



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

25

THIS IS THE BEGINNING OF MUR # 4233

DATE FILMED 7-26-96 CAMERA NO. 2

CAMERAMAN MRJ

96043741953

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: May 18, 1995

ANALYST: Pat Sheppard

I. COMMITTEE: Californians for Huffington
(C00283879)
Dana W. Reed, Treasurer
777 South Figueroa Street, Suite 3700
Los Angeles, CA 90017

II. RELEVANT STATUTE: 2 U.S.C. §434(a)(6)
11 CFR §104.5(f)

III. BACKGROUND:

Failure to File Forty-Eight Hour Notifications

The Californians for Huffington committee ("the Committee") failed to file one (1) 48-Hour Notification for a contribution totaling \$72,599.65 received prior to the 1994 General Election.

The candidate was involved in the 1994 General Election held on November 8, 1994. Prior Notice was sent to the Committee on October 3, 1994 (Attachment 2). The Notice includes a section titled "48 Hour Notices on Contributions". This section reads "Notices are required if the committee receives contributions (including contributions and loans from the candidate's personal funds; and endorsements or guarantees of bank loans) of \$1,000 or more, during the period of October 20 through November 5. The notices must reach the appropriate federal and state filing offices within 48 hours of the committee's receipt of the contribution(s)."

Schedules A and B of the Committee's 1994 30 Day Post-General Report indicate that the Committee failed to file one (1) 48-Hour Notice for a contribution received during the aforementioned period (Attachment 3). The following is the contribution for which no 48-Hour Notice was filed:

<u>Contributor Name</u>	<u>Date</u>	<u>Amount</u>
Michael Huffington	10/24/1994	\$72,599.65

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On January 20, 1995, a Request for Additional Information ("RFAI") was sent to the Committee (Attachment 4). The RFAI notes on an informational basis that the Committee may have failed to file one or more of the required 48-Hour Notices for "last minute" contributions of \$1,000 or more. The notice requests the Committee to review their procedures for checking contributions received during the aforementioned time period. In addition, the notice states that although the Commission may take legal steps, any response would be taken into consideration.

On February 2 and 21, 1995, the Committee responded by letter (Attachment 5). The responses do not adequately address the issue. To date, the Committee has failed to provide additional clarification.

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FEDERAL ELECTION COMMISSION
1993-1994
CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

DATE 16MAY95

PAGE 1

CANDIDATE/COMMITTEE/DOCUMENT	OFFICE Sought/	PARTY	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
			PRIMARY	GENERAL	PRIMARY	GENERAL			
HUFFINGTON, MICHAEL	SENATE	REPUBLICAN PARTY					CALIFORNIA 1994 ELECTION	108	54CA00076
1. STATEMENT OF CANDIDATE							14SEP93	2	93SEN/010/4711
1993 STATEMENT OF CANDIDATE									
2. PRINCIPAL CAMPAIGN COMMITTEE									
CALIFORNIANS FOR HUFFINGTON							ID #C00283879		SENATE
1993 STATEMENT OF ORGANIZATION							14SEP93	3	93SEN/010/4713
YEAR-END			377,710		263,825		1JAN93 -31DEC93	27	94SEN/005/0094
YEAR-END - AMENDMENT			380,009		266,124		1JAN93 -31DEC93	22	94SEN/014/0515
1994 48 HOUR CONTRIBUTION NOTICE							23MAY94	2	94SEN/010/3180
48 HOUR CONTRIBUTION NOTICE							26MAY94	1	94SEN/010/4274
48 HOUR CONTRIBUTION NOTICE							27MAY94	1	94SEN/011/0531
48 HOUR CONTRIBUTION NOTICE							31MAY94	2	94SEN/011/0631
48 HOUR CONTRIBUTION NOTICE							3JUN94	2	92SEN/011/1632
48 HOUR CONTRIBUTION NOTICE							6JUN94	6	94SEN/011/1816
48 HOUR CONTRIBUTION NOTICE							7JUN94	1	94SEN/011/1927
48 HOUR CONTRIBUTION NOTICE							22OCT94	1	94SEN/025/2292
48 HOUR CONTRIBUTION NOTICE							27OCT94	2	94SEN/027/3224
48 HOUR CONTRIBUTION NOTICE							29OCT94	2	94SEN/028/0147
48 HOUR CONTRIBUTION NOTICE							3NOV94	1	94SEN/028/1743
48 HOUR CONTRIBUTION NOTICE							4NOV94	1	94SEN/028/2465
48 HOUR CONTRIBUTION NOTICE							5NOV94	1	94SEN/028/2996
48 HOUR CONTRIBUTION NOTICE							8NOV94	1	94SEN/028/3629
APRIL QUARTERLY			3,879,354		2,511,247		1JAN94 -31MAR94	22	94SEN/009/2668
APRIL QUARTERLY - AMENDMENT			3,881,007		2,512,775		1JAN94 -31MAR94	19	94SEN/014/0538
APRIL QUARTERLY - AMENDMENT							1JAN94 -31MAR94	3	94SEN/032/0004
REQUEST FOR ADDITIONAL INFORMATION							1JAN94 -31MAR94	2	94FEC/941/1491
REQUEST FOR ADDITIONAL INFORMATION 2ND							1JAN94 -31MAR94	3	94FEC/945/3246
PRE-PRIMARY			2,528,442		2,968,155		1APR94 -18MAY94	29	94SEN/010/4279
PRE-PRIMARY - AMENDMENT			2,528,442		2,968,155		1APR94 -18MAY94	11	94SEN/014/0558
PRE-PRIMARY - AMENDMENT							1APR94 -18MAY94	1	94SEN/032/0007
REQUEST FOR ADDITIONAL INFORMATION							1APR94 -18MAY94	3	94FEC/904/1352
REQUEST FOR ADDITIONAL INFORMATION 2ND							1APR94 -18MAY94	4	94FEC/908/3380
REQUEST FOR ADDITIONAL INFORMATION							1APR94 -18MAY94	1	94FEC/941/1490
REQUEST FOR ADDITIONAL INFORMATION 2ND							1APR94 -18MAY94	2	94FEC/945/3244
JULY QUARTERLY				2,716,683		3,689,507	19MAY94 -30JUN94	42	94SEN/014/0570
JULY QUARTERLY - AMENDMENT							19MAY94 -30JUN94	3	94SEN/032/0008
REQUEST FOR ADDITIONAL INFORMATION							19MAY94 -30JUN94	5	94FEC/941/1722
REQUEST FOR ADDITIONAL INFORMATION 2ND							19MAY94 -30JUN94	6	94FEC/945/3238
OCTOBER QUARTERLY				8,544,412		8,463,708	1JUL94 -30SEP94	145	94SEN/022/3204
OCTOBER QUARTERLY - AMENDMENT							1JUL94 -30SEP94	5	95SEN/004/1246
OCTOBER QUARTERLY - AMENDMENT							1JUL94 -30SEP94	131	95SEN/004/1583
OCTOBER QUARTERLY - AMENDMENT				8,545,019		8,464,386	1JUL94 -30SEP94	39	95SEN/005/0209
REQUEST FOR ADDITIONAL INFORMATION							1JUL94 -30SEP94	20	94FEC/953/2763
REQUEST FOR ADDITIONAL INFORMATION 2ND							1JUL94 -30SEP94	21	95FEC/955/1742
PRE-GENERAL				8,150,719		7,305,358	1OCT94 -19OCT94	56	94SEN/026/3309

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FEDERAL ELECTION COMMISSION
1993-1994
CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

DATE 16MAY95

PAGE 2

CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/ PARTY	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES TYPE OF FILER	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
PRE-GENERAL	- AMENDMENT		-			10CT94 -19OCT94	4	95SEN/004/1255
PRE-GENERAL	- AMENDMENT		-			10CT94 -19OCT94	1	95FEC/968/0780
PRE-GENERAL	- AMENDMENT		8,143,367		7,295,716	10CT94 -19OCT94	25	95SEN/005/0248
REQUEST FOR ADDITIONAL INFORMATION						10CT94 -19OCT94	5	94FEC/953/2923
REQUEST FOR ADDITIONAL INFORMATION 2ND						10CT94 -19OCT94	5	95FEC/955/1737
POST-GENERAL			3,243,953		4,224,888	20OCT94 -28NOV94	56	94SEN/033/0897
POST-GENERAL	- AMENDMENT		-			20OCT94 -28NOV94	4	95SEN/004/1231
POST-GENERAL	- AMENDMENT		3,242,909		4,224,888	20OCT94 -28NOV94	4	95SEN/005/0273
REQUEST FOR ADDITIONAL INFORMATION						28OCT94 -28NOV94	4	95FEC/958/0355
REQUEST FOR ADDITIONAL INFORMATION 2ND						20OCT94 -28NOV94	2	95FEC/965/5599
YEAR-END			547,679		539,180	29NOV94 -31DEC94	31	95SEN/003/2530
YEAR-END	- AMENDMENT		-			29NOV94 -31DEC94	1	95FEC/968/0779
YEAR-END	- AMENDMENT		547,679		539,967	29NOV94 -31DEC94	4	95SEN/005/0277
1'ST LETTER INFORMATIONAL NOTICE						29NOV94 -31DEC94	2	95FEC/975/2801
1995 MISCELLANEOUS REPORT TO FEC						2FEB95	2	95SEN/002/4491
TOTAL			6,789,458	23,195,257	5,747,054	24,214,464	799	TOTAL PAGES

- 3. AUTHORIZED COMMITTEES
- 4. JOINT FUNDRAISING COMMITTEES AUTHORIZED BY THE CAMPAIGN

All Reports Have Been Reviewed.

Ending Cash-on-Hand as of 12/31/94: \$23,196

Debts and Obligations Owed by the Committee as of 12/31/94: \$12,022,497

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REPORT NOTICE

FEDERAL ELECTION COMMISSION

CONGRESSIONAL COMMITTEES

October 3, 1994

1994 GENERAL ELECTION CANDIDATE COMMITTEES

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Pre-General	10/01/94 - 10/19/94	10/24/94	10/27/94
Post-General	10/20/94 - 11/28/94	12/08/94	12/08/94

WHO MUST FILE

All 1994 general election principal campaign committees of congressional candidates (including unopposed candidates) who seek election in the November 8, 1994, General Election must file the Pre- and Post-General Election Reports. If the campaign has an authorized committee(s), in addition to the principal campaign committee, the principal campaign committee must also file a consolidated report on Form 3Z and attach the report(s) of the authorized committee(s).

48 HOUR NOTICES ON CONTRIBUTIONS

Notices are required if the committee receives contributions (including contributions and loans from the candidate's personal funds; and endorsements or guarantees of bank loans) of \$1,000 or more, during the period of October 20 through November 5. The notices must reach the appropriate federal and state filing offices within 48 hours of the committee's receipt of the contribution(s).

LABEL

Committees should affix the peel-off label from the envelope to Line 1 of the report. Corrections should be made on the label.

COMPLIANCE

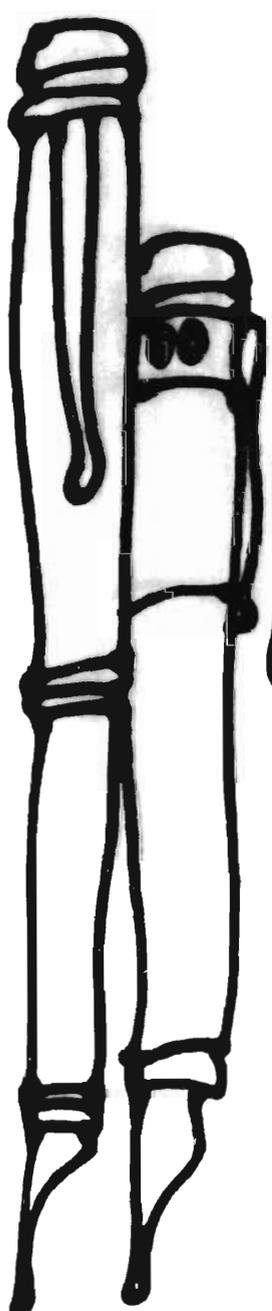
TREASURERS ARE RESPONSIBLE FOR FILING ALL REPORTS AND 48 HOUR NOTICES ON TIME. FAILURE TO DO SO IS SUBJECT TO ENFORCEMENT ACTION. COMMITTEES USING NON-FEC FORMS FOR REPORTS OR FILING ILLEGIBLE REPORTS OR NOTICES WILL BE REQUIRED TO REFILE.

*The period begins with the close of the last report filed by the committee. If the committee has filed no previous reports, the period begins with the date of the committee's first activity.

**Reports sent by registered or certified mail must be post-marked by the mailing date; otherwise, they must be received by the filing date.

FOR INFORMATION, Call: 800/424-9530 or 202/219-3420

26043741958



CHEDULE A

**FINANCED CAMPAIGN
(Contributions From
The Candidates)**

See separate schedule Page 1 of
for each category of the
Detailed Summary Page FOR LINE NUMBER
91429

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

**NAME OF COMMITTEE (in Full)
CALIFORNIA FOR CONSTITUTION**

EMPLOYER

Full Name, Mailing Address and ZIP Code Election Type	Name of Employer Occupation Aggregate Year-to-Date	Date received day month year	Amount of Each Receipt This Period
---	--	---------------------------------	--

WYFFINGTON, MICHAEL
990 NORTH CROFT BL. 9700
COSTA MESA, CA 92626

Aggregate Year-to-Date	2015,343,682.24	10-26-94	2,500,000.00
Receipt For: General		11-01-94	900,000.00
Receipt For: General		10-24-94	200.54 coin Elec
Receipt For: General		10-24-94	72,300.00 coin Elec
Receipt For: General		10-25-94	275.40 coin Elec
Receipt For: General		10-26-94	200.00 coin Elec
Receipt For: General		10-31-94	112.40 coin Elec
Receipt For: General		10-31-94	900.40 coin Elec
Receipt For: General		11-01-94	201.25 coin Elec

TOTAL of Receipts This Page (Optional)..... > 23,074,233.24

TOTAL This Period (last page this line number only)..... > 23,074,233.24

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FORM 28

(DONOR'S SIGNATURE)
(Operating Organization)

SEE ALSO CATEGORY OF THE
Detailed Summary Page SEE LINE NUMBER
97

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

NAME OF COMMITTEE (In Full)
CALIFORNIA FOR HISPANICS

ADDRESS

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Dist. For	Date (Month, day, year)	Amount of Each Disbursement This Period
WYNNISTER, MICHAEL 900 SOUTH BEAST ST. 67C. COSTA MESA, CA 92626	TRAVEL LEGAL FEES TRAVEL	General General General	10-24-94 10-24-94 10-25-94	200.14 72,999.60 275.40
	TRAVEL MEALS TRAVEL TRAVEL	General Gen. .. General General	10-26-94 10-31-94 10-31-94 11-01-94	200.00 112.60 900.60 221.25
WYNNISTER, BOY B. P.O. BOX 4387 MILPITAS, CA 95035	REIMBURSE TRAVEL	General	11-08-94	9,371.50
IMPRESARIO MANAGEMENT CORP. 325 SPRINGDALE DRIVE MILPITAS, CA 95035	GRANTS	General	10-31-94	9,000.00
FEDERAL REVENUE SERVICE FREMONT, CA 94538	TRAVEL TRIP TRAVEL TRIP TRAVEL TRIP TRAVEL TRIP	General General General General	10-31-94 11-15-94 11-31-94 10-31-94	90,472.13 95,000.66 1,100.22 0.01
J. W. HARRIS HOTEL 2751 AVENUE OF THE STARS LOS ANGELES, CA 90067	FEES CONFERENCE	General	11-16-94	1,163.91
SHILSH COMMUNICATIONS 2446 24TH ST. S.W. UNIVERSITY, DC 20009	MEDIA TRAINING	General	11-14-94	3,500.00
SMITH, DAVID C/O 670 CALIFORNIA ROAD 713 HAYLAND AVE. S.E. WASHINGTON, DC 20002	REIMBURSE TRAVEL	General	11-08-94	904.65

(In-kind received)

940203309

TOTAL of Disbursements This Page (optional)..... \$128,796.92
TOTAL This Period (last page this line number only).....



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

JAN 20 1985

Dana W. Reed, Treasurer
Californians for Ruffington
777 South Figueroa Street, Suite 3400
Los Angeles, CA 90017

Identification Number: C00283879

Reference: 30 Day Post-General Report (10/28/94-11/28/94)

Dear Mr. Reed:

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

-Your calculations for the debt schedule (Schedule D) are incorrect. Our calculations disclose an apparent discrepancy of \$66,788.80 in the debt owed to Printech. (\$38,512.93 + \$0 - \$33,394.40 = \$5,118.53). Please amend your report to provide the correct total for this debt on Schedule D.

-All contributions received by your committee from 10/20/94 through 11/5/94 are required to be disclosed on this report. Your committee filed 48 hour notices reporting the following "last minute" contributions:

Contributor	Date	Amount
Alex Tsiboukas	10/28/94	\$1,000
Burt Sugarman	11/04/94	\$1,000

These contributions do not appear on Schedule A of this report. Please amend your report to include these contributions or provide an explanation of these apparent discrepancies.

-Debt payments for this period (Schedule D) are greater than the payments itemized on Schedule B. Each expenditure to a person which in the aggregate is greater than \$200 for the calendar year must be reported on Schedule B. "Person" includes an individual, partnership, corporation, association, and public or private organization -- other than an agency of the United States Government. Please correct the discrepancies in the payments made to Printech and file an amendment to your report. (11 CFR §§104.3(b)(4)(i)(A) and 100.10)

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CALIFORNIANS FOR HU TINGTON
PAGE 2

-You must provide the occupation and name of employer for all individuals who contribute more than \$200 in a calendar year. Please amend your report to include the omitted information.

A committee may demonstrate "best efforts" to obtain the required information by providing the Commission with a description of its procedures for requesting the information, accompanied by copies of the solicitations; the committee must request the contributor information in initial solicitations; make follow-up requests (if necessary); report the information; and file amendments to disclose previously unreported information. Each solicitation must include a clear and conspicuous request for the information and must inform the contributor that the reporting of such information is required by federal law. If a committee receives a contribution that exceeds the \$200 threshold but lacks contributor information, the committee must, within 30 days, make an additional written or oral request for the information. Please note that a written request may not include an additional solicitation or material on any other subject, other than thanking the contributor for the donation and must include a pre-addressed return post card or envelope for the contributor's response. An oral request must be documented in writing. Committees must also disclose information that was not provided by the contributor, but is available in any of the committee's records for that current election cycle. Furthermore, if a committee receives contributor information after the contributions have been reported, it must submit, with its next report, an amended memo Schedule A listing all the contributions for which additional information was received or file, on or before the next reporting date, amendments to the previous reports on which the contributions were originally disclosed. See 11 CFR §104.3(a)(4)(i) and 11 CFR §104.7.

-Expenditures by the candidate have been itemized on this report. When itemizing payments made by the candidate to companies or individuals you must list the name and address of the vendor from which he/she purchased an item or a service. You should also show the date, the amount, and the purpose of the payment if you have paid in excess of \$200 this calendar year to the vendor. (11 CFR §104.9)

-Schedule A of your report indicates that your committee may have failed to file one or more of the required 48 hour notices regarding "last minute" contributions received by your committee after the close of books for

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the 12 Day Pre-General report. A principal campaign committee must notify the Commission, in writing, within 48 hours of any contribution of \$1,000 or more received between two and twenty days before an election. These contributions are then reported on the next report required to be filed by the committee. To ensure that the Commission is notified of last minute contributions of \$1,000 or more to your campaign, it is recommended that you review your procedures for checking contributions received during the aforementioned time period. Although the Commission may take legal action, any response you wish to provide concerning this matter will be considered. (11 CFR §104.5(f))

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Secretary of the Senate, 232 Hart Senate Office Building, Washington, DC 20510 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Pat Sheppard
Senior Reports Analyst
Reports Analysis Division

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96043741963
95039580357

REED & DAVIDSON

ATTORNEYS AT LAW

201 AIRWAY AVENUE, SUITE 204
COSTA MESA, CALIFORNIA 92626

TELEPHONE (714) 441-0000
FACSIMILE (714) 441-0000

LOS ANGELES OFFICE
777 SOUTH FLORENCE STREET
SUITE 2000
LOS ANGELES, CALIFORNIA 90001
TELEPHONE (213) 621-6100
FACSIMILE (213) 621-6100

DANA W. REED
GARY DAVIDSON
OF COUNSEL
BARTL E. WOLD
BRADLEY W. HERTZ

February 17, 1995

Secretary of the Senate
232 Hart Senate Office Building
Washington, DC 20510

95 FEB 21 PM 1:46
RECEIVED
SENATE

RE: Californians for Huffington
30 Day Post-General Report (10/20/94 - 11/28/94)

Dear Sir/Madam:

This letter responds to the letter we received from the Reports Analysis Division and constitutes an amendment to the above referenced campaign report.

An updated Schedule A showing additional occupations and names of employers for individuals listed will be forwarded to you next week. All solicitations made by the committee included a clear and conspicuous request for the information and informed the contributor that the reporting of such information was required by federal law. The updated Schedule A also discloses refunds, reallocations and reattributions that have been made by the committee or contributors to the committee. A refund of \$40.00 was made on 12/16/94 to Charles J. Baier. Refunds of \$400.00 and \$80.00 were made on 12/26/94 to James B. Davis. A refund of \$50.00 was made on 02/15/95 to Joan Joceff. A refund of \$100.00 was made on 12/16/94 to Gary D. Nesen. Burt Sugarman redesignated his 11/04/94 contribution of \$500.00 to the primary election.

The 48 hour notice that we filed on 11/04/94 incorrectly reported a contribution of \$1,000.00 from Burt Sugarman. This contribution was actually \$500.00 as reported on the Schedule A. The 48 hour notice that we filed on 10/28/94 reported a contribution of \$1,000.00 from Alex Tsiboukas. The Schedule A for the period 10/20/94 - 11/28/94 incorrectly reports this contribution was made by Aristides Deslis. We have corrected this error on the enclosed amended Schedule A.

The amount owed to Printech on Schedule D is amended to move \$33,394.40 from the "Payment this Period" column to the "Amount Incurred this Period" column. The outstanding balance at close of this period of \$71,907.33 is correct.

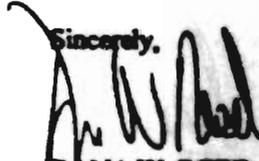
9 0 0 4 1 3 5 1

We have attached itemization of expenditures made by the candidate for this reporting period.

We have reviewed the committee records and we have found no evidence of failing to file any required 48 hour notices regarding "last minute" contributions received by the committee after the close of books for the 12 Day Pre-General report.

Please let us know if you need any further information.

Sincerely,



DANA W. REED
Treasurer

Californians for Huffington

DWR:ced
Encl.

9 5 0 2 0 0 4 1 2 5 2

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

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

Jul 12 9 27 AM '95

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD Referral: 95L-14
Date Activated: 6/28/95
Staff Attorney: Mark T. Kim

SOURCE: INTERNALLY GENERATED

RESPONDENTS: Californians for Huffington
and Dana W. Reed, as treasurer

RELEVANT STATUTE: 2 U.S.C. § 434(a)(6)(A)

I. GENERATION OF MATTER

The Office of the General Counsel received a referral from the Reports Analysis Division ("RAD") on May 18, 1995. See Attachment 1. The basis for the referral is the failure of the Californians for Huffington committee and Dana W. Reed, as treasurer, ("Respondents") to file one 48 Hour notification ("48 Hour Notice") for a candidate contribution totaling \$72,599.65. Michael Huffington lost the 1994 General Election in the State of California with forty-five (45%) percent of the vote.

II. FACTUAL AND LEGAL ANALYSIS

Based on the Factual and Legal Analysis, see Attachment 2, this Office recommends that the Federal Election Commission ("Commission") find reason to believe that Respondents violated 2 U.S.C. § 434(a)(6)(A).

III. DISCUSSION OF CONCILIATION & CIVIL PENALTY

In addition to the reason to believe recommendation, this Office further recommends that the Commission offer to enter

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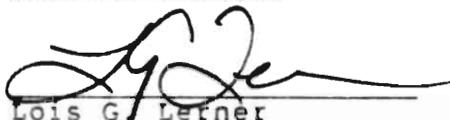
into conciliation with Respondents prior to a finding of probable cause to believe. Attached for the Commission's approval is a proposed conciliation agreement

IV. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that the Californians for Huffington committee and Dana W. Reed, as treasurer, violated 2 U.S.C. § 434(a)(6)(A), and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the attached Factual and Legal Analysis, proposed conciliation agreement, and the appropriate letter.

Lawrence M. Noble
General Counsel

7/11/95
Date

BY: 
Lois G. Lerner
Associate General Counsel

Attachments:

1. Referral Materials
2. Factual and Legal Analysis
3. Proposed Conciliation Agreement

96043741968

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Californians for Huffington and
Dana W. Reed, as treasurer.

)
)
) RAD Referral
) #95L-14 (MUR 4233)
)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 17, 1995, the Commission decided by a vote of 5-0 to take the following actions in RAD Referral #95L-14:

1. Open a MUR.
2. Find reason to believe that the Californians for Huffington Committee and Dana W. Reed, as treasurer, violated 2 U.S.C. § 434(a)(6)(A), and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the Factual and Legal Analysis, proposed conciliation agreement, and the appropriate letter, as recommended in the General Counsel's Report dated July 11, 1995.

Commissioners Aikens, Elliott, McDonald, McGarry, and Potter voted affirmatively for the decision; Commissioner Thomas did not cast a vote.

Attest:

7-17-95
Date

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

Received in the Secretariat:	Wed., July 12, 1995	9:25 a.m.
Circulated to the Commission:	Wed., July 12, 1995	11:00 a.m.
Deadline for vote:	Mon., July 17, 1995	4:00 p.m.

bjr

96043741969



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1995

Dana W. Reed, Treasurer
Californians for Huffington
777 South Figueroa Street, Suite 3400
Los Angeles, CA 90017

RE: MUR 4233
Californians for Huffington and
Dana W. Reed, Treasurer

Dear Mr. Reed:

On July 17, 1995, the Federal Election Commission found that there is reason to believe Californians for Huffington ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(6)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

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

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

If you are interested in expediting the resolution of this matter by pursuing probable 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.

96043741970

MUR 4233
Californians for Huffington
Page 2

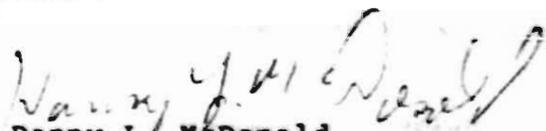
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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.

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.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Mark T. Kim, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,


Danny L. McDonald
Chairman

Enclosures:
Factual and Legal Analysis
Procedures
Designation of Counsel Form
Conciliation Agreement

cc: Michael Huffington

96043741971

FEDERAL ELECTION COMMISSION
FACTUAL & LEGAL ANALYSIS

MUR 4233

RESPONDENTS: Californians for Huffington
and Dana W. Reed, as treasurer

This matter was generated based on information ascertained by the Federal Election Commission ("Commission") in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2).

96043741972

The Federal Election Campaign Act of 1971, as amended ("Act"), requires principal campaign committees of candidates for federal office to notify in writing either the Secretary of the Senate, the Clerk of the U.S. House of Representatives or the Commission, as appropriate, and the Secretary of State, of each contribution totaling \$1,000 or more, received by any authorized committee of the candidate after the 20th day but more than 48 hours before any election. 2 U.S.C. § 434(a)(6)(A). The Act further requires notification to be made within 48 hours after the receipt of the contribution and to include the name of the candidate and office sought, the date of receipt, the amount of the contribution, and the identification of the contributor. Id. The notification of these contributions shall be in addition to all other reporting requirements. 2 U.S.C. § 434(a)(6)(B).

The General Election in the State of California was held on November 8, 1994. Pursuant to the Act, the Respondents were

required to notify the Commission, in writing, of all contributions of \$1,000 or more received from October 20 to November 5, 1994, within 48 hours of their receipt. A review of the Respondents' 1994 30 Day Post-General Election Report identified one candidate contribution received on October 24, 1994, totaling \$72,599.65. The Committee did not submit a 48 Hour Notice for this contribution.

Therefore, there is reason to believe that Californians for Huffington and Dana W. Reed, as treasurer, violated 2 U.S.C. § 434(a)(6)(A) by failing to report one campaign contribution of \$1,000 or more, received after the 20th day, but more than 48 hours before the general election, within 48 hours of receipt of the contribution.

96043741973



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 8, 1995

VIA FIRST CLASS MAIL

Dana W. Reed, Treasurer
Californians for Huffington
777 South Figueroa Street, Suite 3400
Los Angeles, CA 90017

RE: MUR 4233
Californians for Huffington
and Dana W. Reed, Treasurer

Dear Mr. Reed:

On July 20, 1995, you were notified that the Federal Election Commission determined to enter into negotiations directed toward reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. On that same date you were sent a conciliation agreement offered by the Commission in settlement of this matter.

Please note that conciliation negotiations entered into prior to a finding of probable cause to believe are limited to a maximum of 30 days. To date, you have not responded to the proposed agreement. If you intend to pursue preprobable cause conciliation, your immediate response is necessary.

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

Sincerely,

Mark T. Kim
Attorney

96043741974

STATEMENT OF DESIGNATION OF COUNSEL

MR 4233

NAME OF COUNSEL: Cary Davidson

ADDRESS: Reed & Davidson
777 S. Figueroa St., Suite 3700
Los Angeles, CA 90017

TELEPHONE: (213) 624-6200



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.

8-11-95
 Date

[Handwritten Signature]
 Signature

RESPONDENT'S NAME: Californians for Huffington, Dana W. Reed, Treasurer

ADDRESS: 777 S. Figueroa St., Suite 3700
Los Angeles, CA 90017

HOME PHONE: _____

BUSINESS PHONE: (213) 624-6200

96043741975

DANA W. REED
CARY DAVIDSON
OF COUNSEL
BARRYL R. WOLD
GRADLEY W. HERTZ

REED & DAVIDSON
ATTORNEYS AT LAW
777 SOUTH FIGUEROA STREET
SUITE 2700
LOS ANGELES, CALIFORNIA 90017
TELEPHONE (213) 624-8288
FACSIMILE (213) 622-4888

ORANGE COUNTY OFFICE
3841 BURNLEY AVENUE, SUITE 201
COSTA MESA, CALIFORNIA 92626
TELEPHONE (714) 848-8888
FACSIMILE (714) 848-4888

August 21, 1995

Mark T. Kim, Esq.
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

VIA
FACSIMILE

Aug 21 5 24 PM '95
REED & DAVIDSON
ATTORNEYS AT LAW

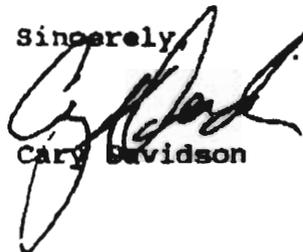
Re: MUR 4233; Californians for Huffington
and Dana W. Reed, Treasurer

Dear Mr. Kim:

Pursuant to our recent telephone conversations, attached is the response of Californians for Huffington and Dana W. Reed, its Treasurer, to the Federal Election Commission's July 20, 1995 letter, Factual and Legal Analysis and Conciliation Agreement.

Please forward our response to the Commission for its consideration. Thank you for your assistance in this matter.

Sincerely,



Cary Davidson

96043741976

DANA W. REED
CARY DAVIDSON

OF COUNSEL
BARRY R. WOLD
BRADLEY W. HERTZ

REED & DAVIDSON
ATTORNEYS AT LAW
777 SOUTH FIGUEROA STREET
SUITE 3700
LOS ANGELES, CALIFORNIA 90007
TELEPHONE (213) 624-8200
FACSIMILE (213) 625-1000

ORANGE COUNTY OFFICE
501 ARDMAY AVENUE, SUITE 141
COSTA MESA, CALIFORNIA 92626
TELEPHONE (714) 841-0000
FACSIMILE (714) 841-1000

August 21, 1995

Danny L. McDonald, Chairman
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

VIA
FACSIMILE

Re: NUR 4233; Californians for Huffington
and Dana W. Reed, Treasurer

Dear Chairman McDonald:

This letter responds to your July 20, 1995 letter concerning Californians for Huffington (the "Committee") and Dana W. Reed, its Treasurer (the "Treasurer").

While we do not dispute the Commission's Factual and Legal Analysis, we believe that the contribution at issue must be considered in the context of the specific facts related to that contribution, and the Committee's overall disclosure record.

The \$72,599.65 in-kind contribution to the Committee on October 24, 1994 was for services rendered to the Committee prior to the last-minute contribution period. The invoice for those services was sent directly to, and paid directly by, the candidate. The Treasurer was unaware of the services, the invoice and the payment until he prepared the 30 Day Post-General Election Report.

Had the payment been made via Committee funds or prior to October 20, 1994 or after November 5, 1994, there would have been no last-minute contribution reporting required and hence, full compliance with the Federal Election Campaign Act. Since the payment was not made in connection with a last-minute mailer, radio, television or newspaper advertisement or other voter contact effort, the public policy requiring 48-hour notices was not breached. If the invoice had been forwarded to the Treasurer, it would have been paid with the other bills and would have been disclosed along with the other expenditures.

Given the large sum of money received and spent, both during the campaign and its last-minute contribution period, the October 24 contribution should be placed in the proper context. While at first glance \$72,599.65 may appear to be a substantial payment,

96043741917

Danny L. McDonald, Chairman
Federal Election Commission
August 17, 1995
Page 2

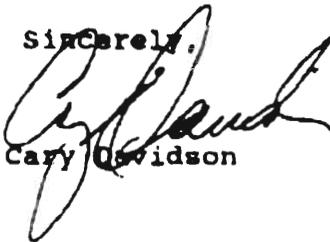
it is, in fact, quite small when compared with all of the contributions received, or even contributions received in the last-minute contribution period. Considering the approximately \$30,000,000 in total contributions to the Committee, \$72,599.65 constituted only 0.24% of the total.

Also, the October 24 contribution must be measured in relation to the last-minute contributions that were timely reported. Seven 48-hour notices, disclosing \$3,027,000, were filed during the last-minute contribution period. Of the contributions disclosed in the notices, the candidate contributed \$3,000,000. The contribution at issue constituted only 2.34% of the total last-minute contributions.

9 6 0 4 3 7 4 1 9 7 8
Californians for Huffington and its treasurer, Dana W. Reed, made every effort to disclose timely all contributions and expenditures. Significant attention was devoted to compliance with filing deadlines. While perfection is the goal, in a campaign of this magnitude, it is customary for small errors to occur. Typically, these may be rectified by amendments. In this instance, that recourse was unavailable. Clearly, there was no intent to mislead the public or to hide a contribution or expenditure.

Thank you for your consideration. If we may provide additional information, please let us know.

Sincerely,


Cary Davidson



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 28, 1995

VIA FACSIMILE & FIRST CLASS MAIL

Cary Davidson, Esq.
Reed & Davidson
777 South Figueroa Street, Suite 3400
Los Angeles, CA 90017

RE: MUR 4233
Californians for Huffington
and Dana W. Reed, Treasurer

Dear Mr. Davidson:

This letter confirms our telephone conversation on August 25, 1995, in which we discussed the nature of the in-kind contribution at issue in this matter. You indicated that the contribution consisted of the candidate's payment for certain legal services rendered prior to the 48 hour reporting period.

As I suggested, these circumstances may alter the nature of the reporting violation. You indicated a willingness to provide this Office with additional information. To this end, please identify the exact nature of the legal services performed, the date such services were rendered and the date payment for such services was made. In addition, this Office requests any invoices or other pertinent documentation in regard to such services. Should you have any questions, please contact me at (202) 219-3690.

Sincerely,

Mark T. Kim
Attorney

96043741979



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 13, 1995

VIA FIRST CLASS MAIL

Cary Davidson, Esq.
Reed & Davidson
777 South Figueroa Street, Suite 3400
Los Angeles, CA 90017

RE: MUR 4233
Californians for Huffington
and Dana W. Reed, Treasurer

Dear Mr. Davidson:

By letter dated August 28, 1995, this Office confirmed your willingness to provide information regarding the exact nature of the candidate's in-kind contribution that is the subject of this matter. To date, this Office has not received any such information. As we discussed over the phone, this information is necessary in order to resolve this matter expeditiously and to avoid more formal methods of discovery. If this information is not received within five (5) days of your receipt of this letter, this Office will seek the issuance of a subpoena by the Commission. Should you have any questions, please contact me at (202) 219-3690.

Sincerely,

Mark T. Kim
Attorney

96043741980

REED & DAVIDSON

ATTORNEYS AT LAW

777 SOUTH FIGUEROA STREET

SUITE 2700

LOS ANGELES, CALIFORNIA 90017

TELEPHONE (213) 624-2222

FACSIMILE (213) 623-1008

DANA W REED
KARY DAVIDSON
OF COUNSEL
BARRYL R. WOLD
BRADLEY W. HERTZ

ORANGE COUNTY OFFICE
2811 AIRWAY AVENUE, SUITE 200
COSTA MESA, CALIFORNIA 92626
TELEPHONE (714) 941-1000
FACSIMILE (714) 946-1000

September 21, 1995

Mark T. Kim, Esq.
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

VIA FACSIMILE

SEP 22 7 12 AM '95
FEDERAL ELECTION COMMISSION

Re: MUR 4233
Californians for Huffington

Dear Mr. Kim:

This letter responds to your letters of August 28 and September 13 requesting additional information in connection with the in-kind contribution at issue in the above-referenced matter. You asked us to identify the exact nature of the legal services performed, the date such services were rendered and the date payment for such services was made. You also asked for any invoices or other pertinent documentation.

The invoice at issue is undated, and the candidate has advised us that the lawyer is his personal lawyer who is involved in all aspects of the candidate's life. Naturally, when Mr. Huffington was a candidate, the lawyer had access to information about the campaign. The nature and extent of the involvement would be protected by the attorney-client privilege.

Without waiving the attorney-client privilege, we confirm that the invoice is from the Law Offices of Allan Gerson for \$72,599.65. It is for professional services rendered July 16, 1994 to October 16, 1994. Mr. Huffington stated that he paid the invoice on October 24, 1994.

As stated in our earlier letter to Chairman McDonald, Mr. Huffington could have paid the invoice at any time. The invoice could have been generated at any time. There was no effort to determine which portion of the invoice, if any, was in connection with the campaign. The treasurer did not receive a copy of the invoice until after the election. Even if this payment is viewed as a last-minute contribution, it is so small compared with the large last-minute contributions properly reported, we continue to believe that no penalty should be assessed.

96043741981

Mark T. Kim, Esq.
Federal Election Commission
September 21, 1995
Page Two

We thank you for considering this additional information in conjunction with our prior letter. If you have further questions, please feel free to let us know.

Sincerely,



Cary Davidson

CONFIDENTIAL

96043741982

REED & DAVIDSON

ATTORNEYS AT LAW

777 SOUTH FIGUEROA STREET

SUITE 3700

LOS ANGELES, CALIFORNIA 90017

TELEPHONE (213) 624-6200

FACSIMILE (213) 623-1092

DANA W. REED
CARY DAVIDSON

OF COUNSEL
GARY L. WOLD
BRADLEY W. HERTZ

ORANGE COUNTY OFFICE
300 AIRWAY AVENUE, SUITE 101
COSTA MESA, CALIFORNIA 92626
TELEPHONE (714) 944-0000
FACSIMILE (714) 944-1000

IMPORTANT FACSIMILE TRANSMISSION

JUN 29 3 04 PM '96
RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

DATE: 1/29/96 TIME: 12:43
TO: Mark J. King FAX #: (202) 219-3921
FROM: Cary Davidson FAX #: (213) 623-1692
CLIENT: Haffington

NUMBER OF PAGES INCLUDING THIS PAGE 7

COMMENTS: This should have accompanied
the letter I faxed you.
Sony

THIS COMMUNICATION IS INTENDED FOR THE USE OF THE PERSON TO WHOM IT IS ADDRESSED. IT MAY CONTAIN INFORMATION THAT IS PRIVILEGED OR CONFIDENTIAL. ANY UNAUTHORIZED DISCLOSURE, DISTRIBUTION OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED.

IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY THE SENDER IMMEDIATELY BY TELEPHONE AND RETURN THE ORIGINAL TO THE SENDER AT THE ABOVE ADDRESS BY MAIL. YOUR ASSISTANCE IN MAINTAINING THE INTEGRITY OF FAX TRANSMISSION SERVICE IS APPRECIATED.

Please notify us immediately if this material was not received properly by calling: (213) 624-6200.

96043741983

REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (In full) CALIFORNIANS FOR HUFFINGTON		2. FEC IDENTIFICATION NUMBER C00283879	
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported. 777 S. Figueroa St., Suite 3700		3. IS THIS REPORT AN AMENDMENT? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
CITY, STATE and ZIP CODE Los Angeles, CA 90017		STATE/DISTRICT California	

4. TYPE OF REPORT

<input type="checkbox"/> April 15 Quarterly Report	<input type="checkbox"/> Twelfth day report preceding _____ (Type of Election)
<input type="checkbox"/> July 15 Quarterly Report	election on _____ in the State of _____
<input checked="" type="checkbox"/> October 15 Quarterly Report	<input type="checkbox"/> Thirtieth day report following the General Election on _____ in the State of _____
<input type="checkbox"/> January 31 Year End Report	
<input type="checkbox"/> July 31 Mid-Year Report (Non-election Year Only)	<input type="checkbox"/> Termination Report

This report contains activity for: Primary Election General Election Special Election Recall Election

SUMMARY

5. Covering Period <u>07/01/94</u> through <u>09/30/94</u>	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. Net Contributions (other than loans)		
(a) Total Contributors (other than loans) (from Line 11(a))	3,030,016.49	10,646,301.27
(b) Total Contribution Refunds (from Line 20(d))	1,729.00	2,329.00
(c) Net Contributors (other than loans) (subtract Line 6(b) from 6(a))	3,028,287.49	10,643,972.27
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	8,462,657.20	17,632,496.07
(b) Total Offsets to Operating Expenditures (from Line 14)	6,264.13	12,465.37
(c) Net Operating Expenditures (subtract Line 7(b) from 7(a))	8,456,393.07	17,620,030.70
8. Cash on Hand at Close of Reporting Period (from Line 27)	150,212.59	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	0	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	7,304,114.73	

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

Type or Print Name of Treasurer DANIA W. REED	Date
Signature of Treasurer 	01/24/96

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

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FEC FORM 3

(revised 4/87)

9 6 0 4 3 7 4 1 9 8 4

SCHEDULE D
(Revised 3/90)

DEBTS AND OBLIGATIONS
Excluding Loans

Page 6 of 6 for
LINE NUMBER 11
(Use separate schedules
for each numbered line)

96043741985

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
CALIFORNIANS FOR HUFFINGTON				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Grand Hyatt New York Park Avenue at Grand Central New York, NY 10017	0	2,912.81	0	2,912.81
Nature of Debt (Purpose): Fundraising expense				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Layne Allred 7088 Cardinal Road Fair Oaks, CA 95628	0	4,638.89	0	4,638.89
Nature of Debt (Purpose): Travel reimbursement				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Alice Borden Company 13743 Ventura Blvd., Suite 360 Sherman Oaks, CA 91423	0	6,346.16	0	6,346.16
Nature of Debt (Purpose): Fundraising expenses				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor Patton Boggs, L.L.P. 2550 M Street, N.W. Washington, DC 20037-1350	0	5,341.43	0	5,341.43
Nature of Debt (Purpose): Legal				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor Allan Gershon 1225 Eye St., N.W. Washington, DC 20005	0	36,299.83	0	36,299.83
Nature of Debt (Purpose): Legal				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				55,539.12
2) TOTAL This Period (last page this line only)				304,114.73
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				7,000,000.00
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				7,304,114.73

REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full) CALIFORNIANS FOR HUFFINGTON		2. FEC IDENTIFICATION NUMBER C00283879
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported. 777 S. Figueroa St., Suite 3700		3. IS THIS REPORT AN AMENDMENT <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
CITY, STATE and ZIP CODE Los Angeles, CA 90017	STATEDISTRICT California	

4. TYPE OF REPORT

April 15 Quarterly Report Twelfth day report preceding General (Type of Election)
 election on 11/08/94 in the State of California

July 15 Quarterly Report

October 15 Quarterly Report Thirtieth day report following the General Election on _____ in the State of _____

January 31 Year End Report

July 31 Mid-Year Report (Non-election Year Only) Termination Report

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

SUMMARY

5. Covering Period <u>10/01/94</u> through <u>10/19/94</u>	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e))	3,141,387.21	13,787,688.48
(b) Total Contribution Refunds (from Line 29(d))	1,120.00	3,449.00
(c) Net Contributions (other than loans) (subtract Line 6(b) from 6(a))	3,140,267.21	13,784,239.48
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	7,294,596.36	24,927,092.43
(b) Total Offsets to Operating Expenditures (from Line 14)	1,173.91	13,639.28
(c) Net Operating Expenditures (subtract Line 7(b) from 7(a))	7,293,422.46	24,913,453.15
8. Cash on Hand at Close of Reporting Period (from Line 27)	997,863.98	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	0	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	12,351,103.21	

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

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

Type or Print Name of Treasurer
DANA W. REED

Signature of Treasurer:

Date: **01/24/96**

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

96043741986

SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page 1 of 1 for
LINE NUMBER 10
(Use separate schedules
for each numbered line)

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
CALIFORNIANS FOR HUFFINGTON				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Infocision Management Corporation 325 Springside Drive Akron, OH 44333	0	5,800.00	0	5,800.00
Nature of Debt (Purpose): Caring				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Allan Gershon, Esq. 1225 Eye Street, N.W. Washington, DC 20005	36,299.83	36,299.82	0	72,599.65
Nature of Debt (Purpose): Legal services				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				78,399.65
2) TOTAL This Period (last page this line only)				351,103.21
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				2,000,000.00
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				2,351,103.21

96043741987

REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL ON TYPE OR PRINT

1. NAME OF COMMITTEE (in full) CALIFORNIANS FOR HUFFINGTON		2. FEC IDENTIFICATION NUMBER 000223879
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported. 777 S. Figueroa St., Suite 3700		3. IS THIS REPORT AN AMENDMENT? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
CITY, STATE and ZIP CODE Los Angeles, CA 90017	STATE/DISTRICT California	

4. TYPE OF REPORT

<input type="checkbox"/> April 15 Quarterly Report	<input type="checkbox"/> Twelfth day report preceding _____ <small>(Type of Election)</small>
<input type="checkbox"/> July 15 Quarterly Report	election on _____ in the State of _____
<input type="checkbox"/> October 15 Quarterly Report	<input checked="" type="checkbox"/> Thirtieth day report following the General Election on
<input type="checkbox"/> January 31 Year End Report	<u>11/08/94</u> in the State of <u>California</u>
<input type="checkbox"/> July 31 Mid-Year Report (Non-election Year Only)	<input type="checkbox"/> Termination Report

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

SUMMARY

5. Covering Period <u>10/20/94</u> through <u>11/28/94</u>	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(a))	3,167,439.54	16,955,128.02
(b) Total Contribution Refunds (from Line 28(d))	2,145.00	5,594.00
(c) Net Contributions (other than loans) (subtract Line 6(b) from 6(a))	3,165,294.54	16,949,534.02
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	4,222,743.83	29,149,836.26
(b) Total Offsets to Operating Expenditures (from Line 14)	74,627.85	68,267.13
(c) Net Operating Expenditures (subtract Line 7(b) from 7(a))	4,148,115.98	29,061,569.13
8. Cash on Hand at Close of Reporting Period (from Line 27)	15,484.93	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
9. Debts and Obligations Owed TO the Committee (Remize all on Schedule C and/or Schedule D)	0	
10. Debts and Obligations Owed BY the Committee (Remize all on Schedule C and/or Schedule D)	12,184,921.43	

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

Type or Print Name of Treasurer DANA W. REED	Date
Signature of Treasurer 	01/24/96

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

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FEC FORM 3

(revised 4/87)

9-6-0-4-3-7-4-1-9-8-8

SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page 5 of 6 for
LINE NUMBER 10
(Use separate schedules
for each numbered line)

Name of Certificate (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
CALIFORNIANS FOR HUFFINGTON				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Seven Seas Travel 149 Riverside Ave. Newport Beach, CA 92663	0	2,488.00	0	2,488.00
Nature of Debt (Purpose): Travel				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Allan Gershon, Esq. 1225 Eye St., N.W. Washington, DC 20005	72,599.65	0	72,599.65*	0
Nature of Debt (Purpose): Legal services				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor	*paid by in-kind contribution from Michael Huffington			
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				2,488.00
2) TOTAL This Period (last page this line only)				184,921.43
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				12,000,000.00
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				12,184,921.43

96043741939

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
 Californians for Huffington)
 and Dana W. Reed, as treasurer)

MUR 4233

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

The Office of the General Counsel received a referral from the Reports Analysis Division ("RAD") on May 18, 1995. The basis for the referral was the failure of the Californians for Huffington and Dana W. Reed, as treasurer, ("Respondents" and/or "Huffington Committee") to file one 48 Hour notification ("48 Hour Notice") for a candidate contribution totaling \$72,599.65. The Commission found reason to believe that the Huffington Committee violated 2 U.S.C. § 434(a)(6)(A), and approved a conciliation agreement

The Commission made its findings based on its understanding of the facts at the time. As a result of obtaining additional information, this Office now has a different understanding, leading to a recommendation that the Commission find reason to believe that the Huffington Committee violated 2 U.S.C. § 434(b). In addition, attached is a signed conciliation agreement and a \$7,500.00 check, this Office recommends that the Commission accept. See Attachments 3 and 4.

II. FACTUAL AND LEGAL ANALYSIS

A. The Responses

In its response the Huffington Committee stated that the \$72,599.65 in-kind contribution reported from the candidate on October 24, 1994, was payment for legal services rendered to the

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Committee prior to the reporting period when Committees are required to file 48 Hour Notices for contributions. See Attachment 1. According to the Respondents the invoice for those legal services rendered to the Committee were sent directly to and paid for by the candidate without notice being given to the committee until preparation of its 30 Day Post-General Election Report. To evaluate this claim, this Office requested that the Huffington Committee furnish the dates for the rendering of such service, the dates of payment, and the invoices, and other documents identifying such services.

In a later response, counsel for the respondents stated that the invoice was undated but that it was from the Law Offices of Allan Gerson for \$72,599.65 for services rendered July 16, 1994 to October 16, 1994. According to the Huffington Committee this law firm is the candidate's personal attorney. Counsel also argued that some of the services were actually for personal matters rather than campaign matters and thus need not have been reported at all. Further, according to counsel no attempt was made to separate campaign related services from those rendered to the candidate on personal matters. When asked to submit documentation to enable the Commission to determine how much was personal, counsel argues that any other information about the services is protected by attorney-client privilege. See Attachment 2.

This Office informed counsel that we did not agree with his claim that the bills for the legal services rendered were privileged. Therefore, absent evidence to the contrary we would treat the whole \$72,599.65 as the amount in violation. Respondents decided they would rather admit that all of the expenditures were campaign related than to provide any additional details about the services.

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B. New Violation

Based on the responses from respondents this Office now considers this to be a misreporting violation rather than a 48 hour notice violation, and now recommends a new reason to believe finding.

1. The Law

The Federal Election Campaign Act of 1971, as amended ("the Act") requires that political committees, including a candidate's authorized committees, report the total amounts of contributions received and expenditures made in the reports for the reporting periods in which they occurred. 2 U.S.C. § 434(b). Authorized committees of candidates must also report separately all contributions received from the candidate. 2 U.S.C. § 434(b)(2)(B). The Act defines both "contribution" and "expenditure" as including "anything of value made by any person for the purpose of influencing any election for Federal office." 2 U.S.C. §§ 431(8)(A)(i) and 431(9)(A)(i). Further, the Act defines "anything of value" to include all in-kind contributions. 11 C.F.R. §§ 100.7(a)(1)(iii) and 100.8(a)(1)(iv).

The Act and regulations treat in-kind contributions the same as all other contributions and thus require committees to report them during the reporting period in which they were made. 2 U.S.C. § 434(b); 11 C.F.R. §§ 104.3(a) and 104.13(a). The issue of the appropriate timing for the reporting of in-kind contributions was addressed in a decision of the United States District Court for the District of Columbia. In FEC v. American Federation of State, County and Municipal Employees - P.E.O.P.L.E., Qualified, et al., CA No. 88-3208 (RCL) (D.D.C. 1990) (D.D.C. Oct. 31, 1990) ("AFSCME"), AFSCME-PQ, a political committee, set up phone banks on behalf of a federal candidate and reported these in-kind contributions in the reporting period in which it disbursed funds to pay for the services rather than in the earlier reporting period

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during which the services were provided to the candidate committee. Citing the portion of 2 U.S.C. § 434(b)(6) related to "other political committees" (2 U.S.C. § 434(b)(6)(B)), the court held "that in-kind contributions made by AFSCME-PQ to the McCloskey campaign in 1982 and 1984 are reportable as of the date the contributions were made, not the date of disbursements by AFSCME-PQ." The court based its ruling upon the "plain language" of 2 U.S.C. § 434(b), stating that this provision "in its entirety requires reporting of contributions in the period in which they were made." In addition, the court found that to permit delay of the reporting of in-kind contributions until after the elections by tying the reporting of such contributions to the date of payment "would emasculate the fundamental purposes of the Act." The Court noted that one of the fundamental purposes of the Act included "provid[ing] the electorate with information as to where political campaign money comes from and how it is spent ... in order to aid the voters in evaluating those [candidates]" (quoting Buckley v. Valeo, 424 U.S. 1, 66). The court stated further: "Inherent in this goal is the need to have the information available at the time voting decisions are being made."

In addition to requiring the reporting of in-kind contributions in the period in which they were made, the Act and regulations generally require simultaneous reporting of in-kind contributions as an expenditure on the appropriate schedule (for typical in-kind contributions this is actually an artificial expenditure required in reporting in order to avoid inflating a committee's cash on hand). 2 U.S.C. § 434(b); 11 C.F.R. §§ 104.3(b) and 104.13(a)(2). However, when a candidate uses his or her personal funds (or personal credit) to pay for a campaign expense and will later be reimbursed by the committee for the payment, special reporting rules apply.

Advisory Opinion 1992-1 provides guidance in this regard.

In Advisory Opinion 1992-1, the candidate inquired whether, *inter alia*, the committee could reimburse him for campaign related expenses that he paid for with his own personal funds. The Commission responded in the affirmative, and addressed the relevant reporting requirements. The Commission explained that the committee should report advances of the candidate's personal funds for campaign related expenses only as memo entries on Schedule A, so that they do not inflate total contributions reported. The Commission stated that the advances must be itemized if the outstanding amount advanced by the candidate, when aggregated with other contributions, exceeds \$200 for the calendar year and the reimbursement does not bring the candidate below the \$200 itemization threshold before the end of the reporting period. The Commission further explained that in contrast to the way other in-kind contributions are reported, corresponding disbursements should not be reported until the Committee subsequently reimburses the candidate. The disbursements reported should indicate the previous memo entry on Schedule A to which they relate. In addition, if the reimbursement is not made in the same reporting period as the original advance, the Committee must also itemize the advance as a debt on Schedule D if it exceeds \$500 or has been outstanding for more than 60 days. 11 C.F.R. §§ 104.11 and 116.5. See, MUR 4152 following the same approach when campaign related expenses (i.e. postage, direct mail services, fundraising, etc.), for which he anticipated reimbursement from the committee were paid for by the candidate from his own personal funds.

2. The Analysis

In this present matter Huffington and the committee incurred the debt as a result of legal services rendered between July 16, 1994 to October 16, 1994. Mr. Huffington paid for the services on October 24, 1994. The Committee did not report the contribution until its 30 Day Post General Report was filed on December 12, 1994. As previously explained, it is the position

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of this Office that the contribution made by Mr. Huffington on behalf of his campaign should have been reported when the services were rendered not at the time of actual payment. See MUR 4152, AFSCME, Advisory Opinion 1992-1, 2 U.S.C. § 434(b); and 11 C.F.R §§ 104.3(a) and 104.13(a). Based on information furnished by the Respondents the breakdown of the services rendered was July 1, 1994 through September 30, 1994 (\$36,299.83), and October 1, 1994 through October 16, 1994 (\$36,299.82).

In view of the foregoing this Office has concluded that this was not a violation of the 48 hour notification requirement, as originally believed, but a misreporting violation by the committee. The Committee should have reported the services rendered to Huffington only as memo entries on Schedule A, of the report for the period in which the expenses were incurred. The services rendered from July 1, 1994 through September 30, 1994 (\$36,299.83), should have been reported as memo entries on Schedule A of the 1994 October Quarterly Report; and the services rendered from October 1, 1994 through October 16, 1994 (\$36,299.82), should have been reported as memo entries on Schedule A of the 1994 Pre-General Report. In fact, the Committee did not report anything until its 30 Day Post General Report.

The corresponding disbursements should not be reported until the Committee subsequently reimburses the candidate. The disbursements reported should indicate the previous memo entry on Schedule A to which it relates. In addition, the contribution must be itemized if the outstanding amount advanced by the candidate, when aggregated with other contributions, exceeds \$200 for the calendar year and the reimbursement does not bring the candidate below the \$200 itemization threshold before the end of the reporting period. In addition, if the reimbursement is not made in the same reporting period as the original advance, the Committee must also itemize the advance as a debt on Schedule D if it exceeds \$500 or has been outstanding

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for more than 60 days. Accordingly, this Office recommends that the Commission take no further action with regard to a violation of 2 U.S.C. § 434(a)(6)(A).

This Office also recommends that the Commission find reason to believe that the respondents violated 2 U.S.C. § 434(b) for misreporting the candidate contribution.

This Office also recommends that the Commission accept the counteroffer submitted by the Huffington Committee, on June 11, 1996.¹ See Attachment 1.

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Finally, this Office recommends that the Commission approve the inclusion of explicit directions as to how to properly amend its reports in the notification letter to the Huffington Committee.

III. RECOMMENDATIONS

1. Take no further action with regard to a violation of 2 U.S.C. § 434(a)(6)(A) by Californians for Huffington and Dana W. Reed, as treasurer.

¹ This Office waited before making its recommendation for the Commission to resolve a similar issue in MUR 4152.

2. Find reason to believe that Californians for Huffington and Dana W. Reed, as treasurer, violated 2 U.S.C. § 434(b).
3. Accept the counteroffer submitted by Californians for Huffington and Dana W. Reed, as treasurer.
4. Approve the Factual and Legal Analysis, and the appropriate letters.
5. Close the file.

Lawrence M. Noble
General Counsel

Date

~~7/11/96~~
6/20/96
SJO

BY:


Lois G. Lerner
Associate General Counsel

Attachments

1. Response 8/21/95
2. Response 9/21/95
3. Conciliation Agreement
4. Civil penalty check
5. Factual and Legal Analysis

Staff Assigned: Phillip L. Wise

96043741997

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
 Californians for Huffington) MUR 4233
 and Dana W. Reed, as treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 25, 1996, the Commission decided by a vote of 5-0 to take the following actions in MUR 4233:

1. Take no further action with regard to a violation of 2 U.S.C. § 434(a)(6)(A) by Californians for Huffington and Dana W. Reed, as treasurer.
2. Find reason to believe that Californians for Huffington and Dana W. Reed, as treasurer violated 2 U.S.C. § 434(b).
3. Accept the counteroffer submitted by Californians for Huffington and Dana W. Reed, as treasurer, as recommended in the General Counsel's Report dated June 20, 1996.

(continued)

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4. Approve the Factual and Legal Analysis, and the appropriate letters, as recommended in the General Counsel's Report dated June 20, 1996.
5. Close the file.

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

Attest:

6-25-96
Date


Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat:	Thurs., June 20, 1996	1:32 p.m.
Circulated to the Commission:	Thurs., June 20, 1996	4:00 p.m.
Deadline for vote:	Tues., June 25, 1996	4:00 p.m.

lrd

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 1, 1996

Cary Davidson, Esquire
Reed & Davidson
777 South Figueroa Street, Suite 3700
Los Angeles, CA 90017

for

Enclosed you will find a copy

RE: MUR 4233
Californians for Huffington and
Dana W. Reed, as treasurer

Dear Mr. Davidson:

On June 25, 1996, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your client's behalf in settlement of a violation of 2 U.S.C. § 434(b), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). Accordingly, the file has been closed in this matter.

This agreement also requires that the Committee amend its reports. In circumstances similar to that of your clients, the Commission has determined the following:

- (1). The Committee should report the advances of the candidate's personal funds (the legal expenses) for campaign related expenses only as memo entries on Schedule A, of the report for the period in which the expenses were incurred;
- (2). The corresponding disbursements should not be reported until the Committee subsequently reimburses the candidate. The disbursements reported should indicate the previous memo entry on Schedule A to which it relates; and
- (3). The advance must be itemized if the outstanding amount advanced by the candidate, when aggregated with other contributions, exceeds \$200 for the calendar year and the reimbursement does not bring the candidate below the \$200 itemization threshold before the end of the reporting period. In addition, if the reimbursement is not made in the same reporting period as the original advance, the Committee must also itemize the advance as a debt on Schedule D if it exceeds \$500 or has been outstanding for more than 60 days.

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Cary Davidson, Esquire
MUR 4233
Page 2

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.

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,

Phillip L. Wise
Phillip L. Wise
Attorney

Enclosure
Conciliation Agreement
Factual and Legal Analysis

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**FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS**

Californians for Huffington)
and Dana W. Reed, as treasurer) **MUR 4233**

I. BACKGROUND

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). The information was that the Californians for Huffington and Dana W. Reed, as treasurer, ("Respondents" and/or "Huffington Committee") failed to file one 48 Hour notification ("48 Hour Notice") for a candidate contribution totaling \$72,599.65. The Commission found reason to believe that the Huffington Committee violated 2 U.S.C. § 434(a)(6)(A). The Commission made its findings based on its understanding of the facts at the time. As a result of obtaining additional information, the Commission now has a different understanding, leading to a finding that the Huffington Committee, instead, violated 2 U.S.C. § 434(b).

II. FACTUAL AND LEGAL ANALYSIS

A. The Responses

In its response the Huffington Committee stated that the \$72,599.65 in-kind contribution reported from the candidate on October 24, 1994, was payment for legal services rendered to the Committee prior to the reporting period when Committees are required to file 48 Hour Notices for contributions. According to the Respondents the invoice for those legal services rendered to

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the Committee were sent directly to and paid for by the candidate without notice being given to the committee until preparation of its 30 Day Post-General Election Report.

Counsel for the respondents stated that the invoice was undated but that it was from the Law Offices of Allan Gerson for \$72,599.65 for services rendered July 16, 1994 to October 16, 1994. According to the Huffington Committee this law firm is the candidate's personal attorney. Counsel also argued that some of the services were actually personal, but no attempt was made to separate campaign related services from those rendered to the candidate on personal matters. Therefore, absent evidence to the contrary the Commission treated the whole \$72,599.65 as the amount in violation. Respondents decided they would rather admit that all of the expenditures were campaign related than to provide any additional details about the services.

B. New Violation

Based on the responses from respondents the Commission now considers this to be a misreporting violation rather than a 48 hour notice violation, and made a new reason to believe finding.

1. The Law

The Federal Election Campaign Act of 1971, as amended ("the Act") requires that political committees, including a candidate's authorized committees, report the total amounts of contributions received and expenditures made in the reports for the reporting periods in which they occurred. 2 U.S.C. § 434(b). Authorized committees of candidates must also report separately all contributions received from the candidate. 2 U.S.C. § 434(b)(2)(B). The Act defines both "contribution" and "expenditure" as including "anything of value made by any person for the purpose of influencing any election for Federal office." 2 U.S.C. §§ 431(8)(A)(i)

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and 431(9)(A)(i). Further, the Act defines "anything of value" to include all in-kind contributions. 11 C.F.R. §§ 100.7(a)(1)(iii) and 100.8(a)(1)(iv).

The Act and regulations treat in-kind contributions the same as all other contributions and thus require committees to report them during the reporting period in which they were made. 2 U.S.C. § 434(b); 11 C.F.R. §§ 104.3(a) and 104.13(a). The issue of the appropriate timing for the reporting of in-kind contributions was addressed in a decision of the United States District Court for the District of Columbia. In FEC v. American Federation of State, County and Municipal Employees - P.E.O.P.L.E., Qualified, et al., CA No. 88-3208 (RCL) (D.D.C. 1990) (D.D.C. Oct. 31, 1990) ("AFSCME"), AFSCME-PQ, a political committee, set up phone banks on behalf of a federal candidate and reported these in-kind contributions in the reporting period in which it disbursed funds to pay for the services rather than in the earlier reporting period during which the services were provided to the candidate committee. Citing the portion of 2 U.S.C. § 434(b)(6) related to "other political committees" (2 U.S.C. § 434(b)(6)(B)), the court held "that in-kind contributions made by AFSCME-PQ to the McCloskey campaign in 1982 and 1984 are reportable as of the date the contributions were made, not the date of disbursements by AFSCME-PQ." The court based its ruling upon the "plain language" of 2 U.S.C. § 434(b), stating that this provision "in its entirety requires reporting of contributions in the period in which they were made." In addition, the court found that to permit delay of the reporting of in-kind contributions until after the elections by tying the reporting of such contributions to the date of payment "would emasculate the fundamental purposes of the Act." The Court noted that one of the fundamental purposes of the Act included "provid[ing] the electorate with information as to where political campaign money comes from and how it is spent ... in order to aid the voters in evaluating those [candidates]" (quoting Buckley v. Valeo, 424 U.S. 1, 66). The court stated

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further: "Inherent in this goal is the need to have the information available at the time voting decisions are being made."

In addition to requiring the reporting of in-kind contributions in the period in which they were made, the Act and regulations generally require simultaneous reporting of in-kind contributions as an expenditure on the appropriate schedule (for typical in-kind contributions this is actually an artificial expenditure required in reporting in order to avoid inflating a committee's cash on hand). 2 U.S.C. § 434(b); 11 C.F.R. §§ 104.3(b) and 104.13(a)(2). However, when a candidate uses his or her personal funds (or personal credit) to pay for a campaign expense and will later be reimbursed by the committee for the payment, special reporting rules apply. Advisory Opinion 1992-1 provides guidance in this regard.

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In Advisory Opinion 1992-1, the candidate inquired whether, *inter alia*, the committee could reimburse him for campaign related expenses that he paid for with his own personal funds. The Commission responded in the affirmative, and addressed the relevant reporting requirements. The Commission explained that the committee should report advances of the candidate's personal funds for campaign related expenses only as memo entries on Schedule A, so that they do not inflate total contributions reported. The Commission stated that the advances must be itemized if the outstanding amount advanced by the candidate, when aggregated with other contributions, exceeds \$200 for the calendar year and the reimbursement does not bring the candidate below the \$200 itemization threshold before the end of the reporting period. The Commission further explained that in contrast to the way other in-kind contributions are reported, corresponding disbursements should not be reported until the Committee subsequently reimburses the candidate. The disbursements reported should indicate the previous memo entry on Schedule A to which they relate. In addition, if the reimbursement is not made in the same

reporting period as the original advance, the Committee must also itemize the advance as a debt on Schedule D if it exceeds \$500 or has been outstanding for more than 60 days. 11 C.F.R. §§ 104.11 and 116.5. See, MUR 4152 following the same approach when campaign related expenses (i.e. postage, direct mail services, fundraising, etc.), for which he anticipated reimbursement from the committee were paid for by the candidate from his own personal funds.

2. The Analysis

In this present matter Huffington and the committee incurred the debt as a result of legal services rendered between July 16, 1994 to October 16, 1994. Mr. Huffington paid for the services on October 24, 1994. The Committee did not report the contribution until its 30 Day Post General Report was filed on December 12, 1994. As previously explained, it is the position of the Commission that the contribution made by Mr. Huffington on behalf of his campaign should have been reported when the services were rendered not at the time of actual payment. See MUR 4152, AFSCME, Advisory Opinion 1992-1, 2 U.S.C. § 434(b); and 11 C.F.R §§ 104.3(a) and 104.13(a). Based on information furnished by the Respondents the breakdown of the services rendered was July 1, 1994 through September 30, 1994 (\$36,299.83), and October 1, 1994 through October 16, 1994 (\$36,299.82).

In view of the foregoing the Commission has concluded that this was not a violation of the 48 hour notification requirement, as originally believed, but a misreporting violation by the committee. The Committee should have reported the services rendered to Huffington only as memo entries on Schedule A, of the report for the period in which the expenses were incurred. The services rendered from July 1, 1994 through September 30, 1994 (\$36,299.83), should have been reported as memo entries on Schedule A of the 1994 October Quarterly Report; and the services rendered from October 1, 1994 through October 16, 1994 (\$36,299.82), should have

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been reported as memo entries on Schedule A of the 1994 Pre-General Report. In fact, the Committee did not report anything until its 30 Day Post General Report.

The corresponding disbursements should not be reported until the Committee subsequently reimburses the candidate. The disbursements reported should indicate the previous memo entry on Schedule A to which it relates. In addition, the contribution must be itemized if the outstanding amount advanced by the candidate, when aggregated with other contributions, exceeds \$200 for the calendar year and the reimbursement does not bring the candidate below the \$200 itemization threshold before the end of the reporting period. In addition, if the reimbursement is not made in the same reporting period as the original advance, the Committee must also itemize the advance as a debt on Schedule D if it exceeds \$500 or has been outstanding for more than 60 days. Accordingly, the Commission decided to take no further action with regard to a violation of 2 U.S.C. § 434(a)(6)(A).

B- Mr. David

However, in view of the foregoing there is reason to believe that the Californians for Huffington and Dana W. Reed, as treasurer, violated 2 U.S.C. § 434(b).

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 4233
 Californians for Huffington)
 and Dana W. Reed, as treasurer)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities.

NOW, THEREFORE, the Commission and the Californians for Huffington Committee and Dana W. Reed, as treasurer ("Respondents"), having participated in informal methods of conciliation, prior to a finding of probable cause to believe, hereby agree as follows:

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

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

III. Respondents enter voluntarily into this agreement with the Commission.

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

1. Californians for Huffington is a political committee within the meaning of 2 U.S.C. Section 431(4), and is the authorized principal campaign committee for Michael Huffington's 1994 campaign for the United States Senate.

2. Dana W. Reed is the treasurer of Californians for Huffington.

3. The Federal Election Campaign Act of 1971, as amended ("Act"), requires authorized committees to timely report all contributions from the candidate. 2 U.S.C. Section 434(b).

4. Michael Huffington made an in-kind contribution to the Committee by paying \$72,599.65 for legal services rendered during the periods July 1, 1994 through September 30, 1994 (\$36,299.83) and October 1, 1994 through October 16, 1994 (\$36,299.82).

5. Although Section 432(e)(2) of the Act explicitly says that a candidate serves as an agent of the authorized committee of such candidate, Respondents contend that Californians for Huffington did not receive an invoice and was unaware of the services until after the payment was made.

V. Respondents failed to properly report the \$72,599.65 candidate contribution, in violation of 2 U.S.C. Section 434(b).

VI. 1. Respondents will pay a civil penalty to the Commission in the amount of Seven Thousand Five Hundred Dollars (\$7,500), pursuant to 2 U.S.C. Section 437(g)(a)(5)(A).

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2. Respondents will amend the appropriate reports pursuant to instructions from the Commission.

VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. Section 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 hereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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

IX. Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirements 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,

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made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

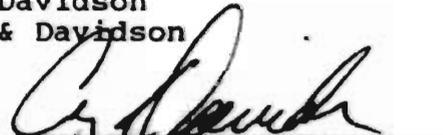
Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

June 28, 1996
Date

FOR THE RESPONDENTS:

Cary Davidson
Reed & Davidson

BY: 
Cary Davidson, Counsel
for Respondents

June 10, 1996
Date

96043742011

REED & DAVIDSON

ATTORNEYS AT LAW

777 SOUTH FIGUEROA STREET

SUITE 3700

LOS ANGELES, CALIFORNIA 90017-5835

(213) 624-6200 • (714) 641-1888

FACSIMILE (213) 623-1882

DANA W. REED
CARY DAVIDSON
JAMES A. SIVSIND

OF COUNSEL
DARRYL R. WOLD*
BRADLEY W. HERTZ

*ORANGE COUNTY OFFICE
3151 AIRWAY AVENUE, SUITE 101
COSTA MESA, CALIFORNIA 92626-4802
TELEPHONE (714) 641-4842
FACSIMILE (714) 646-1003

July 10, 1996

Office of Public Records
Office of the Secretary of the Senate
232 Hart Senate Office Building
Washington, DC 20510-7116

mur 4233

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
Jul 16 3 04 PM '96

Dear Filing Officer:

Enclosed for filing is the original of the following:

Committee: Californians for Huffington

Period: 10/20/94 - 11/28/94 (amended)

Form: EEC 3

This report is being sent by:

- First-class mail
- Certified Mail # _____
- Next-day delivery # _____

Please endorse this transmittal letter as acknowledgement of receipt and return it in the self-addressed, stamped envelope provided.

Sincerely,

Reed & Davidson

CD:ced

cc: California Secretary of State
Phillip L. Wise, Esq., Office of the General Counsel, FEC

96043742013

ITEMIZED DISBURSEMENTS
(Operating Expenditures)

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

NAME OF COMMITTEE (in Full)
CALIFORNIANS FOR HUFFINGTON

C00283879

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Disb. For	Date (month, day, year)	Amount of Each Disbursement This Period
--	-------------------------	-----------	----------------------------	--

HUFFINGTON, MICHAEL 950 SOUTH COAST DR. #100 COSTA MESA, CA 92626	TRAVEL	General	10-24-94	220.14
	LEGAL FEES -Allan Gershon	General	10-24-94	72,599.65
	TRAVEL	General	10-25-94	275.40
	TRAVEL	General	10-26-94	209.00
	MEALS	General	10-31-94	112.40
	TRAVEL	General	10-31-94	595.40
	TRAVEL	General	11-01-94	221.25

(In-kind received)

HUFFINGTON, ROY H. P.O. BOX 4337 HOUSTON, TX 77210	REIMBURSE TRAVEL	General	11-08-94	5,371.30
--	------------------	---------	----------	----------

INPOSITION MANAGEMENT CORP. 325 SPRINGSIDE DRIVE AKRON, OH 44333	CAGING	General	10-31-94	5,800.00
--	--------	---------	----------	----------

INTERNAL REVENUE SERVICE FRESNO, CA 95880	PAYROLL TAXES	General	10-31-94	19,472.13
	PAYROLL TAXES	General	11-15-94	16,683.46
	PAYROLL TAXES	General	11-21-94	1,188.22
	PAYROLL TAXES	General	10-31-94	0.01

J. W. MARRIOTT HOTEL 2151 AVENUE OF THE STARS LOS ANGELES, CA 90067	PRESS CONFERENCE	General	11-16-94	1,163.91
---	------------------	---------	----------	----------

KALISH COMMUNICATIONS 2446 20TH ST. N.W. WASHINGTON, DC 20009	MEDIA TRAINING	General	11-14-94	3,500.00
---	----------------	---------	----------	----------

KEATING, DAVID C/O NTU CAMPAIGN FUND 713 MARYLAND AVE. N.E. WASHINGTON, DC 20002	REIMBURSE TRAVEL	General	11-08-94	984.65
---	------------------	---------	----------	--------

SUBTOTAL of Disbursements This Page (optional).....> \$128,396.92

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

96043742014

THIS IS THE END OF MUR #

4233

96043742015



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 4233

DATE FILMED 9-26-96 CAMERA NO. 2

CAMERAMAN MRJ

96043742016



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Date: 8/27/96

 Microfilm
 Public Records
 Press

THE ATTACHED MATERIAL IS BEING ADDED TO CLOSED MUR 4233

96043743069



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 14, 1996

Cary Davidson, Esquire
Reed & Davidson
777 South Figueroa Street, Suite 3700
Los Angeles, CA 90017

RE: MUR 4233
Californians for Huffington and
Dana W. Reed, as treasurer

Dear Mr. Davidson:

On June 25, 1996, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your client's behalf in settlement of a violation of 2 U.S.C. § 434(b), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). Accordingly, the file has been closed in this matter.

This agreement also required that the Committee amend its reports. On July 16, 1996, this Office received a copy of Schedule B of the Committee's 30 Day Post General Report. This filing does not satisfy the conditions, which the Commission requested when accepting the conciliation agreement, in settlement of this matter. To fulfill the required conditions you must do the following:

(1). The Committee must amend its 1994 October Quarterly Report by filing a Schedule A which is clearly labeled "Memo Entry" and reports the contribution advance from Michael Huffington in the amount of \$36,299.83 for legal services rendered to the Committee from July 1, 1994 through September 30, 1994. The Committee must also amend its Schedule D to show that the \$36,299.83 debt for the legal services rendered is owed to Michael Huffington, and not the law firm as currently reported by the Committee.

(2). The Committee must amend its 1994 12-Day Pre-General Report by filing a Schedule A which is clearly labeled "Memo Entry" and reports the contribution advance from Michael Huffington in the amount of \$36,299.82 for legal services rendered to the Committee from October 1, 1994 through October 16, 1994. The Committee must also amend its Schedule D to show that the \$36,299.82 debt for the legal services rendered is owed to Michael Huffington, and not the law firm as currently reported by the Committee.

96043743070

Cary Davidson, Esquire
MUR 4233
Page 2

(3). The Committee must amend its 1994 30-Day Post General Report by filing a Schedule D which reports the \$72,599.65 debt for legal services rendered is owed to Michael Huffington, and not the law firm as currently reported by the Committee. The Committee must also amend all reports filed after the 1994 30-Day Post General by filing Schedule D's for each reporting period to show that the \$72,599.65 debt for legal services rendered is owed to Michael Huffington, and not the law firm.

We understand the confusion that has caused your clients' reports to be improperly amended. Accordingly, if you run into any difficulty or have any questions with regard to amending these reports, as explained in this letter, please contact me at (202) 219-3690.

Sincerely,



Phillip L. Wise
Attorney

26043743071



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

Date: 9/9/96

Microfilm
 Public Records
 Press

THE ATTACHED MATERIAL IS BEING ADDED TO CLOSED MUR 4233

96043743975

REED & DAVIDSON

ATTORNEYS AT LAW

777 SOUTH FIGUEROA STREET

SUITE 3700

LOS ANGELES, CALIFORNIA 90017-5838

(213) 624-6200 (714) 641-1888

FACSIMILE (213) 623-1892

DANA W. REED
CARY DAVIDSON
JAMES A. SIVESIND

OF COUNSEL
DARRYL R. WOLD*
BRADLEY W. HERTZ

*ORANGE COUNTY OFFICE
3151 AIRWAY AVENUE, SUITE 401
COSTA MESA, CALIFORNIA 92626-4602
TELEPHONE (714) 641-4842
FACSIMILE (714) 648-1003

September 4, 1996

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

MUR 4233

Re: Californians for Huffington
Period Covered: 07/01/94 - 09/30/94

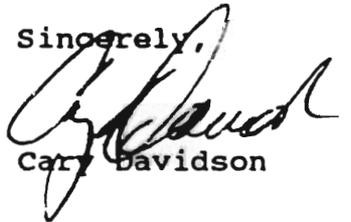
Dear Filing Officer:

This is in response to an August 14, 1996 amendment request
Phillip L. Wise, Esq. of the Federal Election Commission.

We have added the "memo entry" for legal services and included
Michael Huffington on Schedule D.

Please feel free to contact me if you have any questions.

Sincerely,



Cary Davidson

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
SEP 9 10 33 AM '96

cc: Phillip L. Wise, Esq.

96043743976

ITEMIZED RECEIPTS
(Contributions From
The Candidate)

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

NAME OF COMMITTEE (in Full)
CALIFORNIANS FOR HUFFINGTON

C00283879

Full Name, Mailing Address and ZIP Code Election Type	Name of Employer Occupation Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt This Period
---	--	----------------------------	--

HUFFINGTON, MICHAEL
950 SOUTH COAST DR. #100
COSTA MESA, CA 92626

Receipt For: General	Aggregate Year-to-date	\$9,470,033.17	07-01-94	2,000,000.00
Receipt For: General			07-05-94	1,000.00 <<In Kind
Receipt For: General			07-01-94	72.00 <<In Kind
Receipt For: General			07-01-94	142.09 <<In Kind
Receipt For: General			07-06-94	331.92 <<In Kind
Receipt For: General			08-10-94	1,567.00 <<In Kind
Receipt For: General			08-08-94	80,000.00 <<In Kind
Receipt For: General			08-11-94	500.00 <<In Kind
Receipt For: General			09-01-94	96.12 <<In Kind
Receipt For: General			09-01-94	99.68 <<In Kind
Receipt For: General			09-06-94	419.88 <<In Kind
Receipt For: General			09-12-94	350.00 <<In Kind
Receipt For: General			09-13-94	72.61 <<In Kind
Receipt For: General			09-16-94	356.23 <<In Kind
Receipt For: General			09-17-94	484.93 <<In Kind
Receipt For: General			09-20-94	300.00 <<In Kind
Receipt For: General			09-25-94	286.37 <<In Kind

"memo entry" 07/01/94 - 09/30/94 \$36,299.83 for legal services.

SUBTOTAL of Receipts This Page (Optional).....>	\$2,086,078.83
TOTAL This Period (last page this line number only).....>	\$2,086,078.83

Travel, legal, consulting, meetings, insurance and media.

06043743977

DEBTS AND OBLIGATIONS
Excluding Loans

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
CALIFORNIANS FOR HUFFINGTON				
A. Full Name, Mailing Address and ZIP Code of Debtor or Creditor Grand Hyatt New York Park Avenue at Grand Central New York, NY 10017	0	2,912.81	0	2,912.81
Nature of Debt (Purpose): Fundraising expense				
B. Full Name, Mailing Address and ZIP Code of Debtor or Creditor Layne Allred 7088 Cardinal Road Fair Oaks, CA 95628	0	4,638.89	0	4,638.89
Nature of Debt (Purpose): Travel reimbursement				
C. Full Name, Mailing Address and ZIP Code of Debtor or Creditor Alice Borden Company 13743 Ventura Blvd., Suite 360 Sherman Oaks, CA 91423	0	6,346.16	0	6,346.16
Nature of Debt (Purpose): Fundraising expenses				
D. Full Name, Mailing Address and ZIP Code of Debtor or Creditor Patton Boggs, L.L.P. 2550 M Street, N.W. Washington, DC 20037-1350	0	5,341.43	0	5,341.43
Nature of Debt (Purpose): Legal				
E. Full Name, Mailing Address and ZIP Code of Debtor or Creditor Michael Huffington 950 South Coast Drive #100 Costa Mesa, CA 92626	0	36,299.83	0	36,299.83
Nature of Debt (Purpose): Legal				
F. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
Nature of Debt (Purpose)				
1) SUBTOTALS This Period. This Page (optional)				55,539.12
2) TOTALS This Period (last page in this line only)				304,114.73
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				7,000,000.00
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				7,304,114.73

96043743978

REED & DAVIDSON

ATTORNEYS AT LAW

777 SOUTH FIGUEROA STREET

SUITE 3700

LOS ANGELES, CALIFORNIA 90017-6638

(213) 624-6200 • (714) 641-1888

FACSIMILE (213) 623-1692

DANA W REED
CARY DAVIDSON
JAMES A SIVESIND

OF COUNSEL
DARRYL R WOLD*
BRADLEY W HERTZ

*ORANGE COUNTY OFFICE
384 AIRWAY AVENUE, SUITE M-1
COSTA MESA, CALIFORNIA 92626-4602
TELEPHONE (714) 941-4942
FACSIMILE (714) 948-1003

September 4, 1996

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

Re: Californians for Huffington
Period Covered: 10/01/94 - 10/19/94

Dear Filing Officer:

This is in response to an August 14, 1996 amendment request from Phillip L. Wise, Esq. of the Federal Election Commission.

We have added the "memo entry" on Schedule A for legal services and included Michael Huffington on Schedule D.

Please feel free to contact me if you have any questions.

Sincerely,


Cary Davidson

cc: Phillip L. Wise, Esq.

96043743979

ITEMIZED RECEIPTS
(Contributions From
The Candidate)

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

NAME OF COMMITTEE (in Full)
CALIFORNIANS FOR HUFFINGTON

C00283879

Full Name, Mailing Address and ZIP Code Election Type	Name of Employer Occupation Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt This Period
---	--	----------------------------	--

HUFFINGTON, MICHAEL
950 SOUTH COAST DR. #100
COSTA MESA, CA 92626

Receipt For: General	Aggregate Year-to-date >	.312,471,238.52	10-17-94	3,000,000.00
Receipt For: General			10-09-94	509.07 <<In Kind
Receipt For: General			10-17-94	730.65 <<In Kind
Receipt For: General			10-17-94	552.00 <<In Kind
"MEMO entry" 10/01/94 - 10/19/94 \$36,299.82 for legal services. Insurance, travel & meals				

SUBTOTAL of Receipts This Page (Optional).....> \$3,001,791.72

TOTAL This Period (last page this line number only).....> \$3,001,791.72

96043743930

DEBTS AND OBLIGATIONS
Excluding Loans

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
CALIFORNIANS FOR HUFFINGTON A. Full Name, Mailing Address and ZIP Code of Debtor or Creditor Infocision Management Corporation 325 Springside Drive Akron, OH 44333	0	5,800.00	0	5,800.00
Nature of Debt (Purpose):	Caging			
B. Full Name, Mailing Address and ZIP Code of Debtor or Creditor Michael Huffington 950 South Coast Drive #100 Costa Mesa, CA 92626	36,299.83	36,299.82	0	72,599.65
Nature of Debt (Purpose):	Legal			
C. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
Nature of Debt (Purpose):	/			
D. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
Nature of Debt (Purpose):	/			
E. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
Nature of Debt (Purpose):	/			
F. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
Nature of Debt (Purpose):	/			
1) SUBTOTALS This Period This Page (optional)				78,399.65
2) TOTALS This Period (last page in this line only)				351,103.21
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				12,000,000.00
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				12,351,103.21

96043743961

REED & DAVIDSON

ATTORNEYS AT LAW

777 SOUTH FIGUEROA STREET

SUITE 3700

LOS ANGELES, CALIFORNIA 90017-5835

(213) 624-6200 • (714) 641-1686

FACSIMILE (213) 623-1892

DANA W REED
CARY DAVIDSON
JAMES A SIVESIND

OF COUNSEL
DANNYL R WOLD
BRADLEY W HERTZ

ORANGE COUNTY OFFICE
351 AIRWAY AVENUE, SUITE M-1
COSTA MESA, CALIFORNIA 92626-4602
TELEPHONE (714) 641-4942
FACSIMILE (714) 646-1003

September 4, 1996

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

Re: Californians for Huffington
Period Covered: 10/20/94 - 11/28/94

Dear Filing Officer:

This is in response to an August 14, 1996 amendment request from Phillip L. Wise, Esq. of the Federal Election Commission.

We have removed the in-kind contribution from Schedule A and B. We have included Michael Huffington on Schedule D and amended the cover page and detailed summary page.

Please feel free to contact me if you have any questions.

Sincerely,



Cary Davidson

cc: Phillip L. Wise, Esq.

96043743982

REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full) CALIFORNIANS FOR HUFFINGTON		2. FEC IDENTIFICATION NUMBER C000283879
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported. 777 S. Figueroa St., Suite 3700		3. IS THIS REPORT AN AMENDMENT? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
CITY, STATE and ZIP CODE: Los Angeles, CA 90017	STATE/DISTRICT: California	

4. TYPE OF REPORT

- April 15 Quarterly Report
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year End Report
- July 31 Mid-Year Report (Non-election Year Only)
- Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
- Thirtieth day report following the General Election on 11/08/94 in the State of California
- Termination Report

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

SUMMARY

5. Covering Period <u>10/20/94</u> through <u>11/28/94</u>	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e))	3,094,839.89	16,882,528.37
(b) Total Contribution Refunds (from Line 20(d))	2,145.00	5,594.00
(c) Net Contributions (other than loans) (subtract Line 6(b) from 6(a))	3,092,694.89	16,876,934.37
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	4,150,144.18	29,077,236.61
(b) Total Offsets to Operating Expenditures (from Line 14)	74,627.85	88,267.13
(c) Net Operating Expenditures (subtract Line 7(b) from 7(a))	4,075,516.33	28,988,969.48
8. Cash on Hand at Close of Reporting Period (from Line 27)	15,484.93	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	0	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	12,257,521.08	

For further information contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-219-3426

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

Type or Print Name of Treasurer DANA W REED	
Signature of Treasurer 	Date 9/4/96

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

96043743983

DETAILED SUMMARY PAGE

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

Name of Committee (in full) CALIFORNIANS FOR HUFFINGTON	Report Covering the Period:	
	From: 10/20/94	To: 11/28/94
I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A)	53,115.00	
(ii) Unitemized	40,091.30	
(iii) Total of contributions from individuals	93,206.30	1,409,069.89
(b) Political Party Committees	0	0
(c) Other Political Committees (such as PACs)	0	0
(d) The Candidate	3,001,633.59	15,473,458.48
(e) TOTAL CONTRIBUTIONS (other than loans) (add 11(a)(iii), (b), (c) and (d))	3,094,839.89	16,882,528.37
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES	0	0
13. LOANS:		
(a) Made or Guaranteed by the Candidate	0	12,000,000.00
(b) All Other Loans	0	0
(c) TOTAL LOANS (add 13(a) and (b))	0	12,000,000.00
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	74,627.85	88,267.13
15. OTHER RECEIPTS (Dividends, Interest, etc.)	442.39	13,634.99
16. TOTAL RECEIPTS (add 11(e), 12, 13(c), 14 and 15)	3,169,910.13	28,984,430.49
II. DISBURSEMENTS		
17. OPERATING EXPENDITURES	4,150,144.18	29,077,236.61
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES	0	0
19. LOAN REPAYMENTS:		
(a) Of Loans Made or Guaranteed by the Candidate	0	0
(b) Of All Other Loans	0	0
(c) TOTAL LOAN REPAYMENTS (add 19(a) and (b))	0	0
20. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees	2,145.00	5,094.00
(b) Political Party Committees	0	0
(c) Other Political Committees (such as PACs)	0	500.00
(d) TOTAL CONTRIBUTION REFUNDS (add 20(a), (b) and (c))	2,145.00	5,594.00
21. OTHER DISBURSEMENTS	0	0
22. TOTAL DISBURSEMENTS (add 17, 18, 19(c), 20(d) and 21)	4,152,289.18	29,082,830.61
III. CASH SUMMARY		
23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD	\$	977,863.98
24. TOTAL RECEIPTS THIS PERIOD (from Line 16)	\$	3,169,910.13
25. SUBTOTAL (add Line 23 and Line 24)	\$	4,167,774.11
26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22)	\$	4,152,289.18
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (subtract Line 26 from 25)	\$	15,484.93

96043743984

SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
CALIFORNIANS FOR HUFFINGTON				
A. Full Name, Mailing Address and ZIP Code of Debtor or Creditor Seven Seas Travel 149 Riverside Ave. Newport Beach, CA 92663	0	2,488.00	0	2,488.00
Nature of Debt (Purpose): Travel				
B. Full Name, Mailing Address and ZIP Code of Debtor or Creditor Michael Huffington 950 South Coast Drive #100 Costa Mesa, CA 92626	72,599.65	0	0	72,599.65
Nature of Debt (Purpose): Legal				
C. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				75,087.65
2) TOTALS This Period (last page in this line only)				257,521.08
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				12,000,000.00
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				12,257,521.08

96043743985

ITEMIZED RECEIPTS
(Contributions From
The Candidate)

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

NAME OF COMMITTEE (in Full)
CALIFORNIANS FOR HUFFINGTON C00283879

Full Name, Mailing Address and ZIP Code Election Type	Name of Employer Occupation Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt This Period
---	--	----------------------------	--

HUFFINGTON, MICHAEL
950 SOUTH COAST DR. #100
COSTA MESA, CA 92626

Aggregate Year-to-date	\$15,473,458.68	10-26-94	2,500,000.00
Receipt For: General		11-01-94	500,000.00
Receipt For: General		10-24-94	220.14 <<In Kind
Receipt For: General		10-25-94	275.40 <<In Kind
Receipt For: General		10-26-94	209.00 <<In Kind
Receipt For: General		10-31-94	112.40 <<In Kind
Receipt For: General		10-31-94	595.40 <<In Kind
Receipt For: General		11-01-94	221.25 <<In Kind

Travel and meals.

SUBTOTAL of Receipts This Page (Optional).....> \$3,001,633.59

TOTAL This Period (last page this line number only).....> \$3,001,633.59

96043743986

SCHEDULE B

ITEMIZED DISBURSEMENTS
(Operating Expenditures)

Use separate schedule(s) PAGE | OF
for each category of the 12
Detailed Summary Page FOR LINE NUMBER
17

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

NAME OF COMMITTEE (In Full)
CALIFORNIANS FOR HUFFINGTON C00283879

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Disb. For	Date (month, day, year)	Amount of Each Disbursement This Period
---	-------------------------	-----------	-------------------------	---

HUFFINGTON, MICHAEL 950 SOUTH COAST DR. #100 COSTA MESA, CA 92626	TRAVEL	General	10-24-94	220.14
	TRAVEL	General	10-25-94	275.40
	TRAVEL	General	10-26-94	209.00
	MEALS	General	10-31-94	112.40
	TRAVEL	General	10-31-94	595.40
	TRAVEL	General	11-01-94	221.25

(In-kind received)

HUFFINGTON, ROY M. P.O. BOX 4337 HOUSTON, TX 77210	REIMBURSE TRAVEL	General	11-08-94	5,371.30
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INFOCISION MANAGEMENT CORP. 325 SPRINGSIDE DRIVE AKRON, OH 44333	CAGING	General	10-31-94	5,800.00
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INTERNAL REVENUE SERVICE FRESNO, CA 93888	PAYROLL TAXES	General	10-31-94	19,472.13
	PAYROLL TAXES	General	11-15-94	16,683.46
	PAYROLL TAXES	General	11-21-94	1,188.22
	PAYROLL TAXES	General	10-31-94	0.01

J. W. MARRIOTT HOTEL 2151 AVENUE OF THE STARS LOS ANGELES, CA 90067	PRESS CONFERENCE	General	11-16-94	1,163.91
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KALISH COMMUNICATIONS 2446 20TH ST. N.W. WASHINGTON, DC 20009	MEDIA TRAINING	General	11-14-94	3,500.00
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KEATING, DAVID C/O NTU CAMPAIGN FUND 713 MARYLAND AVE. N.E. WASHINGTON, DC 20002	REIMBURSE TRAVEL	General	11-08-94	984.65
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SUBTOTAL of Disbursements This Page (optional).....> \$55,797.27

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

96043743987

REED & DAVIDSON

ATTORNEYS AT LAW

777 SOUTH FIGUEROA STREET

SUITE 3700

LOS ANGELES, CALIFORNIA 90017-5038

(213) 624-6200 • (714) 641-1688

FACSIMILE (213) 623-1692

DANA W REED
CARY DAVIDSON
JAMES A. SIVESIND

OF COUNSEL
DARRYL R WOLD
BRADLEY W HERTZ

ORANGE COUNTY OFFICE
5151 AIRWAY AVENUE, SUITE 401
COSTA MESA, CALIFORNIA 92626-4602
TELEPHONE (714) 641-4842
FACSIMILE (714) 946-1003

September 4, 1996

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

Re: Californians for Huffington
Period Covered: 11/29/94 - 12/31/94
01/01/95 - 06/30/95
07/01/95 - 12/31/95
01/01/96 - 06/30/96

SEP 9 10 33 AM '96

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

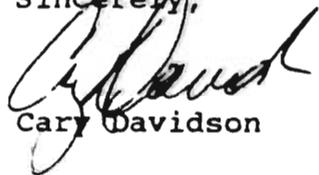
Dear Filing Officer:

This is in response to an August 14, 1996 amendment request from Phillip L. Wise, Esq. of the Federal Election Commission.

We have included Michael Huffington on Schedule D and amended the cover page.

Please feel free to contact me if you have any questions.

Sincerely,



Cary Davidson

cc: Phillip L. Wise, Esq.

GC03 HUFFE.3

96043743988

REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full) CALIFORNIANS FOR HUFFINGTON		2. FEC IDENTIFICATION NUMBER C000283879
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported. 777 S. Figueroa St., Suite 3700		3. IS THIS REPORT AN AMENDMENT? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
CITY, STATE and ZIP CODE: Los Angeles, CA 90017	STATE/DISTRICT: California	

4. TYPE OF REPORT

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

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

SUMMARY

5. Covering Period <u>11/29/94</u> through <u>12/31/94</u>	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e))	531,798.71	17,486,926.73
(b) Total Contribution Refunds (from Line 20(d))	1,905.00	7,499.00
(c) Net Contributions (other than loans) (subtract Line 6(b) from 6(a))	529,893.71	17,479,427.73
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	538,062.49	29,687,898.75
(b) Total Offsets to Operating Expenditures (from Line 14)	15,823.55	104,090.68
(c) Net Operating Expenditures (subtract Line 7(b) from 7(a))	522,238.94	29,583,808.07
8. Cash on Hand at Close of Reporting Period (from Line 27)	23,196.65	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-219-3420
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	0	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	12,095,096.71	

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

Type or Print Name of Treasurer DANA W. REED	Date: 9/4/96
Signature of Treasurer 	

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

96043743989

SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
CALIFORNIANS FOR HUFFINGTON				
A. Full Name, Mailing Address and ZIP Code of Debtor or Creditor Nelson Consulting 926 J Street, Suite 1220 Sacramento, CA 95814	0	9,951.75	0	9,951.75
Nature of Debt (Purpose): Office supplies, travel				
B. Full Name, Mailing Address and ZIP Code of Debtor or Creditor Mitch Rice Photography 2581 Vallejo St. Santa Rosa, CA 95405	0	556.40	0	556.40
Nature of Debt (Purpose): Photography				
C. Full Name, Mailing Address and ZIP Code of Debtor or Creditor California Newspaper Network 1225 8th Street, Suite 260 Sacramento, CA 95814	0	1,688.00	0	1,688.00
Nature of Debt (Purpose): Advertisement production				
D. Full Name, Mailing Address and ZIP Code of Debtor or Creditor Michael Huffington 950 South Coast Drive #100 Costa Mesa, CA 92626	72,599.65	0	0	72,599.65
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
Nature of Debt (Purpose):				

96043743990

1) SUBTOTALS This Period This Page (optional)	84,795.80
2) TOTALS This Period (last page in this line only)	95,096.71
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)	12,000,000.00
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)	12,095,096.71

REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full) CALIFORNIANS FOR HUFFINGTON		2. FEC IDENTIFICATION NUMBER C000283879
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported. 777 S. Figueroa St., Suite 3700		3. IS THIS REPORT AN AMENDMENT? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
CITY, STATE and ZIP CODE Los Angeles, CA 90017	STATE/DISTRICT California	

4. TYPE OF REPORT

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

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

SUMMARY

5. Covering Period <u>01/01/95</u> through <u>06/30/95</u>	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e))	1,010.00	1,010.00
(b) Total Contribution Refunds (from Line 20(d))	1,205.00	1,205.00
(c) Net Contributions (other than loans) (subtract Line 6(b) from 6(a))	(195.00)	(195.00)
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	77,343.88	77,343.88
(b) Total Offsets to Operating Expenditures (from Line 14)	66,873.29	66,873.29
(c) Net Operating Expenditures (subtract Line 7(b) from 7(a))	10,470.59	10,470.59
8. Cash on Hand at Close of Reporting Period (from Line 27)	12,531.06	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-219-3420
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	0	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	12,072,599.65	

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

Type or Print Name of Treasurer DANA W. REED	Date
Signature of Treasurer 	9/4/96

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

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SCHEDULE D
(Revised 3/88)

DEBTS AND OBLIGATIONS
Excluding Loans

Name of Debtor(s) (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
CALIFORNIANS FOR HUFFINGTON				
A. Full Name, Mailing Address and ZIP Code of Debtor or Creditor Michael Huffington 950 South Coast Drive #100 Costa Mesa, CA 92626	72,599.65	0	0	72,599.65
Nature of Debt (Purpose) Legal				
B. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
Nature of Debt (Purpose)				
C. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
Nature of Debt (Purpose)				
D. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
Nature of Debt (Purpose)				
E. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
Nature of Debt (Purpose)				
F. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
Nature of Debt (Purpose)				
1) SUBTOTALS This Period This Page (optional)				72,599.65
2) TOTALS This Period (last page in this line only)				72,599.65
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				12,000,000.00
4) ADD 2) and 3) (and carry forward to appropriate line of Summary Page (last page only))				12,072,599.65

96043743992

REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (In full) CALIFORNIANS FOR HUFFINGTON		2. FEC IDENTIFICATION NUMBER C000283879
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported. 777 S. Figueroa St., Suite 3700		3. IS THIS REPORT AN AMENDMENT? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
CITY, STATE and ZIP CODE: Los Angeles, CA 90017	STATE/DISTRICT: California	

4. TYPE OF REPORT

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

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

SUMMARY

5. Covering Period <u>07/01/95</u> through <u>12/31/95</u>	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e))	0	1,010.00
(b) Total Contribution Refunds (from Line 20(d))	0	1,205.00
(c) Net Contributions (other than loans) (subtract Line 6(b) from 6(a))	0	(195.00)
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	1,859.78	79,203.66
(b) Total Offsets to Operating Expenditures (from Line 14)	779.58	67,652.87
(c) Net Operating Expenditures (subtract Line 7(b) from 7(a))	1,080.20	11,550.79
8. Cash on Hand at Close of Reporting Period (from Line 27)	11,450.86	For further information contact: Federal Election Commission 999 E. Street, NW Washington, DC 20463 Toll Free 900-424-9530 Local 202-219-3420
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	0	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	12,072,599.65	

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

Type or Print Name of Treasurer DANA W. REED	Date
Signature of Treasurer 	9/4/96

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

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FEC FORM 3
(revised 4/87)

96043743993

SCHEDULE D
(Revised 2/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Name of Debtor (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
CALIFORNIANS FOR HUFFINGTON				
A. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
Michael Huffington 950 South Coast Drive #100 Costa Mesa, CA 92626	72,599.65	0	0	72,599.65
Nature of Debt (Purpose)	Legal			
B. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
Nature of Debt (Purpose)				
C. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
Nature of Debt (Purpose)				
D. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
Nature of Debt (Purpose)				
E. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
Nature of Debt (Purpose)				
F. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
Nature of Debt (Purpose)				
1) SUBTOTALS This Period This Page (optional)				72,599.65
2) TOTALS This Period (last page in this line only)				72,599.65
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				12,000,000.00
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				12,072,599.65

96043743994

REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full) CALIFORNIANS FOR HUFFINGTON		2. FEC IDENTIFICATION NUMBER C000283879
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported. 777 S. Figueroa St., Suite 3700		3. IS THIS REPORT AN AMENDMENT? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
CITY, STATE and ZIP CODE: Los Angeles, CA 90017	STATE/DISTRICT: California	

4. TYPE OF REPORT

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

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

SUMMARY

5. Covering Period <u>01/01/96</u> through <u>06/30/96</u>	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e))	0	0
(b) Total Contribution Refunds (from Line 20(d))	0	0
(c) Net Contributions (other than loans) (subtract Line 6(b) from 6(a))	0	0
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	15,141.55	15,141.55
(b) Total Offsets to Operating Expenditures (from Line 14)	18,686.88	18,686.88
(c) Net Operating Expenditures (subtract Line 7(b) from 7(a))	(3,545.33)	(3,545.33)
8. Cash on Hand at Close of Reporting Period (from Line 27)	14,996.19	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-219-3420
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	0	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	12,072.599.65	

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

Type or Print Name of Treasurer DANA W. REED	Date
Signature of Treasurer 	9/4/96

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 5427g.

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96043743995

SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
CALIFORNIANS FOR HUFFINGTON				
A. Full Name, Mailing Address and ZIP Code of Debtor or Creditor Michael Huffington 950 South Coast Drive #100 Costa Mesa, CA 92626	72,599.65	0	0	72,599.65
Nature of Debt (Purpose) Legal				
B. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
Nature of Debt (Purpose)				
C. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
Nature of Debt (Purpose)				
D. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
Nature of Debt (Purpose)				
E. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
Nature of Debt (Purpose)				
F. Full Name, Mailing Address and ZIP Code of Debtor or Creditor				
Nature of Debt (Purpose)				
1) SUBTOTALS This Period This Page (optional)				72,599.65
2) TOTALS This Period (last page in this line only)				72,599.65
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				12,000,000.00
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				12,072,599.65

96043743996