena Calabasas, CA 91302 YEAR TO DATE $600.00	Sea Snack Foods, Inc President	04/24/91	$600.00	P
Sheri Ockrim 24202 Park Athena Calabasas, CA 91302 YEAR TO DATE $649.00	Homemaker	04/24/91 06/06/91	$600.00 $49.00	P P
Dean Plassaras 10639 Whitegate Avenue Sunland, CA 91040 YEAR TO DATE $300.00	Kajima Development Project Manager	05/07/91	$300.00	P

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M

CHEDULE A

ITEMIZED RECEIPTS

[illegible] schedule(s) for each category of the Detailed Summary Page

PAGE [illegible] OF [illegible]

FOR LINE NUMBER: 11a

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NAME OF COMMITTEE (in Full)
Republican Leader's Fund

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Stanley C. Hubbard 3415 University Avenue St. Paul, Minnesota 55114 Receipt For: Primary [X] General Other (specify)	Hubbard Broadcasting President and CEO Aggregate Year to Date $ 1,000	7/3/92	$1,000.00
William F. Paul 21 Springwood Drive Trumbull, Connecticut 06611 Receipt For: Primary [X] General Other (specify)	EARMARKED United Technologies PAC Senior Vice President Aggregate Year to Date > $250.00	7/3/92	250.00
Julian Klein 520 East 77th Street New York, New York 10021 Receipt For: Primary [X] General Other (specify)	Self-employed Occupation Aggregate Year to Date > [illegible]	7/9/92	200.00
Robert A. Levitan 3603 N. Military Road Arlington, Virginia 22207 Receipt For: Primary [X] General Other (specify):	Info Requested Occupation Aggregate Year-to-Date > [illegible]	7/14/92	[illegible]
Margaret Martin Brock 2220 Avenue of the Stars Apt. No. 1404 Los Angeles, California [illegible] Receipt For: Primary [X] General Other (specify):	Info Requested Occupation Aggregate Year-to-Date > $1,000	7/28/92	1,000.00
Wheelock Whitney 1900 Foshay Tower 821 Marquette Avenue Minneapolis, Minnesota 55402-2921 Receipt For: Primary [X] General Other (specify)	Self-employed Occupation Aggregate Year-to-Date > $1,000	7/24/92	1,000.00
William C. Mow 2900 Madera Road Simi, California 93065 Receipt For: Primary [X] General Other (specify):	Self-employed Occupation Aggregate Year-to-Date > $1,000	7/29/92	1,000.00

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

TOTAL This Period (last page this line number only) $4,250.00

9 9 2 0 3 5 8 4 0 1 6 1 0 7 3 2

C

SCHEDULE A — ITEMIZED RECEIPTS
NAME OF COMMITTEE : [illegible] CONTRIBUTIONS COMMITTEE — LINE NUMBER 11A — PAGE 471 OF 690
PERIOD FROM 07/01/92 THRU 09/30/92

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NAME, ADDRESS, CITY, STATE, ZIP	EMPLOYER AND OCCUPATION	RECEIPT INFO DATE	RECEIPT INFO AMOUNT
MITCHELL, MR WILLIAM W. BOX 137 PALMER AK 99645	RETIRED AGGREGATE YTD 250.00	09/29/92	100.00
JONES, MRS WILLARD 5224 16TH ST NW GIG HARBOR WA 98335	RETIRED AGGREGATE YTD 210.00	08/31/92	75.00
[illegible], MR WILLIAM P JR [illegible] ATHENS GA [illegible]	INFORMATION REQUESTED AGGREGATE YTD 1,000.00	08/13/92	1,000.00
[illegible], WILLIAM [illegible] [illegible] CA [illegible]	INFORMATION REQUESTED AGGREGATE YTD [illegible]	07/23/92	[illegible]
[illegible], MR WILLIAM C W [illegible] SIMI CA [illegible]	SELF EMPLOYED AGGREGATE YTD 22,000.00	[illegible]	[illegible]
LIN, MR WALTER E [illegible] [illegible] CA 91745	INFORMATION REQUESTED AGGREGATE YTD 400.00	[illegible]	[illegible]
[illegible], MRS YING-DO [illegible] [illegible] CA 91745	INFORMATION REQUESTED AGGREGATE YTD 500.00	[illegible]	[illegible]

SUBTOTAL OF RECEIPTS THIS PAGE — GRAND TOTAL 13,175.00

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SCHEDULE B

ITEMIZED DISBURSEMENTS

M

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

PAGE 1 OF 1

FOR LINE NUMBER 26a

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NAME OF COMMITTEE (In Full)

NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE--EXPENDITURES

V

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code WILLIAM C. W. NOW 290 MADERA ROAD SIMI, CA 93065	CONTRIBUTION REFUND Disbursement for ☐ Primary ☐ General ☐ Other (specify)	9/30/92	2,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			2,000.00

9201147/11783

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SCHEDULE A — ITEMIZED RECEIPTS — LINE NUMBER 11A

STATEMENT COVERS PERIOD FROM 7/01/91 THROUGH 12/31/91

NAME OF COMMITTEE: U.S. SENATOR JOHN SEYMOUR COMMITTEE — FED ID. C00253480

	EMPLOYER/ OCCUPATION	SENT/ RECEIVED	DATE	AMOUNT
Mr. Edgar L McCoubrey 290 No Indian Canyon Dr Palm Springs CA 92262	Plaza Motors Auto dealer		11/13/91	$500.00
RECEIPT FOR: PRIMARY	AGGREGATE YTD: $500.00			
Mr. William C W Mow 2900 Madera Rd Simi CA 93065	Dugly Moy Executive		9/27/91	$1,000.00
RECEIPT FOR: PRIMARY	AGGREGATE YTD: $1,000.00			
Mr. William C W Mow 2900 Madera Rd Simi CA 93065	Dugly Moy Executive		12/10/91	$1,000.00
RECEIPT FOR: GENERAL	AGGREGATE YTD: $2,000.00			
Mr. John A. Beal 2931 Via Anacapa Palos Verdes CA 90274	Atlantic Richfield Company Vice President		12/04/91	$500.00
RECEIPT FOR: PRIMARY	AGGREGATE YTD: $500.00			
Mr. Reuben W Hills 2920 Broadway San Francisco CA 94115	N/A Retired		10/23/91	$1,000.00
RECEIPT FOR: PRIMARY	AGGREGATE YTD: $1,000.00			

SUBTOTAL OF RECEIPTS THIS PAGE..... ..... > $4,000.00

SCHEDULE B ITEMIZED DISBURSEMENTS

Use separate schedule for each category of the Detailed Summary Page

Page 8

Full Legal Name of Committee (Party)

Refunds of Contributions To 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 payments, other than those to the name and address of any political committee to which contributions from such committee.

Full Name of Committee (Party)

[illegible] AND [illegible] COMMITTEE

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement this period
LISA [illegible] 591 CIVIC CENTER [illegible] 670 440 SANTA ANA CA 92701	[illegible] Disbursement for ☐ Primary ☐ General ☐ Other (specify)	06/17/92	500.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement this period
DONALD P. MURPHY 1025 LA LOMA DR SANTA ANA CA 92705	[illegible] Disbursement for ☐ Primary ☐ General ☐ Other (specify)	06/17/92	750.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement this period
DAVID LEE 14000 TRACY ST LOS ALTOS HILLS CA 94022	[illegible] Disbursement for ☐ Primary ☐ General ☐ Other (specify)	06/17/92	150.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement this period
[illegible] LIEBMAN [illegible] 6TH [illegible] [illegible] CA 91750	[illegible] Disbursement for ☐ Primary ☐ General ☐ Other (specify)	06/17/92	250.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement this period
PAUL LINDSAY 300 S [illegible] ST 8TH FLOOR LOS ANGELES CA 90071	[illegible] Disbursement for ☐ Primary ☐ General ☐ Other (specify)	06/17/92	1000.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement this period
WILLIAM [illegible] [illegible] S [illegible] AVE LOS ANGELES CA 90049	[illegible] Disbursement for ☐ Primary ☐ General ☐ Other (specify)	06/17/92	1000.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement this period
[illegible] [illegible] WILSHIRE [illegible] [illegible] CITY CA 91403	[illegible] Disbursement for ☐ Primary ☐ General ☐ Other (specify)	06/17/92	750.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement this period
[illegible] [illegible] 6TH AVE OAKLAND CA 94621	[illegible] Disbursement for ☐ Primary ☐ General ☐ Other (specify)	06/17/92	250.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement this period
[illegible] [illegible] [illegible] OTTOMAN [illegible] [illegible] LOS ANGELES CA 90017	[illegible] Disbursement for ☐ Primary ☐ General ☐ Other (specify)	06/17/92	1000.00
SUBTOTAL of Disbursements This Page (optional)			6000.00
SUBTOTAL This Period (last page this line number only)			

01015

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 3911

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 William C.W. Mow, the Bush-Quayle '92 Primary Committee and J. Stanley Huckaby, as treasurer, the National Republican Congressional Committee and Donna Singleton, as treasurer, and the U.S. Senator John Seymour Committee and Charles Bell, 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 3911. 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

9404359066 8

FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 28, 1994

Charles Bell, Treasurer
U.S. Senator John Seymour Committee
2100 S. State College Blvd.
Anaheim, CA 92606

RE: MUR 3911

Dear Mr. Bell:

The Federal Election Commission received a complaint which indicates that the U.S. Senator John Seymour 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 3911. 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.

7404359069

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

9404359061 0

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

January 28, 1994

Donna Singleton, Treasurer
National Republican Congressional Committee
320 First Street, NE
Washington, DC 20003

RE: MUR 3911

Dear Ms. Singleton:

The Federal Election Commission received a complaint which indicates that the National Republican Congressional 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 3911. 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.

2404359061

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

9404359067 2

FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

January 28, 1994

J. Stanley Huckaby, Treasurer
Bush-Quayle '92 Primary Committee
228 S. Washington Street, Suite 200
Alexandria, VA 22314

RE: MUR 3911

Dear Mr. Huckaby:

The Federal Election Commission received a complaint which indicates that the Bush-Quayle '92 Primary 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 3911. 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.

24043590613

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

2404359067/4

FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

January 28, 1994

William C.W. Mow
2900 Madera Road
Simi Valley, CA 93065

RE: MUR 3911

Dear Mr. Mow:

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 3911. Please refer to this number in all future correspondence.

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

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

2 4 0 4 3 5 9 0 6 / 5

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

9404359906/6

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM
Feb 9 11 29 AM '94

GINSBURG, STEPHAN, ORINGHER & RICHMAN
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW

LOS ANGELES OFFICE
10100 SANTA MONICA BOULEVARD
EIGHTH FLOOR
LOS ANGELES, CA 90067-4012
(310) 557-2009
FAX (310) 551-0283

Reply to
Los Angeles

ORANGE COUNTY OFFICE
535 ANTON BOULEVARD
SUITE 800
COSTA MESA, CA 92626-1962
(714) 241-0420
FAX (714) 241-0622

94 FEB -9 PM 3:21
RECEIVED
FEDERAL ELECTION COMMISSION

February 7, 1994

VIA U.S. EXPRESS MAIL

08000.59001

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

Re: MUR 3911/Dr. William C.W. Mow

Dear Ms. Taksar:

We are in receipt of your complaint and accompanying documents regarding the above-referenced matter. According to our calculations, since your letter and complaint were not received by Dr. Mow until February 4th, we have until February 19, 1994 to submit a response. Please contact my office immediately if this is not the case. You should have already received, or will shortly be receiving, the completed Designation of Counsel form identifying our firm as counsel of record for Dr. William C.W. Mow in this matter.

Thank you for your courtesy and cooperation.

Very truly yours,

Eugene Moscovitch

EUGENE C. MOSCOVITCH

ECM/elp
cc: Diane L. Becker, Esq.
B:\MOW\ECM1667.LTR

24043590677

GINSBURG, STEPHAN, ORINGHER & RICHMAN

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

LOS ANGELES OFFICE
10100 SANTA MONICA BOULEVARD
EIGHTH FLOOR
LOS ANGELES, CA 90067-4012
(310) 557-2009
FAX (310) 551-0283

Reply to
Los Angeles

ORANGE COUNTY OFFICE
535 ANTON BOULEVARD
SUITE 800
COSTA MESA, CA 92626-1962
(714) 241-0420
FAX (714) 241-0622

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

Feb 14 10 55 AM '94

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RECEIVED
FEDERAL ELECTION COMMISSION

February 9, 1994

VIA FACSIMILE AND FIRST-CLASS U.S. MAIL (202) 219-3923

Office of the General Counsel
Ms. Joan McEnery
Federal Election Commission
Washington, D.C. 20463

20147.05003

Re: MUR 3911

Dear Ms. McEnery:

Thank you for taking the time to speak with me this afternoon regarding the above-referenced matter. Attached please find a fully executed copy of Dr. C.W. Mow's designation of counsel.

The purpose of this letter is to request a twenty (20) day extension of time for us to submit responsive papers relative to the Commission's Complaint, which was filed on January 28, 1994 and received by Dr. Mow in Simi Valley, California on February 4, 1994. When we spoke, you indicated that, absent an extension, our response would otherwise be due on Tuesday, February 22, 1991; I understand that in the event the within requested twenty (20) day extension is granted, said submission date would then be March 14, 1994.

The basis for our requesting the aforementioned extension is that this firm was not retained to handle this matter for Dr. Mow until yesterday, February 8, 1994. The FEC Complaint alleges some thirty-four (34) separate political contributions during the calendar year 1992, resulting in an alleged excess of $41,100.00 over and above the Commission's legal campaign contribution limitation. Given the number of transactions, the number of different recipients, the amount of funds and the passage of time underlying the Commission's allegations, we feel that the mere seven (7) working days which remain of the Commission's initial fifteen (15) day response period, are insufficient to allow us to fully investigate the facts and circumstances surrounding each of these transactions. Likewise, this short period of time would seem to be equally inadequate to allow us to conscientiously

9404359067 8

research the applicable law and perfect our written response to the Commission's Complaint.

Inasmuch as no prior requests for an extension of time have ever been submitted to the Commission by Dr. Mow or this firm on his behalf, we are hopeful that you will accede to this request and continue the pending response date to March 14, 1994. Since time is very much of the essence, we would appreciate receiving your answer regarding this request by fax as soon as possible. Thank you for your consideration.

If you have any questions, please do not hesitate to contact me at our Los Angeles office.

Very truly yours,

Eugene Moscovitch

EUGENE C. MOSCOVITCH

ECM/elp
Enclosure
cc: Diane L. Becker, Esq. (w/out enc.)
B:\MOW\ECM1775.LTR

2404359006779

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF VENTURA

I am employed in the County of Ventura, State of California. I am over the age of 18 and not a party to the within entitled action; my business address is 2900 Madera Road, Simi Valley, California 93065.

On February 8, 1994, I served the foregoing document(s) described as STATEMENT OF DESIGNATION OF COUNSEL on the interested part(y)(ies) in this action by placing a true copy thereof enclosed, in (a) sealed envelope(s), addressed as follows:

Eugene C. Moscovitch, Esq.
Ginsburg, Stephan, Oringher & Richman
10100 Santa Monica Boulevard, 8th Floor
Los Angeles, CA 90067-4012

I am readily familiar with our office's practice for collection and processing of correspondence and other materials for mailing with the United States Postal Service. On this date, I sealed the envelope(s) containing the above materials and placed the envelope(s) for collection and mailing on this date at the address stated above, following our office's ordinary business practices. The envelope(s) will be deposited with the United States Postal Service on this date, in the ordinary course of business.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct and that this Proof of Service was executed on February 8, 1994, at Simi Valley, California.

Cheryl Rangel

Cheryl Rangel

2404359068 0

OGC 0029

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

MUR 3911

NAME OF COUNSEL: EUGENE C. MOSCOVITCH, ESQ.

FEB 14 10 19 AM '94

ADDRESS: GINSBURG, STEPHAN, ORINGHER & RICHMAN
10100 Santa Monica Boulevard, Eighth Floor
Los Angeles, California 90067-2009

TELEPHONE: (310) 557-2009

94 FEB 14 PM 3:26
RECEIVED

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.

2/8/94
Date

Signature WILLIAM C. W. MOW

RESPONDENT'S NAME: WILLIAM C. W. MOW

ADDRESS: 2900 Madera Road
Simi Valley, California 93065

TELEPHONE: HOME(310) 471-5225
BUSINESS(805) 582-1010

9404359068 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

FEB 18 1994

Eugene C. Moscovitch, Esquire
Ginsburg, Stephan, Oringher & Richman
10100 Santa Monica Boulevard, 8th Floor
Los Angeles, CA 90067-2009

RE: MUR 3911
William C.W. Mow

Dear Mr. Moscovitch:

This is in response to your letter dated February 9, 1994, which we received on February 14, 1994, requesting an extension of 20 days to respond to the complaint in this matter. After considering the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on March 14, 1994.

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

Sincerely,

Karen White
for Joan McEnery
Paralegal

9404359063 2

GINSBURG, STEPHAN, ORINGHER & RICHMAN

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

LOS ANGELES OFFICE
10100 SANTA MONICA BOULEVARD
EIGHTH FLOOR
LOS ANGELES, CA 90067-4012
(310) 557-2009
FAX (310) 551-0283

Reply to
Los Angeles

ORANGE COUNTY OFFICE
535 ANTON BOULEVARD
SUITE 800
COSTA MESA, CA 92626-1962
(714) 241-0420
FAX (714) 241-0622

94 FEB 16 PM 2:36
RECEIVED
FEDERAL ELECTION COMMISSION

February 10, 1994

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

20147.20002

Re: MUR 3911/Dr. William C.W. Mow

Dear Ms. Taksar:

Contrary to our letter to you of February 7, 1994, Ms. Joan McEnery of the Office of the General Counsel to the Federal Election Commission (to whom you referred us in your initial correspondence) has subsequently calculated our presently pending response date to be February 22, 1994, rather than February 19, 1994, as previously communicated. Please correct your records to reflect this re-calculation and advise us immediately if, given Dr. Mow's receipt of the complaint on February 4, 1994, it has not been calculated correctly.

Thank you for your cooperation in this matter.

Very truly yours,

Gene Moscovitch

EUGENE C. MOSCOVITCH

ECM/elp
cc: Diane L. Becker, Esq.
(for Dr. C.W. Mow)

B:\MOW\BCM1778.LTR

FEB 16 8 59 AM '94
FEDERAL ELECTION COMMISSION
MAIL ROOM

2404359063

FARANO
& KIEVIET
LAWYERS

2100 E. STATE COLLEGE BLVD.
ANAHEIM, CA 92806
(714) 935-2400
FAX (714) 935-2410

3600 ORANGE STREET
SUITE 160
RIVERSIDE, CA 92501
(714) 275-0282
FAX (714) 683-4307

February 22, 1994

DELIVERED BY FAX TO (202) 219-3923

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

Re: MUR 3911

Our File No. W.C.W.MOW

Dear Ms. Takasar:

This is in response to your letter dated January 28, 1994 addressed to Mr. Charles Bell as Treasurer of the U.S.Senator John Seymour Campaign. This letter was delivered to the Seymour office but was not passed to Mr. Bell by me due to my absence. Please accept my apologies for this delay and the following response on behalf of Mr. Bell.

We have researched the records of the Seymour Campaign in reference to the Now contributions and have reached the following conclusions:

1. Our records show that Rosa Now contributed $1000 to the Seymour general election campaign on March 16, 1992.

2. Our records show that Wm.C.Now contributed $500 to the Seymour primary election campaign on April 29, 1991 and $1000 to the Seymour primary campaign on September 27, 1991.

3. Our records show that Wm.C.Now contributed $1000 to the Seymour general election campaign on December 16, 1991.

4. Our records show that the Seymour campaign refunded the sum of $1500 to Wm.C. Now on June 17, 1992 and that this refund was made as soon as the excessive contribution was noted..

9404359063 4

FARANO
&
KIEVIET
LAWYERS

In addition to the foregoing we have reviewed Exhibit 1 to MUR 3911 pertaining to the Seymour campaign and have concluded that the refund reflected in paragraph four above is included in the Exhibit as a deduction giving effect to our refund.

We are attaching copies of all document referenced in this response as follows:

Attachment 1. copy computer print out of Mow contributions.

Attachment 2. copy check 002923 re Mow refund.

Attachment 3. copy Exhibit 1 to MUR 3911 showing the Mow refund of 6/17/92 as a deduction (-).

We respectfully request that all matters concerning the involvement of the Seymour campaign in the Mow investigation and in Complaint MUR 3911 be terminated and that the Federal Election Commission take no further action.

Very truly yours,

FLOYD L.FARANO, FINANCIAL DIRECTOR FOR THE SEYMOUR CAMPAIGN AND THE REPRESENTATIVE OF CHARLES BELL.

2404359068 5

9 4 0 4 3 5 9 0 6 8 6

Movsesian	Edwin	Retired					
Edwin						714-793-3803	
120 E Hilton Ave							
Redlands	CA 92373						
0/00/00 1061208	91/06/12	35.00	91418B	BP	11A		0/00/00
0/00/00 2042805	92/04/28	35.00	92435N	BP	11A		0/00/00
92/08/11 1081115	92/08/12	35.00	416	PD	11A		0/00/00
92/09/30 1093002	92/09/30	35.00	10439	BG	11A		0/00/00
Mow	Rosa	Housewife					
Rosa							
2900 Madera Rd							
Simi	CA 93065						
0/00/00 2031614	92/03/16	1,000.00	91479	BG	11A		0/00/00
Mow	William C	Executive					
William		Bugle Boy					
2900 Madera Rd							
Simi	CA 93065						
0/00/00 1042922	91/04/29	500.00	91417C	BP	11A		0/00/00
0/00/00 1092724	91/09/27	1,000.00	91169	BP	11A		0/00/00
0/00/00 1121642	91/12/16	1,000.00	91477	BG	11A		0/00/00
0/00/00	92/06/17	~~1,500.00~~			11A	#02423	92/06/17
Mowinckel	Ernest	Retired					
Ernest						818-364-0087	
15455 Glenoaks Bl	#421						
Sylmar	CA 91342						
92/09/29 1092906	92/09/30	10.00	111	BG	11A		0/00/00
Moy	Elsa	Retired					

Ex 1

9 4 0 4 3 5 9 0 6 8 7

1 10007502 Dr

1

1 10019064 Mrs

1

1 10011828 Mr

1

1 10027596 Mr

1

1 10022752

#2

U.S. SENATOR JOHN SEYMOUR COMMITTEE
12760 High Bluff Drive San Diego, California 92130

002923

VENDOR ID: 1805 CHECK NO.: 2923 DATE 06/17/92
PAYEE: MR. WILLIAM MOW MEMO: CONTRIBUTION REFUND

CHECK TOTAL: *****$1,500.00

9 4 0 4 3 5 9 0 6 3 8

U.S. SENATOR JOHN SEYMOUR COMMITTEE
12760 HIGH BLUFF DRIVE 6230
SAN DIEGO, CALIFORNIA 92130

IMPERIAL BANK
Orange County Regional Headquarters
636 Town Center Dr. Costa Mesa, CA 92626

002923

18-144
1222

NO.
2923

ONE THOUSAND FIVE HUNDRED DOLLARS

DATE 06/17/92 AMOUNT *****$1,500.00

PAY TO THE ORDER OF
MR. WILLIAM MOW
575 N. ROCKINGHAM AVENUE
LOS ANGELES, CA 90049

NON-NEGOTIABLE

⑈002923⑈ ⑆122201344⑆ 06⑈145 665⑈

Republican National Cmte	$10,000	07/27/92	92FEC/774/1222
Republican National Cmte	$2,500	09/04/92	92FEC/792/4156
Republican National Cmte	$5,000	10/02/92	92FEC/797/0500
Seymour, John	$500	04/29/91	91SEN/008/2096
Seymour, John	$-500	06/17/92	92SEN/015/1188
Seymour, John	$-1,000	06/17/92	92SEN/015/1188
Seymour, John	$1,000	09/27/91	92SEN/004/1324
Seymour, John	$1,000	12/16/91	92SEN/004/1324

Total Contributions Attributed to 1992: $66,100

6x3

2404359069

STATEMENT OF DESIGNATION OF COUNSEL

FOR: 3011

NAME OF COUNSEL: ROD L. FARAND

ADDRESS: 2100 S. STATE COLLEGE BLVD
ANAHEIM, CA. 92806

TELEPHONE: (714) 935-2400

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.

2/22/94
Date

Charles L. Bell
Signature

RESPONDENT'S NAME: CHARLES BELL

ADDRESS: 555 CAPITOL MALL
SUITE 530
SACRAMENTO, CA 95814

HOME PHONE:

BUSINESS PHONE: (916) 442-7757

9404359069 0

National Republican Congressional Committee

Bill Paxon, M.C.
Chairman

Maria Cino
Executive Director

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

Feb 23 11 01 AM '94

94 FEB 23 PM 3:57

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

February 15, 1993

Ms. Mary L. Taksar
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RE: Response to MUR 3911

Dear Ms. Taksar:

This letter is in response to the Commission inquiry regarding activity in connection with the Complaint filed against William C.S. Mow. The Committee has reviewed its record and confirms that it received the following contributions from Mr. Mow:

Date	Amount
1/10/92	$10,000.00
1/20/92	$1,000.00
2/10/92	$750.00
8/24/92	$1,000.00
8/24/92	$500.00
9/22/92	$10,000.00

On September 30, 1992, a refund check in the amount of $2,000 was issued to Mr. Mow. A copy of the entry on Schedule B from the NRCC report was included in the Complaint. Today an additional check in the amount of $1,250.00 was issued as a refund to Mr. Mow. A copy of the check is attached hereto. With this refund, the total amount contributed to the NRCC in 1992 by Mr. Mow was $20,000.

Sincerely,

Donna Singleton

Donna Singleton
Treasurer

DMS/m

Enclosure

2404359069 1

320 First Street, S.E.
Washington, D.C. 20003
(202) 479-7020

Paid For by the National Republican Congressional Committee. Not printed at Government Expense.

INVOICE #	INVOICE DATE	AMOUNT	DISCOUNT	VOUCHER #	NET AMOUNT
FEB REFUND	02/15/94	1250.00	0.00	VOUCHER 033004	1250.00
TOTAL ▶		1250.00	0.00		1250.00

NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE
CONGRESSMAN BILL PAXON, CHAIRMAN
320 FIRST STREET S.E.
WASHINGTON, D.C. 20003
(202) 479-7040

SOVRAN BANK / DC NATIONAL
WASHINGTON, D.C.
15 - 120 / 540

011444

DATE 02/15/94

CHECK NO. 011444

ONE THOUSAND TWO HUNDRED FIFTY AND NO/100 U.S. DOLLARS

AMOUNT
******$1,250.00

PAY TO THE ORDER OF
WILLIAM C.W. MOW
2900 MADERA ROAD
SIMI, CA 93065

FEDERAL EXPENDITURES ACCOUNT

⑈011444⑈ ⑆054001204⑆ 230850 9⑈

240435592

RECEIVED
FEDERAL ELECTION COMMISSION
WASHINGTON
94 FEB 23 PM 3:57

FEDERAL ELECTION COMMISSION RECEIVED
94 MAR -3 PM 12:20

Stan Huckaby
Treasurer

February 23, 1994

Ms. Mary Taksar
Office of General Counsel
Federal Election Commission
999 E Street NW
Washington, DC 20463

RE: MUR 3911

Dear Ms. Taksar:

The Bush-Quayle '92 Primary Committee, Inc., ("the Primary Committee") and the Bush-Quayle '92 Compliance Committee, Inc., ("the Compliance Committee") received on February 4, 1994 your letter dated January 28, 1994, regarding this MUR.

As indicated in Exhibit 2 accompanying the MUR, Mr. William C.W. Mow made a $ 2,000 contribution to the Primary Committee on November 20, 1991. The Primary Committee issued a $ 1,000 refund to Mr. Mow on January 18, 1992. Mr. Mow made no other contribution to the Primary Committee. Therefore, the Primary Committee is not in violation of any FEC regulation with respect to Mr. Mow's contribution.

Also as indicated in Exhibit 2, Mr. Mow made a $ 1,000 contribution to the Compliance Committee on February 25, 1992. Mr. Mow made no other contributions to the Compliance Committee. Therefore, the Compliance Committee is not in violation of any FEC regulation with respect to Mr. Mow's contribution.

The documentation necessary to support the activity referenced above has already been provided to, and verified by, the Commission's Audit Division. As a result, I request that the Commission determine that no action should be taken against these Committees with respect to MUR 3911.

Sincerely:

J. Stanley Huckaby, Treasurer
Bush-Quayle '92 Primary Committee, Inc., and
Bush-Quayle '92 Compliance Committee, Inc.

9404359063

P.O. Box 18998, Washington, D.C. 20036
Paid for by Bush-Quayle '92 Compliance Committee, Inc.

OGC 515

GINSBURG, STEPHAN, ORINGHER & RICHMAN
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW

LOS ANGELES OFFICE
10100 SANTA MONICA BOULEVARD
EIGHTH FLOOR
LOS ANGELES, CA 90067-4012
(310) 557-2009
FAX (310) 551-0283

Reply to
Los Angeles

ORANGE COUNTY OFFICE
535 ANTON BOULEVARD
SUITE 800
COSTA MESA, CA 92626-1962
(714) 241-0420
FAX (714) 241-0622

MAR 14 9 35 AM '94

March 11, 1994

Office of the General Counsel
c/o Ms. Joan McEnery
Federal Election Commission
999 E. Street
Room 657
Washington, D.C. 20463

20147.05003

Re: MUR 3911

Dear Ms. McEnery:

This letter, and the exhibits attached hereto, shall serve as the Response of Dr. William C.W. Mow to a Federal Election Commission ("FEC" or "Commission") complaint which was first filed on January 14, 1994. Said Complaint was mailed to Dr. Mow by the Commission on January 28, 1994, but not received by him in California until February 4, 1994. The record reflects that, after this office was designated as counsel for Dr. Mow on February 8, 1994, a first extension was granted by the Office of the General Counsel through its letter of February 18, 1994, establishing an official response date of Monday, March 14, 1994. Accordingly, the within response is timely under the Rules of the Commission.

Dr. Mow has been identified by the "Center for Responsive Politics", along with approximately sixty other individuals, as a possible violator of the Federal Election Campaign Act. While the Commission has yet to make a "reason to believe" determination in this matter, the plaintiff's Complaint charges that Dr. Mow exceeded the $25,000 individual campaign contribution limit for the 1992 calendar year in violation of 2 U.S.C. § 441a(a)(3). Although it appears that a technical violation did, in fact, take place, it is clear that it was not a knowing and willful one and that Dr. Mow has since done everything in his power to rectify the situation. This, and other equities, dictate that the commission exercise its discretion to either take no further action and close its file prior to the opening of a formal investigation or commence the conciliation process.

Dr. Mow has fully demonstrated his sincere desire to comply with all of the Commissions' regulations. When he first learned that he had exceeded his individual

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contribution limit for 1992, he proceeded (through counsel) to request refunds from the Republican National Committee ("RNC"), the National Republican Senatorial Committee ("NRSC") and the National Republican Congressional Committee ("NRCC"). See Exhibit "A," attached. As a result, sufficient sums were returned as to bring Dr. Mow's total 1992 political contributions below the $25,000 limit. See Exhibit "B" attached, reflecting the recent return of $41,250. While such rebates were regrettably not accomplished within sixty (60) days of the dates of the actual contributions themselves as mandated by 11 C.F.R. § 103.3(b), the reacquisition of such funds by a contributor at any stage has traditionally been looked upon favorably by the Commission. See, e.g., MUR's # 1526, 1893, 2167 and 3104.

It is also important to note that Dr. Mow's 1992 political contributions would not have been in violation of the Commission's rules had the offending sums been designated differently at the time of their initial contribution. Exhibit "1" to the FEC Complaint, attached hereto as Exhibit "C," accurately reflects that Dr. Mow directed more than 85% of his 1992 political contributions to three Republican committees (the RNC, NRSC, and NRCC); it is well settled that none of these non-candidate specific contributions would have counted towards Dr. Mow's $25,000 limit had they simply been designated to the existing non-federal accounts of each of these three organizations. Unfortunately, Dr. Mow received no such advice or guidance from any of the three party committees to which he generously gave his support. Had Dr. Mow been told to earmark these funds for "general operating costs" or for use in permissible statewide activities at the time of his contributions, he could have given the same exact amounts to each of the committees without having been in violation of 2 U.S.C. §441a(a)(3). Again, while reattribution can no longer be accomplished at this stage under 11 C.F.R. § 103.3(b), these facts are still highly relevant to the Commission's overall review of this matter.

It is also a fact that none of Dr. Mow's contributions bore the signature of his wife, Rosa Mow, who shares his political philosophy and would have willingly lent her name to these donations. Mrs. Mow either did not contribute or contributed only minimally to federal political causes in 1992. It further appears that all of Dr. Mow's donations were drawn from personal, rather than corporate, funds, as each of the checks reflect either a home address where he and his wife reside or a common work address. By taking full advantage of each of their contribution limits and sharing the contributions equally, Dr. Mow and his wife would have each exceeded the Commissions' individual aggregate limit by not much more than $8,000. Thus, even in the absence of the more expeditious designation of these funds to "non-federal" or "operating" party accounts, Dr. Mow's potential personal violation would have been reduced by approximately $33,000 had Rosa Mow co-signed these contribution checks.

By virtue of his primarily giving to party committees rather than named candidates, it is clear that Dr. Mow was not attempting to curry favor with any particular individual in the hope

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of improperly influencing any pending or future legislation. Rather, what emerges is a portrait of an individual who lacked proper counseling as to how to contribute to the political party of his choice in a manner which would not violate FEC regulations. While the sums donated by Dr. Mow were not insubstantial ($17,500.00 to the RNC; $19,850.00 to the NRSC; and $20,000.00 to the NRCC), each was within the $20,000 legal limitation for individual gifts to party committees. Regrettably, Dr. Mow was not advised by any of these three organizations that committee gifts of this size can only be made to one committee. While their aggregate effect can and did place him in excess of the $25,000 individual contribution limit, this potential violation again rested on a lack of knowledge rather than any specific intent to violate the law. Dr. Mow's lack of understanding of the special federal political contribution limits relating to donations to party committees was a good faith error on his part rather than a knowing and willful violation of the FEC's rules.

It should also be noted that Dr. Mow's political contributions in 1992, while significant, paled by comparison to his overall charitable giving during that year. This highly civic-minded and philanthropic founder and CEO of Bugle Boy Industries Inc. freely donated much larger sums to various educational organizations and charitable causes during the same calendar year. As there were no known legal limits applicable to any of Dr. Mow's other contributions during that year, this well-meaning, but relatively inexperienced, political donor erroneously assumed that donations at the party committee level were not further restricted beyond the $20,000 per committee requirement.

Regardless of his past miscalculations, the Commission can be confident that Dr. Mow has committed no violations of any FEC rule or regulation in 1994. This is because, in addition to requesting and receiving refunds of all amounts in excess of $25,000 for 1992, Dr. Mow has ceased making federal political contributions of any kind to any candidate, party or political committee since learning of the present potential violation. He has also instructed one of his assistants to establish a formal approval process to assure conformance to the federal legal requirements.

The present submission, which is pursuant to 2 U.S.C. § 437(d)(1) and 2 U.S.C. 437g (a)(1), recognizes that whether a particular charge merits FEC investigation remains within the sound discretion of the Commission. That decision has been held to be one which is both sensitive and complex, requiring a full evaluation of, not only the credibility of the allegations (which are generally undisputed herein), but also the nature of the threat posed by the offense. See *In re Federal Election Campaign Act Litigation*, 474 F.Supp. 1044. The combination of Dr. Mow's lack of intent to violate the law and his subsequent corrective actions in mitigation demonstrate that no such threat exists in this case and that dismissal, within the exercise of the Commission's sound discretion, is appropriate in this case.

2 4 0 4 3 5 9 0 6 9 6

Nevertheless, should the Commission find that there is "reason to believe" that a violation of 2 U.S.C. § 441a(a)(3) has occurred, Dr. Mow intends to cooperate fully with the Commission and, accordingly, intends to request pre-probable cause conciliation. The amount of any possible fine, however, should be reasonable and appropriate in relation to Dr. Mow's culpability, and not geared to any automatic or arithmetical formula. See, e.g., *Federal Election Commission v. California Medical Association*, 502 F.Supp. 196 (1980). It is hoped that the Commission will recognize and reward the initiative and good faith which Dr. Mow has already demonstrated in obtaining refunds and rechanneling similar funds into charitable contributions; it should recognize the technical and inadvertent nature of his failure to properly designate the bulk of the subject contributions as joint marital and/or "non-federal" donations; and it should not unduly punish him for the failure of these political party committees to more clearly communicate the circumstances under which these same donations could have been made without any violation of the Commission's guidelines.

Please contact me at your convenience should the Commission conclude that conciliation is the appropriate manner in which to resolve this outstanding dispute.

Sincerely yours,

Eugene Moscovitch

Eugene C. Moscovitch

cc: Dr. William C.W. Mow

BCM\94-0240.LTR
inb\0311\05
20147.05003

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Exhibit A

GINSBURG, STEPHAN, ORINGHER & RICHMAN

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

LOS ANGELES OFFICE
10100 SANTA MONICA BOULEVARD
EIGHTH FLOOR
LOS ANGELES, CA 90067-4012
(310) 557-2009
FAX (310) 551-0283

Reply to
Los Angeles

ORANGE COUNTY OFFICE
535 ANTON BOULEVARD
SUITE 900
COSTA MESA, CA 92626-1962
(714) 241-0420
FAX (714) 241-0622

February 28, 1994

VIA FACSIMILE (202) 675-6083

Ms. Carla Eudy
Finance Director
National Republican Senate Committee
425 2nd Street N.E.
Washington, D.C. 20002

20147.20002

Re: MUR 3911/Dr. William C.W. Mow

Dear Ms. Eudy:

I represent Dr. William C.W. Mow, CEO and Chairman of the Board of Bugle Boy Industries, against whom the Federal Election Commission ("FEC") has recently alleged the making of excessive political contributions to various Republican committees and candidates during the 1992 election year. Dr. Mow's overall contributions during that year to the NRSC appear to have been approximately $19,850.00.

Exhibit 1 to MUR 3911 (attached) reflects that all but $7,500.00 of the $66,100.00 contributed by Dr. Mow during 1992 was given to, and divided roughly equally between, the Republican National Committee, the National Republican Senatorial Committee and the National Republican Congressional Committee, rather than to individual candidates. Accordingly, Dr. Mow is requesting a refund of $13,750.00 from each of the above organizations to reduce his aggregate contribution level for 1992 to a sum which does not exceed $25,000.00. If this sum can be transferred by you before the end of the week, I will be able to include that fact in my response to the commission which is due during the week of March 7, 1994.

Thank you for your cooperation in this matter. If you have any questions or comments, please do not hesitate to contact me at my Los Angeles office.

Sincerely

Eugene Moscovitch

EUGENE C. MOSCOVITCH

ECM/elp
cc: Dr. William Mow (c/o Diane L. Becker, Esq.)

B:\MOW\ECM1841.LTR

24043590698

GINSBURG, STEPHAN, ORINGHER & RICHMAN
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW

LOS ANGELES OFFICE
10100 SANTA MONICA BOULEVARD
EIGHTH FLOOR
LOS ANGELES, CA 90067-4012
(310) 557-2009
FAX (310) 551-0283

Reply to
Los Angeles

ORANGE COUNTY OFFICE
535 ANTON BOULEVARD
SUITE 800
COSTA MESA, CA 92626-1962
(714) 241-0420
FAX (714) 241-0622

February 28, 1994

VIA FACSIMILE (202) 863-7509

Susan Waddel, Esq.
Chief Counsel
National Republican Congressional Committee
310 1st Street S.E.
Washington, D.C. 20003

20147.20002

Re: MUR 3911/Dr. William C.W. Mow

Dear Ms. Waddel:

I represent Dr. William C.W. Mow, CEO and Chairman of the Board of Bugle Boy Industries, against whom the Federal Election Commission ("FEC") has recently alleged the making of excessive political contributions to various Republican committees and candidates during the 1992 election year. Dr. Mow's overall contributions during that year to the NRCC appear to have been approximately $20,000.00.

Exhibit 1 to MUR 3911 (attached) reflects that all but $7,500.00 of the $66,100.00 contributed by Dr. Mow during 1992 was given to, and divided roughly equally between, the Republican National Committee, the National Republican Senatorial Committee and the National Republican Congressional Committee, rather than to individual candidates. Accordingly, Dr. Mow is requesting a refund of $13,750.00 from each of the above organizations to reduce his aggregate contribution level for 1992 to a sum which does not exceed $25,000.00. If this sum can be transferred by you before the end of the week, I will be able to include that fact in my response to the commission which is due during the week of March 7, 1994.

Thank you for your cooperation in this matter. If you have any questions or comments, please do not hesitate to contact me at my Los Angeles office.

Sincerely

Eugene Moscovitch

EUGENE C. MOSCOVITCH

ECM/elp
cc: Dr. William Mow (c/o Diane L. Becker, Esq.)

B:\MOW\ECM\SELTR

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GINSBURG, STEPHAN, ORINGHER & RICHMAN

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

LOS ANGELES OFFICE
10100 SANTA MONICA BOULEVARD
EIGHTH FLOOR
LOS ANGELES, CA 90067-4012
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FAX (310) 551-0283

Reply to
Los Angeles

ORANGE COUNTY OFFICE
535 ANTON BOULEVARD
SUITE 800
COSTA MESA, CA 92626-1963
(714) 241-0420
FAX (714) 241-0422

February 28, 1994

VIA FACSIMILE (202) 863-8659

Tom Josefiak, Esq.
Deputy Chief Counsel
Republican National Committee
310 1st Street S.E.
Washington, D.C. 20003

20147.20002

Re: MUR 3911/Dr. William C.W. Mow

Dear Mr. Josefiak:

I represent Dr. William C.W. Mow, CEO and Chairman of the Board of Bugle Boy Industries, against whom the Federal Election Commission ("FEC") has recently alleged the making of excessive political contributions to various Republican committees and candidates during the 1992 election year. Dr. Mow's overall contributions during that year to the RNC appear to have been approximately $17,500.00.

Exhibit 1 to MUR 3911 (attached) reflects that all but $7,500.00 of the $66,100.00 contributed by Dr. Mow during 1992 was given to, and divided roughly equally between, the Republican National Committee, the National Republican Senatorial Committee and the National Republican Congressional Committee, rather than to individual candidates. Accordingly, Dr. Mow is requesting a refund of $13,750.00 from each of the above organizations to reduce his aggregate contribution level for 1992 to a sum which does not exceed $25,000.00. If this sum can be transferred by you before the end of the week, I will be able to include that fact in my response to the commission which is due during the week of March 7, 1994.

Thank you for your cooperation in this matter. If you have any questions or comments, please do not hesitate to contact me at my Los Angeles office.

Sincerely

Eugene Moscovitch

EUGENE C. MOSCOVITCH

ECM/elp
cc: Dr. William Mow (c/o Diane L. Becker, Esq.)

B:\MOW\ECM1048.LTR

24043590700

Exhibit B

63939

SENATORIAL COMMITTEE

IN REF. NO.	YOUR INVOICE NO.	INVOICE DATE	INVOICE AMOUNT	AMOUNT PAID	DISCOUNT TAKEN	NET CHECK AMOUNT
00003 REFUNI		/ /	13,750.00	13,750.00	.00	
1-MOWW		E-063939	03/08/94			13,750.00

01-MOWW

SIGNET BANK VIRGINIA
VIENNA, VA
56-402/560

63939

NATIONAL REPUBLICAN SENATORIAL COMMITTEE
425 SECOND STREET, NE.
WASHINGTON, DC 20002-4967

DATE	CONTROL NO.	AMOUNT
03/08/94	063939	****$13,750.00

PAY TO THE ORDER OF *****13,750 DOLLARS AND 00 CENTS

DR. WILLIAM C.W. MOW
C/O EUGENE MOSCOVITCH
8TH FLOOR
10100 SANTA MONICA BLVD
LOS ANGELES CA 90067

⑈00063939⑈ ⑆056004089⑆ 651-7172927⑈

⑆40435907⑆

NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE

DATE 03/01/94 CHECK NO. 011502 VENDOR KEY NOW

	INVOICE DATE	AMOUNT	DISCOUNT	VOUCHER #	NET AMOUNT
NOWREFUND	03/01/94	13750.00	0.00	VOUCHER 033273	13750.00
TOTAL ▸		13750.00	0.00		13750.00

NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE
CONGRESSMAN BILL PAXON, CHAIRMAN
320 FIRST STREET S.E.
WASHINGTON, D.C. 20003
(202) 479-7040

SOVRAN BANK/NC NATIONAL
WASHINGTON, D.C.
56-183/510

011502

DATE 03/01/94 CHECK NO. 011502

THIRTEEN THOUSAND SEVEN HUNDRED FIFTY AND NO/100 U.S. DOLLARS

AMOUNT
*****13,750.00

PAY TO THE ORDER OF
WILLIAM C.W. NOW
2900 MADERA ROAD
SIMI, CA 93065

FEDERAL EXPENDITURES ACCOUNT

⑈011502⑈ ⑆054001204⑆ 230850 9⑈

SENT BY: ; 3- 1-94 ; 18:02 ; NRCC POLITICAL DIVI→ OSOR:# 2

2781

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

March 7 19 94 1475

PAY TO THE ORDER OF Dr. William C.W. Mow $ *13,750.00*

Pay Exactly **13,750 Dollars and NO/100** DOLLARS

SIGNET BANK
Arlington Virginia

Pat Hunger

FOR

⑈0000278 1⑈ ⑆056004089⑆ 651-7220643⑈

14:40 20288388054 050R:# 3

Exhibit C

MOW, WILLIAM C W

Contributions Attributed to 1992

Exhibit 1

Summary of FEC Data

Recipient	Amount	Date	FEC Microfilm Location
Bush, George	$-1,000	01/18/92	92FEC/739/0586
Bush, George	$1,000	02/25/92	92FEC/739/3707
Bush, George	$2,000	11/20/91	92FEC/731/0757
Dannemeyer, William E	$1,000	03/28/91	91SEN/007/2700
Gallegly, Elton	$1,000	04/26/91	91HSE/431/3759
Gallegly, Elton	$500	11/22/91	92HSE/439/3076
Herschensohn, Bruce	$1,000	09/14/92	92SEN/022/0816
National Republican Congressional Cmte	$10,000	01/09/92	92HSE/446/2304
National Republican Congressional Cmte	$1,000	01/20/92	92HSE/446/2354
National Republican Congressional Cmte	$1,000	08/24/92	92HSE/469/4464
National Republican Congressional Cmte	$10,000	09/22/92	92HSE/469/4464
National Republican Congressional Cmte	$-2,000	09/30/92	92HSE/477/1788
National Republican Senatorial Cmte	$750	01/17/92	92HSE/438/1235
National Republican Senatorial Cmte	$13,000	02/10/92	92SEN/007/0625
National Republican Senatorial Cmte	$760	02/10/92	92SEN/007/0625
National Republican Senatorial Cmte	$505	03/03/92	92SEN/009/3780
National Republican Senatorial Cmte	$750	03/30/92	92SEN/009/3780
National Republican Senatorial Cmte	$250	06/18/92	92SEN/016/0759
National Republican Senatorial Cmte	$750	06/30/92	92SEN/016/0759
National Republican Senatorial Cmte	$1,125	07/20/92	92SEN/018/3955
National Republican Senatorial Cmte	$250	07/24/92	92SEN/018/3955
National Republican Senatorial Cmte	$250	07/27/92	92SEN/018/3955
National Republican Senatorial Cmte	$210	08/21/92	92SEN/020/2685
President's Dinner 1992	$1,500	02/10/92	92FEC/753/0330
Republican Leader's Fund	$1,000	07/29/92	92HSE/464/1172
Republican National Candidate Trust	$1,000	08/24/92	92FEC/786/3415

9404359070 4

Republican National Cmte	$10,000	07/27/92	92FEC/774/1222
Republican National Cmte	$2,500	09/04/92	92FEC/792/4156
Republican National Cmte	$5,000	10/02/92	92FEC/797/0500
Seymour, John	$500	04/29/91	91SEN/008/2095
Seymour, John	$-500	06/17/92	92SEN/015/1188
Seymour, John	$-1,000	06/17/92	92SEN/015/1188
Seymour, John	$1,000	09/27/91	92SEN/004/1324
Seymour, John	$1,000	12/16/91	92SEN/004/1324

Total Contributions Attributed to 1992: $66,100

2404359070 5

OGC# 1540

GINSBURG, STEPHAN, ORINGHER & RICHMAN

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

LOS ANGELES OFFICE

10100 SANTA MONICA BOULEVARD
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(310) 557-2009
FAX (310) 551-0283

Reply to
Los Angeles

ORANGE COUNTY OFFICE

535 ANTON BOULEVARD
SUITE 800
COSTA MESA, CA 92626-19[illegible]
(714) 241-0420
FAX (714) 241-0622

JUN 1 9 49 AM '94
RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

June 1, 1994

Office of the General Counsel
c/o Ms. Joan McEnery
Federal Election Commission
999 E. Street, Room 657
Washington, D.C. 20463

20147.05003

Re: MUR 3911

Dear Ms. McEnery:

On March 11, 1994, this office forwarded its formal response to the FEC regarding the above-referenced complaint. As yet, we have had no response from the Commission or General Counsel relative to our requests for a dismissal or, alternatively, for leave to attempt to resolve this matter through the conciliation process.

Please be so kind as to advise us of the status of this case. In particular, we would appreciate receiving some written acknowledgment of your receipt of our response to the pending allegations, as well as some indication as to the Commission's likely timetable for resolving this matter.

Thank you in advance for your attention to this matter.

Very truly yours,

Gene Moscovitch

EUGENE C. MOSCOVITCH

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FEDERAL ELECTION
COMMISSION
ADMINISTRATIVE [illegible]

ECM/mp
cc: Dr. William Mow
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COMMISSION
SECRETARIAT

Jan 25 3 25 PM '94

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

FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

Pre-MUR 295 / MUR 3911
Date Pre-MUR 295 Activated: 2/16/94
Date MUR 3911 Activated: 2/4/94
STAFF MEMBER: Dominique Dillenseger

SOURCE: INTERNALLY-GENERATED & COMPLAINT-GENERATED

COMPLAINANT: The Center for Responsive Politics

RESPONDENTS: William C.W. Mow
Bush-Quayle '92 Primary Committee, Inc. and J. Stanley Huckaby, as treasurer
U.S. Senator John Seymour Committee and Charles Bell, as treasurer
National Republican Congressional Committee and Donna Singleton, as treasurer

RELEVANT STATUTES: 2 U.S.C. § 441a(a)(1)(A)
2 U.S.C. § 441a(a)(1)(B)
2 U.S.C. § 441a(a)(3)
2 U.S.C. § 441a(f)

INTERNAL REPORTS CHECKED: Disclosure reports and FEC indices

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

Pre-MUR 295 was generated on January 11, 1994, when the Federal Election Commission ("the Commission" or "FEC") referred to this Office individual contributors who were identified in a Los Angeles Times news article as having made the most contributions in excess of the $25,000 annual contribution limit for individuals in 1992. One of these individuals is William C.W. Mow, who is listed in the article as having made $65,350 in contributions in 1992.

MUR 3911 was generated by a complaint, filed on January 21, 1994, by the Center for Responsive Politics ("the Complainant")

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alleging, inter alia, that William C.W. Mow made $66,100 in contributions in 1992, exceeding by $41,100 the $25,000 annual contribution limit for individuals. See Attachment 1. In addition, the materials included in the complaint showed that Mr. Mow apparently contributed $2,000 to the Bush-Quayle '92 Primary Committee, Inc. ("Bush-Quayle"); $1,500 to the U.S. Senator John Seymour Committee ("the Seymour Committee") for that candidate's primary; and $23,250 to the National Republican Congressional Committee ("the NRCC"). On January 28, 1994, this Office notified Mr. Mow, Bush-Quayle, the Seymour Committee, and the NRCC of the complaint and each has filed a response. See Attachments 2, 3, 4, and 5.

II. FACTUAL AND LEGAL ANALYSIS

A. Statement of the Law

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.

2 U.S.C. § 441a(a)(1)(A) limits contributions by an individual to a federal candidate and his authorized political committees to $1,000 per election.

2 U.S.C. § 441a(a)(1)(B) limits contributions to political committees established and maintained by a national political party, which are not the authorized political committees of any candidate, to $20,000 in the aggregate in any calendar year.

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Under the Act, candidates and political committees are prohibited from accepting any contributions in excess of the Act's limitations. 2 U.S.C. § 441a(f). Contributions which exceed the contribution limitations of the Act on their face, and contributions which do not exceed the Act's limitations on their face but which do exceed those limitations when aggregated with other contributions from the same contributor, may either be deposited into a campaign depository or returned to the contributor. 11 C.F.R. § 103.3(b)(3). If any such contribution is deposited, the treasurer may request redesignation or reattribution of the contribution in accordance with 11 C.F.R. §§ 110.1(b), 110.1(k) or 110.2(b), as appropriate. Id. If redesignation or reattribution is not obtained within sixty days of the treasurer's receipt of the contribution, the treasurer must refund the contribution to the contributor. Id.

B. Discussion

A review of Commission records and indices discloses that Mr. Mow made the following contributions and received the following refunds attributable to the 1992 calendar year:

03/28/91	1,000	P	DANNEMEYER FOR SENATE '92
04/26/91	1,000	P	GALLEGLY FOR CONGRESS
04/29/91	500	P	U S SENATOR JOHN SEYMOUR COMMITTEE
09/27/91	1,000	P	U S SENATOR JOHN SEYMOUR COMMITTEE
11/20/91	2,000	P	BUSH - QUAYLE '92 PRIMARY COMMITTEE INC
11/22/91	500	G	GALLEGLY FOR CONGRESS
12/16/91	1,000	G	U S SENATOR JOHN SEYMOUR COMMITTEE
01/09/92	10,000	P	NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE
01/17/92	750	P	NATIONAL REPUBLICAN SENATORIAL COMMITTEE
01/18/92	-1,000	P	BUSH - QUAYLE '92 PRIMARY COMMITTEE INC
01/20/92	1,000	P	NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE
02/10/92	760	P	NATIONAL REPUBLICAN SENATORIAL COMMITTEE

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02/10/92	($15)[1]	P	NATIONAL REPUBLICAN SENATORIAL COMMITTEE
02/10/92	13,000	P	NATIONAL REPUBLICAN SENATORIAL COMMITTEE
02/10/92	1,500[2]	P	PRESIDENT'S DINNER/AKA 1992 REPUBLICAN SENATE-HOUSE DINNER COMMITTEE
02/12/92	($100)	P	NATIONAL REPUBLICAN SENATORIAL COMMITTEE
02/25/92	1,000	G	BUSH - QUAYLE '92 COMPLIANCE COMMITTEE INC
03/03/92	505	P	NATIONAL REPUBLICAN SENATORIAL COMMITTEE
03/30/92	750	P	NATIONAL REPUBLICAN SENATORIAL COMMITTEE
03/31/92	($120)	P	NATIONAL REPUBLICAN SENATORIAL COMMITTEE
06/17/92	[-500][3]	P	U S SENATOR JOHN SEYMOUR COMMITTEE
06/17/92	[-1,000]	G	U S SENATOR JOHN SEYMOUR COMMITTEE
06/18/92	250	P	NATIONAL REPUBLICAN SENATORIAL COMMITTEE
06/30/92	750[4]	P	NATIONAL REPUBLICAN SENATORIAL COMMITTEE
07/20/92	1,125	P	NATIONAL REPUBLICAN SENATORIAL COMMITTEE
07/24/92	250	P	NATIONAL REPUBLICAN SENATORIAL COMMITTEE
07/27/92	250	P	NATIONAL REPUBLICAN SENATORIAL COMMITTEE
07/27/92	10,000	P	REPUBLICAN NATIONAL COMMITTEE - RNC
07/29/92	1,000	P	REPUBLICAN LEADER'S FUND
08/21/92	210	P	NATIONAL REPUBLICAN SENATORIAL COMMITTEE

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1. Contributions shown in parentheses are listed in the report schedules but are not included in the complaint.

2. There is a discrepancy in the reporting of the allocation for this contribution. Disclosure documents show that the President's Dinner/AKA 1992 Republican Senate-House Dinner Committee ("President's Dinner"), a joint fundraising committee composed of the NRCC and the NRSC, reported the $1,500 as a contribution from Mr. Mow only. Attachment 6, pp. 1-2. The NRCC, however, reported its $750 allocated share as a contribution from Mr. and Mrs. Mow (Id. at 3), while the NRSC reported its $750 allocated share as a contribution from Mrs. Mow. Id. at 4. Later, the NRCC, in its response, attributed the $750 contribution to Mr. Mow. Attachment 5. Based on the NRCC's response and the original contribution to the President's Dinner, it appears that the NRCC and NRSC may have misreported their allocated shares. A review of disclosure documents for these two committees does not reveal any amendments with regard to these contributions. In light of this discrepancy, this $1,500 contribution has been listed above under the President's Dinner, rather than as two separate contributions to the NRCC and NRSC.

3. Bracketed amounts denote that the refund was not made within sixty days of the committee's receipt of the contribution as required by 11 C.F.R. § 103.3(b)(3). These refunds are not deducted from the contribution total.

4. Although reported as a contribution by the NRSC, this contribution does not appear on the FEC contributor index. Attachment 1, p. 9.

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08/24/92	1,000[5]	P	REPUBLICAN NATIONAL CANDIDATE TRUST
08/24/92	1,000	P	NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE
08/25/92	($100)	P	NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE
09/04/92	2,500	P	REPUBLICAN NATIONAL COMMITTEE - RNC
09/14/92	1,000	G	HERSCHENSOHN FOR U S SENATE-1992
09/22/92	10,000	P	NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE
09/30/92	-2,000	P	NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE
10/02/92	5,000	P	REPUBLICAN NATIONAL COMMITTEE - RNC
02/15/94	[-500]	P	NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE
02/15/94	[-750]	P	NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE
03/01/94	[-13,750]	P	NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE
03/07/94	[-13,750]	P	REPUBLICAN NATIONAL FINANCE COMMITTEE
03/08/94	[-13,750]	P	NATIONAL REPUBLICAN SENATORIAL COMMITTEE
TOTAL:	$67,935		

In light of the above, it appears that Mr. Mow violated 2 U.S.C. § 441a(a)(3) by making contributions totaling $67,935 or $42,935 in excess of the $25,000 annual contribution limit for calendar year 1992. This contribution total differs from the $66,100 total in the complaint because it includes four additional contributions, shown above in parentheses, and the $1,500 contribution to the Seymour Committee that was not refunded in a timely manner. In the complaint, this amount was erroneously deducted from the contribution total. Mr. Mow eventually obtained a total of $44,000 in refunds, bringing him under the $25,000 limit, but these refunds are also not deducted from the total

5. Like the President's Dinner, supra, a review of disclosure documents reveals discrepancies in the allocation of this contribution. The Republican National Candidate Trust ("Candidate Trust"), a joint fundraising committee composed of the NRCC and the NRSC as participating committees, reported a $1,000 contribution from Mow dated August 24, 1992. Attachment 1, p. 12. The NRSC reported a $500 share allocated through the Candidate Trust on August 24, 1992. Attachment 6, p. 7. The NRCC, however, reported a $1,000 contribution from Mow dated August 24, 1992, but there is no indication in the report schedule that the contribution was allocated through the Candidate Trust, and it is being treated as a separate contribution to the NRCC. Id. at 8. The $1,000 contribution to the fundraising committee has been listed above under "Candidate Trust" rather than as two separate contributions.

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because they were not made within the sixty-day limit. See 11 C.F.R. § 103.3(b)(3).

In addition, it appears that Mr. Mow violated 2 U.S.C. §§ 441a(a)(1)(A) and 441a(a)(1)(B) by making excessive contributions to two committees. First, the above list reflects that Mr. Mow contributed $1,500 to the primary election campaign of U.S. Senator John Seymour, which is $500 in excess of the $1,000 per election contribution limit to candidates and their committees. A $500 contribution was made on April 29, 1991, and a $1,000 contribution on September 27, 1991. The Seymour Committee refunded the $500 excessive outside the sixty-day limit.[6] In its response, the Committee contends that the refund was made "as soon as the excessive contribution was noted," but does not explain why it took nearly six months from the receipt of the excessive contribution to issue the refund.

Second, in calendar year 1992, Mr. Mow gave the NRCC contributions totaling $23,250 or $3,250 in excess of the $20,000 annual contribution limit to a party committee. The NRCC issued a timely, partial refund of $2,000. The $1,250 balance on the refund was not issued until after the sixty-day limit. Donna Singleton, the treasurer for the NRCC, acknowledges the untimely refund in her response.

On November 20, 1991, Mr. Mow contributed $2,000 to the Bush-Quayle '92 Primary Committee which is $1,000 in excess of the

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6. Disclosure documents also show the committee refunded $1,000 designated for the general election. It is not clear why this amount was refunded.

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$1,000 per election limit. Bush-Quayle issued a $1,000 refund within the sixty-day time frame, so there is no excessive contribution in this instance.

In his response, counsel for Mr. Mow does not dispute that his client made excessive contributions or that the refunds were not timely. Counsel, however, maintains that the case should be dismissed because: (1) the violations resulted from Mr. Mow's lack of understanding and counseling regarding FEC regulations, rather than "a knowing and willful violation of the FEC's rules"; and (2) Mr. Mow took subsequent corrective action in mitigation following notification of the violations. Attachment 2.

In the alternative, counsel states that if the Commission finds reason to believe that a violation has occurred, Mr. Mow will "cooperate and request preprobable cause conciliation." Id. at 4. Regarding the civil penalty, counsel argues that it should be "reasonable and appropriate" and "not geared to any automatic or arithmetical formula." Id. Counsel's request for dismissal of the case and his alternative request for an "appropriate" civil penalty will be discussed separately.

Dismissal

With regard to his claim that Mr. Mow lacked understanding and counseling on FEC rules, counsel contends that Mr. Mow is a "well-meaning, relatively inexperienced political donor" who "erroneously assumed" that contributions to party committees, like his donations to charity, "were not further restricted beyond the $20,000 per committee requirement." Id. at 2. Counsel also contends that the violations would never have occurred had the

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recipient committees, specifically the three Republican party committees to which Mr. Mow gave the bulk of his contributions,[7] advised him properly. Id. Counsel argues that the fact that the bulk of Mr. Mow's contributions was to the major Republican party committees rather than to "named candidates" demonstrates that Mr. Mow did not attempt "to curry favor with any particular individual" in order to "improperly influenc[e] . . . legislation." Id.

With regard to "corrective action" taken by Mr. Mow since notification of the violations, counsel cites the following: (1) requesting and receiving refunds of all amounts exceeding $25,000 for calendar year 1992;[8] (2) "rechanneling" the refunds to

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7. Mr. Mow contributed a combined total of $56,435 to the RNC, the NRSC, and the NRCC.

8. Counsel is referring here to letters Mr. Mow sent on February 28, 1994, to the NRSC, the NRCC, and the RNC requesting a refund of $13,750 from each committee. Attachment 2, pp. 5-10. Each of these committees issued the requested refund. Although this brought Mr. Mow's total contribution to under $25,000, these refunds are not deducted from the total because they were not timely received.

Further, citing MURs 1526, 1893, 2167 and 3104, counsel argues that the Commission has "favorably" viewed the contributor's "reacquisation of such funds . . . at any stage." Attachment 2, p. 2. These MURs, however, are distinguishable from our current case on their facts. In MURs 1526, 1893 and 2167, the Commission found reason to believe that the respondents had exceeded their annual contribution limits, but the Commission took no further action because of the sua sponte initiation of the proceeding by the respondents, and because the respondents obtained or sought refunds of their excessive contributions -- which in each case amounted to less than $10,000 -- before the respondents notified the Commission. By contrast, this matter was not generated by Mr. Mow, but by the Commission as an internally-generated matter and by the Center for Responsive Politics as a complaint-generated matter. Although Mr. Mow requested refunds, he did so after the receipt of notification.

Similarly, MUR 3104 also undercuts the Respondent's

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charities; (3) refraining from making any further federal political contributions; and (4) instructing an assistant "to establish a formal approval process to assure conformance to the federal legal requirements." Id. at 3.

As a preliminary matter, Mr. Mow's apparent lack of understanding or knowledge regarding FEC rules on contribution limits does not relieve him of responsibility in this matter. Counsel's suggestion that the party committees are at fault here for not advising Mr. Mow about the $25,000 limit is also misplaced. With the exception of joint fundraising activity, committees do not keep track of money a contributor gives to other, separate committees. It is the contributor who is responsible for ensuring that his contributions do not exceed, in the aggregate, the annual contribution limit.

Further, although Mr. Mow has taken corrective action, it should be noted that it was not timely. His requests for refunds, for example, were made on February 28, 1994, approximately two years after the contributions were made, and only after he had received notification from the Commission.

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(Footnote 8 continued from previous page)
contention. In this MUR, the respondent cited MURs 1526, 1893, and 2167 for the proposition that "voluntary and expeditious action, before a compliance file has been opened, has led uniformly to decisions to take no further action." The Commission, however, did not dismiss this case, but found probable cause to believe the respondent had exceeded his annual contribution limit and imposed a civil penalty. Unlike the three MURs cited, MUR 3104 had been generated by the Commission rather than the respondent and the remedial action taken by the respondent was neither complete nor timely. Only about half of the excessive contributions were refunded, and these were not obtained until after a newspaper published an article questioning whether the respondent had exceeded the annual limit -- some nine to eleven months after the contributions were made.

Although the factors cited above by counsel may be considered mitigating by the Commission, they do no warrant a dismissal of the case. Accordingly, this Office recommends that the Commission deny the Respondent's request to dismiss.

Civil Penalty

Counsel requests that the civil penalty be "reasonable and appropriate" and "not geared to any automatic or arithmetical formula."

This Office recommends that the Commission consider the mitigating factors presented by the Respondent in our pre-probable cause conciliation negotiations.

The record indicates that in 1992, Wiliam C.W. Mow made contributions totaling $67,935 or $42,935 in excess of the $25,000 annual contribution limit. The record also shows that he exceeded, by $500, the per election limit on contributions to a candidate and that he exceeded, by $3,250, the $20,000 per calendar year limit on contributions to political committees established and maintained by a national political party. The NRCC timely refunded $2,000 of the $3,250, leaving an excessive contribution of $1,250. Accordingly, this Office recommends that the Commission find reason to believe that William C.W. Mow violated 2 U.S.C. §§ 441a(a)(3), 441a(a)(1)(A) and 441a(a)(1)(B).

As noted above, Bush-Quayle refunded the excessive portion of Mr. Mow's $2,000 contribution within the sixty-day time frame set forth in the Commission's regulations. Accordingly, this Office

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recommends that the Commission find no reason to believe that the Bush-Quayle '92 Primary Committee, Inc. and J. Stanley Huckaby, as treasurer, violated 2 U.S.C. § 441a(f) with regard to this contribution and close the file as to these Respondents.

With regard to Mr. Mow's $1,500 contribution to the Seymour Committee, FEC records disclose that the $500 excessive portion was refunded more than sixty days after the contribution. Accordingly, this Office recommends that the Commission find reason to believe that the U.S. Senator John Seymour Committee and Charles Bell, as treasurer, violated 2 U.S.C. § 441a(f). In light of the amount of the excessive contribution, however, this Office recommends that the Commission take no further action, send an admonishment letter, and close the file as to these Respondents.

With regard to the $23,250 in contributions Mr. Mow made to the NRCC, FEC records disclose that $2,000 was refunded timely and the balance of $1,250 was not issued within the sixty-day time frame. Accordingly, this Office recommends that the Commission find reason to believe that the National Republican Congressional Committee and Donna Singleton, as treasurer, violated 2 U.S.C. § 441a(f). In light of the amount of the excessive contribution, however, this Office recommends that the Commission take no further action, send an admonishment letter, and close the file as to these Respondents.

III. <u>CIVIL PENALTY DISCUSSION</u>

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IV. RECOMMENDATIONS

1. Pre-MUR 295

   a. Open a MUR.

   b. Merge what was previously Pre-MUR 295 into MUR 3911 and hereafter refer to this matter as MUR 3911.

2. MUR 3911

   a. Deny the request to dismiss presented on behalf of William C.W. Mow.

b. Find reason to believe that William C.W. Mow violated 2 U.S.C. § 441a(a)(3) with respect to his aggregate contributions for 1992; violated 2 U.S.C. § 441a(a)(1)(A) with respect to his contributions to the Bush-Quayle '92 Primary Committee, Inc. and to the U.S. Senator John Seymour Committee; and, violated 2 U.S.C. § 441a(a)(1)(B) with respect to his contributions to the National Republican Congressional Committee.

c. Find no reason to believe that the Bush-Quayle '92 Primary Committee, Inc. and J. Stanley Huckaby, as treasurer, violated 2 U.S.C. § 441a(f), and close the file as to these Respondents.

d. Find reason to believe that the U.S. Senator John Seymour Committee, Inc. and Charles Bell, as treasurer, violated 2 U.S.C. § 441a(f), but take no further action, send an admonishment letter, and close the file as to these Respondents.

e. Find reason to believe that the National Republican Congressional Committee and Donna Singleton, as treasurer, violated 2 U.S.C. § 441a(f), but take no further action, send an admonishment letter, and close the file as to these Respondents.

f. Approve the attached Factual and Legal Analysis, Conciliation Agreement and the appropriate letters.

Lawrence M. Noble
General Counsel

7/25/94
Date

BY: [signature]
Lois G. Lerner
Associate General Counsel

Attachments:
1. Complaint
2. Mow Response
3. Bush-Quayle '92 Primary Committee, Inc. Response
4. U.S. Senator John Seymour Committee, Inc. Response
5. The National Republican Congressional Committee Response
6. Disclosure Documents
7. Factual and Legal Analysis
8. Conciliation Agreement

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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 28, 1994

SUBJECT: PRE-MUR 295/MUR 3911 - FIRST GENERAL COUSNEL'S REPORT DATED JULY 25, 1994.

The above-captioned document was circulated to the Commission on Tuesday, July 26, 1994 at 11:00 a.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, August 2, 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	)	
	)	Pre-MUR 295/
William C.W. Mow;	)	MUR 3911
Bush-Quayle '92 Primary Committee, Inc. and J. Stanley Huckaby, as treasurer;	)	
U.S. Senator John Seymour Committee and Charles Bell, as treasurer;	)	
National Republican Congressional Committee and Donna Singleton, as treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on August 2, 1994, do hereby certify that the Commission decided by a vote of 5-1 to take the following actions with respect to Pre-MUR 295 and MUR 3911:

1. Pre-MUR 295

   a. Open a MUR.

   b. Merge what was previously Pre-MUR 295 into MUR 3911 and hereafter refer to this matter as MUR 3911.

2. MUR 3911

   a. Deny the request to dismiss presented on behalf of William C.W. Mow.

(continued)

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b. Find reason to believe that William C.W. Mow violated 2 U.S.C. § 441a(a)(3) with respect to his aggregate contributions for 1992; violated 2 U.S.C. § 441a(a)(1)(A) with respect to his contributions to the U.S. Senator John Seymour Committee; and violated 2 U.S.C. § 441a(a)(1)(B) with respect to his contributions to the National Republican Congressional Committee.

c. Find no reason to believe that William C.W. Mow violated 2 U.S.C. § 441a(a)(1)(A) with respect to his contributions to the Bush-Quayle '92 Primary Committee, Inc.

d. Find no reason to believe that the Bush-Quayle '92 Primary Committee, Inc. and J. Stanley Huckaby, as treasurer, violated 2 U.S.C. § 441a(f), and close the file as to these Respondents.

e. Find reason to believe that the U.S. Senator John Seymour Committee, Inc. and Charles Bell, as treasurer, violated 2 U.S.C. § 441a(f), but take no further action, send an admonishment letter, and close the file as to these Respondents.

(continued)

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f. Find reason to believe that the National Republican Congressional Committee and Donna Singleton, as treasurer, violated 2 U.S.C. § 441a(f), but take no further action, send an admonishment letter, and close the file as to these Respondents.

g. Approve the Factual and Legal Analysis, Conciliation Agreement, and the appropriate letters as recommended in the General Counsel's report dated July 25, 1994.

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

Attest:

8-2-94
Date

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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AUGUST 9, 1994

Eugene C. Moscovitch, Esquire
Ginsburg, Stephan, Oringher & Richman
10100 Santa Monica Boulevard, Eighth Floor
Los Angeles, California 90067-2009

RE: MUR 3911

Dear Mr. Moscovitch:

On January 28, 1994, the Federal Election Commission notified your client, William C.W. Mow, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your client at that time.

Upon further review of the allegations contained in the complaint and information supplied by you, the Commission on August 2, 1994, found that there is reason to believe that your client violated 2 U.S.C. §§ 441a(a)(1)(A), 441a(a)(1)(B), and 441a(a)(3), provisions of the Act. The Commission also denied your request, on behalf of your client, to dismiss this matter. The Factual and Legal Analysis, which formed a basis for the Commission's findings, 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 you are interested in expediting the resolution of this matter by pursuing preprobable cause conciliation and if you agree 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 Dominique Dillenseger, 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: William C.W. Mow **MUR:** 3911

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the 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 on January 21, 1994, by the Center for Responsive Politics ("the Complainant") alleging that William C.W. Mow made $66,100 in contributions in 1992, exceeding by $41,100 the $25,000 annual contribution limit for individuals. In addition, the materials included in the complaint and Commission records show that Mr. Mow apparently contributed $2,000 to the Bush-Quayle '92 Primary Committee, Inc. ("Bush-Quayle"); $1,500 to the U.S. Senator John Seymour Committee ("the Seymour Committee") for that candidate's primary; and $23,250 to the National Republican Congressional Committee ("the NRCC"). On January 28, 1994, this Office notified Mr. Mow of the complaint. On March 11, 1994, counsel for Mr. Mow submitted a response.

II. FACTUAL AND LEGAL ANALYSIS

A. Statement of the Law

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

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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.

2 U.S.C. § 441a(a)(1)(A) limits contributions by an individual to a federal candidate and his authorized political committees to $1,000 per election.

2 U.S.C. § 441a(a)(1)(B) limits contributions to political committees established and maintained by a national political party, which are not the authorized political committees of any candidate, to $20,000 in the aggregate in any calendar year.

Under the Act, candidates and political committees are prohibited from accepting any contributions in excess of the Act's limitations. 2 U.S.C. § 441a(f). Contributions which exceed the contribution limitations of the Act on their face, and contributions which do not exceed the Act's limitations on their face but which do exceed those limitations when aggregated with other contributions from the same contributor, may either be deposited into a campaign depository or returned to the contributor. 11 C.F.R. § 103.3(b)(3). If any such contribution is deposited, the treasurer may request redesignation or reattribution of the contribution in accordance with 11 C.F.R. §§ 110.1(b), 110.1(k) or 110.2(b), as appropriate. Id. If a redesignation or reattribution is not obtained within sixty days of the treasurer's receipt of the contribution, the treasurer must refund the contribution to the contributor. Id.

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B. **Discussion**

A review of Commission records and indices discloses that Mr. Mow made the following contributions and received the following refunds attributable to the 1992 calendar year:

03/28/91	1,000	P	DANNEMEYER FOR SENATE '92
04/26/91	1,000	P	GALLEGLY FOR CONGRESS
04/29/91	500	P	U S SENATOR JOHN SEYMOUR COMMITTEE
09/27/91	1,000	P	U S SENATOR JOHN SEYMOUR COMMITTEE
11/20/91	2,000	P	BUSH - QUAYLE '92 PRIMARY COMMITTEE INC
11/22/91	500	G	GALLEGLY FOR CONGRESS
12/16/91	1,000	G	U S SENATOR JOHN SEYMOUR COMMITTEE
01/09/92	10,000	P	NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE
01/17/92	750	P	NATIONAL REPUBLICAN SENATORIAL COMMITTEE
01/18/92	-1,000	P	BUSH - QUAYLE '92 PRIMARY COMMITTEE INC
01/20/92	1,000	P	NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE
02/10/92	760	P	NATIONAL REPUBLICAN SENATORIAL COMMITTEE
02/10/92	($15)[1]	P	NATIONAL REPUBLICAN SENATORIAL COMMITTEE
02/10/92	13,000	P	NATIONAL REPUBLICAN SENATORIAL COMMITTEE
02/10/92	1,500[2]	P	PRESIDENT'S DINNER/AKA 1992 REPUBLICAN SENATE-HOUSE DINNER COMMITTEE
02/12/92	($100)	P	NATIONAL REPUBLICAN SENATORIAL COMMITTEE
02/25/92	1,000	G	BUSH - QUAYLE '92 COMPLIANCE COMMITTEE INC
03/03/92	505	P	NATIONAL REPUBLICAN SENATORIAL COMMITTEE
03/30/92	750	P	NATIONAL REPUBLICAN SENATORIAL COMMITTEE
03/31/92	($120)	P	NATIONAL REPUBLICAN SENATORIAL COMMITTEE

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1. Contributions shown in parentheses are listed in the report schedules but are not included in the complaint.

2. There is a discrepancy in the reporting of the allocation for this contribution. Disclosure documents show that the President's Dinner/AKA 1992 Republican Senate-House Dinner Committee ("President's Dinner"), a joint fundraising committee composed of the NRCC and the NRSC, reported the $1,500 as a contribution from Mr. Mow only. The NRCC, however, reported its $750 allocated share as a contribution from Mr. and Mrs. Mow, while the NRSC reported its $750 allocated share as a contribution from Mrs. Mow. Later, the NRCC, in its response, attributed the $750 contribution to Mr. Mow. Based on the NRCC's response and the original contribution to the President's Dinner, it appears that the NRCC and NRSC may have misreported their allocated shares. A review of disclosure documents for these two committees does not reveal any amendments with regard to these contributions. In light of this discrepancy, this $1,500 contribution has been listed above under the President's Dinner, rather than as two separate contributions to the NRCC and NRSC.

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06/17/92	[-500][3]	P	U S SENATOR JOHN SEYMOUR COMMITTEE
06/17/92	[-1,000]	G	U S SENATOR JOHN SEYMOUR COMMITTEE
06/18/92	250	P	NATIONAL REPUBLICAN SENATORIAL COMMITTEE
06/30/92	750[4]	P	NATIONAL REPUBLICAN SENATORIAL COMMITTEE
07/20/92	1,125	P	NATIONAL REPUBLICAN SENATORIAL COMMITTEE
07/24/92	250	P	NATIONAL REPUBLICAN SENATORIAL COMMITTEE
07/27/92	250	P	NATIONAL REPUBLICAN SENATORIAL COMMITTEE
07/27/92	10,000	P	REPUBLICAN NATIONAL COMMITTEE - RNC
07/29/92	1,000	P	REPUBLICAN LEADER'S FUND
08/21/92	210	P	NATIONAL REPUBLICAN SENATORIAL COMMITTEE
08/24/92	1,000[5]	P	REPUBLICAN NATIONAL CANDIDATE TRUST
08/24/92	1,000	P	NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE
08/25/92	($100)	P	NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE
09/04/92	2,500	P	REPUBLICAN NATIONAL COMMITTEE - RNC
09/14/92	1,000	G	HERSCHENSOHN FOR U S SENATE-1992
09/22/92	10,000	P	NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE
09/30/92	-2,000	P	NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE
10/02/92	5,000	P	REPUBLICAN NATIONAL COMMITTEE - RNC
02/15/94	[-500]	P	NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE
02/15/94	[-750]	P	NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE
03/01/94	[-13,750]	P	NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE
03/07/94	[-13,750]	P	REPUBLICAN NATIONAL FINANCE COMMITTEE
03/08/94	[-13,750]	P	NATIONAL REPUBLICAN SENATORIAL COMMITTEE
TOTAL:	$67,935		

3. Bracketed amounts denote that the refund was not made within sixty days of the committee's receipt of the contribution as required by 11 C.F.R. § 103.3(b)(3). These refunds are not deducted from the contribution total.

4. Although reported as a contribution by the NRSC, this contribution does not appear on the FEC contributor index.

5. Like the President's Dinner, supra, a review of disclosure documents reveals discrepancies in the allocation of this contribution. The Republican National Candidate Trust ("Candidate Trust"), a joint fundraising committee composed of the NRCC and the NRSC as participating committees, reported a $1,000 contribution from Mow dated August 24, 1992. The NRSC reported a $500 share allocated through the Candidate Trust on August 24, 1992. The NRCC, however, reported a $1,000 contribution from Mow dated August 24, 1992, but there is no indication in the report schedule that the contribution was allocated through the Candidate Trust, and it is being treated as a separate contribution to the NRCC. The $1,000 contribution to the fundraising committee has been listed above under "Candidate Trust" rather than as two separate contributions.

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In light of the above, it appears that Mr. Mow violated 2 U.S.C. § 441a(a)(3) by making contributions totaling $67,935 or $42,935 in excess of the $25,000 annual contribution limit for calendar year 1992. This contribution total differs from the $66,100 total in the complaint because it includes four additional contributions, shown above in parentheses, and the $1,500 contribution to the Seymour Committee that was not refunded in a timely manner. In the complaint, this amount was erroneously deducted from the contribution total. Mr. Mow eventually obtained a total of $44,000 in refunds, bringing him under the $25,000 limit, but these refunds are also not deducted from the total because they were not made within the sixty-day limit. See 11 C.F.R. § 103.3(b)(3).

In addition, it appears that Mr. Mow violated 2 U.S.C. §§ 441a(a)(1)(A) and 441a(a)(1)(B) by making excessive contributions to two committees. First, the above list reflects that Mr. Mow contributed $1,500 to the primary election campaign of U.S. Senator John Seymour, which is $500 in excess of the $1,000 per election contribution limit to candidates and their committees. A $500 contribution was made on April 29, 1991, and a $1,000 contribution on September 27, 1991. The Seymour Committee refunded the $500 excessive outside the sixty-day limit.[6]

Second, in calendar year 1992, Mr. Mow gave the NRCC contributions totaling $23,250 or $3,250 in excess of the $20,000

6. Disclosure documents also show the committee refunded $1,000 designated for the general election. It is not clear why this amount was refunded.

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annual contribution limit to a party committee. The NRCC issued a timely, partial refund of $2,000. The $1,250 balance on the refund was not issued until after the sixty-day limit.
On November 20, 1991, Mr. Mow contributed $2,000 to the Bush-Quayle '92 Primary Committee which is $1,000 in excess of the $1,000 per election limit. Bush-Quayle issued a $1,000 refund within the sixty-day time frame, so there is no excessive contribution in this instance.

In his response, counsel for Mr. Mow does not dispute that his client made excessive contributions or that the refunds were not timely. Counsel, however, maintains that the case should be dismissed because: (1) the violations resulted from Mr. Mow's lack of understanding and counseling regarding FEC regulations, rather than "a knowing and willful violation of the FEC's rules"; and (2) Mr. Mow took subsequent corrective action in mitigation following notification of the violations. In the alternative, counsel states that if the Commission finds reason to believe that a violation has occurred, Mr. Mow will "cooperate and request preprobable cause conciliation."

With regard to his claim that Mr. Mow lacked understanding and counseling on FEC rules, counsel contends that Mr. Mow is a "well-meaning, relatively inexperienced political donor" who "erroneously assumed" that contributions to party committees, like his donations to charity, "were not further restricted beyond the $20,000 per committee requirement." Counsel also contends that the violations would never have occurred had the recipient committees, specifically the three Republican party committees to

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which Mr. Mow gave the bulk of his contributions,[7] advised him properly. Counsel argues that the fact that the bulk of Mr. Mow's contributions was to the major Republican party committees rather than to "named candidates" demonstrates that Mr. Mow did not attempt "to curry favor with any particular individual" in order to "improperly influenc[e] . . . legislation."

With regard to "corrective action" taken by Mr. Mow since notification of the violations, counsel cites the following: (1) requesting and receiving refunds of all amounts exceeding $25,000 for calendar year 1992;[8] (2) "rechanneling" the refunds to

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7. Mr. Mow contributed a combined total of $56,435 to the RNC, the NRSC, and the NRCC.

8. Counsel is referring here to letters Mr. Mow sent on February 28, 1994, to the NRSC, the NRCC, and the RNC requesting a refund of $13,750 from each committee. Each of these committees issued the requested refund. Although this brought Mr. Mow's total contribution to under $25,000, these refunds are not deducted from the total because they were not timely received.

Further, citing MURs 1526, 1893, 2167 and 3104, counsel argues that the Commission has "favorably" viewed the contributor's "reacquisation of such funds . . . at any stage." These MURs, however, are distinguishable from our current case on their facts. In MURs 1526, 1893 and 2167, the Commission found reason to believe that the respondents had exceeded their annual contribution limits, but the Commission took no further action because of the sua sponte initiation of the proceeding by the respondents, and because the respondents obtained or sought refunds of their excessive contributions -- which in each case amounted to less than $10,000 -- before the respondents notified the Commission. By contrast, this matter was not generated by Mr. Mow, but by the Commission as an internally-generated matter and by the Center for Responsive Politics as a complaint-generated matter. Although Mr. Mow requested refunds, he did so after the receipt of notification.

Similarly, MUR 3104 also undercuts the Respondent's contention. In this MUR, the respondent cited MURs 1526, 1893, and 2167 for the proposition that "voluntary and expeditious action, before a compliance file has been opened, has led uniformly to decisions to take no further action." The Commission, however, did not dismiss this case, but found

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charities; (3) refraining from making any further federal political contributions; and (4) instructing an assistant "to establish a formal approval process to assure conformance to the federal legal requirements."

As a preliminary matter, Mr. Mow's apparent lack of understanding or knowledge regarding FEC rules on contribution limits does not relieve him of responsibility in this matter. Counsel's suggestion that the party committees are at fault here for not advising Mr. Mow about the $25,000 limit is also misplaced. With the exception of joint fundraising activity, committees do not keep track of money a contributor gives to other, separate committees. It is the contributor who is responsible for ensuring that his contributions do not exceed, in the aggregate, the annual contribution limit.

Further, although Mr. Mow has taken corrective action, it should be noted that it was not timely. His requests for refunds, for example, were made on February 28, 1994, approximately two years after the contributions were made, and only after he had received notification from the Commission.

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(Footnote 8 continued from previous page)
probable cause to believe the respondent had exceeded his annual contribution limit and imposed a civil penalty. Unlike the three MURs cited, MUR 3104 had been generated by the Commission rather than the respondent and the remedial action taken by the respondent was neither complete nor timely. Only about half of the excessive contributions were refunded, and these were not obtained until after a newspaper published an article questioning whether the respondent had exceeded the annual limit -- some nine to eleven months after the contributions were made.

Although the factors cited above by counsel may be considered mitigating by the Commission, they do no warrant a dismissal of the case. Accordingly, the Commission denied the Respondent's request to dismiss.

The record indicates that in 1992, Wiliam C.W. Mow made contributions totaling $67,935 or $42,935 in excess of the $25,000 annual contribution limit. The record also shows that he exceeded, by $500, the per election limit on contributions to a candidate and that he exceeded, by $1,250, the $20,000 per calendar year limit on contributions to political committees established and maintained by a national political party. Accordingly, there is reason to believe that William C.W. Mow violated 2 U.S.C. §§ 441a(a)(3), 441a(a)(1)(A) and 441a(a)(1)(B).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AUGUST 9, 1994

J. Stanley Huckaby, Treasurer
Bush-Quayle '92 Primary Committee
228 S. Washington Street, Suite 200
Alexandria, Virginia 22314

RE: MUR 3911

Dear Mr. Huckaby:

On January 28, 1994, the Federal Election Commission notified the Bush-Quayle '92 Primary Committee ("the Committee") and you, as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act").

On August 2, 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

9404359075 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AUGUST 9, 1994

Donna Singleton, Treasurer
National Republican Congressional Committee
320 First Street, S.E.
Washington, D.C. 20003

RE: MUR 3911

Dear Ms. Singleton:

On January 28, 1994, the Federal Election Commission ("the Commission") notified the National Republican Congressional Committee ("the Committee") and you, as treasurer, of a complaint filed on January 21, 1994, by the Center for Responsive Politics alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint and information supplied by you, the Commission on August 2, 1994, found there is reason to believe that the National Republican Congressional Committee and you, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Act. 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 Commission's finding is based on Commission records which show that William C.W. Mow contributed a total of $23,250 to the National Republican Congressional Committee in calendar year 1992. The contributions were $3,250 in excess of the $20,000 annual contribution limit to a party committee. See 2 U.S.C. § 441a(a)(1)(B). The Committee issued a timely, partial refund of $2,000 on September 30, 1992, but did not issue the $1,250 balance on the refund until February 15, 1994, more than sixty days after the treasurer received the contributions.

The Commission reminds you that it is a violation of 2 U.S.C. § 441a(f) for a political committee to accept any contribution in excess of the Act's limitations. Further, Commission regulations require the treasurer to redesignate, reattribute, or refund such contributions within sixty days of the treasurer's receipt of the contribution. See 11 C.F.R. § 103.3(b)(3). You should take steps to ensure that this activity does not reoccur in the future.

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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 Dominique Dillenseger, the attorney assigned to this matter, at (202) 219-3690.

For the Commission,

Trevor Potter
Chairman

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AUGUST 9, 1994

Floyd L. Farano, Esquire
2100 South State College Boulevard
Anaheim, California 92806

RE: MUR 3911

Dear Mr. Farano:

On January 28, 1994, the Federal Election Commission ("the Commission") notified the U.S. Senator John Seymour Committee, Inc. ("the Committee") and Charles Bell, as treasurer, your clients, of a complaint filed on January 21, 1994, by the Center for Responsive Politics alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time.

Upon further review of the allegations contained in the complaint and information supplied by you, the Commission on August 2, 1994, found there is reason to believe that the U.S. Senator John Seymour Committee, Inc. and Charles Bell, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Act. 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 this Committee and its treasurer.

The Commission's finding is based on Commission records which show that William C.W. Mow contributed a total of $1,500 to the U.S. Senator John Seymour Committee for that candidate's primary. A $500 contribution was made on April 29, 1991, and a $1,000 contribution on September 27, 1991. The contributions were $500 in excess of the $1,000 per election contribution limit. See 2 U.S.C. § 441a(a)(1)(A). The Committee refunded the $500 excessive on June 17, 1992, more than sixty days after the treasurer received the contribution.

The Commission reminds your clients that it is a violation of 2 U.S.C. § 441a(f) for a political committee to accept any contribution in excess of the Act's limitations. Further, Commission regulations require the treasurer to redesignate, reattribute, or refund such contributions within sixty days of the treasurer's receipt of the contribution. See 11 C.F.R. 103.3(b)(3). Your clients should take steps to ensure that this activity does not reoccur in the future.

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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 Dominique Dillenseger, the attorney assigned to this matter, at (202) 219-3690.

For the Commission,

Trevor Potter
Chairman

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FEDERAL ELECTION
COMMISSION
ADMINISTRATIVE DIVISION

Sep 19 12 06 PM '94

BUGLE BOY.
INDUSTRIES

September 13, 1994

VIA CERTIFIED MAIL

Office of the General Counsel
c/o Dominique Dillenseger, Esq.
Federal Election Commission
999 E Street, Room 657
Washington, DC 20463

Dear Ms. Dillenseger:

Enclosed please find a check from Dr. William Mow in the amount of $35,000, made payable to the Federal Election Commission.

Very truly yours,

Diane L Becker

DIANE L. BECKER
Chief Legal Officer

cc: Eugene C. Moscovitch, Esq.
dlb\let\dillen

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2900 MADERA ROAD, SIMI VALLEY, CA 93065 TEL: (805) 582-1010 FAX: (805) 522-1212 TLX: 6831540 DRAGN UW

390 5TH AVE., SUITE 200, NEW YORK, NY 10018 TEL. (212) 564-4950 FAX: (212) 947-6023

12711 VENTURA BLVD. SUITE 200
STUDIO CITY, CA 91604
TEL. (818) 755-0888
FAX. (818) 761-5987

2300 STEMMONS FWY., SUITE M-2C01
DALLAS, TX 75207
TEL. (214) 630-9891
FAX: (214) 634-2122

1411 BROADWAY, SUITE 205
NEW YORK, NY 10018
TEL. (212) 921-7177
FAX: (212) 730-6058

1595

MOW
GENERAL ACCOUNT
2900 MADERA ROAD 805-582-9193
SIMI VALLEY, CA 93065

16-49/1220

SEP 13 1994 19

PAY TO THE ORDER OF FEDERAL ELECTION COMMISSION $ 35,000

35000 DOLS 00 CTS DOLLARS

Union Bank
West Valley Regional Office
6400 Canoga Avenue
Woodland Hills, CA 91367-2495

FOR REF. MUR 3411

⑈001595⑈ ⑆122000496⑆ 3051010332⑈

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

9/19/94

SEP 20 12 31 PM '94

FEDERAL ELECTION COMMISSION
OFFICE OF GC

TWO WAY MEMORANDUM

TO: OGC, Docket

FROM: Rosa E. Swinton
Accounting Technician

SUBJECt: Account Determination for Funds Received

We recently received a check from Dr. William Mow, check number 1595, dated 9/13/94, and in the amount of $35,000.00. 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 $35,000.00, the MUR number is 3911 and in the name of Dr. William Mow. 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

9-20-94
Date

2 4 0 4 3 5 9 0 7 4 2

GINSBURG, STEPHAN, ORINGHER & RICHMAN
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW

LOS ANGELES OFFICE
10100 SANTA MONICA BOULEVARD
EIGHTH FLOOR
LOS ANGELES, CA 90067-4012
(310) 557-2009
FAX (310) 551-0283

Reply to
Los Angeles

ORANGE COUNTY OFFICE
535 ANTON BOULEVARD
SUITE 800
COSTA MESA, CA 92626-1962
(714) 241-0420
FAX (714) 241-0622

SEP 22 12 37 PM '94
RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

September 16, 1994

Office of the General Counsel
c/o Dominique Dillenseger, Esq.
Federal Election Commission
999 E Street, Room 657
Washington, DC 20463

20147.05003

Re: MUR 3911

Dear Ms. Dillenseger:

Pursuant to your letter of September 9, 1994, enclosed is the original executed Conciliation Agreement between the Commission and Respondent Dr. William C.W. Mow. If I can be of further assistance, please do not hesitate to contact me.

Sincerely,

Eugene Moscovitch

EUGENE C. MOSCOVITCH

ECM:ct
enclosure

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RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

OCT 3 10 47 AM '94

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR: 3911
William C.W. Mow	)	

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

The Federal Election Commission ("the Commission") found reason to believe that William C.W. Mow ("the Respondent") violated 2 U.S.C. §§ 441a(a)(3), 441a(a)(1)(A), and 441a(a)(1)(B). The Commission also determined to offer to enter into preprobable cause conciliation with the Respondent and approved an agreement

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This Office recommends, therefore, that the Commission approve the attached, signed conciliation agreement and close the file in this matter.

III. **RECOMMENDATIONS**

1. Approve the attached conciliation agreement with William C.W. Mow.

2. Close the file.

3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

Date 9/30/94

BY: Lois G. Lerner
Associate General Counsel

Attachments
1. Respondent's letter, dtd August 22, 1994
2. Proposed Conciliation Agreement
3. Civil Penalty check

Staff Assigned: Dominique Dillenseger

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
William C.W. Mow.	)	MUR 3911
	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 6, 1994, the Commission decided by a vote of 6-0 to take the following actions in MUR 3911:

1. Approve the conciliation agreement with William C.W. Mow, as recommended in the General Counsel's Report dated September 30, 1994.

2. Close the file.

3. Approve the appropriate letter, as recommended in the General Counsel's Report dated September 30, 1994.

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

Attest:

10-6-94
Date

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

Received in the Secretariat:	Mon.,	Oct. 3, 1994	10:47 a.m.
Circulated to the Commission:	Mon.,	Oct. 3, 1994	4:00 p.m.
Deadline for vote:	Thurs.,	Oct. 6, 1994	4:00 p.m.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 17, 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 3911

Dear Ms. Miller:

This is in reference to the complaint you filed with the Federal Election Commission ("the Commission") on January 21, 1994, concerning possible violations of the Federal Election Campaign Act of 1971, as amended, ("the Act"), by William C.W. Mow; the U.S. Senator John Seymour Committee and Charles Bell, as treasurer; the National Republican Congressional Committee and Donna Singleton, as treasurer; and the Bush-Quayle '92 Primary Committee, Inc. and J. Stanley Huckaby, as treasurer.

Based on the complaint, on August 2, 1994, the Commission found: (1) reason to believe that William C.W. Mow violated 2 U.S.C. §§ 441a(a)(3), 441a(a)(1)(A), and 441a(a)(1)(B); (2) reason to believe that the U.S. Senator John Seymour Committee and Charles Bell, as treasurer, violated 2 U.S.C. § 441a(f), but determined to take no further action and closed the file as to these respondents; (3) reason to believe that the National Republican Congressional Committee and Donna Singleton, as treasurer, violated 2 U.S.C. § 441a(f), but determined to take no further action and closed the file as to these respondents; and (4) no reason to believe that the Bush-Quayle '92 Primary Committee, Inc. and J. Stanley Huckaby, as treasurer, violated 2 U.S.C. § 441a(f), and closed the file as to these respondents.

On October 6, 1994, a conciliation agreement signed by counsel for William C.W. Mow was accepted by the Commission. Accordingly, the Commission closed the file in this matter on October 6, 1994. A copy of this agreement is enclosed for your information. Also enclosed is a copy of the redacted First General Counsel's Report dated July 25, 1994. Please note that paragraph 2b of the Recommendations section of the report was amended and that the Commission vote is reflected in the enclosed Certification of Commission action.

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This matter will become part of the public record within 30 days. If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Dominique Dillenseger

Dominique Dillenseger
Attorney

Enclosures
Conciliation Agreement
General Counsel's Report (redacted)
Certification of Commission action

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 17, 1994

J. Stanley Huckaby, Treasurer
Bush-Quayle '92 Primary Committee, Inc.
228 S. Washington Street, Suite 200
Alexandria, Virginia 22314

RE: MUR 3911

Dear Mr. Huckaby:

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,

Dominique Dillenseger

Dominique Dillenseger
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 17, 1994

Donna Singleton, Treasurer
National Republican Congressional Committee
320 First Street, S.E.
Washington, D.C. 20003

RE: MUR 3911

Dear Ms. Singleton:

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,

Dominique Dillenseger

Dominique Dillenseger
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 17, 1994

Floyd L. Farano, Esquire
2100 South State College Boulevard
Anaheim, California 92806

RE: MUR 3911
U.S. Senator John Seymour Committee
and Charles Bell, as treasurer

Dear Mr. Farano:

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,

Dominique Dillenseger

Dominique Dillenseger
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 17, 1994

Eugene C. Moscovitch, Esquire
Ginsburg, Stephan, Oringher & Richman
10100 Santa Monica Boulevard, Eighth Floor
Los Angeles, California 90067-2009

RE: MUR 3911
William C.W. Mow

Dear Mr. Moscovitch:

On October 6, 1994, the Federal Election Commission approved the signed conciliation agreement and civil penalty submitted on your client's behalf in settlement of violations of 2 U.S.C. §§ 441a(a)(3), 441a(a)(1)(A), and 441a(a)(1)(B), provisions 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.

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,

Dominique Dillenseger

Dominique Dillenseger
Attorney

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
William C.W. Mow	)	MUR: 3911

CONCILIATION AGREEMENT

This matter was generated based upon information ascertained by the Federal Election Commission ("the 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 by the Center for Responsive Politics alleging that William C.W. Mow made contributions in 1992, in violation of the $25,000 annual contribution limit for individuals. The Commission found reason to believe that William C.W. Mow ("the Respondent") violated 2 U.S.C. §§ 441a(a)(3), 441a(a)(1)(A) and 441a(a)(1)(B).

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

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

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

1. The Respondent, William C.W. Mow, 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. 2 U.S.C. § 441a(a)(1)(A) limits contributions by an individual to a federal candidate and his authorized political committees to $1,000 per election.

4. 2 U.S.C. § 441a(a)(1)(B) limits contributions to political committees established and maintained by a national political party, which are not the authorized political committees of any candidate, to $20,000 in the aggregate in any calendar year.

5. Under the Act, candidates and political committees are prohibited from accepting any contributions in excess of the Act's limitations. 2 U.S.C. § 441a(f).

6. Contributions which exceed the contribution limitations of the Act on their face, and contributions which do not exceed the Act's limitations on their face but which do exceed those limitations when aggregated with other contributions from the same contributor, may either be deposited into a campaign depository or

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returned to the contributor. 11 C.F.R. § 103.3(b)(3). If any such contribution is deposited, the treasurer may request redesignation or reattribution of the contribution in accordance with 11 C.F.R. §§ 110.1(b), 110.1(k) or 110.2(b), as appropriate. Id. If a redesignation or reattribution is not obtained within sixty days of the treasurer's receipt of the contribution, the treasurer must refund the contribution to the contributor. Id.

7. A review of the Commission's records and indices indicates that, for the 1992 calendar year, the Respondent made contributions to political committees which total $67,935 in the aggregate.

8. A review of the Commission's records and indices indicates that, for the 1992 calendar year, the Respondent contributed $1,500 to the U.S. John Seymour Committee for that candidate's primary election campaign. The $500 excessive portion was refunded more than sixty days after the contribution.

9. A review of the Commission's records and indices indicates that, for the 1992 calendar year, the Respondent made $23,250 in contributions to the National Republican Congressional Committee ("the NRCC"). The NRCC timely refunded $2,000 of this amount, but the $1,250 balance was not refunded within the sixty-day time frame.

10. Dr. Mow contends that he acted with no improper motive or purpose in exceeding the FECA statutory limits and that his violation was not knowing and willful. Dr. Mow promptly sought

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and received refunds of all excessive committee contributions immediately upon being apprised of these violations by the Commission.

V.1. The Respondent exceeded by $42,935 the $25,000 annual contribution limit to federal committees, in violation of 2 U.S.C. § 441a(a)(3).

2. The Respondent exceeded by $500 the $1,000 per election limit on contributions to a federal candidate and his authorized political committees, in violation of 2 U.S.C. § 441a(a)(1)(A).

3. The Respondent exceeded by $1,250 the $20,000 per calendar year limit on contributions to political committees established and maintained by a national political party, which are not the authorized political committees of any candidate, in violation of 2 U.S.C. § 441a(a)(1)(B).

VI. The Respondent will pay a civil penalty to the Federal Election Commission in the amount of Thirty-Five Thousand Dollars ($35,000), 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. 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.

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IX. The 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: Lois G. Lerner — Date: 10-14-94
Lois G. Lerner
Associate General Counsel

FOR THE RESPONDENT:

Eugene Moscovitch — Date: Sept. 16, 1994
Eugene C. Moscovitch
Counsel for the Respondent

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3911

DATE FILMED 10-25-94 CAMERA NO. 4

CAMERAMAN JMN

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