



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 4240
~~4241~~

DATE FILMED 11-7-96 CAMERA NO. 4

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WILEY, REIN & FIELDING

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January 6, 1995

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FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
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BY HAND

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Hard Rock Cafe, Inc.; Hard Rock Cafe
America, L.P.; Mr. Peter Morton

Dear Mr. Noble:

This office represents Hard Rock Cafe America, L.P. and
Hard Rock Cafe, Inc. ("Hard Rock"),^{1/} Melrose Corporation,
and their principal Peter Morton.

Mr. Morton is a financial supporter of various political
campaigns and social causes. In recent years he was
subjected to numerous solicitations for contributions to
which he often responded. Mr. Morton, however, is not
otherwise politically active and is not versed in election
law and regulations. His donations were not subject to prior
review by counsel.

In December 1994, there was a review of corporate
finances by the Nevada Gaming Control Board. As a result of
the review, Hard Rock and Mr. Morton became aware that over
several years they inadvertently may have violated certain
federal election laws and retained counsel to assist them in
bringing their affairs into compliance.

^{1/} Hard Rock Cafe America, L.P. is the successor of
Hard Rock Cafe Investors Ltd. after a July 1992
reorganization. Hard Rock Cafe America, L.P. is a Delaware
limited partnership owned principally by Peter Morton through
a subchapter-S corporation. Hard Rock Cafe, Inc., a Delaware
corporation, is the general partner of each Hard Rock Cafe
restaurant owned principally by Peter Morton.

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Over the past three weeks Hard Rock and Mr. Morton have collected financial records pertaining to political contributions from 1987 to the present and counsel has reviewed these documents in an effort to achieve compliance with federal election law. Our factual and legal analyses are based on a review of these documents and are summarized on three charts attached as Exhibit 1 and explained below. Also enclosed as Exhibit 2 are financial records provided to counsel for the Commission's independent review.^{2/}

At the outset, our clients want to emphasize that any violations of federal election law were inadvertent. They did not intend to circumvent any prohibitions. Indeed, they were wholly unaware that their activities might be illegal. The documents that they have provided confirm that they did not knowingly violate the law. The documents reflect no falsifications of business records to hide their activities, but do reflect ignorance of federal election laws. Such was the conclusion of the FEC's former head of enforcement, Kenneth A. Gross, who issued a letter to the Nevada Gaming Control Board. See Exhibit 3.

The charts attached as Exhibit 1 indicate the following potential violations of federal election law from 1987 to 1994:

2 U.S.C. § 441b

The Hard Rock Cafe Investors, Ltd., a California limited partnership that no longer exists, reimbursed Peter Morton approximately \$8,750 for federal political contributions.

The Hard Rock Cafe Investors, Ltd. II (of San Francisco), a California limited partnership that no longer exists, reimbursed Peter Morton \$1,000.

The Hard Rock Cafe Investors, Ltd. VII (of San Diego), a California limited partnership that no longer exists, reimbursed Peter Morton \$1,000.

^{2/} Many of the documents we have been provided do not pertain to federal contributions or elections, but we are providing them here in the spirit of full disclosure. We have made every effort to make copies as legible as possible.

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The Hard Rock Cafe, a Delaware corporation, reimbursed Peter Morton approximately \$5,166.67 and Alan Mazursky, Chief Financial Officer, approximately \$500 for federal political contributions.

The Hard Rock Cafe America L.P., a Delaware limited partnership, reimbursed Peter Morton approximately \$2,666.67 for federal political contributions.

Melrose Corporation reimbursed Peter Morton approximately \$3,416.66 for federal political contributions.

In total, Peter Morton and Alan Mazursky were reimbursed approximately \$22,500 from corporate entities from 1987 to 1994.

2 U.S.C. § 441f

Approximately \$22,000 in federal political contributions were reported from Peter Morton and Tarlton Morton, but reimbursements resulted in the contributions being from the Hard Rock Cafe Investors, Ltd., the Hard Rock Cafe, the Hard Rock Cafe America, L.P., and Melrose Corporation.

Approximately \$500 in a federal political contribution was reported from Alan Mazursky, but reimbursement resulted in the contribution being from the Hard Rock Cafe.

2 U.S.C. § 441a(a)(3)

In 1992, FEC contributor records indicate that Peter Morton contributed \$30,800 to federal candidates and other federal committees.

In light of my clients' discovery that these activities were prohibited by federal election law, they have done or will do the following to bring themselves into compliance:

- (1) they have conducted a thorough review of their records, produced the documents to counsel, and have requested disclosure of these documents to the Commission for its independent review;

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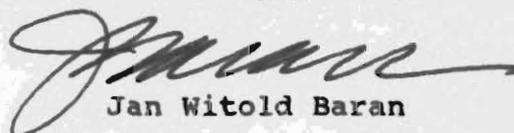
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- (2) they have requested a review of their financial records by counsel to identify every possible error under federal election law;
- (3) based on a review of the documents, my clients have requested counsel to disclose this information to the Federal Election Commission for appropriate review and enforcement;
- (4) Peter Morton will reimburse a total of \$22,000 to the appropriate entities that reimbursed his federal political contributions;
- (5) Alan Mazursky will reimburse the Hard Rock Cafe \$500;
- (6) Each corporate entity has adopted new procedures to prevent these occurrences in the future. See Exhibit 3.

My clients regret these mistakes and are eager to rectify this matter. Undersigned counsel is authorized to answer questions and our clients are prepared to cooperate fully in any proceeding initiated by the FEC.

Sincerely yours,



Jan Witold Baran

Attachments: Exhibits 1-3

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FEC CONTRIBUTOR RECORDS

Peter Norton Federal (and Non-Federal) Contributions
(1987-1994)

DATE	RECIPIENT & ELECTION	AMOUNT	REIMBURSEMENT
6/18/87	Albert Gore for Pres. Comm. Primary	\$1,000	
3/21/88	McCarthy for U.S. Senate Primary	\$1,000	HRC?
5/21/88	Dukakis for Pres. Comm. Inc. Primary	\$1,000	HRC?
10/6/88	McCarthy for U.S. Senate General	\$500	HRC
11/2/88	McCarthy for U.S. Senate General	\$500	HRC?
11/22/89	Bill Bradley for U.S. Sen. '90 Primary	\$1,000	HRC Invest. Ltd.
11/22/89	Bill Bradley for U.S. Sen. '90 General	\$1,000	HRC Invest. Ltd.
3/16/90	Mel Levine for Congress General	\$1,000	
9/11/90	Harvey Gantt for U.S. Senate General	\$500	HRC
3/22/91	Friends of Chris Dodd Primary	\$500	HRC Invest. Ltd.
5/13/91	Levine Camp. Comm. Primary [\$4,000 Check No. 4209 from Peter Morton]	\$1,000	HRC Invest. Ltd.
5/13/91	Levine Camp. Comm [\$4,000 Check No. 4209 from Peter Morton] General	\$1,000	Melrose Corp.
11/22/91	Kerrey for President Primary	\$500	Melrose Corp.
2/3/92	Citizens Comm. for Ernest F. Hollings Primary	\$250	Melrose Corp.

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DATE	RECIPIENT & ELECTION	AMOUNT	REIMBURSEMENT
2/13/92	Rostenkowski for Congress Primary	\$500	
2/24/92	Handgun Control Voter Educ. Fund Primary	\$500	
3/18/92	Jerry Brown for President	\$100	
3/18/92	Jerry Brown for President	\$100	
3/18/92	Jerry Brown for President	\$100	
4/28/92	Kostmayer 1990 Comm. Primary	\$250	HRC Invest. Ltd.
7/22/92	DSCC Primary [notation on Check No. 5323 "Credit Diane Feinstein"]	\$10,000	
7/27/92	Lynn Yeakel for Senate Primary [\$5,000 Check No. 5325 from Peter Morton with Attributions: \$1,000 Peter, \$1000 Tarlton, \$1,000 Pamela (sister), \$1,000 Harry (son), \$1,000 Matthew (son)]	\$1,000	
7/27/92	Lynn Yeakel for Senate General [\$5,000 Check No. 5325 from Peter Morton with Attributions: \$1,000 Peter, \$1000 Tarlton, \$1,000 Pamela (sister), \$1,000 Harry (son), \$1,000 Matthew (son)]	\$1,000	
7/29/92	DSCC Primary	\$1,000	
7/31/92	Levine Camp. Comm General [Levine lost June 2, 1992 Primary]	(\$1,000) (Refund)	
7/31/92	Levine Camp. Comm. Primary [Redesignation to 1994 campaign]	\$1,000	

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DATE	RECIPIENT & ELECTION	AMOUNT	REIMBURSEMENT
8/11/92	DNC - Non-Federal Primary	\$100,000 ^{1/}	
8/11/92	DNC - Non-Federal Primary	\$100,000	
8/28/92	Beilenson Camp. Comm. General	\$1,000	HRC America L.P.
9/17/92	DSCC Primary [\$10,000 Check No. 5486 made out to DSCC sent to Barbara Boxer for Senate with notation "Tally Barbara Boxer"]	\$10,000	HRC Invest. Ltd. \$5,000
9/24/92	Effective Govt. Comm. (Gephardt PAC) Primary	\$5,000	HRC America L.P. 1/3 Melrose 1/3 HRC? 1/3
9/30/92	DSCC Primary (3/23/93 Refund)	(\$1,000) (Refund)	
6/9/93	Feinstein for Senate '94 Primary	\$1,000	
6/9/93	Feinstein for Senate '94 General	\$1,000	
6/22/93	DSCC Primary	\$10,000	
7/29/93	DNC - Non-Federal Primary	\$25,000	
10/25/93	DNC - Non-Federal Primary	\$25,000	
11/18/93	DNC - Non-Federal Primary	\$50,000	
6/14/94	Kennedy/DSCC Victory Fund Primary	\$1,000	

^{1/} Peter Morton reimbursed Hard Rock Cafe America L.P. \$100,000 for contribution to DNC on 7/30/92. Check No. 5396 drawn on Peter Morton's personal account at Union Bank, Beverly Hills, CA.

DATE	RECIPIENT & ELECTION	AMOUNT	REIMBURSEMENT
9/19/94	DSCC Primary [Check No. 7616 Notation "Dianne Feinstein's Tally"]	\$20,000	
9/28/94	Kennedy for Senate Primary (% to Jt. FR)	\$1,000	
10/24/94	Karen Shepard for Congress	\$500	
<u>Peter Morton Total (1987-1994)</u>			
		<u>Federal</u>	<u>Non-Federal</u>
40 Contributions	=	\$76,800	\$300,000
2 Refunds	=	(\$2,000)	

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Tarlton Pauley Morton Federal Contributions
(1987-1994)

DATE	RECIPIENT & ELECTION	AMOUNT	REIMBURSEMENT
5/13/91	Levine Camp. Comm. Primary [\$4,000 Check No. 4209 from Peter Morton]	\$1,000	HRC Invest. Ltd. VII to Peter Morton
5/13/91	Levine Camp. Comm. General [\$4,000 Check No. 4209 from Peter Morton]	\$1,000	HRC Invest. Ltd. II to Peter Morton
7/24/92	Lynn Yeakel for Sen. Primary	\$1,000	Peter Morton ^{1/}
7/24/92	Lynn Yeakel for Sen. General	\$1,000	Peter Morton ^{1/}
7/31/92	Levine Camp. Comm. General [Lost June 2, 1992 Primary]	(\$1,000) (Refund)	
7/31/92	Levine Camp. Comm. Primary [Evidently a redesignation was executed by Peter Morton or Tarlton Morton to 1994 Campaign]	\$1,000	
10/5/92	Feinstein for Senate Comm. Primary	\$1,000	
10/5/92	Feinstein for Senate Comm. General	\$1,000	
10/17/92	DSCC (Women's Council) Primary	\$3,000	Peter Morton ^{2/} \$5,000
6/9/93	Feinstein for Senate '94 Primary	\$1,000	

^{1/} Peter Morton reimbursed Tarlton Morton \$2,000 for contributions to Lynn Yeakel for Senate on 7/24/92. Check No. 4363 drawn on Peter Morton's personal account at Union Bank, Beverly Hills, CA.

^{2/} Peter Morton reimbursed Tarlton Morton \$5,000 for contributions to DSCC on 10/1/92. Check No. 5543 drawn on Peter Morton's personal account at Union Bank, Beverly Hills, CA.

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DATE	RECIPIENT & ELECTION	AMOUNT	REIMBURSEMENT
6/9/93	Feinstein for Senate '94 General	\$1,000	
Tarlton Pauley Morton Total (1987-1994)			
	9 Contributions	=	\$11,000
	1 Refund	=	(\$1,000)

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Alan Mazursky Federal Contributions
(1987-1994)

DATE	RECIPIENT & ELECTION	AMOUNT	REIMBURSEMENT
3/11/92	Levine Campaign Comm. Primary	\$250	
10/15/92	Karen Shepard for Congress General	\$500	HRC ^{1/}
Alan Mazursky Total (1987 - 1994)			
2 Contributions		=	\$750

^{1/} Hard Rock Cafe (L.A.) reimbursed Alan Mazursky \$500 for contribution to Karen Shepard for Congress on 10/14/92. Check No. 20711 drawn on Hard Rock Cafe's account at Union Bank, Beverly Hills, CA.

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DONATION XLS

	P = Political C = Charitable M = Miscellaneous / Unidentified				
		1988			
Donations	CK#	Date	Payee	Comment	Amount
P	7566	1/19/88	Denise Zimmer	Reimb. Steve Saltzman for City Council	500.00
P	7717	3/18/88	Peter Morton		1,000.00
P	7854	5/11/88	Peter Morton		1,000.00
P	7881	5/13/88	Peter Morton		250.00
P	7882	5/20/88	Hilary Rice	Assume Steve Saltzman	500.00
P	7921	6/6/88	Peter Morton		500.00
P	8114	8/30/88	Friends of Kathleen Brown		500.00
P	8231	10/8/88	Peter Morton	Reimb. Leo McCarthy	500.00
P	8273	10/17/88	Peter Morton		500.00
P	8490	12/16/88	Robert Brown	Reimb. Steve Saltzman for City Council	500.00
P	8489	12/16/88	Alan Mazursky	Reimb. Steve Saltzman for City Council	500.00
				Subtotal	6,250.00
C	7524	1/8/88	Greenpeace		200.00
C	7584	1/22/88	City of Hope		30.00
C	7685	3/2/88	So. Coalition		25.00
C	7731	3/28/88	CA Fire Book		250.00
C	7757	4/8/88	Wpca/ Stateins		75.00
C	7807	4/25/88	Transfrica Forum		35.00
C	7871	5/19/88	Citizen for a Livable Los Angeles		100.00
C	7887	5/24/88	National Coalition to Ban Handguns		50.00
C	7909	6/2/88	World Jewish Congress		50.00
C	7922	6/8/88	LA County Welfare		50.00
C	7993	7/14/88	R.F. Kennedy Foundation		100.00
C	8030	8/2/88	Tree People		25.00
C	8087	8/15/88	Heal the Bay		250.00
C	41JE	8/21/88	Remove Cost From LAX / re. AJE		125.00
C	8142	9/9/88	KCET		50.00
C	8141	9/9/88	So. Poverty Law Center		25.00
C	8205	9/23/88	Share Our Strength		250.00
C	8220	10/4/88	Handgun Control		50.00
C	8229	10/6/88	Citizens for Liable L. A.		1,000.00
C	8255	10/13/88	League of Conservation Voters		50.00
C	8254	10/13/88	Save the Children		192.00

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DONATION XLS

C	8271	10/17/88	SCEC Coalition 88		100.00
C	8270	10/17/88	Lucy Blake		100.00
C	59JE	10/23/88	Rec Donation Made To C		372.63
C	8315	11/2/88	Southern Poverty Law Center		25.00
C	8333	11/9/88	Intl Planned Parenthood		100.00
C	8345	11/11/88	Greenpeace USA		1,000.00
C	8348	11/11/88	The World Wildlife Fund		1,000.00
C	47081	12/1/88	Marki		343.40
C	8468	12/12/88	Fund for a Free South Africa		100.00
C	8468	12/12/88	Natural Resources Defense Council		100.00
				Subtotal:	6,223.03
				Total:	12,473.03
					605.00
					11,868.03
	1989				
	CK#	Date	Payee	Comment	Amount
P	1044	2/13/89	Citizens for Michael Woo		500.00
P	99JE	3/26/89	To Record Manual Check	Cl#1072 Reimb. to P.M. For Yaroslavsky	500.00
P	99JE	3/26/89	To Record Manual Check	Yaroslavsky -CC	500.00
P	99JE	3/26/89	Natl Coalition to Ban Handgun		100.00
P	1203	4/23/89	Fair Rep. for Bond Issues		250.00
P	1227	4/23/89	ACLU		50.00
P	1220	4/23/89	Calif. Safe Streets Weapons		50.00
P	1574	7/26/89	People for The American Way		250.00
P	1683	8/17/89	California Democratic Party		5,000.00
P	1702	9/5/89	1993 Friends of Mike Woo		500.00
P	1826	10/12/89	Friends of Councilman Paul Koontz		250.00
P	2032	12/14/89	Kathleen Brown for State Treasurer		1,000.00
				Subtotal:	8,950.00
M	13CR	3/26/89	Received Misc. Deposit	Recycling	(678.00)
M	99JE	3/26/89	To Record Manual Check/ Carla Moore	Miscless	211.50
				Subtotal:	(466.50)
C	8570	1/12/89	Police, Fire Charity		350.00
C	8573	1/13/89	Natural Resource Dev Council		100.00
C	8601	1/24/89	Quest		200.00

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DONATION XLS

P	2574	5/31/90	Van De Camp 90		1,000.00
P	2723	8/6/90	Educational Fund to End Handgun Violence		125.00
P	CD000343	8/6/90	National Restaurant Assoc		150.00
P	2782	8/28/90	James P Rees	Reim Restaurant & Assoc	150.00
P	2827	9/12/90	Yes on 128 Big Green		500.00
P	2831	9/14/90	Peter Morton	Reim Zev Yaroslavsky	1,000.00
P	2836	9/18/90	Peter Morton	Reim Arto Smith Atty General	1,000.00
P	2837	9/18/90	Peter Morton	Reimb. - Dianne Feinstein Governor	1,000.00
P	2844	9/20/90	Calif League of Conservation Voters		200.00
P	2875	10/10/90	Yes on 128 - Big Green		10,000.00
P	2882	10/11/90	Resolution Against N.H. Poker Casino		100.00
				Subtotal	17,825.00
M	175GL	1/28/90	Accrue Inc Accounting	Miscellaneous	4,500.00
M	GL385940	10/29/90	Rord P/C Payout		141.83
M	GL430242	12/30/90	Rord Pt Pycs 12/30		150.00
				Subtotal	4,791.83
C	2372	4/2/90	Peter Morton	Reimb. for Trans Africa Forum	2,500.00
C	2225	2/6/90	Rain Forest Foundation		4,000.00
C	2241	2/13/90	W. Hollywood Shriffs Fund		50.00
C	2243	2/13/90	Peter Morton	Reimb. Sting (Rain Forest Concert)	500.00
C	2255	2/19/90	Habitat for Humanity Int'l		25.00
C	2254	2/19/90	KCET		100.00
C	2285	2/22/90	Levy & Parzanti Assoc.	Homeless Benefit	500.00
C	2320	3/12/90	Phoenix House		250.00
C	2330	3/15/90	Life Saver to Adam Brock		50.00
C	213GL	4/1/90	Xactna		107.75
C	2373	4/2/90	AIDS Dance a Thon		50.00
C	2542	5/18/90	W. Hollywood Homeless Organization		100.00
C	2584	6/6/90	Univ of Denver - HRC Scholarship		11,050.00
C	2789	6/23/90	Sierra Club Legal Defense Fund		250.00
C	GL337310	6/26/90	Record August C/R	Recycling	(700.00)
C	2799	9/5/90	CA Special Olympics	From Recycling	500.00
C	2800	9/5/90	American Cancer Society		200.00
C	2839	9/19/90	Charles Daniel	Donation to Trust from Recycling	600.00
C	2889	10/15/90	Caimont School Library Fund		200.00
C	2888	10/15/90	NRDC		1,015.54
C	GL384450	10/28/90	R/C Recycling Incm Oct		(600.00)
C	2968	11/25/90	Fire Fight Assoc		200.00
C	3067	12/30/90	Hard Rock Cafe	Memorial Fund E. Redorguez	350.00
				Subtotal	22,162.29

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DONATION XLS

					Total	44,809.12
						300.00 off
	1991					
	CK#	Date	Payee	Comment		Amount
P	3259	3/29/91	James P. Rees	Reimb Restaurant & Assoc		100.00
P	3271	3/29/91	Peter Morton	Reimb Senate Chris Dodd		500.00
P	3397	5/28/91	Peter Morton	Reimb Mel Levine Senate		1,000.00
P	3544	6/30/91	Peter Morton	Reimb Mike Woo Campaign		5,000.00
P	AP001689	7/28/91	0591 07/25/91 James P. Rees	Reimb Restaurant & Assoc.		150.00
					Subtotal:	6,750.00
M	GL482140	1/27/91	Rerd P/C Payouts			185.00
M	GL509417	2/25/91	Void Old AP Checks			(150.00)
					Subtotal:	(50.00)
C	3257	3/29/91	AIDS IDC Unit			500.00
C	3338	4/28/91	T. J. Martel Foundation			125.00
C	3375	4/28/91	Donation from Recycling			500.00
C	3387	4/28/91	LA Youth Project			90.00
C	GL546382	4/28/91	Rerd Rainforest Donation			10,000.00
C	3511	6/30/91	B. H. Little League Sponsorship			200.00
C	3557	6/30/91	Univ of Denver	Scholarship		12,852.00
C	3605	7/28/91	Plan International			264.00
C	3707	8/25/91	City of Hope			2,500.00
C	3765	9/29/91	L. A. Center for Living			1,800.00
C	3786	9/29/91	Muscula Dystrophy Fund			100.00
C	3815	10/27/91	Univ. of Denver	Scholarship		12,852.00
C	3827	10/27/91	ISIS Fund/ Walden Woods			2,000.00
C	3832	10/27/91	American Cincnathque			250.00
C	3879	10/27/91	Ent. Service	Tickets to Walden Woods		300.00
					Subtotal:	43,533.00
					Total	50,233.00
						56,133.00
						100.00

HRC005

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DONATION XLS

1992					
	CK#	Date	Payee	Comment	Amount
P	AP4304	2/28/92	Peter Morton	Reimb Tom Hayden for Senate	1,000.00
P	AP4243	2/28/92	IRPAC Fundraiser		600.00
P	AP4381	4/28/92	Peter Morton	Reimb Kostmayer for Congress	250.00
P	AP4329	4/28/92	James P. Rees	Reimb Restaurant Assoc	150.00
P	AP4424	5/4/92	Peter Morton	Reimb Bob Tannenbaum for D.A.	2,500.00
P	AP081392	8/23/92	Peter Morton	Reimb Tony Belenson for Congress	1,000.00
P	AP1128	9/27/92	Peter Morton	Reimb Gephardt for Effective Government Commitat	1,988.67
P	AP1108	9/27/92	Gil Garcetti for D.A.		2,000.00
P	AP1113	9/27/92	Peter Morton	Reimb Democratic Senate Campaign	1,888.00
P	AP101382	10/25/92	Alan Mazursky	Reimb. Karen Shepherd for Congress	500.00
P	AP100882	10/25/92	Nate Holden for Mayor		1,000.00
P	AP112482	12/27/92	Kathleen Brown		5,000.00
Subtotal:					17,333.33
M	AP4244	2/28/92	Pedro Varga		139.86
M	AP100882	10/25/92	Offside		627.85
Subtotal:					757.85
C	AP30482	3/28/92	Heal The Bay		2,000.00
C	AP080292	6/28/92	Lifestarts Centinella Hospital		1,000.00
C	AP080292	6/28/92	Library Foundation of Los Angeles		500.00
C	GL000029	6/28/92	To Rec Payouts For June		246.00
C	AP4618	7/28/92	University of Denver		13,572.00
C	AP1111	9/27/92	Forrest Fund c/o Pomona Fire Fighters Assoc.		1,000.00
C	AP111082	11/22/92	MDA		50.00
C	AP102792	11/22/92	Peter Morton	Reimb. APLA	494.54
Subtotal:					18,818.54
Total:					38,907.72
					8,841.20
					30,066.52
1993					
	CK#	Date	Payee	Comment	Amount
M	AP012693	2/21/93	Mildred Hillard		100.00

HRC006

DONATION XLS

C	AP2065	1/23/94	Curtis Smith		1,700.00
C	AP2028	1/23/94	AIDS Project Los Angeles		3,000.00
C	AP010794	1/23/94	Naacp		1,000.00
C	AP2178	3/27/94	The Country Music Foundation		1,000.00
C	AP9031	4/24/94	T.J. Martel Foundation		12,000.00
C	AP041994	4/24/94	Do Something Inc.		10,000.00
C	AP040794	4/24/94	American Oceans Campaign		1,500.00
C	AP051894	5/22/94	Library Foundation		10,000.00
C	AP28103	6/26/94	Visual Image Products		(297.88)
C	AP2275	6/26/94	Fraternal Order of Police		575.00
C	GL000081	7/24/94	Edward Van Hellen Charity Golf		4,855.00
C	AP010188	7/24/94	Visual Image		38.00
C	AP2327	7/24/94	Texas Wildlife Rehabilitation Fund		25.00
C	AP2338	8/21/94	America Chiropractors		3,000.00
C	GL000017	8/22/94	1080 Ckr2044	NAACP	1,000.00
C	AP2367	9/25/94	University of Denver		15,000.00
C	AP2358	9/25/94	Cal Fire Service Review		785.00
C	AP2368	9/25/94	American Cancer Society		100.00
C	AP2388	9/25/94	A.Y. S.O. Region 78		250.00
C	AP010885	10/23/94	Visual Image Products		101.41
C	AP100494	10/23/94	The Friendly Hand Foundation		500.00
C	AP100794	10/23/94	Syco Food		560.00
C	AP941867	10/23/94	Winterland		498.47
C	AP2386	10/23/94	American Film Institute		500.00
C	AP928297	11/20/94	Winterland		223.97
C	AP929612	11/20/94	Winterland		28.00
					Subtotal: 70,450.19
					Total: 84,537.69
SUMMARY					
	Political	Misc	Charitable		Total
1988	6,250.00	0.00	6,223.03		12,473.03
1989	8,950.00	(488.50)	28,275.00		36,736.50
1990	17,825.00	4,791.83	22,192.29		44,809.12
1991	6,750.00	(50.00)	43,533.00		50,233.00
1992	17,333.33	757.85	18,816.54		36,907.72
1993	0	200.00	28,778.43		28,978.43
1994	13,687.50	400.00	70,450.19		84,537.69
TOTAL	70,795.83	5,833.18	218,280.48		294,809.49

BRC008

DOMSF

SAN FRANCISCO DONATIONS SCHEDULE

POL (P) / CHAR (C)	CHK #	DATE	PAYEE	COMMENTS	AMOUNT
C	85764	1/20/88	TOYS-R-US		750.00
C	85833	4/22/88	PROJECT OPEN		14,000.00
SP	85884	7/14/88	HANDGUN CONTROL		25.00
C	85933	10/17/88	PETER MORTON		500.00
C		11/21/88	CAIDLAN BUS CO		320.00
C		11/30/88	S.F. POLICE		125.00
C		12/88	BAL TO ADJ TO Y/E		(675.00)
TOTAL =					15,045.00
C		2/19/89	FEB WANG ACTY AS400 (WANG MISC)		774.18
C		4/23/89	MISC. VENDOR		125.00
C		4/23/89	APR WANG ACTY AS400		44.90
C		6/23/89	MISC. VENDOR		32.50
C		6/23/89	MISC. VENDOR		95.00
C		9/24/89	PETTY CASH PAID-OUT		78.14
C	81191	10/06/89	H.R.D.C.		26,458.00
C	81202	10/19/89	MISC. VENDOR		6,000.00
C	82617	10/21/89	MISC. VENDOR		500.00
C		12/24/89	MRC FOUNDATION		10,357.00
TOTAL =					44,464.72
C		7/1/90	BEGINNING BAL		1,734.12
C		7/26/90	MISC. VENDOR		314.03
C		7/26/90	RCSD P/C PAYOLTS 7/29		50.00
C		8/23/90	SAN FRANCISCO POLICE		75.00
C		10/10/90	DONATION FROM SALE		1,372.93
C	82596	12/30/90	ORCE		1,058.00
TOTAL =					4,624.08
C		3/31/91	MISC. VENDOR		100.00
C	82719	4/28/91	SAN FRANCISCO POLICE		100.00
C		5/26/91	PETER MORTON		1,000.00
C		6/30/91	MISC. VENDOR		50.00
C		6/30/91	MISC. VENDOR		120.00
C		8/23/91	MISC. VENDOR		100.00
C		8/23/91	MISC. VENDOR		100.00
C		8/23/91	MISC. VENDOR		104.90
C		9/29/91	MISC. VENDOR		100.00
C		9/29/91	MISC. VENDOR		100.00
C		10/27/91	MISC. VENDOR		500.00
C		11/24/91	MISC. VENDOR		125.00
C		11/24/91	MISC. VENDOR		100.00
TOTAL =					2,599.90

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DONSF

SAN FRANCISCO DONATIONS SCHEDULE

POL (P) / CHAR (C)	CHK #	DATE	PAYEE	COMMENTS	AMOUNT
C		1/26/92	SAN FRANCISCO		100.00
C	#1240	3/29/92	COMMERCIAL		105.00
C	#1248	3/29/92	JANA SHITTE		100.00
C	#1251	3/29/92	L.A. MAYFLO		60.00
C	#1272	4/26/92	BALHORA VMS		120.00
C	#1319	7/26/92	OPERATION S		20.00
C	#1026	9/27/92	SFPOA NOTES		110.00
C	#1029	9/27/92	FRATERNAL O		90.00
P	#1113	9/27/92	PETER HORTON		1,646.67
C	LA#1184	11/22/92	PETER HORTON	GERPHEROT PAC APLA CONTR REING PD OUT OF LA SK.	454.54
TOTAL =					2,826.21
C	#1179	8/22/93	EAST COAST		100.00
C	#1206	10/24/93	OPERATION S		100.00
C	#1204	10/24/93	SFPOA NOTES		110.00
TOTAL =					310.00
C		2/20/94	CALIFORNIA		37.50
C	#1275	4/24/94	SAN FRANCISCO		110.00
C		9/25/94	R/C E/E SPONSORSHIP		371.85
C	#1376	11/20/94	OPERATION SUNSHINE		100.00
TOTAL =					619.35

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DONSD

SAN DIEGO DONATIONS SCHEDULE

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96043764304

POL (P) / CHAR (C)	CHK #	DATE	PAYEE	COMMENTS	AMOUNT
.....
C		3/26/89	TO REFLECT MAR ACTIVITY		100.00
C		12/89	JULY-DEC, NO JE B/U		3,808.65
C		12/89	Y/E ADJ JE	NRC FOUNDATION	10,357.00
TOTAL =					14,265.65
C		9/30/90	PETTY CASH PAID-OUT		44.00
C		10/10/90	DONATION FR SALE		720.68
TOTAL =					764.68
C		5/26/91	MISC. VENDOR		40.00
P		5/26/91	PETER NORTON	REIMB MEL LEVINE FOR SEMATE	1,000.00
C		7/28/91	MISC. VENDOR		40.00
C		7/28/91	MISC. VENDOR		55.00
C		10/27/91	MISC. VENDOR		40.00
TOTAL =					1,175.00
C		8/23/92	R/C 10% BLM REIMB		(606.40)
P		9/27/92	PETER NORTON	REIMB GEPHARDT NRC	1,666.67
C	LA#1184	11/22/92	PETER NORTON	APLA CONTRI REIMB PD OUT OF LA SK	454.55
TOTAL =					1,514.82
C		2/21/93	R/C ST. VINCENTS HOSPITAL		7,000.00
C		8/22/93	R/C '92 SK MILLER		(4,900.00)
C		8/22/93	PETTY CASH PAID-OUT		48.00
C		12/26/93	R/C '92 SK MILLER EXPENSES		225.00
TOTAL =					3,273.00
C		2/20/94	CALIFORNIA		37.50
C	81454	4/26/94	A/P EXPENSES		200.00
C	81536	9/25/94	CHUCK ROSE		100.00
TOTAL =					337.50

HRC011

DONNO

NEW ORLEANS DONATIONS SCHEDULE

96043764325

CHAR(C)/POL(P) CHK #	DATE	PAYEE	COMMENTS	AMOUNT
C	1/24/88	REC PETTY CASH		50.00
C	3/02/88	LOUISIANA CHILDREN		1,000.00
C	3/27/88	REC PETTY CASH		200.00
C	4/24/88	REC PETTY CASH		33.44
C	5/19/88	MISC WORLD TEACH		100.00
C	6/26/88	REC PETTY CASH		570.00
C	6/26/88	REC PETTY CASH		28.00
C	11/30/88	OPANO - N.O. POLICE		100.00
C	12/20/88	REC PETTY CASH		34.89
TOTAL =				2,116.42
C	#1448 1/16/89	MISC BECKY BAILEY		424.00
C	2/19/89	REC PETTY CASH PAID		25.00
C	3/26/89	MARCH PETTY CASH		150.00
C	5/21/89	REC PETTY CASH PAID		40.50
C	7/21/89	MISC VENDOR		40.00
C	7/23/89	REC PETTY CASH		225.00
C	9/24/89	REC PETTY CASH		60.00
C	10/22/89	REC PETTY CASH		225
C	#8006 11/19/89	CUSIMANO PRODUCE		25.94
C	#8020 11/19/89	NATCO		19.22
C	#2162 11/21/89	MISC VENDOR		100.00
C	12/14/89	NATCO		21.80
C	#1192 12/18/89	OZAMAH INN		5,000.00
C	12/24/89	PETTY CASH PAIDOUT		100.00
C	#2281 12/29/89	MISC. VENDOR		1,241.37
C	12/29/89	AUDIT AJE - NRC FOUNDATION		10,357.00
TOTAL =				18,054.63
C	#2323 1/11/90	MISC. VENDOR		125.00
C	#2339 1/15/90	MISC. VENDOR		150.00
C	#2349 1/18/90	MISC. VENDOR		100.00
C	2/14/90	MISC. VENDOR		120.00
C	2/25/90	PETTY CASH PAID-GUT		21.20
C	2/25/90	NATCO		17.50
C	2/25/90	NATCO		15.49
C	3/15/90	MISC. VENDOR		60.00
C	3/20/90	MISC. VENDOR		125.00
C	#309 4/01/90	NATCO		16.88
C	#409 4/29/90	NATCO		16.88
C	5/22/90	MISC. VENDOR		125
C	5/24/90	MISC. VENDOR		100
C	#517 5/27/90	NATCO		16.88
C	#503 5/27/90	NATCO		16.88

DONNO

NEW ORLEANS DONATIONS SCHEDULE

CHAR(C)/POL(P)	CHK #	DATE	PAYEE	COMMENTS	AMOUNT
C	#614	7/01/90	NATCO		16.88
C		8/21/90	MISC. VENDOR		200.00
C		10/4/90	MISC. VENDOR		75.00
C		10/9/90	MISC. VENDOR		125.00
C		10/10/90	DONATION FN SALE		531.31
C		10/17/90	MISC. VENDOR		100.00
C		11/25/90	MISC. VENDOR		75.00
C		11/25/90	MISC. VENDOR		100.00
C	#1227	12/30/90	NATCO		20.71
C		12/30/90	OZAMAM INN		4,355.27
C	#1213	12/30/90	NATCO		16.88
C	#1213	12/30/90	NATCO		16.88
C	#1130	12/30/90	NATCO		16.88
TOTAL =					6,976.52
C		1/27/91	MISC. VENDOR		125.00
C		1/27/91	MISC. VENDOR		60.00
C		1/27/91	MISC. VENDOR		80.00
C	#110	1/27/91	NATCO		20.71
C		2/24/91	POLICE ASSC OF NEW		150.00
C		2/24/91	LOUISIANA PEACE		125.00
C		2/24/91	NATCO		19.18
C		5/26/91	ZOO TO DO EXPENSES		2,296.73
C		5/26/91	ZOO TO DO EXPENSES		650.53
C		7/28/91	MISC. VENDOR		40.00
C		9/29/91	MISC. VENDOR		40.00
C		9/29/91	MISC. VENDOR		100.00
C		10/27/91	MISC. VENDOR		75.00
C		10/27/91	MISC. VENDOR		25.00
C		11/19/91	MISC. VENDOR		50.00
C		11/24/91	MISC. VENDOR		125.00
C		11/24/91	PETTY CASH PAID-OUT		12.56
C		12/29/91	MISC. VENDOR		50.00
C		12/29/91	PETTY CASH PAID-OUT		33.38
C		12/29/91	MISC. VENDOR		10,000.00
TOTAL =					14,076.09
C	#4529	4/24/92	CLARKSON CAMPAIGN		200.00
C	#4541	4/24/92	KEVIN ANDERSON		100.00
C	#4568	4/24/92	ALZHEIMERS DISEASE ASSOC		150.00
C		4/26/92	DAILY SALES 4/17		(48.00)
C		5/24/92	SAM'S WHOLESALE CLUB		95.68
C	#43092	5/24/92	THE AUTUBON INSTITUTE		135.00
C		5/24/92	CHAPS RENTAL		119.90
C		5/24/92	WALMART		43.74

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DOWND

NEW ORLEANS DONATIONS SCHEDULE

CHAR(C)/POL(P) CHK #	DATE	PAYEE	COMMENTS	AMOUNT
*****	*****	*****	*****	*****
C	5/24/92	UHAUL		78.83
C	#52792 6/28/92	AMERICAN CANCER SOCIETY		102.00
C	10/25/92	OPANO - N.O. POLICE		200.00
C	#1177 10/25/92	NEW ORLEANS F.O.P.		100.00
C	#1187 10/25/92	REDERMER HIGH SCHOOL		50.00
C	LA#1184 11/22/92	PETER MORTON	APLA CONTR REIMB PO OUT OF LA SK.	454.55
C	#1297 12/27/92	OPANO - N.O. POLICE		100.00
C	12/27/92	NATCO/THANKSGIVING		98.48
C	12/27/92	5K RUN EXPENSES		5863.49
C	12/27/92	5K RUN MILLER BREW		(4,000.00)
TOTAL =				3,843.67
C	#1627 2/21/93	JEWISH VOICE		174.00
C	#1713 4/25/93	EARTH DAY RESOURCES		100.00
C	#1765 5/23/93	STUDENT CHAPTER OF LA. REST.		100.00
C	5/23/93	REC PETTY CASH PAID		114.92
C	#1805 6/27/93	P.M.B.A.		100.00
C	#1878 6/27/93	MAYFLOWER SOCIETY		25.00
C	6/27/93	REC PETTY CASH PAID		85.02
C	#1293 8/22/93	MARCH OF DIMES		100.00
C	#2144 10/24/93	UNITED CEREBAL PALSY		340.00
TOTAL =				1,138.94
C	#2509 3/27/94	G.M.C.F.F		125.00
C	#2524 3/27/94	CROWN BEVERAGE		200.00
C	#2641 5/22/94	OPANO - N.O. POLICE		100.00
C	#2616 5/22/94	NEW ORLEANS POLICE DEPT.		250.00
C	6/26/94	DAILY REPORTS JUNE 9		500.00
C	8/21/94	PETTY CASH PAID-OUT		242.00
C	8/21/94	NATCO		26.94
C	8/21/94	NATCO		55.02
C	9/15/94	NATCO		27.26
C	9/30/94	NATCO		28.42
C	#2957 10/23/94	TOMMY PHILLIPS OPEN		500.00
C	#2016 11/20/94	KREWE OF CARROLLTON		325.00
TOTAL =				2,379.64

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DOMLV

LAS VEGAS DONATIONS SCHEDULE

POL (P) / CHAR (C)	CHK #	DATE	PAYEE	COMMENTS	AMOUNT
C		9/06/90	MISC. VENDOR		500.00
C		10/26/90	MISC. VENDOR		30.00
C		11/25/90	ST. JUDES DONATION		393.60
C		12/30/90	MISC. VENDOR		60.00
TOTAL =					983.60
C		1/27/91	MISC. VENDOR		70.00
C		1/27/91	MISC. VENDOR		50.00
C		1/27/91	MISC. VENDOR		60.00
C		2/24/91	MISC. VENDOR		35.00
C		2/24/91	MISC. VENDOR		35.00
C		3/29/91	MISC. VENDOR		290.00
C		3/29/91	MISC. VENDOR		100.00
C		3/29/91	MISC. VENDOR		35.00
C		3/29/91	MISC. VENDOR		39.95
C		4/28/91	MISC. VENDOR		40.00
C		4/28/91	ST. JUDES RANCH		125.00
C		5/26/91	MISC. VENDOR		35.00
C		5/26/91	PETTY CASH PAID-OUT		39.95
C		6/30/91	MISC. VENDOR		75.00
C		6/30/91	MISC. VENDOR		150.00
C		6/30/91	MISC. VENDOR		40.00
C		6/30/91	MISC. VENDOR		60.00
C		7/28/91	MISC. VENDOR		35.00
C		7/28/91	MISC. VENDOR		75.00
C		8/25/91	PETTY CASH PAID OUT		50.00
C		9/29/91	CORR CODING ERROR		(450.00)
C		9/29/91	MISC. VENDOR		80.00
C		9/29/91	MISC. VENDOR		60.00
C		9/29/91	MISC. VENDOR		50.00
C		9/29/91	MISC. VENDOR		1,000.00
C		9/29/91	MISC. VENDOR		250.00
C		9/29/91	MISC. VENDOR		500.00
C		9/29/91	MISC. VENDOR		29.95
C		10/27/91	MISC. VENDOR		150.00
C		10/27/91	PETTY CASH PAID-OUT		60.00
C		11/24/91	MISC. VENDOR		25.00
C		11/24/91	PETTY CASH PAID-OUT		65.00
C		12/29/91	MISC. VENDOR		60.00
C		12/29/91	PETTY CASH PAID-OUT		107.82
C		12/29/91	USA TODAY		277.50
TOTAL =					3,066.30
C		12/30/92	MISC VENDORS	TOTAL =	6,376.00

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DOMLV

LAS VEGAS DONATIONS SCHEDULE

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POL (P) / CHAR (C)	CHK #	DATE	PAYEE	COMMENTS	AMOUNT
.....
C		1/24/93	PETTY CASH PAID-OUT		69.44
C		2/21/93	PETTY CASH PAID-OUT		119.14
C	#2948	3/28/93	BOY SCOUT		100.00
C	#2949	3/28/93	NEVADA ZOO		46.00
C		4/25/93	PETTY CASH PAID-OUT		210.00
C		5/23/93	MPAF		175.00
C		5/23/93	1/PM POST 10		40.00
C		6/27/93	PETTY CASH PAID-OUT		23.92
C		7/25/93	AMERICAN W		49.95
C		7/25/93	NEVADA CONF		150.00
C		7/25/93	CLARK COUNTY		100.00
C		7/25/93	PETTY CASH PAID-OUT		176.00
C		8/22/93	AMERICAN W		60.00
C		8/22/93	LAS VEGAS		100
C		8/22/93	PETTY CASH PAID-OUT		45.00
C		9/26/93	PROFESSIONAL		125
C		9/26/93	MARCH OF DIMES		200
C		9/26/93	ANGEL PLANE		176.00
C		9/26/93	PETTY CASH PAID-OUT		102.16
C		11/21/93	CLARK COUNTY		100.00
C		11/21/93	NEW HOPE OF		90.00
C		12/26/93	CLARK COUNTY		150.00
C		12/26/93	SHRINE CIRCUS		50.00
C		12/26/93	INTERNATIONAL		50.00
TOTAL =					2,467.61
C		1/23/94	NEW HOPE OF		50.00
C		1/23/94	NATIONAL FI		150.00
C		1/23/94	FRATERNAL O		90.00
C		2/20/94	CLARK COUNTY		100.00
C		2/20/94	ANGEL PLANE		176.00
C		2/20/94	PETTY CASH PAID-OUT		8.37
C		3/27/94	CLARK COUNTY		105.00
C		3/27/94	PETTY CASH PAID-OUT		5.98
C		4/24/94	FOSTER PARENTS		100.00
C		4/24/94	SHARE OUR STRENGTH		400.00
C		4/24/94	PETTY CASH PAID-OUT		36.67
C		5/22/94	AMERICAN W		150.00
C		5/22/94	MPAF		200.00
C		5/22/94	NATIONAL FI		150.00
C		5/22/94	FRATERNAL O		75.00
C		6/26/94	INTERNATION		150.00
C		6/26/94	REDROCK PRO		250.00
C		6/26/94	PETTY CASH PAID-OUT		176.00
C		7/24/94	AMERICAN W		50.00
C		7/24/94	NEW HOPE OF		50.00

ONLY

LAS VEGAS DONATIONS SCHEDULE

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POL (P) / CHAR (C)	CHK #	DATE	PAYEE	COMMENTS	AMOUNT
C		8/21/94	CONGRESSIONAL YOUTH LEADERSHIP		
C		9/23/94	NEVADA CONF		200.00
C		9/23/94	NEVADA JAYC		120.00
C		9/25/94	PETTY CASH PAID OUT		95.00
C		10/23/94	NEVADA YOUTH		100.00
			TOTAL		515.00
				
					3,137.62

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DONMAUI

MAUI DONATIONS SCHEDULE

CHAR(C)/POL(P)	CHK #	DATE	PAYEE	COMMENTS	AMOUNT
*****	****	*****	*****	*****	*****
C		10/02/90	DONATION FROM SAVE		241.77
C		10/22/90	MIKE SCHER	Longhi's Charity	100.00
				Benefit	
C		10/27/90	MISC. VENDOR		300.00
TOTAL =					641.77
C		3/31/91	MISC. VENDOR		400.00
C		4/28/91	MISC. VENDOR		100.00
C		5/26/91	MISC. VENDOR		150.00
C		5/26/91	MISC. VENDOR		50.00
C		12/29/91	PETTY CASH PAID-OUT		100.00
TOTAL =					800.00
C	#547	3/29/92	CASCO CARLS		150.00
C	#579	5/24/92	LANAIA ART		225.00
C		5/24/92	10 K RUN		(150.00)
C	LA#1184	11/22/92	PETER MORTON	APLA CONTR REIMS PD OUT OF LA 5K	454.55
C		12/27/92	TO BOOK 10K RUN LOSS		1,395.02
TOTAL =					2,074.57
C	#317	6/27/93	LIGHTBENERS		2,000.00
C		8/22/93	TO COMPLETE BOOKING		(534.42)
C		8/22/93	TO COMPLETE BOOKING		(5,006.00)
C		12/26/93	PETTY CASH PAID-OUT		134.32
TOTAL =					(3,406.10)
C	#510	2/20/94	JOHN FERRELL		125.00
C	#521	2/20/94	KANAIE ANGEL		150.00
C		3/27/94	PETTY CASH PAID-OUT		109.79
C		6/26/94	PETTY CASH PAID-OUT		100.00
C		9/25/94	PETTY CASH PAID-OUT		65.00
TOTAL =					549.79

96043164371

DONASP

ASPEN DONATIONS SCHEDULE

POL (P) / CHAR (C)	CHK #	DATE	PAYEE	COMMENTS	AMOUNT
C		1/27/91	PETTY CASH PAID-OUT		
C	#1009	1/27/91	ASPEN SKI MUSEUM		201.08
C		2/22/91	ASPEN WINTER CLUB		500.00
C	#1129	2/22/91	SPIDER SABICA MEN. FUND		6,136.00
C	#1231	7/26/91	B.A.T.F.		1,000.00
C		9/29/91	MISC. VENDOR		250.00
C		10/27/91	MISC. VENDOR		1,000.00
C		11/24/91	MISC. VENDOR		35.00
					300.00
			TOTAL =		9,422.08
C		6/28/92	GRASS ROOTS		300.00
C		6/28/92	PETTY CASH PAID-OUT		5.00
C	#1029	9/27/92	ASPEN WINTER		2,000.00
C		9/27/92	PETTY CASH PAID-OUT		50.00
C		11/22/92	LARRY DRAGO		200.00
C		11/22/92	PETER MORTON		656.55
				APLA CONTR REIMB PG OUT OF LA SK.	
C		12/27/92	PETTY CASH PAID-OUT		28.20
			TOTAL =		3,037.75
C		3/28/93	PETTY CASH PAID-OUT		51.04
C		10/24/93	PETTY CASH PAID-OUT		54.61
C	#1282	12/26/93	SISTERS OF CHARITY EMERGENCY		225.04
C	#1290	12/26/93	OUR HOME TOUR		2,050.04
			TOTAL =		2,380.70
C		6/26/94	PETTY CASH PAID-OUT		40.00
C	#1488	9/15/94	MOUNTAIN RESCUE		300.00
C		10/23/94	PETTY CASH PAID-OUT		25.00
			TOTAL =		345.00

96043764332

DOMEST

NEWPORT BEACH DONATIONS SCHEDULE

POL (P) / CHAR (C)	CHK #	DATE	PAYEE	COMMENTS	AMOUNT
C	LA#1184	11/22/92	PETER MORTON	APLA CONTR REIMB PD OUT OF LA SK.	454.55
C		12/27/92	WINTERLAND		5.45
C		12/27/92	WINTERLAND		114.73
C	#240	12/27/92	CERTIFIED		570.00
TOTAL =					1,144.73
C	#327	2/21/93	SPEAK-UP NEW		400.00
C	#477	9/26/93	AMFAR		1,200.00
TOTAL =					1,600.00
C		2/20/94	CALIFORNIA		37.50
C	#562	4/24/94	C.O.P.E.S.		715.00
C	#6949	9/25/94	UPPER NEWPORT		500.00
TOTAL =					1,252.50

96043 / 64333

DONCHI

CHICAGO DONATIONS SCHEDULE

CHAR(C)/POL(C) *****	CHK #	DATE	PAYEE *****	COMMENTS *****	AMOUNT *****
C	#1584	8/20/88	V MISC IRPAC		100.00
TOTAL =					100.00
C	#3545	7/10/89	MISC. HAND C		
C	#3546	7/12/89	MISC. HAND C		10,000.00
C		8/20/89	MISSING B/U		250.00
C	#4000	10/20/89	MISC. HAND C		13.45
C	#4717	10/22/89	NATIONAL VETERAN'S M		100.00
C	#4000	11/23/89	MISC HAND		175.00
C	#4000	12/04/89	MISC HAND		150.00
C	#4000	12/20/89	MISC HAND		50.00
C		12/24/89	A3.1 REC C		160.00
					HRC Foundation
TOTAL =					10,357.00
					21,255.45
C	#3864	2/01/90	MISC. VENDOR		
C		4/29/90	RECR PAYOUTS @ 4/29		250.00
C		10/15/90	DONATION FROM SALE		149.00
C		10/28/90	MISC. VENDOR		1,713.50
C	#4585	10/28/90	ILLINOIS RESTAURANT		195.00
TOTAL =					1,250.00
					3,557.50
C		5/26/91	MISC. VENDOR		
C		5/26/91	MISC. VENDOR		25.20
C		5/26/91	MISC. VENDOR		100.00
C		7/28/91	MISC. VENDOR		84.00
C	#5069	8/25/91	MISC. VENDOR		100.00
C	#5090	8/25/91	MISC. VENDOR		1,000.00
C	#5138	8/25/91	MISC. VENDOR		10,000.00
C	#5198	9/29/91	MISC. VENDOR		250.45
C	#5399	12/29/91	MISC. VENDOR		500.00
C	#5432	12/29/91	MISC. VENDOR		105.00
C		12/29/91	BOOK PETTY CASH		75.00
TOTAL =					39.15
					12,278.80
C		1/26/92	SHAFFER COMU		
C	#5582	2/23/92	SAM ROSTENS		75.00
C	#5580	2/23/92	A/P EXPENSES		100.00
C		2/23/92	BOOK PETTY CASH		1,000.00
C		3/29/92	FRATERNAL		69.93
P	#2102	5/24/92	PETER MORTON		50.00
C	#5697	5/24/92	EAST BANK	R. Daley Campaign	1,250.00
					125.00

96043164374

DONCHI

CHICAGO DONATIONS SCHEDULE

96043764375

CHAR(C)/POL(C)	CHK #	DATE	PAYEE	COMMENTS	AMOUNT
C		6/28/92	PETTY CASH PAID-OUT		100.00
C	#6042	8/23/92	A/P EXPENSES		75.00
C	#5582	8/23/92	SAN ROSTERS		(100.00)
C	#220	9/27/92	CHICAGO CON		1,000.00
C	#221	9/27/92	ROSE BONDY		68.00
C	#323	10/25/92	MERCY HOME		10,000.00
C		10/25/92	10K RUN		(9,615.95)
C	LA#1184	11/22/92	PETER HORTON	APLA CONTR REIMB PD OUT OF LA SK.	454.34
C		12/27/92	IRIE SCHOLAR, SCHOOL FUND		5,000.00
TOTAL =					9,651.52
C		1/24/93	C.C.P.A.		75.00
C		6/27/93	C.C.P.A.		75.00
C		9/26/93	ILLINOIS RESTAURANT ASSOCIATION		4,000.00
C		9/26/93	FRATERNAL O		75.00
C		12/26/93	C.C.P.A.		75.00
C		12/26/93	MAKE A WISH		10,000.00
C		12/26/93	VOID CV #1556		500.00
C		12/26/93	REC PETTY CASH		82.62
TOTAL =					14,882.62
C		2/21/94	FRATERNAL		100.00
C	#4419	5/22/94	I.A.R.F.		90.00
C		6/27/94	NATIONAL BA		54.96
C		6/27/94	PREMIER PRO		96.00
C	#2240	7/24/94	CLARA'S HOUSE		30.00
C	#1376	9/25/94	GREATER WOR		1,000.00
C	#2913	10/23/94	ILLINOIS RESTAURANT ASSOCIATION	Scholarship Fund	600.00
C	#2577	10/23/94	MEDIMAN SHR		100.00
C		10/23/94	REC PETTY CASH		188.38
C		11/20/94	REC PETTY CASH		270.71
TOTAL =					2,530.05

DONTX

HOUSTON DONATIONS SCHEDULE

96043764376

POL (P) / CHAR (C)	CHK #	DATE	PAYEE	COMMENTS	AMOUNT
-----	-----	-----	-----	-----	-----
C	#2033	1/12/88	MISC TX STATE TROOPER		100.00
C		2/22/88	TO REC PETTY CASH		48.60
C		2/23/88	MISC HOUSTON LEE DWTN		75.00
C	#2174	5/03/88	MISC SOFTBALL COUNTRY		125.00
C		5/10/88	V KIRBY		150.00
C	#2055	10/11/88	V AM LUNG ASSOC		25.00
C		11/20/88	V THOA, 5/23/88		325.00
TOTAL =					848.60
C	#5508	5/21/89	UPPER KIRBY DISTRICT		150.00
C	#2699	9/02/89	MISC. VENDOR		200.00
C		12/24/89	HRC FOUNDATION		10,357.00
TOTAL =					10,707.00
C	#2942	1/8/90	MISC. VENDOR		34.90
C		2/25/90	PETTY CASH		9.62
C		8/26/90	PETTY CASH		200.00
C	#3380	8/30/90	MISC. VENDOR		1,000.00
TOTAL =					1,244.52
C		1/27/91	RCRD P/R PAYOUTS		178.00
C		1/27/91	MISC. VENDOR		60.00
C		10/27/91	PETTY CASH PAYOUT		350.00
TOTAL =					588.00
C	#4043	7/26/92	DUNKIN DONUTS		85.75
C	LA#118411/22/92		PETER NORTON	APLA CONTR REIMB PD OUT OF LA !K.	454.54
C		11/22/92	TO BOOK MONTHLY PAID		3.23
TOTAL =					543.52
C		1/24/93	TO R/C A/R OTHER		999.17
C		3/28/93	% OF SALES		(109.12)
C		10/24/93	REC PETTY CASH		100.00
C		12/26/93	% OF SALES		(16.56)
C		12/26/93	REC PETTY CASH		40.00
TOTAL =					1,009.49

HRC023

DONTX

HOUSTON DONATIONS SCHEDULE

POL (P) / CHAR (C)	CHK #	DATE	PAYEE	COMMENT'S	AMOUNT
C		2/20/94	A/R OTHER DONATION		(3,948.63)
C		2/20/94	MILLER CHK RECEIVED		5,000.00
C		3/27/94	% OF SALES		(140.16)
C		3/27/94	REC PETTY CASH		25.00
C		7/24/94	CHK TO SPACE CENTER		2,000.00
C		7/24/94	TO BOOK ADDITIONAL		(319.00)
C		9/25/94	% OF SALES		(205.58)
C		9/25/94	TO CORRECT BOOKING OF		100.00
TOTAL					2,511.63

96043764337

HRC024

DONNO

HONOLULU DONATIONS SCHEDULE

POL (P) / CNR (C)	CNK #	DATE	PAYEE	COMMENTS	AMOUNT
C		2/21/88	REC PETTY CASH		383.84
C	#681	3/27/88	MISC CAROL KAI		700.00
C		4/01/88	M V 888		375.00
C		6/88	MISSING B/U		1,000.00
C		10/23/88	M S CK#530		1,000.00
C		10/23/88	REC PETTY CASH		1,120.00
TOTAL =					4,580.84
C		2/19/89	FEB WANG ACTY AS400		673.80
C		3/26/89	MAR WANG ACTY AS400		317.21
C		4/23/89	APR WANG ACTY AS400		10.00
C		4/23/89	BR 5 WANG 4/89		100.00
C		6/25/89	REC PETTY CASH TRANS		512.00
C		7/21/89	MISC VENDOR		10,000.00
C		9/26/89	MISC VENDOR		250.00
C		11/19/89	REC PETTY CASH		20.00
C		12/24/89	NTR - FAST S	HRC FOUNDATION	10,000.00
TOTAL =					22,241.01
C		12/30/90	MISC. VENDORS	TOTAL =	30,649.83
C		3/31/91	RED RACE		700.00
C		3/31/91	PETTY CASH PAID-OUT		130.45
C		4/28/91	PETTY CASH PAID-OUT		383.47
C		10/27/91	PETTY CASH PAID-OUT		20.70
TOTAL =					1,244.62
C		3/29/92	PETTY CASH PAID-OUT		200.00
C		6/28/92	EARTH VISIONS		100.00
C		7/26/92	10K RUN JUN '92		2,148.52
C		8/23/92	THE GIRL SC		500.00
C		9/27/92	PARTNERSHIP		450.00
C		9/27/92	PETTY CASH PAID-OUT		45.88
C		10/25/92	PETTY CASH PAID-OUT		70.00
C	LA#1184	11/22/92	PETER NORTON	APLA CONTRI RETIRE PD (OUT OF LA SK.	454.54
C		12/27/92	REVEREND AI		100.00
TOTAL =					4,029.85

96043164378

DONNO

HONOLULU DONATIONS SCHEDULE

POL (P) / CHAR (C)	CHK #	DATE	PAYEE	COMMENTS	AMOUNT
C	#282	3/28/93	HABITAT, IN		150.00
C		11/24/93	HAWAII BAKI		386.93
C		11/24/93	STATE POLY		20.03
C		11/24/93	GOVINDA'S		201.00
C		11/29/93	S E RYKOFF		461.32
C	#452	12/26/93	YOUNG'S MEA		1,238.00
TOTAL =					2,457.28
C	#494	2/18/94	MARCH OF DIMES		500.00
C		4/12/94	S E RYKOFF		612.31
C		4/15/94	S E RYKOFF		367.33
C		4/15/94	TAI HING CO.		129.71
C	#537	4/24/94	CAROLE KAI		700.00
C	#534	4/24/94	FIRBALL CL		100.00
C		4/24/94	PETTY CASH PAID-OUT		380.78
C		5/22/94	PETTY CASH PAID-OUT		(85.09)
C		6/01/94	MEADOW GOLD		23.76
C		6/01/94	S E RYKOFF		72.48
C		6/01/94	TAI HING CO.		65.30
C	#696	10/23/94	HAWAII POLI		225.00
C		11/16/94	S E RYKOFF		54.98
TOTAL =					3,146.76

96043764379

23
Clarke
American

THE MELROSE CORPORATION

Bank of America (212) 200-2700
Los Angeles Private Banking #1128
555 South Flower Street Suite 600
Los Angeles, CA 90071

1121

Nov. 23, 19 93

16-08/1228
1128

PAY SEVEN HUNDRED FIFTY ***** DOLLARS 750.00

TO
THE
ORDER
OF

PAUL KORETZ

NON-NEGOTIABLE

⑆001121⑆ ⑆12200066⑆ ⑆11261-02289⑆

THE MELROSE CORPORATION

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

96043764310

DATE	DESCRIPTION	AMOUNT	DISTRIBUTION	
			ACCT. NO.	AMOUNT
11/23/93	Contribution	\$750.00	999-157 8115	

PERIOD ENDING	TOTAL EARNINGS	DEDUCTIONS					TOTAL DEDUCTIONS	NET PAY
		F.I.C.A.	WITHHELD U.S. RES. TAX	STATE TAX				

NON-NEGOTIABLE

Description
Cash Account

MAILED

Box # AP199

HRC027

CHECK REQUEST FORM

DATE: 11/22/93

INDIVIDUAL REQUESTING CHECK: S Bushman

RESTAURANT ON WHICH TO BE DRAWN: Wostons

AMOUNT: \$ ~~1,000~~ 750.00

DISTRIBUTION: SEND TO PAYEE

RETURN TO INDIVIDUAL REQUESTING CHECK OR RETURN TO: _____

DESCRIPTION: Contribution

PAYEE (as to appear on check) Paul Kosety

ADDRESS (if to be sent) _____

AUTHORIZATION: [Signature]

FOR ACCOUNTING USE ONLY

Checks

Trans. # _____	Rest. # _____
Rest. # _____	Paid Invoice # _____
Vendor # _____	Dr. Liability _____
Check # _____	G/L Account _____
Check Date <u> </u> / <u> </u> / <u> </u>	Direct Expense _____
Amount \$ _____	
Description _____	
Cash Account _____	

MAILED

Box # AP199

96043764311

Clarke American

THE MELROSE CORPORATION

Bank of America (212) 200-3700
Los Angeles Private Banking #1128
555 South Flower Street, Suite 500
Los Angeles, CA 90071

1104

Oct. 19, 19 93

10-08/1229
1128

PAY TWO HUNDRED FIFTY ***** DOLLARS 250.00

TO THE ORDER OF

Friends of Councilman Paul Koretz
c/o David Gould, Treasurer
600 Wilshire Blvd.
Suite 1500
Los Angeles, CA 90017

NON-NEGOTIABLE

⑈001104⑈ ⑆122000661⑆ 11261-02289⑈

THE MELROSE CORPORATION

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

2
3
4
5
6
7
8
9

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT. NO.	AMOUNT
10/19/93	Contribution	\$250.00	977-31 8115	

ENTERED NOV 2 1993

PERIOD	TOTAL	FICA	WITHHELD	OTHER	NET
ENDING	EARNINGS		U.S. TAX		

NON-NEGOTIABLE

Description
Cash Account

ENTERED NOV 9 1993

MAILED
OCT 1 1993

Box #
AP 199

OCT 1 1993

HRC029

Sam - veser says you decide wheare
= make a donation or not.
(from mortorio)

Ok It's
Pm
THE SUNSET TOWER

The Sunset Tower is one of the most prominent landmarks in the City of West Hollywood. Completed in 1931, it originally housed forty-six luxury apartments. Among the famous Hollywood stars who once lived in the Sunset Tower are Marilyn Monroe, Clark Gable, Errol Flynn and Jean Harlow. The Tower was placed on the National Registry of Historic Places of the United States in 1979. The building's exterior deteriorated badly in later years. It was acquired by the St. James's Club in 1985. The Club has spent \$40 million to restore the building to its original grand style. Today, the St. James's Club offers luxurious hotel accommodations in the Tower to members and guests.

after the fact -
He is asking for
a donation.
" \$500. "

PLEASE JOIN US AT THE
HISTORIC, BEAUTIFULLY
RESTORED SUNSET TOWER
TO HONOR OUR GREAT
COUNCILMEMBER PAUL KORETZ

Tuesday, October 12, 1993
The St. James's Club
8358 Sunset Boulevard
West Hollywood

5:30-7:30 p.m.
Cocktails and hors d'oeuvres
Tickets: \$250 per person (held at the door)
R.S.V.P.: 310-278-8329

ERC031

6 5 0 4 5 7 6 4 3 4 4

Sept. 25, 92

ONE THOUSAND DOLLARS 1,000.00

PAY TO THE ORDER OF

NOT NEGOTIABLE

DEPOSIT ONLY CHECK

96043764345

Reim. donation Mike Wagon

\$1,000.00

0 999 1000 102
8/10

Trans. # _____
Rest. # _____
Vendor # _____
Check # _____
Check Date _____
Amount \$ _____
Description _____
Cash Account _____

Rest. # _____
Paid Invoice # _____
Dr. Liability _____
G/L Account _____
Direct Expense _____

MAILED

HARD ROCK CAFE
MANUAL CHECK REQUEST FORM

DATE: 9, 25, 92

INDIVIDUAL REQUESTING CHECK: P Morton

RESTAURANT ON WHICH TO BE DRAWN: Mortons

AMOUNT: \$ 1,000

DISTRIBUTION: _____ SEND TO PAYEE

_____ RETURN TO INDIVIDUAL REQUESTING
CHECK OR RETURN TO: _____

DESCRIPTION: Reimb. donation
Mike Woo - Mayor

PAYEE (as to appear on check) Tarleton Morton

ADDRESS (if to be sent) _____

AUTHORIZATION: 

FOR ACCOUNTING USE ONLY

Checks

Trans. # _____
Rest. # _____
Vendor # _____
Check # _____
Check Date / /
Amount \$ _____
Description _____
Cash Account _____

Rest. # _____
Paid Invoice # _____
Dr. Liability _____
G/L Account _____
Direct Expense _____

MAILED

95043764346

E 53

UNCT ... Bank

Sept. 11, 92

TO SAID ***** 1,000.00

USE ADD ... BY DR

NOT NEGOTIABLE

TELETYPE ...

96043764347

CONTRIBUTION

199100097
0
115

\$1,000.00

Trans. # _____ Rest. # _____
 Rest. # _____ Paid Invoice # _____
 Vendor # _____ Dr. Liability _____
 Check # _____ G/L Account _____
 Check Date _____ Direct Expense _____
 Amount \$ _____
 Description _____
 Cash Account _____

MAILED

HRC034

HARD ROCK CAFE
MANUAL CHECK REQUEST FORM

DATE: 9, 11, 92

INDIVIDUAL REQUESTING CHECK: E Burdine

RESTAURANT ON WHICH TO BE DRAWN: Mortons

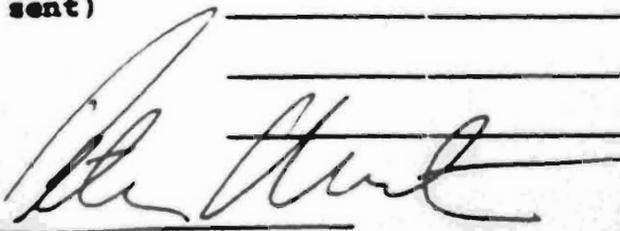
AMOUNT: \$ 1,000

DISTRIBUTION: SEND TO PAYEE
 RETURN TO INDIVIDUAL REQUESTING CHECK OR RETURN TO: _____

DESCRIPTION: contribution

PAYEE (as to appear on check) Mike Woo for Mayor

ADDRESS (if to be sent) _____

AUTHORIZATION: 

FOR ACCOUNTING USE ONLY

Checks

Trans. # _____
Rest. # _____
Vendor # _____
Check # _____
Check Date / /
Amount \$ _____
Description _____
Cash Account _____

Rest. # _____
Paid Invoice # _____
Dr. Liability _____
G/L Account _____
Direct Expense _____

MAILED

HRC035

96043764348

Sept. 24, 92

10-10-1992

PAY TWO HUNDRED FIFTY DOLLARS \$ 250.00

TO: FRIENDS OF COUNCILMAN
FRANK ROSENZ
c/o DAVID COULD
500 WILSHIRE BLVD STE 1500
LOS ANGELES CA 90017

NOT NEGOTIABLE

PAID TO ORDER OF

DEBIT TO CHECK # 4

96043764319

9/24/92	Contribution	1911 7115	\$250.00		
---------	--------------	--------------	----------	--	--

DATE	DESCRIPTION	AMOUNT	TYPE	STATUS	TOTAL DEBIT	TOTAL CREDIT	BALANCE

Checks

Trans. # _____ Rest. # _____
 Rest. # _____ Paid Invoice # _____
 Vendor # _____ Dr. Liability _____
 Check # _____ G/L Account _____
 Check Date _____ Direct Expense _____
 Amount \$ _____
 Description _____
 Cash Account _____

MAILED

Box #
AP148

HARD ROCK CAFE
MANUAL CHECK REQUEST FORM

DATE: 9, 23, 92

INDIVIDUAL REQUESTING CHECK: S Bushman

RESTAURANT ON WHICH TO BE DRAWN: Mortons

AMOUNT: \$ 250.00

DISTRIBUTION: SEND TO PAYEE

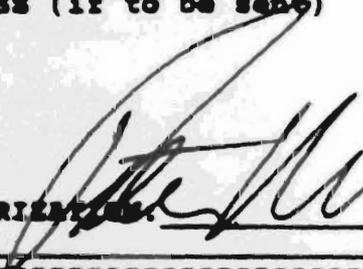
RETURN TO INDIVIDUAL REQUESTING CHECK OR RETURN TO: _____

DESCRIPTION: Contribution

PAYEE (as to appear on check) Friends of Councilman

ADDRESS (if to be sent) Paul Koretz
c/o David Gould
600 Wilshire Ste 1500

LA, CA 90027

AUTHORIZED SIGNATURE: 

FOR ACCOUNTING USE ONLY

Checks

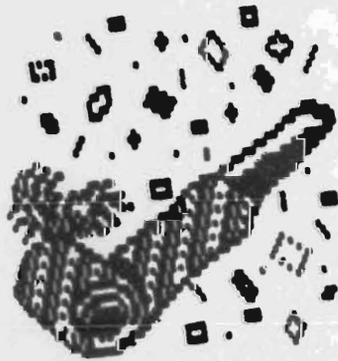
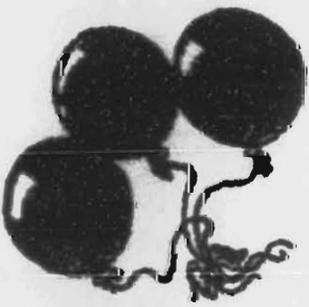
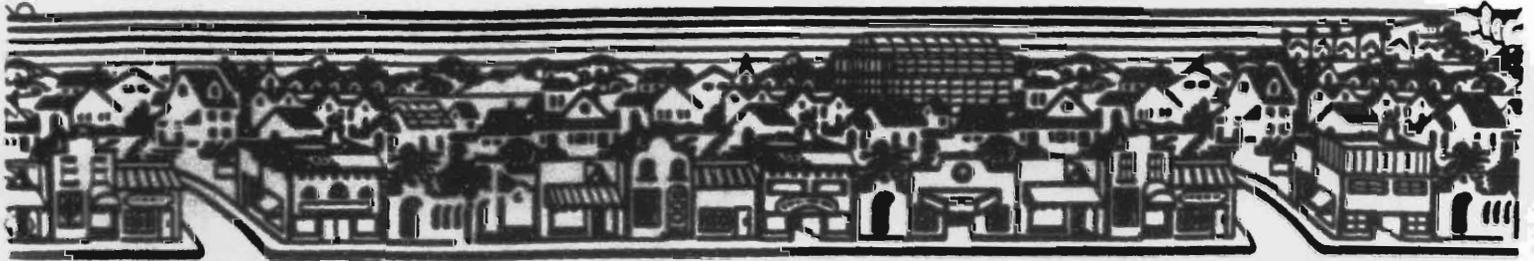
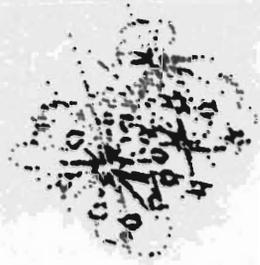
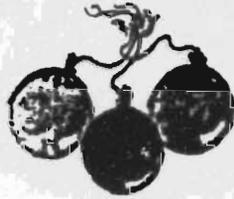
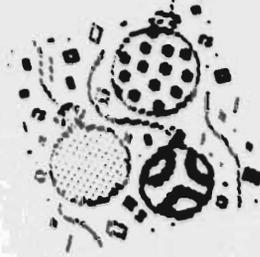
Trans. # _____	Rest. # _____
Rest. # _____	Paid Invoice # _____
Vendor # _____	Dr. Liability _____
Check # _____	G/L Account _____
Check Date <u> </u> / <u> </u> / <u> </u>	Direct Expense _____
Amount \$ _____	
Description _____	
Cash Account _____	

MAILED

Box #
AP148

960437643 C

Make checks payable to:
Friends of Councilman Paul Koretz
c/o David Gould, Treasurer
600 Wilshire Blvd., Suite 1500
Los Angeles, CA 90017

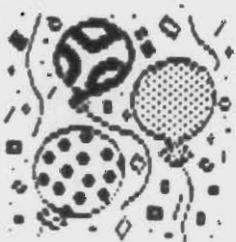


At the Roxbury Club . . .

HRC038

9 6 4 3 5 1

9 6 0 4 3 7 6 4 3 5 2



**To Celebrate The Re-election
of Councilman Paul Koretz to
the West Hollywood City Council**

Thursday, October 15, 1992

The Roxbury

8225 Sunset Boulevard

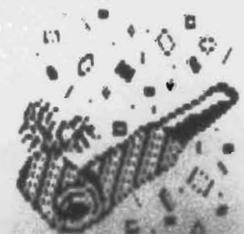
West Hollywood

5:30 - 7:30 p.m.

Cocktails and Hors d'oeuvres

Tickets: \$250 per person

(310) 278-8329



PETER MORTON

Union
OFFICE OF THE
TREASURER
1000 17th St, N.W.

5505

Sept. 23, 92
September 23, 92

10-771220

PAY *Five Thousand Dollars & no/100** DOLLARS \$ 55,000.00

TO
THE
ORDER
OF

Effective Government Committee
80 F Street, N.W., 8th Floor
Washington, D.C., 20001

NOT NEGOTIABLE

PETER MORTON

DELUXE FORM WVC-8 V-2

DATE

DESCRIPTION

9/23/92

Contribution

\$5,000.00

9 6 0 4 3 7 6 4 3 5 3



HRC040

Sept. 23, 92

10-11111111

ONE THOUSAND SIX HUNDRED SIXTY SIX AND 67/100 ***** DOLLARS 1,666.67

PETER HORTON

NOT NEGOTIABLE

DELIVER TO: HEAROSE V-8

96043764354

9/23/92

Reim. contribution

11757
115

\$1,666.67

				TOTAL					TOTAL	
DATE	DESCRIPTION	AMOUNT		DEBIT	CREDIT	DEBIT	CREDIT	DEBIT	CREDIT	

Rest. # _____
 Vendor # _____
 Check # _____
 Check Date _____
 Amount \$ _____
 Description _____
 Cash Account _____

Paid Invoice # _____
 Dr. Liability _____
 G/L Account _____
 Direct Expense _____

MAILED

HARD ROCK CAFE
MANUAL CHECK REQUEST

DATE: 01, 23, 92

INDIVIDUAL REQUESTING CHECK: _____

RESTAURANT ON WHICH TO BE DRAWN: MORTON'S

AMOUNT: 3,600.00

DISTRIBUTION: _____ SEND TO PAYEE
 RETURN TO INDIVIDUAL REQUESTING CHECK OR RETURN TO: _____

DESCRIPTION: REIMBURSEMENT OF CONTRIBUTION

PAYEE (as to appear on check) PETER MORTON

ADDRESS (if to be sent) _____

AUTHORIZATION: [Signature]

FOR ACCOUNTING USE ONLY

Checks

Trans. # _____	Rest. # _____
Rest. # _____	Paid Invoice # _____
Vendor # _____	Dr. Liability _____
Check # _____	G/L Account _____
Check Date <u> </u> / <u> </u> / <u> </u>	Direct Expense _____
Amount \$ _____	
Description _____	
Cash Account _____	

MAILED

95043764355

April 13, 92

TWO HUNDRED FIFTY ***** DOLLARS \$250.00

PETER MARTIN

NOT NEGOTIABLE

DELIVER TO THE FOLLOWING ADDRESS

96043764356

4/13/92 Reimburse for Donation

3115

\$250.00

ENTERED

Inst. # _____
Vendor # _____
Check # _____
Check Date _____
Amount \$ _____
Description _____
Cash Account _____

Paid Invoice # _____
Dr. Liability _____
G/L Account _____
Direct Expense _____

MAILED

HRC043

HARD ROCK CAFE
MANUAL CHECK REQUEST FORM

DATE: 4.10.92

INDIVIDUAL REQUESTING CHECK: S Bushman

RESTAURANT ON WHICH TO BE DRAWN: Mortons

AMOUNT: \$ 250

DISTRIBUTION: _____ SEND TO PAYEE
_____ RETURN TO INDIVIDUAL REQUESTING CHECK OR RETURN TO: _____

DESCRIPTION: Reimburse for
Donation

PAYEE (as to appear on check) Peter Morton

ADDRESS (if to be sent) _____

AUTHORIZATION: [Signature]

FOR ACCOUNTING USE ONLY

Checks

Trans. \$ _____	Rest. \$ _____
Rest. \$ _____	Paid Invoice \$ _____
Vendor \$ _____	Dr. Liability _____
Check \$ _____	G/L Account _____
Check Date _____	Direct Expense _____
Amount \$ _____	
Description _____	
Cash Account _____	

MAILED

95043764357

PETER MORTON

Union Bank
Every Mail Express Office
1400 W. 14th Street
Berkeley, CA 94710

508

April 10 1992

15 77

PAY Two Hundred Fifty Dollars & no/100 DOLLARS \$250.00

TO
THE
ORDER
OF

Cathy O'Neill Senate Campaign
Committee



PETER MORTON

DETACH AND RETAIN THIS STATEMENT
IF YOU WISH TO OBTAIN A STATEMENT OF THIS DONATION
IF YOU WISH TO OBTAIN A STATEMENT OF THIS DONATION

DELUXE FORM WVC-3 V-2

DATE	DESCRIPTION	AMOUNT
4/10/92	Donation	\$250.00

90043164358

HRC045

Jan. 17, 92

TWO HUNDRED FIFTY 250.00

PETER WORTON

NOT NEGOTIABLE

FORM NO. 107 1-63 1-4

95043764359

1/17/92

Reimburse donation

3-1957
8115

\$250.00

Rest. \$ _____
Vendor \$ _____
Check \$ _____
Check Date / /
Amount \$ _____
Description _____
Cash Account _____

Paid Invoice \$ _____
Dr. Liability _____
O/L Account _____
Direct Expense _____

MAILED

HRC046

HARD ROCK CAFE
MANUAL CHECK REQUEST FORM

DATE: 1/16/92

INDIVIDUAL REQUESTING CHECK: S Bushman

RESTAURANT ON WHICH TO BE DRAWN: Mortons

AMOUNT: \$ 250.00

DISTRIBUTION: SEND TO PAYEE
 RETURN TO INDIVIDUAL REQUESTING CHECK OR RETURN TO: _____

DESCRIPTION: reimburse donation

political donation

PAYEE (as to appear on check) Peter Morton

ADDRESS (if to be sent) _____

AUTHORIZATION: 

FOR ACCOUNTING USE ONLY

Checks

Trans. \$ _____
Rest. \$ _____
Vendor \$ _____
Check \$ _____
Check Date 1/16/92
Amount \$ _____
Description _____
Cash Account _____

Rest. \$ _____
Paid Invoice \$ _____
Dr. Liability _____
O/L Account _____
Direct Expense _____

MAILED

96043764360

THE FIRST

PAID BANK

November 18 91

**Five Hundred Dollars & no/100

DOLLARS \$500.00

Peter Norton

NOT NEGOTIABLE

TEL. 1 800 4 6 3 7 1

11/18/91

REimb. donation
Kerrey for President

6587
9115

\$500.00

96043764361

Trans. # _____
Rest. # _____
Vendor # _____
Check # _____
Check Date _____
Amount \$ _____
Description _____
Cash Account _____

Rest. # _____
Paid Invoice # _____
Dr. Liability _____
G/L Account _____
Direct Expense _____

Box #
AP148

MAILED

HRC048

Kerry for Pres.
10900 Wilshire Blvd Ste 1400

90024

You are cordially invited
to a cocktail reception in honor of

**Nebraska Senator Bob Kerrey
1992 Democratic Presidential candidate**

Hosted by

- | | |
|------------------------|------------------------------|
| Jeff Berg | Peter Hoffman |
| Skip Brittenham | Pat Kingsley |
| Al Checchi | Sherry Lansing |
| John Cooke | Alan J. Levine |
| Nancy Daly | Patricia Duff Medavoy |
| Sally Field | Ron Meyer |
| Ted Field | Jerry Moss |
| Sandy Gallin | Jane Semel |
| David Geffen | Rosalie Swedlin |
| Alan Greisman | Jim Watt |
| Barry Hirsch | Ken Ziffren |

at the home of
Barry Diller
1940 Coldwater Canyon
Beverly Hills

**Wednesday, November 20th
6:30 p.m.**

**Minimum Contribution of \$500 per person
Maximum Contribution of \$1,000 per person**

- All donations must be in the form of personal checks •
- Corporate contributions are not permitted under Federal law •
- Contributions are not deductible for Federal tax purposes •

R.S.V.P. to Ann McKenzie (310) 208-9636

Paid for by Kerrey for President

96043764362

HARD ROCK CAFE
MANUAL CHECK REQUEST FORM

DATE: 11/18/91 /

INDIVIDUAL REQUESTING CHECK: Peter Morton

RESTAURANT ON WHICH TO BE DRAWN: Mortons

AMOUNT: \$ 5500.00

DISTRIBUTION: _____ SEND TO PAYEE

RETURN TO INDIVIDUAL REQUESTING CHECK OR RETURN TO: _____

DESCRIPTION: *Reimb.* Contribution - Senator Bob Kerrey

PAYEE (as to appear on check) *Kerrey for President* *Peter Morton*

ADDRESS (if to be sent) 10100 Wilshire Boulevard, Ste 1400

Los Angeles, CA 90024

AUTHORIZATION: *[Signature]*

FOR ACCOUNTING USE ONLY

Checks

Trans. # _____	Rest. # _____
Rest. # _____	Paid Invoice # _____
Vendor # _____	Dr. Liability _____
Check # _____	G/L Account _____
Check Date _____	Direct Expense _____
Amount \$ _____	
Description _____	
Cash Account _____	

MAILED

HRC050

96043764363

Box # AP148

1 2 3

April 30, 91

ONE HUNDRED ***** 100.00

JERSON FOR ASSEMBLY

NOT NEGOTIABLE

MEMORIAL 1981 EDITION

DELIVER FORM 910-9 V-6

9
6
0
4
3
7
6
3
6
4

3/30/91	Donation		\$100.00		
---------	----------	--	----------	--	--

DATE	DESCRIPTION	TOTAL DEBIT	TOTAL CREDIT	BALANCE

ENTERED MAY 18 1991

Check # _____
Amount \$ _____
Description _____
Cash Account _____

Box #
MRTAP/
marked
in
Purple

MAILED

HRC051

HARD ROCK CAFE
MANUAL CHECK REQUEST FORM

DATE: 1-1-1

INDIVIDUAL REQUESTING CHECK: _____

RESTAURANT ON WHICH TO BE DRAWN: _____

AMOUNT: \$ _____

DISTRIBUTION: _____ SEND TO PAYEE
 RETURN TO INDIVIDUAL REQUESTING CHECK OR RETURN TO: _____

DESCRIPTION: TOMATOES

PAYEE (as to appear on check) _____

ADDRESS (if to be sent) _____

AUTHORIZATION: [Signature]

FOR ACCOUNTING USE ONLY

Checks

Trans. # _____	Rest. # _____
Rest. # _____	Paid Invoice # _____
Vendor # <u>675</u>	Dr. Liability _____
Check # _____	G/L Account <u>8115</u>
Check Date <u>1/1</u>	Direct Expense _____
Amount \$ _____	
Description _____	
Cash Account _____	

MAILED

Box #
MRTAP
marked
by [unclear]

96043764365

THE MICHIGAN

CITY NATIONAL BANK
Member FDIC
Equal Housing Lender

8255

Sept. 20, 89

12/20

FIVE HUNDRED

500.00

Robert Brown

NOT NEGOTIABLE

⑆0123016038⑆ 001-5408707

THE MICHIGAN CORP.

DELIVER FORM WFC-3 1-8

9/20/89

Rm. misc. exp.

\$500.00

ENTERED OCT 02 1989

96043764366

Withdrawals

Trans. # _____

Rest. # _____

Rest. # _____

Paid Invoice # _____

Vender # _____

Dr. Liability _____

Check # _____

G/L Account _____

Check Date ____/____/____

Direct Expense _____

Amount \$ _____

Description _____

Cash Account _____

Box #
AP935

7064

HRC053

HARD ROCK CAFE
MANUAL CHECK REQUEST FORM

DATE: 9,20,89

INDIVIDUAL REQUESTING CHECK: Peter Morton

RESTAURANT ON WHICH CHECK DRAWN: Melrose Corp

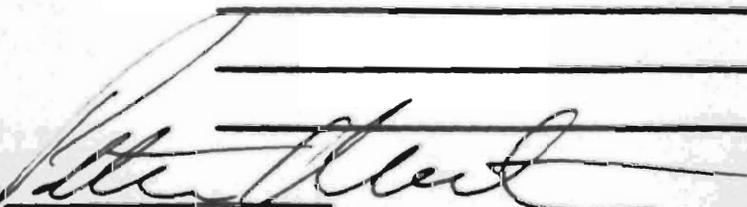
DISTRIBUTION: Send to Payee AMOUNT \$ 500.00

Return to individual requesting check
or return to _____

DESCRIPTION Reimbursement for Misc. Expenses

PAYEE (as to appear on check): Robert Brown

ADDRESS (if to be sent): _____

AUTHORIZATION: 

FOR ACCOUNTING USE ONLY

Checks

Trans. # _____ Rest. # _____

Rest. # _____ Paid Invoice # _____

Vendor # _____ Dr. Liability _____

Check # _____ G/L Account _____

Check Date / / Direct Expense _____

Amount \$ _____

Description _____

Cash Account _____

*Box #
AP935*

7064

96043764357

Sept. 5, 89

12-1028

FIVE HUNDRED

500.00

1993 Friends of Mike Woo

NOT NEGOTIABLE

⑆0122015015⑆ 00⑆⑆0403⑆0⑆

MERRILL LYNCH PIERCE FENNER & SMITH

DELIVER FORM WFO-3 1-8

96043764368

9/5/89

luncheon to discuss current issues & fundraisers for re-election campaign

\$500.00

ENTERED OCT 2 1989

LIABILITIES

Trans. # _____

Rest. # _____

Rest. # _____

Paid Invoice # _____

Vendor # _____

Dr. Liability _____

Check # _____

G/L Account _____

Check Date ____/____/____

Direct Expense _____

Amount \$ _____

Description _____

Cash Account _____

Box AP935

7064

MAILED
9.5.89

HARD ROCK CAFE
MANUAL CHECK REQUEST FORM

DATE: 9/5/89

INDIVIDUAL REQUESTING CHECK: [Signature]

RESTAURANT ON WHICH CHECK DRAWN: Morton's

DISTRIBUTION: Send to Payee AMOUNT \$ 500.00

Return to individual requesting check or return to _____

DESCRIPTION [Faded text]

PAYEE (as to appear on check): [Faded text]

ADDRESS (if to be sent):
1100 1/2 Blvd. by [Faded]
2464 Sunset Blvd.
Suite 870

AUTHORIZATION: [Signature] [Faded]

FOR ACCOUNTING USE ONLY

Checks

Trans. # _____ Rest. # _____
Rest. # _____ Paid Invoice # _____
Vendor # _____ Dr. Liability _____
Check # _____ G/L Account _____
Check Date 9/5/89 Direct Expense _____
Amount \$ _____

Description _____
Cash Account _____

96043164319

Box
AP935
7064

MAILED
9.5.89

DONOR

MORTONS DONATIONS SCHEDULE

POL (P) / CHAR (C)	CHK #	DATE	PAYEE	COMMENTS	AMOUNT
C		5/21/89	TO CLEAR PETTY CASH		5.00
C		7/13/89	CHILD		250.00
C		7/28/89	MISC. VENDOR		500.00
C		8/15/89	THASC SALES CO.		39.63
P	#8844	9/5/89	FRIENDS OF MIKE WOO		500.00
P	#8855	9/20/89	ROBERT BROWN	REIMBURSEMENT	500.00
TOTAL =					1,794.63
C	#8971	2/8/90	MISC. VENDOR	UCLA FOUNDATION	1,000.00
C	#9017	4/30/90	MISC. VENDOR	CHILDRENS DIABETES FUND	250.00
C	#9040	6/11/90	I. REVELES	DAUGHTERS FUNERAL	1,000.00
C		8/31/90	PETTY CASH		10.00
C		9/30/90	PETTY CASH		10.00
C		11/30/90	BOOK MKOMAZI FUND RAISER		3544.15
C		11/30/90	MISC. VENDOR		50.00
C		12/31/90	Y/E ADJ EMPLOYEE BENEFIT FR		(1,000.00)
TOTAL =					4,864.15
C		4/30/91	BOOK PETTY CASH	YOUTH PROJECT	50.00
P	#9246	4/30/91	JOHNI EMERSON FOR ASSEMBLY	POLITICAL DONATION	100.00
P		4/30/91	PETER MORTON	REIMB MEL LEVINE FOR SENATE	1,000.00
C		5/31/91	BOOK PETTY CASH	CROSSROADS MISSION	10.00
C		5/31/91	MISC. VENDOR	AIDS PROJECT	500.00
C		6/30/91	MISC. VENDOR	CHILDREN'S DIABETES	1,000.00
C		10/31/91	MISC. VENDOR	AMERICAN CANCER SOCIETY	1,000.00
P	#9386	11/30/91	PETER MORTON	REIMB KERREY FOR PRESIDENT	500.00
C		11/30/91	MISC. VENDOR	FRIENDS OF L.A. FREE CLINIC	250.00
TOTAL =					4,610.00
P	#9432	1/31/92	PETER MORTON	POLITICAL DONATION	250.00
P	#9467	2/29/92	FRIENDS OF MAYOR PAUL KORETZ	POLITICAL DONATION	1,000.00
P	#9500	4/30/90	PETER MORTON	POLITICAL DONATION-CATHY O'NEILL	250.00
C		3/29/92	AMNESTY INTERNATIONAL USA		475.00
C	#9560	7/31/92	EDWARD BLOOM		500.00
P	#9607	6/28/92	PETER MORTON	REIMB GEPHARDY PAC	1,666.67
P	#9608	8/23/92	FRIENDS OF MAYOR PAUL KORETZ	POLITICAL DONATION	250.00
P	#9600	8/23/92	MIKE WOO FOR MAYOR	POLITICAL DONATION	1,000.00
P	#9611	9/27/92	TARLTON MORTON	REIMB POLITICAL DONATION; MIKE WOO	1,000.00
TOTAL =					6,391.67

9604376437C

DONOR

MORTONS DONATIONS SCHEDULE

POL (P) / CHAR (C)	CHK #	DATE	PAYEE	COMMENTS	AMOUNT
*****	*****	*****	*****	*****	*****
C		5/31/93	THE RAPE FOUNDATION		250.00
C		8/31/93	AMERICAN CANCER SOCIETY		1,000.00
P	#1104	10/31/93	FRIENDS OF MAYOR PAUL KORITZ		250.00
C		11/30/93	THE UCLA FOUNDATION		1,000.00
P	#1121	11/30/93	PAUL KORETZ		750.00
C		12/31/93	ELEGANT RENTALS, INC		45.00
			TOTAL =		3,295.00
C		6/30/94	R/C GIFT CERTIFICATES	VENICE ART WALK \$200, SHARE \$100 HUNTER COLLEGE \$100, CHILDRENS BUREAU \$45.	547.02
C		8/31/94	RECORD PETTY CASH		15.50
C		8/31/94	R/C DONATIONS CODED INCORRECTLY	CIRCLE OF CHILDREN \$264, AMERICAN CINEMATHEQUE \$197.02, AVIVA CENTER \$66.	445.00
			TOTAL =		1,007.52

96043764371



*You are cordially invited to attend a reception
in honor of*

Chicago Mayor Richard M. Daley

Monday, January 9, 1995

5:30pm to 7:00pm

Drais Restaurant

730 North La Cienega, Los Angeles

*Reply enclosed
or call 312.855.8125*

*\$2,500 sponsor
\$500 individual*

96043764372

April 8, 92

10-07-1988

ONE THOUSAND TWO HUNDRED FIFTY ***** 1,250.00

TO
THE
ORDER OF

PIZZERIA

VOID AFTER 90 DAYS

NOT NEGOTIABLE

⑆0000 2102⑆ ⑆122000⑆750⑆200⑆1⑆1752⑆

HARD ROCK CAFE INVESTORS LTD. IV

CELDFE FORM WVC-3 V-6

96043764373

4/8/92

Reim. Donation

46.80

\$12250.00

Boett
11 APR 11 1992



HARD ROCK CAFE
MANUAL CHECK REQUEST FORM

DATE: 4.7.92

INDIVIDUAL REQUESTING CHECK: S Bushman

RESTAURANT ON WHICH TO BE DRAWN: Chicago

AMOUNT: \$ 1250.

DISTRIBUTION: SEND TO PAYEE

RETURN TO INDIVIDUAL REQUESTING CHECK OR RETURN TO:

DESCRIPTION: Reimburse Donation

PAYEE (as to appear on check) Peter Morton

ADDRESS (if to be sent) _____

AUTHORIZATION: [Signature]

FOR ACCOUNTING USE ONLY

Checks

Trans. # _____
Rest. # _____
Vendor # _____
Check # _____
Check Date / / _____
Amount \$ _____
Description _____
Cash Account _____

Rest. # _____
Paid Invoice # _____
Dr. Liability _____
C/L Account _____
Direct Expense _____

MAILED

96043764374

PETER MORTON

Union Bank
Security First National
Bank (Member FDIC)
San Francisco, CA 94102

5078

18-77-1220

April 8 1992

PAY One Thousand Two Hundred Fifty Dollars & no/100 DOLLARS \$ 1,250.00

TO
THE
ORDER
OF

Richard M. Daley
Campaign Committee



PETER MORTON

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

DELUXE FORM WVC-3 V-2

DATE	DESCRIPTION	AMOUNT
4/8/92	Donation	\$1,250.00

96043764375

HRC062

DONCHI

CHICAGO DONATIONS SCHEDULE

CHAR(C)/POL(C)	CHK #	DATE	PAYEE	COMMENTS	AMOUNT
-----	-----	-----	-----	-----	-----
C	#1584	8/20/88	V MISC IPAC		100.00
TOTAL =					100.00
C	#3545	7/10/89	MISC. HAND C		10,000.00
C	#3546	7/12/89	MISC. HAND C		250.00
C		8/20/89	MISSING B/U		13.45
C	#4000	10/20/89	MISC. HAND C		100.00
C	#4717	10/22/89	NATIONAL VETERAN'S M		175.00
C	#4000	11/23/89	MISC HAND		150.00
C	#4000	12/04/89	MISC HAND		50.00
C	#4000	12/20/89	MISC HAND		160.00
C		12/24/89	A3.1 REC C	HRC Foundation	10,357.00
TOTAL =					21,255.45
C	#3864	2/01/90	MISC. VENDOR		250.00
C		4/29/90	RECR PAYOUTS @ 4/29		149.00
C		10/15/90	DONATION FROM SALE		1,713.50
C		10/28/90	MISC. VENDOR		195.00
C	#4585	10/28/90	ILLINOIS RESTAURANT		1,250.00
TOTAL =					3,557.50
C		5/26/91	MISC. VENDOR		25.20
C		5/26/91	MISC. VENDOR		100.00
C		5/26/91	MISC. VENDOR		84.00
C		7/28/91	MISC. VENDOR		100.00
C	#5069	8/25/91	MISC. VENDOR		1,000.00
C	#5090	8/25/91	MISC. VENDOR		10,000.00
C	#5138	8/25/91	MISC. VENDOR		250.45
C	#5198	9/29/91	MISC. VENDOR		500.00
C	#5399	12/29/91	MISC. VENDOR		105.00
C	#5432	12/29/91	MISC. VENDOR		75.00
C		12/29/91	BOOK PETTY CASH		39.15
TOTAL =					12,278.80
C		1/26/92	SHAHER COMM		75.00
C	#5582	2/23/92	SAM ROSTENB		100.00
C	#5580	2/23/92	A/P EXPENSES		1,000.00
C		2/23/92	BOOK PETTY CASH		69.93
C		3/29/92	FRATERNAL		50.00
P	#2102	5/24/92	PETER NORTON	R. Deley Campaign	1,250.00
C	#5697	5/26/92	EAST BANK		125.00

96043764376

DONCHI

CHICAGO DONATIONS SCHEDULE

CHAR(C)/POL(C) *****	CHK # *****	DATE *****	PAYEE *****	COMMENTS *****	AMOUNT *****
C		6/28/92	PETTY CASH PAID-OUT		100.00
C	#6042	8/23/92	A/P EXPENSES		75.00
C	#5582	8/23/92	SAN ROSTENB		(100.00)
C	#220	9/27/92	CHICAGO COM		1,000.00
C	#221	9/27/92	ROSE BOWDRY		68.00
C	#323	10/25/92	MERCY HOME		10,000.00
C		10/25/92	10K RUN		(9,615.95)
C	LA#1184	11/22/92	PETER MORTON	APLA CONTR REIMB PD OUT OF LA 5K.	454.54
C		12/27/92	IRE SCHOLAR, SCHOOL FUND		5,000.00
TOTAL =					9,651.52
C		1/24/93	C.C.P.A.		75.00
C		6/27/93	C.C.P.A.		75.00
C		9/26/93	ILLINOIS RESTAURANT ASSOCIATION		4,000.00
C		9/26/93	FRATERNAL O		75.00
C		12/26/93	C.C.P.A.		75.00
C		12/26/93	MAKE A WISH		10,000.00
C		12/26/93	VOID CV #1556		500.00
C		12/26/93	REC PETTY CASH		82.62
TOTAL =					14,882.62
C		2/21/94	FRATERNAL		100.00
C	#4419	5/22/94	I.A.R.F.		90.00
C		6/27/94	NATIONAL BA		54.96
C		6/27/94	PREMIER PRO		96.00
C	#2240	7/24/94	CLARA'S HOUSE		30.00
C	#1376	9/25/94	GREATER WOR		1,000.00
C	#2513	10/23/94	ILLINOIS RESTAURANT ASSOCIATION	Scholarship Fund	600.00
C	#2577	10/23/94	MEDINAH SHR		100.00
C		10/23/94	REC PETTY CASH		188.38
C		11/20/94	REC PETTY CASH		270.71
TOTAL =					2,530.05

96043764377

15

DEPOSIT TICKET

ADDRESS 
DATE 7-8-92

CURRENCY

COIN

CHECKS (BY SIGNATURE)

2500 00

LAITAC
RETURN

Beverly Hills Regional Office
UNION BANK
9400 Wilshire Blvd., Beverly Hills, CA 90212

TOTAL DEPOSIT 2,500 00

PETER MORTON

TOTAL 2,500 00

HARD ROCK CAFE INVESTORS LTD.
LOS ANGELES

DETACH AND RETURN THIS STATEMENT
IF THE ATTACHED CHECK IS RETURNED UNPAID
OR NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT REQUIRED.

DELUXE FORM WVC-3 V-9

HRC065

DATE	DESCRIPTION	AMOUNT	ACCT NO.	DISTRIBUTIONS	AMOUNT
5/7/92	Reim. donation	\$2,500.00			

PERIOD ENDING	EMPLOYEE				DEDUCTIONS				TOTAL DEDUCTIONS	NET PAY	
	HOURS	RATE	AMOUNT PAID AT REGULAR RATE	OVERTIME AND OTHER	TOTAL EARNINGS	FICA	WITHHELD U.S. INC. TAX	SAL			STATE INC. TAX

VSA

96043164378

OWNER
Hard Rock
CAR

PETER MORTON

MAY 13 1992

Union Bank
Security Plus Program
East Window Building
Beverly Hills, CA 90210

5149

16-77/1220

May 7 19 92

PAY Two Thousand Five Hundred Dollars & no/100 DOLLARS \$ 2,500.00

TO
THE
ORDER
OF

Bob Tannenbaum for District
Attorney
c/o 708 NO. Roxbury
Beverly Hills, CA 90210
016100713 050

[Handwritten Signature]
518920067000

0000250000

95043164379

HRC066

44

POSTAGE

For Deposit Only

Tammenbaum



PSC 1/2
9335314

1220-1
10000
CITY NATL. BANK
1801 W. OLYMPIC BLVD.
LOS ANGELES, CA 90006
TEL (213) 425-7

96043164300

HRC067

45

14

DEPOSIT TICKET

P MORTON

ADDRESS [REDACTED]
DATE 04 MAY 92

CURRENCY		COIN		CHECKS	
DOLLARS	CENTS	DOLLARS	CENTS	DOLLARS	CENTS
16	77			250	—
<i>Reimbursement Donation</i>					
TOTAL		250		—	

Beverly Hills Regional Office
UNION BANK
960 Wilshire Blvd., Beverly Hills, CA 90212

TOTAL DEPOSIT

250 00

PETER MORTON

Union Bank
MAY 4 92
20013-5

TOTAL 250 00

HARD ROCK CAFE INVESTORS LTD.
LOS ANGELES

THE ATTACHING CHECK IS IN PAYMENT OF THE STATEMENT BALANCE.
IF NOT CORRECT PLEASE RETURN TO THE ISSUING OFFICE.
DELUXE FORM WVC-8 V-0

DATE	DESCRIPTION	AMOUNT	ACCT NO.	DISTRIBUTIONS	AMOUNT
4/24/92	Reim. donation	\$250.00			

PERIOD ENDING	EARNINGS			DEDUCTIONS			TOTAL DEDUCTIONS	NET PAY
	HOURS	RATE	AMOUNT	FICA	UNEMPLOYMENT	STATE		

HRC068

1 8 3 4 9 7 3 4 0 3 6

PETER MORTON



Unifon Bank
Member FDIC
Member S&W, CA 99117

April 27 1992

04-27/0250

5108

PAY Two Hundred Fifty Dollars & no/100

DOLLARS \$ 250.00

TO THE ORDER OF

Kostmayer for Congress
85 Old Dublin Pike
Doylestown, PA 18901

⑆00000025000⑆

HRC069

96043764382

FOR DEPOSIT ONLY
KOSTMAYER CAMPAIGN COMMITTEE
KOSTMAYER 1990
PROVIDENT NAT'L BANK 4159012

THIS LINE

96043764383

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PROVIDENT NAT'L BK.
120 S. 17TH ST.
PHILA., PA 19101

MPSC 11/92 06
6546/92
92157166 122000661

HRC070

DEPOSIT TICKET

ADDRESS R. MORTON
 [REDACTED]
 DATE 25 MAR 92 DOLLARS CENTS

CURRENCY
 COIN
 CHECKS 1,000

Union Bank
 Beverly Hills Regional Office
 9440 Wilshire Boulevard
 Beverly Hills, CA 90212

*Full
 Reim.
 Comm.*

UB 016
 MAR 25 1992
 2005200

PETER MORTON

TOTAL DEPOSIT 1,000

4,2

TOTAL 1,000

HAND ROCK CAFE INVESTORS LTD.
 LOS ANGELES

DETACH AND RETAIN THIS STATEMENT
 THE ATTACHED CHECKS IN PAYMENT OF THE AMOUNT CHECKED BELOW
 IF NOT CORRECT PLEASE NOTIFY US PROMPTLY AND RETURN CHECKS

DELUXE FORM WVC-9 V4

HRC071

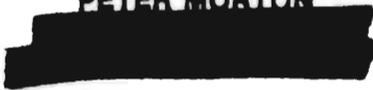
DATE	DESCRIPTION	AMOUNT	ACT NO	DISTRIBUTIONS	AMOUNT
3/24/92	Reim. donation	\$1,000.00			

EMPLOYEE	EARNINGS				DEDUCTIONS				TOTAL DEDUCTIONS	NET PAY
	PERIOD ENDING	HOURS	RATE	AMOUNT	AMOUNT	AMOUNT	AMOUNT	AMOUNT		

VSA

96043764334

PETER MORTON



Union Bank
Branch: 11111 Avenue 100
West Hollywood, California
Branch: 11111, CA 90024

5035

March 23 19 92

16-77/1220

PAY One Thousand Dollars & no/100 DOLLARS \$ \$1,000.00

TO
THE
ORDER
OF

Tom Hayden Senate Campaign
#301A
227 Broadway
Santa Monica, CA 90401



⑈0000 100000⑈

96043764385

HRC072

9 5 0 4 3 7 6 4 3 0 6

Hayden Lane

Credited to the account of the within addressee
payee in accordance with payor's instructions.

Absence of Endorsement Guaranteed
Security MONICA OFFICE

SPENDING accordance with payor's instructions.
Absence of Endorsement Guaranteed

MONICA OFFICE
SECURITY PACIFIC MAY 21 1972



12200004341
MAY 21 1972
0242592

MPSC
03/26/72
20109029

96043764389

PETER MORTON

Union Bank
of California
San Francisco, CA 94103

4729

LAY

16 7/1020

November 18 19 91

PAY Five Hundred Dollars & no/100

DOLLARS \$ 500.00

Kerrey for President
10900 Wilshire Boulevard
Los Angeles, CA 90024

Peter Morton

UNION BANK OF CALIFORNIA
SAN FRANCISCO, CALIFORNIA

re: trunk # 184

⑈000058000⑈

HRC076

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0530-0022-8
0280-0022-8
601-183

NO '91' 25
MPSC

HRC077

26

DEPOSIT TICKET

ADDRESS P. MORTON



DATE 21 June 91 DOLLARS

CURRENCY _____
 COIN _____
 CHECKS 10000

Union Bank
 Beverly Hills Regional Office
 4600 Wilshire Boulevard
 Beverly Hills, CA 90212

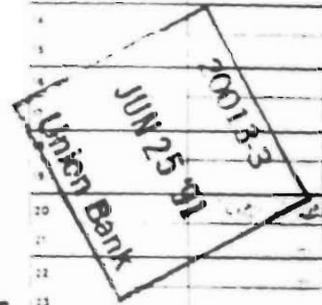
NUMBER USD 62691M0410 \$5,000.00 D



TOTAL DEPOSIT

5,000 00

1.2



PETER MORTON

TOTAL \$5000.00

HARD ROCK CAFE INVESTORS LTD.
 LOS ANGELES

DETACH AND RETAIN THIS STATEMENT
 THE ATTACHED CHECK IS IN POSSESSION OF THE ISSUING ORGANIZATION
 IF NOT CORRECTLY PLEASE NOTIFY US IMMEDIATELY AND RECEIPT OBTAINED
DELUXE FORM WVC-3 V4

HRC078

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT NO	AMOUNT
6/20/91	Reim. donation (Mike Wood)	\$5,000.00		

PERIOD ENDING	EARNINGS				DEDUCTIONS				TOTAL DEDUCTIONS	NET PAY
	HOURS	RATE	AMOUNT EARNED REGULAR PAY	OVERTIME AND OTHER	SAL	S社 AND OTHER TAX				

V9A

96043764321

PETER MORTON



Union Bank
San Francisco, California
Beverly Hills, CA 90212

June 20 19 91

4387

16-771(0220)

HRC079

PAY Five Thousand & no/100

DOLLARS \$ 5,000.00

TO
THE
ORDER
OF

Councilman Mike Woo
Officeholder Account
ID# 890964

⑈0000500000⑈

96043764392

PETER MORTON

Union Bank
Bank of the Pacific
San Francisco, CA 94111

April 8 1992

5078

16 771 1220

PAY One Thousand Two Hundred Fifty Dollars & no/100 DOLLARS \$ 1,250.00

TO
THE
ORDER
OF

Richard M. Daley
Campaign Committee

Peter Morton

⑆0000125000⑆

HRC081

96043764394

96043764395

PSDA 24 011 1008
0211 153111 0710

PAY TO THE ORDER OF
280CRH
CHICAGO TRUST & SAVINGS BANK
CHICAGO, ILLINOIS 60604
FOR DEPOSIT ONLY
RICHARD M. DALEY CAMPAIGN COMMITTEE

111111

PETER MORTON



Union Bank
Member FDIC
Branch: 1000 Wilshire Blvd., Los Angeles, CA 90017

April 26 19 91

16-71/1220

4209

PAY Four Thousand & no/100 DOLLARS \$ 4,000.00

TO THE ORDER OF

Mel Levine for Senate
291 So. La Cienega Blvd.
Suite 212
Beverly Hills, CA 90212

(107)

⑆00004000000⑆

96249724096

PAY TO THE ORDER OF
BANK OF LOS ANGELES
LOS ANGELES, CA 90062
▶ 122239005 ◀
FOR DEPOSIT ONLY
LEVINE CAMPAIGN COMMITTEE
0100081119

96043764397

(213) 550-8900
BANK OF
LOS ANGELES
LOS ANGELES, CA
▶ 122239005 ◀

MAY 14
12200496
MPSC

DN 10Z1 CR ACCT 1061119
05/14/91

HRC085

DEPOSIT TICKET

ADDRESS _____ P. MORTON _____

DATE 30 A _____ COLLARS _____ CENTS _____

CURRENCY _____

COIN _____

CHECKS

1-10-76	1,000 00
1-10-77	1,000 00
1-10-77	1,000 00
1-10-77	1,000 00

Union Bank
Member FDIC
Head Office: 1111 Broadway
New York, NY 10038

0110884 4/30/910110

\$4,000.00 0

ATM, MORTON
P.M.
KING W.D.

APR 30 91

PETER MORTON

TOTAL DEPOSIT

42

TOTAL

4,000 00

PLEASE ENTER TOTAL HERE!

DEPOSITS MAY NOT BE AVAILABLE FOR IMMEDIATE WITHDRAWAL

96043764398

STAND ROCK CAFE INVESTORS LTD.
LOS ANGELES

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF THIS CHECK NUMBER BELOW
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY NO REFUND IS GIVEN

DELUXE FORM WVC-3 V-8

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT NO	AMOUNT
4/29/91	Reimbursement donation Mel Levene-Senate	\$1,000.00		

HRC087

EMPLOYEE

PERIOD ENDING	EARNINGS				DEDUCTIONS				TOTAL DEDUCTIONS	NET PAY
	HOURS	RATE	AMOUNT PAID AS REGULAR RATE	OVERTIME AND OTHER	FICA	WITHHELD U.S. INC. TAX	SDI	STATE INCOME TAX		
VSA										

THE MELROSE CORP.

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF THIS CHECK NUMBER BELOW
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY NO REFUND IS GIVEN

DELUXE FORM WVC-3 V-8

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT NO	AMOUNT
4/29/91	Reimbursement donation Mel Levene-Senate	\$1,000.00		

EMPLOYEE

PERIOD ENDING	EARNINGS				DEDUCTIONS				TOTAL DEDUCTIONS	NET PAY
	HOURS	RATE	AMOUNT PAID AS REGULAR RATE	OVERTIME AND OTHER	FICA	WITHHELD U.S. INC. TAX	SDI	STATE INCOME TAX		
VSA										

66249724096

HARD ROCK CAFE INVESTORS LTD. VII
SAN DIEGO

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW
IF YOU RECEIVE THIS STATEMENT WITHOUT A CHECK, YOU WILL BE RESPONSIBLE FOR PAYING THE
DELUXE FORM DVC-3 V-8

DATE	DESCRIPTION	AMOUNT	ACCT NO	DISTRIBUTIONS AMOUNT
4/29/91	Reimbursement donation Mel Levene-Senate	\$1,000.00		

HRC088

EMPLOYEE

PERIOD ENDING	EARNINGS			DEDUCTIONS			TOTAL DEDUCTIONS	NET PAY
	HOURS	RATE	AMOUNT EARNED AT REGULAR RATE	FICA	EMPLOYER'S SHARE OF SOCIAL SECURITY TAX	STATE INCOME TAX		

HARD ROCK CAFE INV. LTD. II

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW
IF YOU RECEIVE THIS STATEMENT WITHOUT A CHECK, YOU WILL BE RESPONSIBLE FOR PAYING THE
DELUXE FORM WVC-3 V-8

DATE	DESCRIPTION	AMOUNT	ACCT NO	DISTRIBUTIONS AMOUNT
4/29/91	Reimbursement donation Mel Levene-Senate	\$1,000.00		

EMPLOYEE

PERIOD ENDING	EARNINGS				DEDUCTIONS				TOTAL DISTRIBUTIONS	NET PAY
	HOURS	RATE	AMOUNT EARNED AT REGULAR RATE	OT EARNINGS AND OTHER	FICA	EMPLOYER'S SHARE OF SOCIAL SECURITY TAX	STATE INCOME TAX	SDI		

960376400

DEPOSIT TICKET

P. MORTON

ADDRESS [REDACTED]

DATE 3/8/91 TIME 10:00 TELLER 1234

CURRENCY _____
 COIN _____
 CHECKS
 100.00
 100.00
 100.00
 100.00

Union Bank
 Beverly Hills Regional Office
 940 Wilshire Boulevard
 Beverly Hills, CA 90212

ATL Reims

PETER MORTON

TOTAL DEPOSIT 3,000

42

TOTAL 3,000

PLEASE ENTER TOTAL HERE

HARD ROCK CAFE INVESTORS LTD.
 LOS ANGELES

DETACH AND RETAIN THIS STATEMENT
 THE ATTACHED CHECK IS IN PAYMENT OF DEBIT DESCRIBED BELOW
 IF NOT CORRECT PLEASE NOTIFY US IMMEDIATELY AND RECEIPT OBTAINED

DELUXE FORM WVC-3 V-4

89DC089

DATE	DESCRIPTION	AMOUNT	ACT NO	DISTRIBUTIONS	AMOUNT
3/8/91	Reim. donation for Senator Chris Dodd	\$500.00			

PERIOD ENDING	EMPLOYEE				DEDUCTIONS				TOTAL DEDUCTIONS	NET PAY
	HOURS	RATE	AMOUNT	OTHER	FICA	STATE	FEDERAL	STATE		

VISA

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96043764402

PETER MORTON

Union Bank
Member FDIC
1000 Union Bank Building
Berkeley, CA 94701

4088

16 7/12 20

3/7 19 91

PAY FIVE HUNDRED AND NO/100 ***** DOLLARS \$ 500.00

TO
THE
ORDER
OF

FRIENDS OF CHRIS DODDS

[Handwritten Signature]

⑈000050000⑈

DEPOSIT TICKET

ADDRESS: 210 N. ...
LA ...

CURRENCY	CHECKS	COIN	DATE	AMOUNT
	20.00	1,159.44	9/18/90	1,179.44
	1,000.00			1,000.00
				1,000.00

20018 11
SEP 19 90
UNION BANK

TOTAL
3,417.24

Union Bank
Beverly Hills Regional Office
9400 Wilshire Boulevard
Beverly Hills, CA 90212

PETER MORTON

TOTAL DEPOSIT: 3,417.24

42

HARD ROCK CAPE INVESTORS LTD.
LOS ANGELES

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

DELUXE FORM WVC-3 V-6

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT NO.	AMOUNT
9/18/90	reimbursement for donation to support Arlo Smith for Attorney General	\$1,000.00		

EMPLOYEE

ACCT ENDING	EARNINGS				TOTAL EARNINGS	DEDUCTIONS				TOTAL DEDUCTIONS	NET PAY
	HOURS	RATE	AMOUNT EARNED AT REGULAR RATE	OVERTIME AND OTHER		FICA	WITHHOLDING U.S. INC. TAX	S&C	STATE INCOME TAX		

HARD ROCK CAPE INVESTORS LTD.
LOS ANGELES

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

DELUXE FORM WVC-3 V-6

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT NO.	AMOUNT
9/18/90	reimbursement for donation to support Diane Feinstein for Governor	\$1,000.00		

EMPLOYEE

PERIOD ENDING	EARNINGS				TOTAL EARNINGS	DEDUCTIONS				TOTAL DEDUCTIONS	NET PAY
	HOURS	RATE	AMOUNT EARNED AT REGULAR RATE	OVERTIME AND OTHER		FICA	WITHHOLDING U.S. INC. TAX	S&C	STATE INCOME TAX		

95043764404

PETER MORTON

Union Bank
Member FDIC
Branch: N.O. CA 0011

9/17 19 90

16-771/0220

3646

PAY ONE THOUSAND AND NO/100***** DOLLARS \$ 1,000.00

TO THE ORDER OF

DIANE FEINSTEIN FOR GOVERNOR
3540 Wilshire Blvd.
Suite 312
Los Angeles, CA 90010

ID #890035



⑈0000100000⑈

HRC093

96043164405

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FOR DEPOSIT ONLY
FEINSTEIN FOR GOVERNOR
COMMITTEE
FPPC I.D. #990035
OPERATING ACCOUNT
00330 24776

SE '90 28 | 01 '90 01
BANK OF AMERICA
1455 MARKET ST.
SAN FRANCISCO, CA
NCS

9 6 0 4 3 7 6 4 4 0 8

Arlo Smith for Attorney General

I. D. # 890109

143-85101-14

Thank You!

SE 90 28

NC: (

SE 90 27

SPNB-SF-HOC
121000044
PAY ANY BANK P.E.B.

HRC096

DEPOSIT TICKET

ADDRESS 510 N. Hollywood Blvd
LA 90048

DATE 9-14-90 DOLLARS 1000 CENTS 00

CURRENCY /

COIN /

CHECKS 1677 1000

Union Bank
 Beverly Hills Regional Office
 9640 Wilshire Boulevard
 Beverly Hills, CA 90212

001088H 447 91490M097 \$1000.00 0



TOTAL DEPOSIT 1000

1.2

PETER MORTON

SEP 12 1990

TOTAL 1000

HARD ROCK CAFE INVESTORS LTD.
 LOS ANGELES

DETACH AND RETAIN THIS STATEMENT
 THE ATTACHED CHECK IS IN PAYMENT OF THIS DEBIT FROM BELOW
 IF NOT CORRECTLY PLEASE NOTIFY US PROMPTLY AND WE'LL REVERSE IT

DELUXE FORM WVC-3 V-6

HRC097

DATE	DESCRIPTION	AMOUNT	ACCT NO	DISTRIBUTIONS AMOUNT
9/14/90	reimbursement for donation to Councilman Zev. Yoroslavsky	\$1,000.00		

PERIOD ENDING	EARNINGS				DEDUCTIONS				TOTAL DEDUCTIONS	NET PAY
	HOURS	RATE	AMOUNT EARNED AT REGULAR RATE	OVERTIME AND OTHER	FICA	UNEMPLOYMENT INS. & SOC. SEC. TAX	SAL	STATE INCOME TAX		

60449724096

PETER MORTON



Union Bank
Member FDIC
Branch Office
10000 Wilshire Blvd
Beverly Hills, CA 90212

9/14 1990

16 771 0220

3640

PAY ONE THOUSAND AND NO/100***** DOLLARS \$ 1,000.00

TO THE ORDER OF CITIZENS FOR A LIVABLE LOS ANGELES

ID #860660



Peter Morton

#00001000000

HRC098

01469124096

DEPOSIT TICKET

ADDRESS [REDACTED]
 DATE 26 Sept 90 DOLLARS CENTS

CURRENCY	COIN	CHECKS
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Union Bank
 Beverly Hills Regional Office
 9649 Wilshire Boulevard
 Beverly Hills, CA 90212

ACCOUNT 329 9069001111 \$500.00 0

TOTAL DEPOSIT

42 500

PETER MORTON

TOTAL

PLEASE ENTER TOTAL HERE

HARD ROCK CAFE

DETACH AND RETAIN THIS STATEMENT
 THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW
 IF NOT CORRECT PLEASE NOTIFY US PROMPTLY AND RECEIPT RETURNED
 DELUXE FORM WVC-3 V-2

HRC099

DATE	DESCRIPTION	AMOUNT
9/6/90	reimbursement for contribution to Harvey Gant <i>U.S. SENATE</i>	\$500.00

V-2

96043764411

PETER MORTON



Union Bank
Member FDIC
Member NCUA
Member SBA
Member CA 9885

3619

18-77/1220

9/6 19 90

PAY FIVE HUNDRED AND NO/100 ***** DOLLARS \$ 500.00

TO
THE
ORDER
OF

HARVEY GANTT FOR SENATE
Campaign Committee
700 E. Stonewall St.
Charlotte, NC 28202

RPE



#0000050000

960437644

HRC100

96043764413

ADDRESS [REDACTED]
DATE 06 JUL 89

CURRENCY [REDACTED]
COIN [REDACTED]
CHECKS
16.77 13.00 =
16.77 2.00 =

Union Bank
010688K 421100689M1370 \$17,000.00 0

TOTAL DEPOSIT 17,000

PETER MORTON

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2013-10
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TOTAL 17,000

DEPOSITS MAY NOT BE AVAILABLE FOR IMMEDIATE CASH

HARD ROCK CAFE INVESTORS LTD. DETACH AND RETAIN THIS STATEMENT
LOS ANGELES THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW
IF NOT COMPLETELY PAID BY THE END OF THE MONTH, THIS RECEIPT IS VOID

DELUXE FORM NWC-3 V-6

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT NO	AMOUNT
10/5/89	reimbursement to Peter for Gala dinner for Bill Bradley (for U.S. Senate)	\$2,000.00		

EMPLOYEE PERIOD ENDING	EARNINGS			DEDUCTIONS				NET PAY	
	HOURS	RATE	AMOUNT EARNED AS REGULAR PAY	TOTAL EARNINGS	FICA	RETROACTIVE U.S. INC TAX	S.S.I.		STATE INCOME TAX

PETER MORTON



Union Bank
MEMBER OF THE FEDERAL RESERVE SYSTEM
HEAD OFFICE BOSTON
BOSTON, MASS. 02112

2666

10/3 19 89

18-77/200
1220

PAY TWO THOUSAND AND NO/100***** DOLLARS \$ 2,000.00

TO
THE
ORDER
OF

TARLTON PAULEY



⑈0000200000⑈

96043764414

HRC102

PETER MORTON



Union Bank
Security First Regional Office
and Future Boulevard
Seattle, WA, USA 98112

2674

10/5 1989

16-77-200
1220

PAY TWO THOUSAND AND NO/100***** DOLLARS \$ 2,000.00

TO
THE
ORDER
OF

BILL BRADLEY FOR U.S. SENATE



⑈0000200000⑈

96043764415

HRC103

DEPOSIT TICKET

NOTICE: ...

ADDRESS 5100 Wilshire Blvd

DATE 10/6/88

CURRENCY _____
 COIN _____
 CHECKS 1000.00

Beverly Hills - West Los Angeles Regional Office
UNION BANK
 5100 Wilshire Blvd, Beverly Hills, CA 90212

0108000100010070800000

TOTAL \$500.00 DEPOSIT

PETER MORTON

Reimbursement
For, McCarthy
Lunch Contribution

Union Bank
 OCT 07 1988
 20013 10

TOTAL 500.00

DETAILS AND RETAIN THIS STATEMENT
 THE ATTACHED CHECK IS THE ONLY RECEIPT FOR THIS DEPOSIT
 IF NOT CORRECT PLEASE NOTIFY THE BRANCH IMMEDIATELY

HARD ROCK CAFE

DELUXE FORM WVC-3 V-2

DATE	DESCRIPTION	AMOUNT
10-6-88	reimburse Peter for contribution McCarthy	\$500.00

96043764416

.2

DEPOSIT TICKET

ADDRESS: [REDACTED]
 DATE: 3-2-89
 CURRENCY: DOLLARS
 COIN: [REDACTED]
 CHECKS: 15,000.00
 15,200.00
 500.00
 400.00
 300.00
 200.00
 100.00
 50.00
 25.00
 12.50
 6.25
 3.125
 1.5625
 0.78125
 0.390625
 0.1953125
 0.09765625
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DONATION XLS

HRC106

		P = Political C = Charitable M = Miscellaneous / Unidentified			
		1988			
Donations	CK#	Date	Payee	Comment	Amount
P	7588	1/19/88	Denise Zimmer	Reimb. Steve Saltzman for City Council	500.00
P	7717	3/18/88	Peter Morton		1,000.00
P	7854	5/11/88	Peter Morton		1,000.00
P	7881	5/13/88	Peter Morton		250.00
P	7882	5/20/88	Hilary Rice	Assume Steve Saltzman	500.00
P	7921	6/6/88	Peter Morton		500.00
P	8114	8/30/88	Friends of Kathleen Brown		500.00
P	8231	10/6/88	Peter Morton	Reimb. Leo McCarthy	500.00
P	8273	10/17/88	Peter Morton		500.00
P	8490	12/16/88	Robert Brown	Reimb. Steve Saltzman for City Council	500.00
P	8489	12/16/88	Alan Mazursky	Reimb. Steve Saltzman for City Council	500.00
Subtotal					6,250.00
C	7524	1/8/88	Greenpeace		200.00
C	7584	1/22/88	City of Hope		30.00
C	7685	3/2/88	So. Coalition		25.00
C	7731	3/28/88	CA Fire Book		250.00
C	7757	4/8/88	Wpoal/ Stateline		75.00
C	7807	4/25/88	Transafrica Forum		35.00
C	7871	5/19/88	Citizen for a Livable Los Angeles		100.00
C	7887	5/24/88	National Coalition to Ban Handguns		50.00
C	7909	6/2/88	World Jewish Congress		50.00
C	7922	6/8/88	LA County Welfare		50.00
C	7993	7/14/88	R F Kennedy Foundation		100.00
C	8030	8/2/88	Tree People		25.00
C	8067	8/15/88	Heal the Bay		250.00
C	41JE	8/21/88	Remove Cost From LAX / re AJE		125.00
C	8142	9/9/88	KCET		50.00
C	8141	9/9/88	So. Poverty Law Center		25.00
C	8205	9/23/88	Share Our Strength		250.00
C	8220	10/4/88	Handgun Control		50.00
C	8229	10/6/88	Citizens for Liable L. A.		1,000.00
C	8255	10/13/88	League of Conservation Voters		50.00
C	8254	10/13/88	Save the Children		192.00

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DONATION XLS

HRC107

C	8271	10/17/88	SCEC Coalition 88		100.00
C	8270	10/17/88	Lucy Blake		100.00
C	59JE	10/23/88	Rec Donation Made To C		372.63
C	8315	11/2/88	Southern Poverty Law Center		25.00
C	8333	11/9/88	Intl Planned Parenthood		100.00
C	8345	11/11/88	Greenpeace USA		1,000.00
C	8346	11/11/88	The World Wildlife Fund		1,000.00
C	47061	12/1/88	Marki		343.40
C	8468	12/12/88	Fund for a Free South Africa		100.00
C	8466	12/12/88	Natural Resources Defense Council		100.00
				Subtotal	6,223.03
				Total	12,473.03
					805.00
					11,668.03
	1989				
CK#	Date	Payee	Comment	Amount	
P	1044	2/13/89	Citizens for Michael Woo	500.00	
P	99JE	3/26/89	To Record Manual Check	500.00	
P	99JE	3/26/89	To Record Manual Check	500.00	
P	99JE	3/26/89	Nat'l Coalition to Ban Handgun	100.00	
P	1203	4/23/89	Fair Rep. for Bond Issues	250.00	
P	1227	4/23/89	ACLU	50.00	
P	1220	4/23/89	Calif. Safe Streets Weapons	50.00	
P	1574	7/26/89	People for The American Way	250.00	
P	1663	8/17/89	California Democratic Party	5,000.00	
P	1702	9/5/89	1993 Friends of Mike Woo	500.00	
P	1826	10/12/89	Friends of Councilman Paul Koontz	250.00	
P	2032	12/14/89	Kathleen Brown for State Treasurer	1,000.00	
			Subtotal	8,950.00	
M	13CR	3/26/89	Received Misc. Deposit	(678.00)	
M	99JE	3/26/89	To Record Manual Check/ Carla Moore	211.50	
			Subtotal	(466.50)	
C	8570	1/12/89	Police, Fire Charity	350.00	
C	8573	1/13/89	Natural Resource Dev Council	100.00	
C	8601	1/24/89	Quest	200.00	

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DONATION XLS

P	2574	5/31/90	Van De Camp 90		1,000.00
P	2723	8/6/90	Educational Fund to End Handgun Violence		125.00
P	CD000343	8/6/90	National Restaurant Assoc		150.00
P	2782	8/28/90	James P. Rees	Reim. Restaurant & Assoc	150.00
P	2827	9/12/90	Yes on 128 Big Green		500.00
P	2831	9/14/90	Peter Morton	Reim Zev Yaroslavsky	1,000.00
P	2836	9/18/90	Peter Morton	Reim. Ario Smith: Atty General	1,000.00
P	2837	9/18/90	Peter Morton	Reimb - Dianne Feinstein Governor	1,000.00
P	2844	9/20/90	Calif League of Conservation Voters		200.00
P	2875	10/10/90	Yes on 128 - Big Green		10,000.00
P	2882	10/11/90	Resolution Against N.H. Poker Casino		100.00
				Subtotal	17,825.00
M	175GL	1/28/90	Accrue Imo Accounting	Misclass	4,500.00
M	GL385940	10/28/90	Rcrrd P/C Payout		141.83
M	GL430242	12/30/90	Rcrrd Pt Pyots 12/30		150.00
				Subtotal	4,791.83
C	2372	4/2/90	Peter Morton	Reimb. for Trans Africa Forum	2,500.00
C	2225	2/6/90	Rain Forest Foundation		4,000.00
C	2241	2/13/90	W. Hollywood Shrifts Fund		50.00
C	2243	2/13/90	Peter Morton	Reimb. Sting (Rain Forest Concert)	500.00
C	2255	2/19/90	Habitat for Humanity Int'l		25.00
C	2254	2/19/90	KCET		100.00
C	2285	2/22/90	Levy & Parzanti Assoc	Homeless Benefit	500.00
C	2320	3/12/90	Phoenix House		250.00
C	2330	3/15/90	Life Saver fo Adam Brock		50.00
C	213GL	4/1/90	Xscans		107.75
C	2373	4/2/90	AIDS Dance a Thon		50.00
C	2542	5/18/90	W. Hollywood Homeless Organization		100.00
C	2584	6/8/90	Univ of Denver - HRC Scholarship		11,950.00
C	2769	8/23/90	Sierra Club Legal Defense Fund		250.00
C	GL337310	8/26/90	Record August C/R	Recycling	(708.00)
C	2799	9/5/90	CA Special Olympics	From Recycling	500.00
C	2800	9/5/90	American Cancer Society		200.00
C	2839	9/19/90	Charles Daniel	Donation to Trust from Recycling	600.00
C	2889	10/15/90	Calmont School Library Fund		200.00
C	2888	10/15/90	NRDC		1,015.54
C	GL384450	10/28/90	R/C Recycling Incm Oct		(800.00)
C	2968	11/25/90	Fire Fight Assoc		200.00
C	3067	12/30/90	Hard Rock Cafe	Memorial Fund E. Redorguez	350.00
				Subtotal	22,192.29

HRC109

DONATION XLS

HRC110

					Total
					44,809.12
					300.00 off
	1991				
	CHK#	Date	Payee	Comment	Amount
P	3259	3/29/91	James P. Rees	Reimb. Restaurant & Assoc.	100.00
P	3271	3/29/91	Peter Morton	Reimb. Senate Chris Dodd	500.00
P	3397	5/26/91	Peter Morton	Reimb. Mel Levine Senate	1,500.00
P	3544	6/30/91	Peter Morton	Reimb. Mike Woo Campaign	5,000.00
P	AP001689	7/28/91	0591 07/25/91 James P. Rees	Reimb. Restaurant & Assoc.	150.00
				Subtotal:	6,750.00
M	GL462140	1/27/91	Rerd P/C Payouts		100.00
M	GL509417	2/25/91	Void Old AP Checks		(150.00)
				Subtotal:	(50.00)
C	3257	3/29/91	AIDS IDC Unit		500.00
C	3336	4/26/91	T J. Martel Foundation		125.00
C	3375	4/26/91	Donation from Recycling		500.00
C	3387	4/26/91	LA Youth Project		90.00
C	GL546382	4/28/91	Rerd Rainforest Donation		10,000.00
C	3511	6/30/91	B.H. Little League Sponsorship		200.00
C	3557	6/30/91	Univ of Denver	Scholarship	12,852.00
C	3605	7/26/91	Plan International		264.00
C	3707	8/25/91	City of Hope		2,500.00
C	3765	9/29/91	L.A. Center for Living		1,000.00
C	3786	9/29/91	Muscula Dystrophy Fund		100.00
C	3815	10/27/91	Univ of Denver	Scholarship	12,852.00
C	3827	10/27/91	ISIS Fund/ Walden Woods		2,000.00
C	3832	10/27/91	American Cinematheque		250.00
C	3879	10/27/91	Entl Service	Tickets fo Walden Woods	300.00
				Subtotal:	43,533.00
				Total:	50,233.00
					50,133.00
					100.00

9 6 0 4 3 7 6 4 4 2 2

DONATION XLS

HRC121

1992					
	CK#	Date	Payee	Comment	Amount
P	AP4304	2/28/92	Peter Morton	Reimb. Tom Hayden for Senate	1,000.00
P	AP4243	2/28/92	I.R.P.A.C. Fundraiser		600.00
P	AP4381	4/26/92	Peter Morton	Reimb. Kostmayer for Congress	250.00
P	AP4329	4/26/92	James P. Rees	Reimb. Restaurant Assoc.	150.00
P	AP4424	5/4/92	Peter Morton	Reimb. Bob Tannenbaum for D.A.	2,500.00
P	AP081392	8/23/92	Peter Morton	Reimb. Tony Bellerson for Congress	1,000.00
P	AP1128	9/27/92	Peter Morton	Reimb. Gephard for Effective Government Committe	1,666.87
P	AP1108	9/27/92	Gil Garcetti for D.A.		2,000.00
P	AP1113	9/27/92	Peter Morton	Reimb. Democratic Senate Campaign	1,666.66
P	AP101392	10/25/92	Alan Mazursky	Reimb. Karen Shepherd for Congress	500.00
P	AP100692	10/25/92	Nate Holden for Mayor		1,000.00
P	AP112492	12/27/92	Kathleen Brown		5,000.00
Subtotal:					17,333.33
M	AP4244	2/28/92	Pedro Varga		130.00
M	AP100692	10/25/92	Offside		627.85
Subtotal:					757.85
C	AP30482	3/29/92	Heal The Bay		2,000.00
C	AP060292	6/28/92	Lifestarts Cedrinella Hospital		1,000.00
C	AP060292	6/28/92	Library Foundation of Los Angeles		500.00
C	GL000029	6/28/92	To Rec. Payouts For June		240.00
C	AP4618	7/26/92	University of Denver		13,572.00
C	AP1111	9/27/92	Forest Fund c/o Pomona Fire Fighters Assoc.		1,000.00
C	AP111092	11/22/92	MDA		50.00
C	AP102792	11/22/92	Peter Morton	Reimb. APLA	454.54
Subtotal:					18,810.54
Total:					36,907.72
					6,841.20
					30,066.52
1993					
	CK#	Date	Payee	Comment	Amount
M	AP012693	2/21/93	Mildred Hillard		100.00

9 5 0 4 3 7 6 4 4 2 3

DONATION XLS

HRC113

C	AP2065	1/23/94	Curtis Smith		1,700.00
C	AP2028	1/23/94	AIDS Project Los Angeles		5,000.00
C	AP010794	1/23/94	Naacp		1,000.00
C	AP2178	3/27/94	The Country Music Foundation		1,000.00
C	AP9031	4/24/94	T J Martel Foundation		12,500.00
C	AP041994	4/24/94	Do Something Inc		10,000.00
C	AP040794	4/24/94	American Oceans Campaign		1,500.00
C	AP051894	5/22/94	Library Foundation		10,000.00
C	AP26103	6/26/94	Visual Image Products		(297.98)
C	AP2275	6/26/94	Fraternal Order of Police		575.00
C	GL000081	7/24/94	Edward Van Halen Charity Golf		4,855.00
C	AP010188	7/24/94	Visual Image		38.00
C	AP2327	7/24/94	Texas Wildlife Rehabilitation Fund		25.00
C	AP2339	8/21/94	America Cinertheatre		3,000.00
C	GL000017	8/22/94	1060 Ck#2044	NAACP	1,000.00
C	AP2367	9/25/94	University of Denver		15,000.00
C	AP2358	9/25/94	Cal Fire Service Review		795.00
C	AP2368	9/25/94	American Cancer Society		100.00
C	AP2369	9/25/94	A Y S O Region 76		250.00
C	AP010685	10/23/94	Visual Image Products		101.41
C	AP100494	10/23/94	The Friendly Hand Foundation		500.00
C	AP100794	10/23/94	Sysco Food		560.00
C	AP941867	10/23/94	Winterland		498.47
C	AP2385	10/23/94	American Film Institute		500.00
C	AP928297	11/20/94	Winterland		223.97
C	AP929612	11/20/94	Winterland		28.00
				Subtotal:	70,450.19
				Total:	84,537.69

SUMMARY

	Political	Misc	Charitable	Total
1988	6,250.00	0.00	6,223.03	12,473.03
1989	8,950.00	(466.50)	28,275.00	36,758.50
1990	17,825.00	4,791.83	22,192.29	44,809.12
1991	6,750.00	(50.00)	43,533.00	50,233.00
1992	17,333.33	757.85	18,816.54	36,907.72
1993	0	200.00	28,779.43	28,979.43
1994	13,687.50	400.00	70,450.19	84,537.69
TOTAL	70,795.83	5,633.18	218,289.48	294,698.49

9 6 0 4 3 7 6 4 4 3 5

PAY ONE HUNDRE

TO THE
ORDER
OF

Quest
584 Rosemont Ave.
Pasadena, CA 91103

VOID AFTER 60 DAYS

NOT NEGOTIABLE

WEST BORN ONE HUNDRED CTS.
LOS ANGELES

ISSUED FOR THE

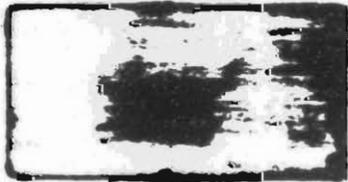
DATE

AMOUNT

8/15/88

QUEST INC. PASADENA, CALIF. THE FOLLOWING IS A
REPRODUCTION OF THE ORIGINAL CHECK WHICH WAS
DEPOSITED INTO THE ACCOUNT OF QUEST INC. ON 8/15/88

96043764426



HARD ROCK CAFE
MANUAL CHECK REQUEST FORM

DATE: 8/17/89

INDIVIDUAL REQUESTING CHECK: Peter Martin

RESTAURANT ON WHICH CHECK DRAWN: HRC - HLL

DISTRIBUTION: Send to Payee AMOUNT \$ 100.00

Return to individual requesting check or return to _____

DESCRIPTION Donation to Quest to raise funds for research & provide res. of

PAYEE (as to appear on check): Quest

ADDRESS (if to be sent): 584 Rosemont Ave.
Pasadena, CA. 91103

facilities in So. Ca.
In support for ch.
and adults with
with Prader-Willi
drome (of unresoc
origin & is assoc. w/
mental retardation at
varying levels)

AUTHORIZATION: 

FOR ACCOUNTING USE ONLY

Checks

Trans. # _____

Rest. # _____

Rest. # _____

Paid Invoice # _____

Vendor # 0675

Dr. Liability _____

Check # _____

G/L Account 9465

Check Date 1/1

Direct Expense _____

Amount \$ _____

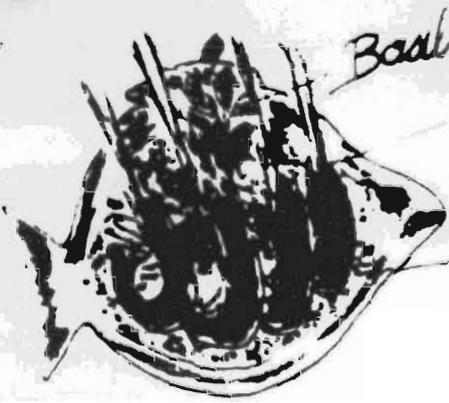
Description _____

Cash Account _____

MAILED
8.18.89

96043764427

96043764428



Basil

Shrimp

Basil
Tomato
Mousseline

Spago

California Cuisine

Pears

Caramel Sauce

Puff Pastry



California

Vegetables



Baby Lamb

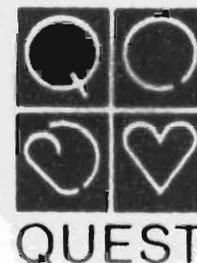
Wally & Bob '80

FOUNDERS

Antoinette Campoy - Ann Scott

BOARD OF DIRECTORS

Chairman	Antoinette Campoy
Treasurer	Anne Scott
President	Emell Shapiro
Vice President	Darrien Earle
Special Events	Lisa Popel
Corresponding Secretary	Laura Aldridge
Ways and Means	Katrina Campoy
Publicity	Whitney Chasin
Entertainment	Lienkie Kutash
Membership	Barbara Laykin
Social Chairman	Janice Pennington de Abreu
Theme Design	Linda Scheff
Recording Secretary	Dori Schneider



HRC117

Please join us
for our Third Luncheon
with

Wolfgang Puck

Spago

1114 Horn Avenue
Corner of Sunset Boulevard
Los Angeles

Friday, September 15th, 1989
11:30 a.m.

Cooking demonstration
followed by a
scrumptious lunch,
both prepared by
Wolfgang Puck

HONORARY BOARD

Maud Adams	Susan Day	Ali McGraw
Marcus Allen	Linda Evans	Ed & Victoria Mc Mahon
Lee Bailey Esq	Robert Evans	David Niven Jr
Polly Bergen	Fredric & Corinna Fields	Sidney Pollock
Elaine Brown	Shirley Fonda	Jill St. John
Henry Burdick	George Hamilton	Marianne & Kenny Rogers
Glenn Casady	Lee Corcoran	Melody Rogers
Cher	Reggie Jackson	Doy & Dale Rogers
Francesca Clancy	Shirley Jones	O.J. Simpson
Genny & Allison Davis	Tommy Landra	Robert Wagner

**Great Raffle
Prizes**

**A "Grand"
Jackpot Draw!**

Reservations Limited!

9 6 0 4 3 7 6 4 4 9

9604376443C

Our organization needs your support for children and adults afflicted with Prader-Willi Syndrome. Prader-Willi Syndrome (PWS) is of unknown origin and is associated with mental retardation at varying levels. It is caused by a brain dysfunction which affects cognitive processes, growth, erratic behavior, obesity, and in some cases, premature death.

Our organization needs your support for research and to provide a residential facility in Southern California.

PAY FIFTY

TO
THE
ORDER
OF

Handgun Control
P.O. Box 96638
Washington, D.C. 20090-6637

NOT NEGOTIABLE

FEDERAL RESERVE NOTE
SERIAL NO.

DATE

AMOUNT

2/18/88

1000 Federal of ...
Control

9
6
0
4
3
7
6
4
4
3
1



HARD ROCK CAFE
MANUAL CHECK REQUEST FORM

DATE: 7/18/89

INDIVIDUAL REQUESTING CHECK: Peter Morton

RESTAURANT ON WHICH CHECK DRAWN: HRC - ALL

DISTRIBUTION: Send to Payee AMOUNT \$ 50.00

Return to individual requesting check or return to _____

DESCRIPTION 1989 Renewal of support towards Handgun
PAYEE (as to appear on check): Handgun Control Centre

ADDRESS (if to be sent): P.O. Box 96638
Washington, D.C.

AUTHORIZATION 
Peter Morton

.....

FOR ACCOUNTING USE ONLY

Checks

Trans. # _____

Rest. # _____

Rest. # _____

Paid Invoice # _____

Vendor # 0675

Dr. Liability _____

Check # _____

G/L Account 9465

Check Date 7/1/89

Direct Expense _____

Amount \$ _____

Description _____

Cash Account _____

MAILED

7/19/89

9604376432

1966 RENEWAL STATEMENT

MR PETER MORTON

The minimum annual contribution is \$10.00 or more enable you to enjoy the full privileges of Handgun Control.

Please make your check out to Handgun Control and return with this form to P O Box 96638, Washington, D C 20090-6638.

Contributions to Handgun Control, Inc. are not tax deductible.

96043764433

PAGE ONE HUNDRE

TO
THE
ORDER
OF

KCET
P.O. Box 3728
Escondido, CA 9202 5-0928

96043764434



HARD ROCK CAFE
MANUAL CHECK REQUEST FORM

DATE: 7 / 10 / 89

INDIVIDUAL REQUESTING CHECK: Peter Marton

RESTAURANT ON WHICH CHECK DRAWN: HRC - LA

DISTRIBUTION: Send to Payee AMOUNT \$ 100.00

Return to individual requesting check or return to _____

DESCRIPTION Contribution to support KCET's future

PAYEE (as to appear on check): KCET

ADDRESS (if to be sent): P.O. Box 3728

Escondido, CA.

92025-0928

AUTHORIZATION: *Peter Marton*

FOR ACCOUNTING USE ONLY

Checks

Trans. # _____

Rest. # _____

Rest. # _____

Paid Invoice # _____

Vendor # 10675

Dr. Liability _____

Check # _____

G/L Account 9165

Check Date: 7 / 1 / 89

Direct Expense _____

Amount \$ _____

Description _____

Cash Account _____

MAILED
7/17/89

960437614435

ONE WORD

TO
THE
ORDER
OF

Nicaragua Network

NOT NEGOTIABLE

96043764436



HRC124

HARD ROCK CAFE
MANUAL CHECK REQUEST FORM

DATE: 7 17 89

INDIVIDUAL REQUESTING CHECK: Peter Norton

RESTAURANT ON WHICH CHECK DRAWN: HRC - ALL

DISTRIBUTION: Send to Payee AMOUNT \$ 100.00
 Return to individual requesting check or return to _____

DESCRIPTION Contribution to support save the lives of Nicarag.
PAYEE (as to appear on check): Nicaragua Network children
ADDRESS (if to be sent): Suite 212
2025 I Street, N.W.
Washington, D.C. 20007-2840

AUTHORIZATION: *Peter Norton*

FOR ACCOUNTING USE ONLY

Checks

Trans. # _____

Rest. # _____

Rest. # _____

Paid Invoice # _____

Vendor # 0675

Dr. Liability _____

Check # _____

G/L Account 9465

Check Date 7/17/89

Direct Expense _____

Amount \$ _____

Description _____

Cash Account _____

MAILED
7/17/89

96043764437

ONE HUNDRED DOLLARS EVEN

TO THE ORDER OF

Heal the Bay
1658 A Tenth Street
Santa Monica, CA 90404

NOT NEGOTIABLE

HEAL THE BAY FOUNDATION INC.
LOS ANGELES

ENTERED

96043764438



HARD ROCK CAFE
MANUAL CHECK REQUEST FORM

DATE: 4/18/89

INDIVIDUAL REQUESTING CHECK: Peter Morton

RESTAURANT ON WHICH CHECK DRAWN: HRC - LA

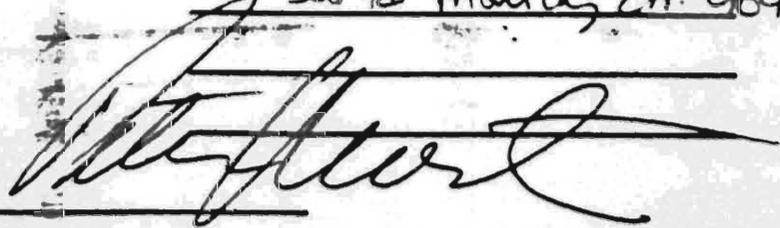
DISTRIBUTION: Send to Payee AMOUNT \$ 100

Return to individual requesting check or return to _____

DESCRIPTION Contribution to save Santa Monica Bay

PAYEE (as to appear on check): Heal the Bay

ADDRESS (if to be sent): 1650 A Tenth Street
Santa Monica, CA 90404

AUTHORIZATION: 

.....

FOR ACCOUNTING USE ONLY

Checks

Trans. # _____

Rest. # _____

Rest. # _____

Paid Invoice # _____

Vendor # 0675

Dr. Liability _____

Check # _____

G/L Account 9465

Check Date 4/18/89

Direct Expense _____

Amount \$ _____

Description _____

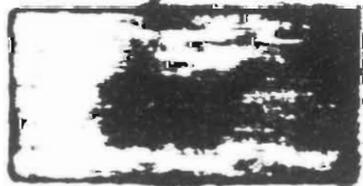
Cash Account _____

96043764439

TO
THE
ORDER
OF

NRDC
P.O. Box 96048
Washington, D.C. 20097-7848

960437644C



HARD ROCK CAFE
MANUAL CHECK REQUEST FORM

DATE: 3, 8, 89

INDIVIDUAL REQUESTING CHECK: Peter Martin

RESTAURANT ON WHICH CHECK DRAWN: HRC - ALL

AMOUNT: 200 00

DISTRIBUTION: Send to Payee
 Return to individual requesting check or return to _____

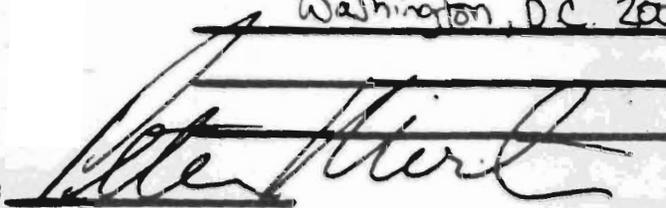
DESCRIPTION: Contribution to Natural Resources Defense Council

PAYEE (IS TO ORDER OF CHECK): NRDC

ADDRESS (IF TO BE SENT): P.O. Box 96048

Washington, D.C. 20077-7438

To stop illegal dumping of medical waste, industrial & raw materials into our coastal water

AUTHORIZATION: 

.....

FOR ACCOUNTING USE ONLY

Checks

Trans. \$ _____
Recd. \$ _____
Vendor \$ 165 _____
Check \$ _____
Credit Card _____
Amount \$ _____
Destination: _____
Cash Account _____

Recd. \$ _____
Paid Invoice \$ _____
Gr. Liability _____
C/L Account 9465 _____
Direct Expense _____

9604376441

WE MUST SAVE OUR BEACHES AND OCEANS!!

I'm shocked and disgusted by the illegal dumping of medical waste, industrial toxics and even raw sewage into our nation's coastal waters. This terrible health hazard is destroying some of our most beautiful seashores.

Mr. Peter Morton
510 North Robertson Boulevard
Los Angeles, CA 90048

00146098 A9210



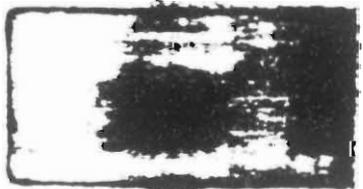
96043764412



HRC130

Doris Day Animal League
111 Massachusetts Ave. N.W.
Washington, D.C. 20001

9 6 0 4 3 1 6 4 4 1 3



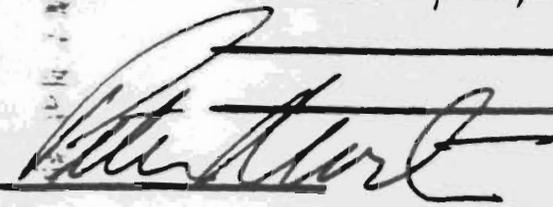
HARD ROCK CAFE
MANUAL CHECK REQUEST FORM

DATE: 2, 21 89

INDIVIDUAL REQUESTING CHECK: Peter Morton
RESTAURANT ON WHICH CHECK DRAWN: HRC - AL
AMOUNT: 50.00

DISTRIBUTION: Send to Payee
 Return to individual requesting check
or return to _____

DESCRIPTION: Donation TO Doris Day Animal League • TC STOP
PAYEE (is to accept or check): Doris Day Animal League *Mime*
ADDRESS (if to be sent): 111 MASS. AVE. NW *file*
Washington, D.C. 20001

AUTHORIZATION: 

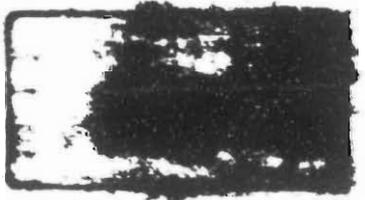
.....

FOR ACCOUNTING USE ONLY

Checks
Trans. \$ _____ Rest. \$ _____
Rest. \$ _____ Paid Invoice \$ _____
Vendor \$ 7.50 Dr. Liability _____
Check \$ _____ C/L Account 9465
Check Date ____/____/____ Direct Expense _____
Amount \$ _____
Description _____
Cash Account _____

9604376444

9 6 0 4 3 7 6 4 4 5



HRC133

HARD ROCK CAFE
MANUAL CHECK REQUEST FORM

DATE: 6/21/85

INDIVIDUAL REQUESTING CHECK: Peter Morton

RESTAURANT ON WHICH CHECK DRAWN: HRC - CA.

DISTRIBUTION: Send to Payee AMOUNT \$ 1,000.00

Return to individual requesting check or return to _____

DESCRIPTION Contribution to support Kathleen Brown's camp

PAYEE (as to appear on check): Kathleen Brown for State Treasurer 190 Tax State Treas

ADDRESS (if to be sent): 8075 W. Third St.

Suite 402

LA, CA 90048

AUTHORIZATION: 

FOR ACCOUNTING USE ONLY

Checks

Trans. # _____

Rest. # _____

Rest. # _____

Paid Invoice # _____

Vendor # 0675

Dr. Liability _____

Check # _____

G/L Account 9465

Check Date 1/1

Direct Expense _____

Amount \$ _____

Description _____

Cash Account _____

9604376446

KATHLEEN
BROWN

June 9, 1989

Mr. Peter Morton
510 N. Robertson Blvd.
Los Angeles, CA 90048

Dear Peter:

I want to be Treasurer of California and be a part of the leadership team that takes California into the 21st Century. But my success depends to a great extent on the support of California friends like you over the next 17 months.

Experts tell me that due to the high price of media in California, my state race will cost \$4 to \$5 million. Therefore, I must ask for not only your personal endorsement, but for your financial support of my candidacy.

I hope you will show your support by joining me on Wednesday, June 28th, 6:00-8:00 p.m., at the home of Jodie Evans and Max Palevsky, 841 Greenaway, for what I call a "max-out" party.

The new campaign finance laws allow an individual or corporation to give a campaign committee up to \$1,000 per fiscal year. Married couples can give \$2,000 per fiscal year. We have three fiscal periods between now and the general election in 1990. The first fiscal year ends Friday, June 30. And so I'm asking you to contribute whatever amount brings your total contribution to \$1000.

To date, I have no Democratic opposition in the June 1990 primary, and I hope that will hold. But the winner of the contested Republican primary will launch an all-out battle against me, and political insiders are already predicting that my race may be the most "exciting" of 1990.

Please help! Please join us on June 28th.

Best regards,



Kathleen Brown

8075 W. THIRD ST. / STE. 402
LOS ANGELES, CALIFORNIA
9 0 0 - 4 8

TELEPHONE 213 / 930-2070
FAX 213 / 930-2078

HRC135

9604376447

3600 BEVERLY BOULEVARD
LOS ANGELES CA 90048

00001787

INVOICE NUMBER	INVOICE DATE	DESCRIPTION	GROSS AMOUNT	DISCOUNTS, ADJUSTMENTS	PAYMENT AMOUNT
11 222	0010/13/92		500.00	.00	
TOTALS →			500.00	.00	



DATE 10/13/92

UNION BANK
9480 WILSHIRE BL.
BEVERLY HILLS, CA

CHECK NO.

2071

AMOUNT

*****500.00

PAY FIVE HUNDRED AND NO/100 *****

TO THE ORDER OF

ALAN MAZURSKY
510 W ROBERTSON

000001787

LOS ANGELES

CA 90048

VOID AFTER 90 DAYS

NON-NEGOTIABLE

[Handwritten signature]
[Handwritten signature]

⑆02071⑆ ⑆122000496⑆2000128028⑆



HRC135

95043764478

HARD ROCK CAFE
MANUAL CHECK REQUEST FORM

DATE: 10.13.92
INDIVIDUAL REQUESTING CHECK: S Bushman
RESTAURANT ON WHICH TO BE DRAWN: LA
AMOUNT: \$ 500

DISTRIBUTION: _____ SEND TO PAYEE
_____ RETURN TO INDIVIDUAL REQUESTING
CHECK OR RETURN TO: _____

DESCRIPTION: Reimb. donation

PAYEE (as to appear on check) Alan Majurosky
ADDRESS (if to be sent) _____

AUTHORIZATION: [Signature] 3 1992

FOR ACCOUNTING USE ONLY

Checks

Trans. # _____	Rest. # _____
Rest. # _____	Paid Invoice # _____
Vendor # _____	Dr. Liability _____
Check # _____	G/L Account _____
Check Date <u> / / </u>	Direct Expense _____
Amount \$ _____	
Description _____	
Cash Account _____	

1787
9465

MAILED

96043764419

OK

ALAN S. MAZURSKY
LAURIE M. MAZURSKY

1808 1012

2158
NO 710033772

Pay To The Order of **KAREN SHERIDAN FOR CONSUMERS** \$ 500.54

FIVE HUNDRED

Dollars

GREAT WESTERN BANK 

A Federal Reserve Bank
VALLEJO, CA 94590
1-800-527-5242

For CONSUMERS

Alan S. Mazur

HRC138

96043764450

HARD ROCK CAFE AMERICA L.P.
LOS ANGELES

Union Bank
Trust and Savings Bank
40 Wilton Boulevard
Arcadia, CA 91709

1128

Sept. 23, 92

10-77/92

ONE THOUSAND SIX HUNDRED SIXTY SIX AND 67/100***** DOLLARS \$ 1,666.67

PETER MORTON

VOID AFTER 90 DAYS

NOT NEGOTIABLE

HARD ROCK CAFE AMERICA L.P.

DELITE FORM 670-C V-8

9604376451

DATE	DESCRIPTION	AMOUNT	MEMO
9/23/92	1/3 Reim..Contribution.	\$1,666.67	1671 9465

DATE	DESCRIPTION	AMOUNT	MEMO

ENTERED SEP 29 1992



HRC139

HARD ROCK CAFE
MEMORIAL CHECK REQUEST

DATE: 9, 23, 92

INDIVIDUAL REQUESTING CHECK: _____

RESTAURANT ON WHICH TO BE DRAWN: LA - MAIN

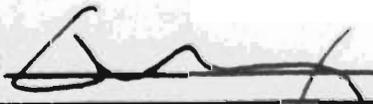
AMOUNT: \$ 1,666 ⁰²

DISTRIBUTION: _____ SEND TO PAYEE
 RETURN TO INDIVIDUAL REQUESTING
CHECK OR RETURN TO: ALAN

DESCRIPTION: 1/3 REIMBURSEMENT OF CONTRIBUTION

PAYEE (as to appear on check) PETER MARON

ADDRESS (if to be sent) _____

AUTHORIZATION: 

FOR ACCOUNTING USE ONLY

Checks

Trans. # _____	Rest. # _____
Rest. # _____	Paid Invoice # _____
Vendor # _____	Dr. Liability _____
Check # _____	G/L Account _____
Check Date <u> / / </u>	Direct Expense _____
Amount \$ _____	
Description _____	
Cash Account _____	



MAILED

HRC140

96043764452

AMERICAN BANK NOTE COMPANY
NEW YORK, N.Y.

Bank of America
San Francisco, California

Sept. 18, 92

FIVE THOUSAND

5,000.00

PETER HORTON

DATE OF MATURITY

NOT NEGOTIABLE

AMERICAN BANK NOTE COMPANY

DEL. & FORN. WVC-3 16

96043764453

9/18/92

Reim: Contribution

\$5,000.00

1671
~~7465~~
8115
1-16666
2-16666
7-16666



*see
also
San Diego
San Fran*

HRC142

HARD ROCK CAFE
MANUAL CHECK REQUEST FORM

DATE: 9/18/92

INDIVIDUAL REQUESTING CHECK: Peter

RESTAURANT ON WHICH TO BE DRAWN: LA/MAIN

AMOUNT: \$ 5,000

DISTRIBUTION: _____ SEND TO PAYEE

RETURN TO INDIVIDUAL REQUESTING
CHECK OR RETURN TO: main

DESCRIPTION: REIMBURSEMENT

PAYEE (as to appear on check) PETER MORAN

ADDRESS (if to be sent) _____

AUTHORIZATION: _____

FOR ACCOUNTING USE ONLY

Checks

Trans. # _____
Rest. # _____
Vendor # _____
Check # _____
Check Date ____/____/____
Amount \$ _____
Description _____
Cash Account _____

Rest. # _____
Paid Invoice # _____
Dr. Liability _____
G/L Account _____
Direct Expense _____

NON-ADAPTABLE CASH ITEMS

1/3 LA
1/3 SF
1/3 SD

MAILED

96043764454

PETER MORTON



5505

Sept. 23, 1992
September 23 1992

1-71

AY *Five Thousand Dollars & no/100** DOLLARS \$5,000.00

TO
THE
ORDER
OF

Effective Government Committee
80 F Street, N.W., 8th Floor
Washington, D.C., 20001

NOT NEGOTIABLE

PETER MORTON

DELUXE FORM WFO-8 Y-8

DATE

DESCRIPTION

9/23/92

Contribution

\$5,000.00

96043764455



HRC144

HARD ROCK CAFE AMERICA L.P.
LOS ANGELES

Union Bank
Member FDIC
-A Member of the
Bank of America Group
San Francisco, CA 94111

1049

Aug. 13, 1992

8-77/228

ONE THOUSAND ***** DOLLARS: 1,000.00

PETER A. MORROW

VOID AFTER 90 DAYS

NOT NEGOTIABLE

HARD ROCK CAFE AMERICA L.P.

DELUXE FORM WVC-6 V-6

8/13/92	Reim. donation	1,000.00	
---------	----------------	----------	--

96043764456

DATE	DESCRIPTION	AMOUNT	TOTAL DEDUCTION	TOTAL DEDUCTION	REMARKS	DATE	INITIALS



HRC145

HARD ROCK CAFE
MANUAL CHECK REQUEST FORM

DATE: 8, 13, 92

INDIVIDUAL REQUESTING CHECK: S Bushman

RESTAURANT ON WHICH TO BE DRAWN: LA

AMOUNT: \$ 1,000.00

DISTRIBUTION: SEND TO PAYEE

RETURN TO INDIVIDUAL REQUESTING CHECK OR RETURN TO:

DESCRIPTION: Reimb. donation

PAYEE (as to appear on check) Peter Morton

ADDRESS (if to be sent)

AUTHORIZATION: [Signature]

FOR ACCOUNTING USE ONLY

Checks

Trans. \$ _____
Rest. \$ _____
Vendor \$ _____
Check # _____
Check Date / /
Amount \$ _____
Description _____
Cash Account _____

Rest. \$ _____
Paid Invoice \$ _____
Dr. Liability _____
O/L Account _____
Direct Expense _____

MAILED

1671
9456

96043764457

PETER MORTON

Union Bank
Member FDIC

5431

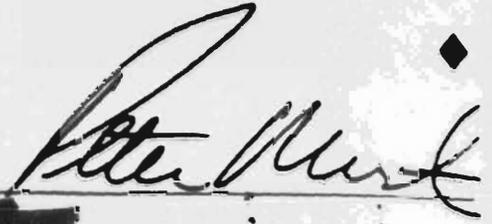
August 13 1992

16-77/1228

PAY *One Thousand Dollars & * no/100* DOLLARS \$ 1,000.00

TO
THE
ORDER
OF

Tony Bellenson for Congress



PETER MORTON

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

DELUXE FORM WVC-3 Y-3

DATE	DESCRIPTION	AMOUNT
8/13/92	donation	\$1,000.00

96043164458

HRC147

HARD ROCK CAFE INVESTORS LTD.
LOS ANGELES

United Bank
San Francisco
New York, N.Y.

4-24

May 7, 1972

0478

TWO THOUSAND FIVE HUNDRED DOLLARS 2,500.00

TO

PETER MORTON

VOID AFTER 60 DAYS

Handwritten signature
NOT NEGOTIABLE

⑆004434⑆ ⑆12200077⑆⑆200⑆⑆-3663⑆

HARD ROCK CAFE INVESTORS LTD.
LOS ANGELES

SELICOR FORM 870-6 1-6

96043764459

DATE	DESCRIPTION	AMOUNT	BY	
			NAME	INITIALS
5/7/72	Reim. donation	2,500.00		
EMPLOYEE				
EMPLOYEE	DATE	AMOUNT	BY NAME	INITIALS

Handwritten circled stamp
1671
8/15



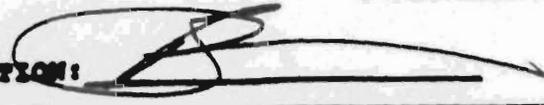
HARD ROCK CAFE
MANUAL CHECK REQUEST FORM

DATE: 5, 7, 92
INDIVIDUAL REQUESTING CHECK: S Bushme
RESTAURANT ON WHICH TO BE DRAWN: LA
AMOUNT: \$ 2,500

DISTRIBUTION: _____ SEND TO PAYEE
_____ RETURN TO INDIVIDUAL REQUESTING
CHECK OR RETURN TO: _____

DESCRIPTION: Reimb. Donation

PAYEE (as to appear on check) Peter Morton
ADDRESS (is to be sent) _____

AUTHORIZATION: 

FOR ACCOUNTING USE ONLY

Checks

Trans. # _____	Rest. # _____
Rest. # _____	Paid Invoice # _____
Vendor # _____	Dr. Liability _____
Check # _____	G/L Account _____
Check Date <u> </u> / <u> </u> / <u> </u>	Direct Expense _____
Amount \$ _____	
Description _____	
Cash Account _____	

MAILED

ENTERED 5/22 1992

96043764460

PETER MORTON

5149

May 7

92

5-7-92

Two Thousand Five Hundred Dollars & no/100

DOLLARS \$2,500.00

TO THE ORDER OF

Bob Tannenbaum for District Attorney
c/o 700 W. Robbery
Beverly Hills, CA 90210

NOT NEGOTIABLE

PETER MORTON

DELUXE FORM WFO-8 V-8

5/7/92

Donation:

\$2,500.00

96043764461

HRC150

HARD ROCK CAFE INVESTORS LTD.
LOS ANGELES

Debit Bank
City and County
San Diego, CA

4381

April 24, 92

15-77 100

TWO HUNDRED FIFTY DOLLARS \$250.00

TO

PETER MORTON

VOID AFTER 90 DAYS

NOT NEGOTIABLE

⑆00432⑆ ⑆⑆⑆200077⑆⑆200⑆⑆⑆3653⑆

HARD ROCK CAFE INVESTORS LTD.
LOS ANGELES

DEBIT FORM WFC-6 1-0

1671
9465

DATE	DESCRIPTION	AMOUNT	INITIALS	AMOUNT
4/24/92	Reim. donation	\$250.00		

ENTERED APR 27 1992

96043764462

DATE	DESCRIPTION	AMOUNT	INITIALS	AMOUNT



HRC151

HARD ROCK CAFE
MANUAL CHECK REQUEST FORM

DATE: 4, 24, 92
INDIVIDUAL REQUESTING CHECK: S Bushman
RESTAURANT ON WHICH TO BE DRAWN: MCO
AMOUNT: \$ 250.00

DISTRIBUTION: _____ SEND TO PAYEE
_____ RETURN TO INDIVIDUAL REQUESTING
CHECK OR RETURN TO: _____

DESCRIPTION: Reimburse Donation

PAYEE (as to appear on check) Peter Morton
ADDRESS (if to be sent) _____

AUTHORIZATION: [Signature]

FOR ACCOUNTING USE ONLY

<u>Checks</u>	
Trans. \$ _____	Rest. \$ _____
Rest. \$ _____	Paid Invoice \$ _____
Vendor \$ _____	Dr. Liability _____
Check \$ _____	G/L Account _____
Check Date <u> </u> / <u> </u> / <u> </u>	Direct Expense _____
Amount \$ _____	
Description _____	
Cash Account _____	

MAILED

96043764463

PETER L. MORTON

5108

April 27 92

Two Hundred Fifty Dollars & no/100

DOLLARS \$ 250.00

TO
-2
OF

Kostmayer for Congress
35 Old Dublin Pike
Doylestown, PA 18901

NOT NEGOTIABLE

PETER MORTON

DELUXE FORM WVC-3 V-2

96043764444

4/27/92

Contribution

\$250.00



HRC153

HARD ROCK CAFE INVESTORS LTD.
LOS ANGELES

4305

March 29, 1992

ONE THOUSAND DOLLARS 1,000.00

TO
OF

PETER MORTON

VOID AFTER 60 DAYS

NOT NEGOTIABLE

⑆004304⑆ ⑆12200077⑆⑆200⑆⑆-3663⑆

HARD ROCK CAFE INVESTORS LTD.
LOS ANGELES

DELIVER FORM 870-0 1-8

1671
5

DATE	DESCRIPTION	AMOUNT	AGE	AMOUNT
3/28/92	Reim. donation	\$1,000.00		

EMPLOYEE

NAME	ADDRESS	CITY	STATE	ZIP

96043764465



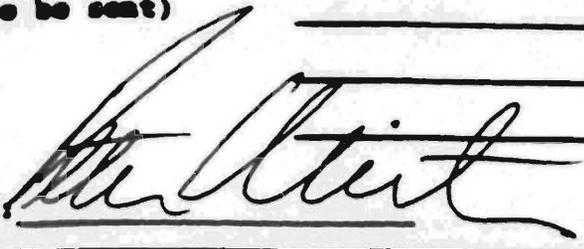
HRC154

HARD ROCK CAFE
MANUAL CHECK REQUEST FORM

DATE: 3, 23, 92
INDIVIDUAL REQUESTING CHECK: S Bushman
RESTAURANT ON WHICH TO BE DRAWN: LA
AMOUNT: \$ 1,000
DISTRIBUTION: _____ SEND TO PAYER
_____ RETURN TO INDIVIDUAL REQUESTING CHECK OR RETURN TO: _____

DESCRIPTION: Reimburse -
Donation.

PAYER (as to appear on check) Peter Morton
ADDRESS (if to be sent) _____

AUTHORIZATION: 

FOR ACCOUNTING USE ONLY

Checks
Trans. \$ _____ Rest. \$ _____
Rest. \$ _____ Paid Invoice \$ _____
Vendor \$ _____ Dr. Liability _____
Check \$ _____ O/L Account _____
Check Date 3/23/92 Direct Expense _____
Amount \$ _____
Description _____
Cash Account _____

MAILED

ENTER 37 1992

96043764466

PETER MORTON

5035

March 23

92

47

Five Dollars & 10/100

1992 \$1,000.00

United States Senate Campaign

177-5-5040

NOT NEGOTIABLE

PETER MORTON

DELUXE TRAIL VCS 12

96043764467

HRC156

HARD ROCK CAFE (AMERICA), L.P.

Union Bank
Beverly Hills Regional Office
9400 Wilshire Boulevard
Beverly Hills, CA 90212

1004

16-77/1220

July 30 - 1992

PAY **One Hundred Thousand Dollars & no/100** DOLLARS \$ 100,000.00

TO
THE
ORDER
OF

Democratic National Committee
'92/Non-Federal Account

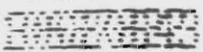
VOID AFTER 90 DAYS

⑈001004⑈ ⑆12200077⑆ 2000168125⑈

⑈0010000000⑈

96043764468

1992
MPS 001 19



FEDERAL RESERVE BANK DC
111000000000

111000000000

HRC157

AMAN HAZESKY

95043764459



HRC158

HARD ROCK CAFE
MANUAL CHECK REQUEST FORM

DATE: 12 / 15 / 89

INDIVIDUAL REQUESTING CHECK: ALAN

RESTAURANT ON WHICH CHECK DRAWN: LA / MAN OFFICE

AMOUNT: \$500

DISTRIBUTION: Send to Payee
 Return to individual requesting check
or return to _____

DESCRIPTION: REIMBURSE OUT-OF-POCKET DONATION

PAID TO BY (to appear on check): ALAN MARINOFF

ADDRESS (if to be sent):

AUTHORIZATION: _____

.....

FOR ACCOUNTING USE ONLY

Checks

Trans. # _____
Rest. # _____
Vendor # BB
Check # _____
Check Date 1 / 1
Amount \$ _____
Description _____
Cash Account _____

Rest. # _____
Paid Invoice # _____
Dr. Liability _____
C/L Account 9154
Direct Expense _____

960437647C

96043764471



Vertical text or stamp, possibly a date or office mark, located in the center of the document.

2604
CHECK HERE IF TAX DEDUCTIBLE ITEM

00 Dec 86

STEVE SALTZMAN P.A. CITY COUNCIL

EXACTLY FIVE HUNDRED

BAL FORD THIS PAYMENT	500.00
BALANCE	
OTHER	
BAL FORD	

CAMPAIGN '05. (1987)

NEGOTIABLE

HRC160

LIBRARY

ENTERED MAY 27 1966

[Handwritten scribbles]

9 1 0 1 3 6 4 4 7 2



HARD ROCK CAFE

MANUAL CHECK REQUEST FORM

DATE: 5, 20, 96

INDIVIDUAL REQUESTING CHECK: PETER MORTON

RESTAURANT ON WHICH CHECK DRAWN: HRC-

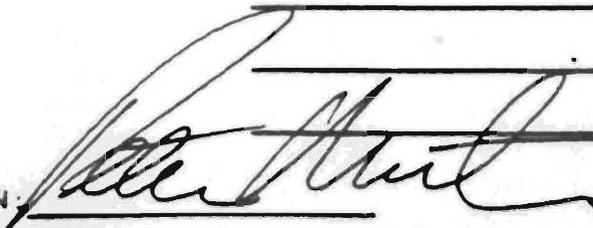
AMOUNT: \$500.00

DISTRIBUTION: Send to Payee
 Return to individual requesting check or return to HILARY

DISCRIPTION: office expense

PAYEE (as to appear on check): HILARY RICE

ADDRESS (if to be sent): _____

AUTHORIZATION: 

FOR ACCOUNTING USE ONLY

Checks

Trans. \$ _____ Rest. \$ _____

Rest. \$ _____ Paid Invoice \$ _____

Vendor \$ ASH Dr. Liability _____

Check \$ _____ G/L Account 9154

Check Date / / Direct Expense _____

Amount \$ _____

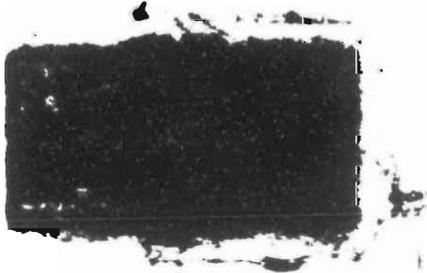
Description _____

Cash Account _____

96043764473

ENTERED NOV 29 1964

9 5 0 4 3 7 6 4 4 7 4



HARD ROCK GOLF INVESTORS LTD.
LOS ANGELES

Union Bank
San Francisco, California
Member FDIC

3544

June 20, 91

1-711228

FIVE THOUSAND DOLLARS \$ 5,000.00

TO
OF

VOID AFTER 90 DAYS

PETER MORTON

Handwritten: NOT NEGOTIABLE

⑆00000 123000 7120011 1131

HARD ROCK GOLF INVESTORS LTD.
LOS ANGELES

DELUXE FORM SVC-3 V-8

96043764475

DATE	DESCRIPTION	AMOUNT	ACT NO	CHQ NO
6/20/91	Reim. donation <i>U1621 9465</i>	\$5,000.00		

DATE	MEMO	DEBIT	CREDIT	TOTAL	MEMO	DATE	MEMO	DATE	MEMO



HRC164

HARD ROCK CAFE
MANUAL CHECK REQUEST FORM

DATE: 6/20/91
INDIVIDUAL REQUESTING CHECK: S Bushman
RESTAURANT ON WHICH TO BE DRAWN: LA
AMOUNT: \$ 5000.-
DISTRIBUTION: _____ SEND TO PAYEE

RETURN TO INDIVIDUAL REQUESTING CHECK OR RETURN TO:
DESCRIPTION: Reimburse donation

PAYEE (as to appear on check) Peter Morton
ADDRESS (if to be sent) _____

AUTHORIZATION: 

FOR ACCOUNTING USE ONLY

Checks

Trans. # _____	Rest. # _____
Rest. # _____	Paid Invoice # _____
Vendor # _____	Dr. Liability _____
Check # _____	G/L Account _____
Check Date <u> </u> / <u> </u> / <u> </u>	Direct Expense _____
Amount \$ _____	
Description _____	
Cash Account _____	

MAILED

96043764476

June 20 91

PAY Five Thousand & no/100

DCLLA-2 \$5,000.00

TO THE DEP OF

Councilman Mike Woo
Officeholder Account
ED 390964

NOT NEGOTIABLE



PETER MORTON

DELUXE FORM WVC-8 V-2

96043764477

6/20/91

Campaign donation

\$5,000.00

Backup

Eva-

HRC166

HARD ROCK GOLF INVESTORS LTD.
LOS ANGELES

Union Bank
Member FDIC

3397

April 29, 91

18-771/1228

PAY ONE THOUSAND DOLLARS \$ 1,000.00

TO THE ORDER OF

PETER MORTON

VOID AFTER 90 DAYS

NOT NEGOTIABLE

⑆000377⑆ ⑆12⑆000⑆71⑆200⑆1⑆0⑆3253⑆

HARD ROCK GOLF INVESTORS LTD.
LOS ANGELES

DELUXE FORM SVC-8 V-8

96043764478

DATE	DESCRIPTION	AMOUNT	ACTUAL	REMARKS
4/29/91	Reimbursement donation Mel Levens-Senate	\$1,000.00		

9465

STAMP: MAY 28 1991

EMPLOYEE	FORM	DATE	AMOUNT	DESCRIPTION	TOTAL	REMARKS



HRC167

HARD ROCK CAFE
MANUAL CHECK REQUEST FORM

DATE: 4/29/91

INDIVIDUAL REQUESTING CHECK: Alan

RESTAURANT ON WHICH TO BE DRAWN: LA

AMOUNT: \$ 1,000 -

DISTRIBUTION: SEND TO PAYEE
 RETURN TO INDIVIDUAL REQUESTING CHECK OR RETURN TO: _____

DESCRIPTION: Rum donation -
Mr Lerner - Senate

PAYEE (as to appear on check) Riley Morton

ADDRESS (if to be sent)

AUTHORIZATION: _____

FOR ACCOUNTING USE ONLY

Checks

Trans. # _____
Rest. # _____
Vendor # 1671 ✓
Check # _____
Check Date / /
Amount \$ _____
Description _____
Cash Account _____

Rest. # _____
Paid Invoice # _____
Dr. Liability _____
G/L Account 9405 ✓
Direct Expense _____

MAILED

96043164479

HRC169

PETER MORTON



Union Bank
Bank of the South
San Francisco, CA 94104

4209

April 26 91

0-11/88

PAY

Four Thousand & no/100

DOLLARS \$4,000.00

TO THE ORDER OF

Mel Levine for Senate
292 So. La Cienega Blvd.
Suite 212
Beverly Hills, CA 90212

LA
SF
SD
MORT.
= 4
1,000.00

NOT NEGOTIABLE



PETER MORTON

UNION BANK FORM 1000 1-80

DATE	DESCRIPTION	
4/26/91	Donation - Levine for Senate	\$4,000.00

9604376480

HARD ROCK CAFE
MANUAL CHECK REQUEST FORM

DATE: 8/2/90

INDIVIDUAL REQUESTING CHECK: None

RESTAURANT ON WHICH TO BE DRAWN: HRC-ALL

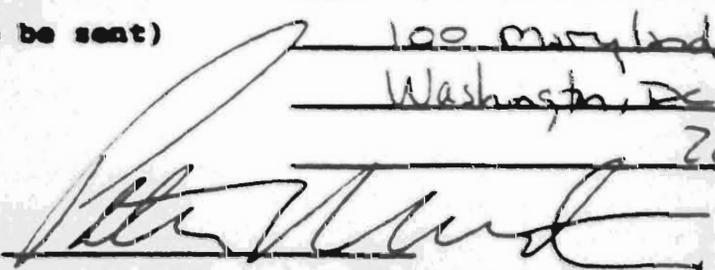
AMOUNT: \$ 125.00

DISTRIBUTION: SEND TO PAYEE
 RETURN TO INDIVIDUAL REQUESTING CHECK OR RETURN TO: _____

DESCRIPTION: TO support the educational fund to end handgun violence

PAYEE (as to appear on check) EFFHV

ADDRESS (if to be sent) 100 Maryland Avenue, NE
Washington, DC
20002

AUTHORIZATION: 

FOR ACCOUNTING USE ONLY

Checks

Trans. # _____	Rest. # _____
Rest. # _____	Paid Invoice # _____
Vendor # <u>0675</u>	Dr. Liability _____
Check # _____	G/L Account <u>9465</u>
Check Date <u>8/2/90</u>	Direct Expense _____
Amount \$ _____	
Description _____	
Cash Account _____	

MAILED

96043164432

THE
EDUCATIONAL
FUND TO

END HANDGUN VIOLENCE

T
O
Marjolijn Bijlefeld
Educational Fund to End Handgun Violence
100 Maryland Avenue, NE
Washington, DC 20002

F
R
O
M
Mr. Peter A. Morton
510 N. Robertson Blvd.
Los Angeles, CA 90048

Yes! I want to expose gunmakers' greed and the sexist propaganda they use to promote guns to women. Women need information to sort fact from fiction on handgun death and injury statistics and to select safe alternatives for self defense and home protection.

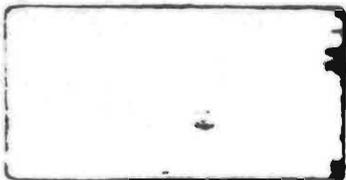
We cannot count on government to get the information out. We have to do it ourselves by completing and releasing the Educational Fund's "Women & Guns" report as quickly as we can. You can count on me to help with my enclosed special contribution of:

\$125 \$150 \$200 Other \$ _____ Please also send me a copy of "Women & Guns" the minute its available.

90048MORTP510 N EC001

★ ★ ★ ★ ★

Please make your tax-deductible check payable to EPEHV, and return it with this response memo in the postage-paid envelope provided. A copy of the annual financial report may be obtained by contacting Coalition to Stop Handgun Violence, 100 Maryland Ave, NE, Washington DC 20002. (202) 544-7190. Office of Charities Registration, 182 Washington Avenue, Albany, NY 12231. Office of the Secretary of State, State House, Annapolis, MD 21401. State Division of Consumer Affairs, P.O. Box 1183, Richmond, VA 23209. Registration with government agencies does not imply endorsement by the state.



96043764483

HARD ROCK CAFE INVESTORS LTD.
LOS ANGELES

Union Bank
Los Angeles

2844

Sept. 20, 1990

10-371120

PAY TWO HUNDRED DOLLARS \$200.00

TO THE ORDER OF

California League of Conservation Voters

VOID AFTER 60 DAYS

NOT NEGOTIABLE

⑆ 2844 ⑆ 10120007710009 ⑆ 32030⑆

HARD ROCK CAFE INVESTORS LTD.
LOS ANGELES

DEBITOR FORM WVC-8 Y-8

96043764424

DATE	DESCRIPTION	AMOUNT	INITIALS
9/20/90	donation	\$200.00	

ERES OCT 1 1990

7465

PERIOD	EARNINGS				TOTAL DEDUCTIONS	TOTAL	REMARKS
	WAGES	TIPS	COMMISSIONS	OTHER			



HARD ROCK CAFE
MANUAL CHECK REQUEST FORM

DATE: 9, 20, 90

INDIVIDUAL REQUESTING CHECK: Nine

RESTAURANT ON WHICH TO BE DRAWN: HRC. CA.

AMOUNT: \$ 200.00

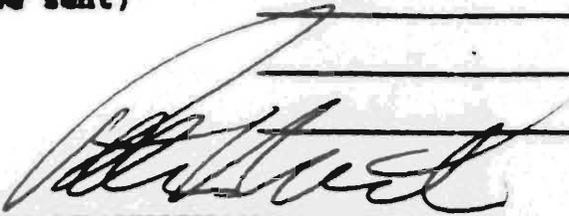
DISTRIBUTION: _____ SEND TO PAYEE

RETURN TO INDIVIDUAL REQUESTING
CHECK OR RETURN TO: _____

DESCRIPTION: donation

PAYEE (as to appear on check) California League of Conservation Voters

ADDRESS (if to be sent) _____

AUTHORIZATION: 

FOR ACCOUNTING USE ONLY

Checks

Trans. #	_____	Rest. #	_____
Rest. #	_____	Paid Invoice #	_____
Vendor #	<u>0675</u>	Dr. Liability	_____
Check #	_____	G/L Account	<u>9465</u>
Check Date	____/____/____	Direct Expense	_____
Amount \$	_____		
Description	_____		
Cash Account	_____		

MAILED

HRC174

96043764485

March

PAY ONE THOUSAND DOLLARS 1,000.00

TO THE ORDER OF

Mel Levine for Congress
c/o Cathy Unger
8075 W. Third St.
Suite 402
L.A., CA 90048

VOID AFTER 60 DAYS

NOT-NEGOTIABLE

⑆01 2327 1 032200077 1 0300 6 6-36630⑆

WIND ROCK CASE INVESTORS LTD.
LOS ANGELES

DELAWARE FORM WVC-6 V-6

96043764486

DATE	DESCRIPTION	AMOUNT	BALANCE	
			A CT NO.	AMOUNT
3/14/90	Fundraiser	\$1,000.00		

EMPLOYEE	CARRIED				TOTAL	RECEIVED				TOTAL	REMARKS	
	NAME	DATE	AMOUNT	BY		AMOUNT	DATE	BY	AMOUNT			

9465

PAID



HARD ROCK CAFE
MANUAL CHECK REQUEST FORM

DATE: 3, 14, 90

INDIVIDUAL REQUESTING CHECK: Nini Mirkil

RESTAURANT ON WHICH TO BE DRAWN: HRC

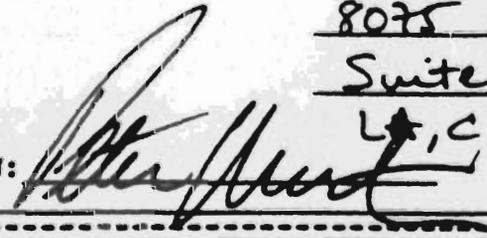
AMOUNT: \$ 1000.00

DISTRIBUTION: SEND TO PAYEE
 RETURN TO INDIVIDUAL REQUESTING CHECK OR RETURN TO: _____

DESCRIPTION: Fundraisers

PAYEE (as to appear on check) M&L Levine for Congress

ADDRESS (if to be sent) c/o Cathy Unger
8075 W. Third St.
Suite 402
LA, CA. 90048

AUTHORIZATION: 

FOR ACCOUNTING USE ONLY

Checks

Trans. # _____	Rest. # _____
Rest. # _____	Paid Invoice # _____
Vendor # <u>0675</u>	Dr. Liability _____
Check # _____	G/L Account <u>9465</u>
Check Date <u>1/1</u>	Direct Expense _____
Amount \$ _____	
Description _____	
Cash Account _____	

MAILED

96043764487

March 1, 1990

Peter Morton
President
Hard Rock Cafe America
510 N. Robertson Blvd.
Los Angeles, CA. 90048

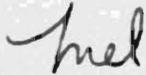
Dear Peter:

I'm sorry we didn't connect, but I spoke to Mimi.

I hope that you can purchase some tickets to my \$1000 per person fundraiser on March 18. The event will be at the beautiful home of my good friends Lou and Ann Kemp at 200 Toyopa, Pacific Palisades from 5 p.m. to 7 p.m. Checks can be made out to Mel Levine for Congress and be sent to Cathy Unger, 8075 W. Third St., Ste. 402, Los Angeles, CA. 90048. If you have any questions please call her at (213) 930-2070.

Your friendship and help mean an enormous amount to me. Thanks again.

Sincerely,



Mel Levine

96043764498

LOS ANGELES CA 90048

1738

02/09/90	02/09/90	000659	100.00	0.00	100.00
TOTALS →			100.00	0.00	100.00



DATE 02/26/90

UNION BANK / 9400 WILSHIRE BL / BEVERLY HILLS CA

CHECK NO. 004939

18-7 / 122

PAY ONE HUNDRED DOLLARS AND NO CENTS

TO THE ORDER OF CALIFORNIA REST-ADON POLITICAL ACTION COMMITTEE 1600 "K" STREET 0100 SACRAMENTO, CA 95814

[Handwritten Signature]
 SIGNATURE

⑆004939⑆ 61220007716 20011-3663⑆

96043764489



HRC178

U1738
9465

Mr. James Rees
February 9, 1990
Page 2

paid by employers who currently provide health insurance for their employees and dependents. Employers who choose to provide group coverage are given a credit against the gross payroll tax. Estimates for employer costs range from \$85 to \$200 per month per employee!

And, unfortunately, the mandated benefits debate continues with Governor Deukmejian planning to submit his health insurance proposal to the legislature by March 1, 1990. We do know that the proposal would require every California business to provide health insurance for all workers who have been on the job at least three months and their dependents.

On a less ominous note, CRA/PAC members and CRA Government Affairs staff can be proud of the fact that Terry Friedman's third party liquor liability bill, AB 585, died on the floor last month as did Senator Barry Keene's food labeling bill, SB 1385.

In short, CRA/PAC works! Our industry's best defense has always been a strong offense and a healthy Political Action Committee. CRA/PAC will continue to be the political watchdog for the foodservice industry with your support.

Since it is such a critical time in the legislative session and only months away from the June primary, I am asking that you and Hard Rock Cafe give your support to CRA/PAC by donating \$1000. Nothing affects the well-being of our businesses and bottom lines as much as the State Government in Sacramento. With your help, the PAC can continue its momentum as an effective, aggressive advocate for you and the foodservice industry as a whole.

On behalf of the CRA/PAC Trustees, I would like to thank you in advance for your consideration and renewed support for 1990.

Sincerely,

Jim Pardini
Jim Pardini
CRA/PAC Chairman

PAID (FOR PAYMENT)
DATE 2/25/90
RESTAURANT 100

JP/dda
Enclosure

P.S. The CRA/PAC Trustees have set an ambitious fundraising goal of \$200,000 this year. It would be most helpful if you would send your donation to CRA/PAC by February 26, 1990.

HRC179

9604376442C



**CALIFORNIA RESTAURANT ASSOCIATION
POLITICAL ACTION COMMITTEE**

1600 K STREET, SUITE 100 SACRAMENTO, CA 95814
(916) 447-5793

February 9, 1990

Mr. James Rees
Hard Rock Cafe
510 N. Robertson
Los Angeles, CA 90048

Dear Mr. Rees:

The California Legislature reconvened its 1989-90 session just five weeks ago. During the first half of this two-year cycle, legislators introduced 4,659 bills, and we expect at least that many to be introduced before the March 2 deadline for introduction of new bills!

The restaurant industry faces a number of critical challenges in 1990:

AB 2573 (Connelly) Alcohol Taxes

This bill would impose an excise surtax of five cents for specified amounts of beer, wine, and distilled spirits. The surtaxes would be in addition to the excise taxes currently levied on alcohol beverages in the state. If passed, the surtax will be the largest California has experienced since 1965. This surtax would make California's alcohol beverage excise taxes among the highest in the U.S. It is poor public policy to place on the back of business, programs that government is no longer willing or able to support.

AB 77 (Moore) Family Leave

Would make it an unlawful employment practice for an employer of 25 or more employees, working at the same location, to refuse to grant a request for leave by an employee with more than one year of continuous service. A total of four months in a 24-month period of unpaid leave may be taken. The employee would remain eligible for all other benefits except the employer may request the employee to pay health and welfare benefit plan premiums.

AB 328 (Margolin) Health Insurance

Would enact a gross payroll tax and an unemployment health insurance tax. Businesses can decide to either provide health insurance to employees or pay a gross payroll tax of an unspecified amount. The amount of the tax is to be based on the average percentage of gross payroll, which is

96043764421

Trustees

Jim Pardini, Chairman
Pardini's
Fresno

Ted Balestreri
Sardine Factory
Monterey

Santa Beaman
Bah Ha/Lighthouse
San Diego

Richard P. Birmingham
Collins Foods International
Los Angeles

Theodore Burke
Shadowbrook Restaurant
Capitola

Doug Cavanaugh
The Ruby's Restaurant Group
Costa Mesa

Leon W. "Pete" Harman
Harman Management Corp.
Los Altos

Ronald F. Higgins
Trans/Pacific Restaurants, Inc.
Irvine

Eggle Johnson
Eggle's Restaurants, Inc.
Sacramento

Donald F. Karcher
Carl Karcher Enterprises, Inc.
Anaheim

W. Don Ladd
Marron Corporation
Washington, D.C.

Ruben Villavicencio
R & M Food Services, Inc.
Brea

HRC180

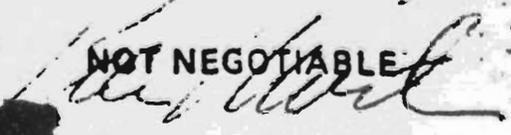
FOR FILING

TO THE ORDER OF

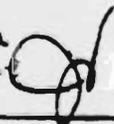
Contributors for Bill Press
7200 Franklin Ave.
Suite 207
L.A., CA 90005

VOID AFTER 60 DAYS

NOT NEGOTIABLE



K' TO ROCK CLUB INVESTORS LTD.
LOS ANGELES



BLANK FORM 8000 1-80

DATE	DESCRIPTION	AMOUNT	REMARKS	
			ACCT.	PART.
1/29/80	contribution to elect Bill Press ID# 890676	1500.00		

EMPLOYEE

EMPLOYEE	DATE	AMOUNT	REMARKS

96043764492



HARD ROCK CAFE
MANUAL CHECK REQUEST FORM

DATE: 1/25/90

INDIVIDUAL REQUESTING CHECK: Peter Morton

RESTAURANT ON WHICH TO BE DRAWN: HRC. LA

AMOUNT: \$ 500.00

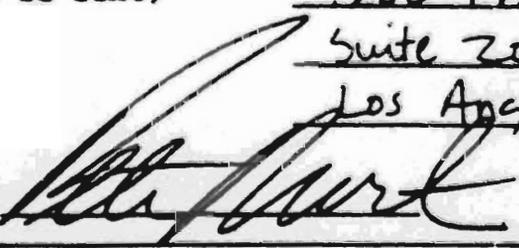
DISTRIBUTION: SEND TO PAYEE

RETURN TO INDIVIDUAL REQUESTING
CHECK OR RETURN TO: _____

DESCRIPTION: Contribution to elect Bill Press
Id. # 890676

PAYEE (as to appear on check) Californians for Bill Press

ADDRESS (if to be sent) 7250 Franklin Ave.
Suite 207
Los Angeles, CA. 90046

AUTHORIZATION: 

FOR ACCOUNTING USE ONLY

Checks

Trans. # _____
Rest. # _____
Vendor # 0675
Check # _____
Check Date 1/25/90
Amount \$ _____
Description _____
Cash Account _____

Rest. # _____
Paid Invoice # _____
Dr. Liability _____
G/L Account 9465
Direct Expense _____

MAILED

96043764493



Established in London

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September 23, 1992

Via Federal Express

Honorable Richard A. Gephardt
House Majority Leader
c/o 80 F Street, N.W.
Washington, D.C. 20001

Dear Congressman Gephardt:

It was a pleasure meeting you Monday and I'm pleased to be able to help you in your campaign.

I hope your Effective Government Committee is indeed able to support good Democratic candidates in this election and I look forward to the change that is necessary for America's future success.

If there is anything else I can do, please don't hesitate to contact me.

Sincere regards,

Peter A. Morton
Chairman

PAM/srb
Encl.

96043764494

9 6 0 4 3 7 6 4 4 9 5

PETER MORTON

Union Bank
Branch 2100 Irving Street
San Francisco, CA 94134

5505

September 23, 1992

18-771000

PAY *Five Thousand Dollars & no/100** DOLLARS \$ 5,000.00

TO
THE
ORDER
OF

Effective Government Committee
80 F Street, N.W., 8th Floor
Washington, D.C., 20001



PETER MORTON

DETACH AND RETAIN THIS STATEMENT
THIS ATTACHED CHECK IS IN PAYMENT OF DEBTS TO US ONLY. IF NOT CORRECT PLEASE NOTIFY US IMMEDIATELY. NO RECEIPT NECESSARY.

DELUXE FORM WVC-3 V-2

DATE	DESCRIPTION	AMOUNT
9/23/92	Contribution	\$5,000.00

HR184

PETER MORTON

September 8, 1992

Via Federal Express

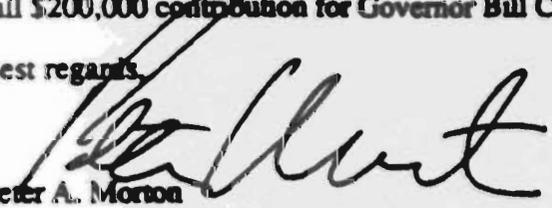
Rahm Emanuel
Finance Chairman
Democratic National Committee
430 South Capitol Street, S.W.
Washington, D.C. 20003

Dear Rahm,

Thank you for your letter regarding my Mobile Vaccination Program in Los Angeles.

Enclosed please find my second check for \$100,000 bringing my total contribution to \$200,000. The last contribution was, by mistake, written on a Hard Rock Cafe account. As I have reimbursed my company for the amount, would you please see that I am credited for the full \$200,000 contribution for Governor Bill Clinton.

Best regards,


Peter A. Morton

PAM/srb
Encl.

cc: Jerry Stern

96043764496

HRC185

PETER MORTON

Union Bank
Member FDIC
Equal Housing Lender

5473

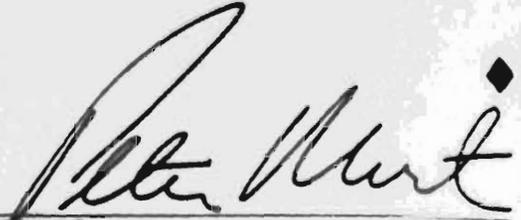
September 8 1992

16-77/122

PAY *One Hundred Thousand Dollars & no/100** DOLLARS \$ 100,000.0

TO
THE
ORDER
OF

Democratic National Committee
Non-Federal Account
430 South Capitol Street, S.E.
Washington, D.C. 20003



PETER MORTON

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

DELUXE FORM WVC-3 V-8

DATE	DESCRIPTION	AMOUNT
9/8/92	Political Contribution	\$100,000.0

96043764407

2

HRC186



Established in London

Los Angeles • Chicago • Sydney • Aspen • Honolulu • Houston • San Francisco • New Orleans • Maui • San Diego • Las Vegas • Newport Beach

August 31, 1992

Via Federal Express

Rahm Emanuel
Finance Chairman
Democratic National Committee
430 South Capitol Street, S.W.
Washington, D.C. 20003

Dear Mr. Emanuel:

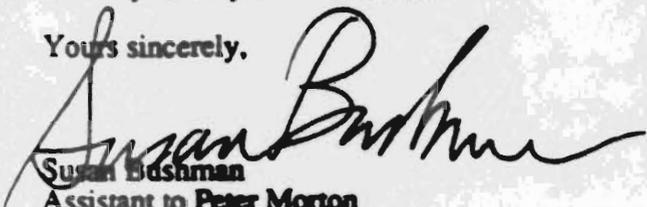
Mr. Morton has requested that I send you copies of the letters previously sent to you and Governor Clinton via Federal Express on August 6.

Mr. Morton would also like to make a second \$100,000 contribution, specifically to Governor Clinton's presidential campaign.

Please fax me with the mailing address and payee information so that I may have the check prepared for Mr. Morton's return to Los Angeles on September 8.

Thank you for your assistance.

Yours sincerely,


Susan Bushman
Assistant to Peter Morton

Encls.

Hard Rock America
Corporate Offices • 510 North Robertson Boulevard, Los Angeles, California USA 90048 • Telephone: 310.854.3366 Fax: 310.652.8747

This letterhead is printed on recycled paper.

HRC187

9604376448

PETER MORTON

August 6, 1992

Via Federal Express

Rahm Emanuel
Democratic National Committee
430 South Capitol Street, S.W.
Washington, D.C. 20003

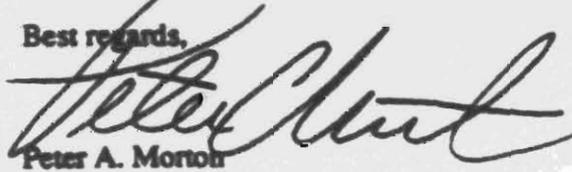
Dear Rahm,

It was good talking to you last week. As you no doubt know I have sent a check for \$100,000 to the Democratic National Committee.

You may also be interested in the letter I sent to Governor Clinton, a copy of which I am enclosing.

Please do not hesitate to be in touch with me if I can be of further assistance to you.

Best regards,



Peter A. Morton

cc: Jeffrey Leeds
Encl.

HRC188

9504376449

Hard Rock CAFE

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August 12, 1992

Governor William Clinton
c/o Clinton for President
8501 Wilshire Blvd.
3rd floor
Los Angeles, CA 90024

Dear Governor Clinton,

As I have discussed with your office in Los Angeles, we will be starting a Mobile Vaccination Program in Los Angeles in September and would like to invite you to participate in the launch event.

Solid statistical evidence exists to prove that more than 50% of the children under the age of five in Los Angeles County have not been immunized for the common childhood diseases of measles, mumps, rubella, tetanus, polio, diphtheria, pertussis, meningitis, and tuberculosis. The World Health Organization of the United Nations recently stated that in 1992, more children in third world countries will be immunized to prevent these diseases than in Los Angeles County.

I first learned about the Mobile Medical program from Paul Simon who asked me to make a \$150,000 contribution to his unit in New York as payment for a television performance he did for the Hard Rock. I realized that the children of South Central Los Angeles were in desperate need of a similar program, especially in light of the recent riots, and I contacted Centinela Hospital about administering a mobile vaccination unit which I would fund. I was tired of writing checks to charities and never knowing what happened to the money. With this program I will get a list each week of the number of inoculations administered and the areas we have helped.

The van will go directly to the areas of the city where mothers cannot even afford to take their children to the hospital when they are sick, let alone think about preventative measures like inoculations against childhood diseases, which are completely preventable with the proper immunizations.

Hard Rock America

Corporate Offices • Los Angeles

310 North Robertson Boulevard, Los Angeles, California USA 90044

Telephone: 310.854.3366 Fax: 310.652-8747

HRC189

This letterhead is printed on recycled paper.

96043764500

page two

I have made a \$600,000 commitment over the next three years to fund this program. Our hope is to inoculate over 25,000 children per year. If this pilot program is a success I then hope to repeat it in Chicago.

We are flexible as to the date of our launch event. I understand you will be in town and potentially available on September 16th, but we are more than willing to plan around your schedule if this date is inconvenient. Our hope is that you will take a ride in the van through South Central Los Angeles and see for yourself how we plan to target and inoculate Los Angeles' underprivileged children.

The reason I am inviting you and the reason I have contributed \$100,000 to your campaign so far is because I sat and watched and waited for President Bush to respond to the needs of our city. He did nothing. I believe you can and will restore the vitality of our cities and therefore hope you will be able to join us in our launch.

Sincerely yours,



Peter A. Morton
Chairman

cc: Mary Leslie

96043764501

HRC190



Established in London

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September 14, 1992

Rahm Emanuel
Finance Director
Democratic National Committee
430 South Capitol Street, S. W.
Washington, D.C. 20003

Dear Rahm:

To date, in addition to my \$200,000 donation to the Democratic Committee, I have also donated to the Senatorial Campaign Committees of Barbara Boxer and Dianne Feinstein \$10,000 each and \$5,000 to Lynn Yeakel direct.

Best regards,

Peter A. Morton

PAM/srb
Encls.

cc: Mary Leslie

96043764502



Democratic Senatorial Campaign Committee
430 South Capitol Street, S.E., Washington, D.C. 20003 • (202) 224-2447

Chairman
Charles S. Robb, VA

Ex-Officio
George Mitchell, ME

Program Chairmen
John D. Rockefeller IV, WV
National Finance Council

Richard Bryan, NV
Majority Trust

Bob Graham, FL
Leadership Circle

David Pryor, AR
Business Roundtable

Paul Simon, IL
Labor Council

Full Committee
Lloyd Bentsen, TX
Joseph Biden, DE
Bill Bradley, NJ
John Breaux, LA
Alan Cranston, CA
Thomas Daschle, SD
Christopher Dodd, CT
Wyche Fowler, GA
Albert Gore, TN
Daniel Inouye, HI
Bennett Johnston, LA
Edward Kennedy, MA
Robert Kerrey, NE
John Kerry, MA
Herbert Kohl, WI
Frank Lautenberg, NJ
Joseph Lieberman, CT
Howard Metzenbaum, OH
Barbara Mikulski, MD
Sam Nunn, GA
Donald Riegle, MI
Jim Sasser, TN
Paul Wellstone, MN

September 20, 1992

Mr. Peter Morton
510 N. Robertson Blvd.
Los Angeles, CA 90048

Dear Peter:

I want to thank you for your generous contribution to the Democratic Senatorial Campaign Committee. Your assistance will help the DSCC in our efforts to elect Democrats that share our commitment to a strong, healthy and educated America.

My colleagues in the U.S. Senate and I appreciate your support in this most challenging election year and extend to you our most sincere thanks.

Best regards.

Sincerely,

George J. Mitchell
George J. Mitchell

95043764503



Established in London

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Via Federal Express

July 17, 1992

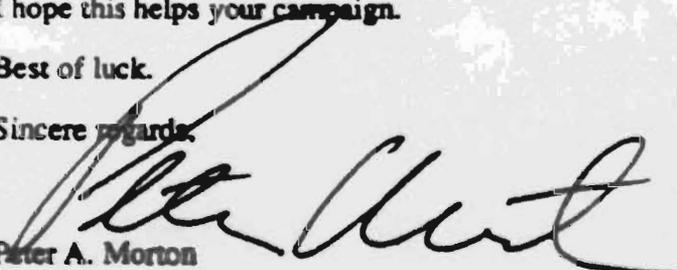
Lynn Yeakel
c/o Lynn Yeakel for Senate
1314 Chestnut Street
Philadelphia, PA 19107
11th Floor

Dear Lynn,

I hope this helps your campaign.

Best of luck.

Sincere regards,


Peter A. Morton
Chairman

PAM/srb
Encl.

Hard Rock America
Corporate Offices • 510 North Robertson Boulevard, Los Angeles, California USA 90048 • Telephone: 310.854.3366 Fax: 310.652.8747

This letterhead is printed on recycled paper.

HRC193

96043764504

PETER MORTON

Union Bank
100 Market Street
San Francisco, CA

5325

July 17 19 92

18-77/1220

PAY **Five Thousand Dollars & no/100** DOLLARS \$ 5,000.00

TO
THE
ORDER
OF

Lynn Yeakel for Senate
1314 Chestnut Street
Philadelphia, PA 19107
11th Floor



PETER MORTON

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF DEBTS DESCRIBED BELOW
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY - NO RECEIPT REQUIRED

DELUXE FORM WVC-8 V-3

DATE	DESCRIPTION	AMOUNT
7/17/92	Campaign Donation: Contributors:	
	Peter Morton - Chairman, Hard Rock Cafe	\$1,000
	Tarlton Morton - Wife	\$1,000
	Pamela Morton - Sister	\$1,000
	Harry Morton - Son	\$1,000
	Matthew Morton - Son	\$1,000
	phone: (310)854-3366	\$5,000

96043764505

HRC194



Established in London

Los Angeles • Chicago • Sydney • Aspen • Honolulu • Houston • San Francisco • New Orleans • Maui • San Diego • Las Vegas • Newport Beach

September 14, 1992

Hand Deliver

Barbara Boxer
Barbara Boxer for Senate
7060 Hollywood Boulevard
Suite 514
Los Angeles, CA 90028

Dear Barbara:

Best of luck.

If there is anything else I can do, please don't hesitate to ask.

Sincerely,

Peter A. Morton
Chairman

PAM/srb
Encl.

9 6 0 4 3 7 6 4 5 0 6

PETER MORTON

Union Bank
San Francisco, CA

5486

September 14 1992

18-77-1220

PAY Ten Thousand Dollars & no/100** DOLLARS \$ 10,000.00

TO
THE
ORDER
OF

Democratic Senate Campaign Committee



PETER MORTON

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

DELUXE FORM WVC-3 V-3

DATE	DESCRIPTION	AMOUNT
9/14/92	Tally Barbara Boxer	\$10,000.00

96043164507

HRC196

True copy

September 11, 1992

Gil Garcetti
c/o Gil Garcetti for District Attorney
11661 San Vicente
Suite 304
Los Angeles, CA 90049

Dear Gil,

If there's anything I can do to help you, please don't hesitate to contact me.

Best of luck,

Peter Morton
Chairman

PAM/srb
Encl.

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HRC197

Sept. 11, 92

.....

2,000.00

AL CONCETTI FOR DISTRICT
ATTORNEY
11061 SAN VICENTE BLVD
104
LOS ANGELES CA 90049

NOT NEGOTIABLE

96043764509

*/11/92

CONTRIBUTION

\$2,000.00

Check # _____
Check Date ____/____/____
Amount \$ _____
Description _____
Cash Account _____

G/L Account _____
Direct Expense _____

MAILED

HRC198



Democratic National Committee

September 8, 1992

Mr. Peter Morton
Hard Rock Cafe America
310 North Robertson Boulevard
Los Angeles, CA 90048

Dear Peter:

Thank you for your letter to Governor Clinton regarding the Mobile Vaccination Program in Los Angeles. I have forwarded your letter to Mr. John Emerson, the California campaign manager, who will be following up with you.

Your program to help ensure better health for the youth of the Los Angeles area through an immunization program is one that should be commended; I say this as the son of a Pediatrician. What you are doing for the people of your community is inspiring.

Again, Peter, thank you for all your help in this campaign. Your support is greatly appreciated.

Sincerely,

Rahm Emanuel
Chairman
Victory Fund

cc: Mr. John Emerson
Mr. Richard Mintz

9604376451C



Democratic Senatorial Campaign Committee

430 South Capitol Street, S.E., Washington, D.C. 20003 • (202) 224-2447

Chairman

Charles S. Robb VA

Ex-Officio

George Mitchell ME

Program Chairmen

John D. Rockefeller IV WV
National Finance Council

Richard Bryan NV

Majority Trust

Bob Graham FL

Leadership Circle

David Pryor AR

Business Roundtable

Paul Simon IL

Labor Council

Full Committee

Lloyd Bentsen TX
Joseph Biden DE
Bill Bradley NJ
John Breaux LA
Alan Cranston CA
Thomas Daschle SD
Christopher Dodd CT
Wyche Fowler GA
Albert Gore TN
Daniel Inouye HI
Bennett Johnston LA
Edward Kennedy MA
Robert Kerrey NE
John Kerry MA
Herbert Kohl WI
Frank Lautenberg NJ
Joseph Lieberman CT
Howard Metzenbaum OH
Barbara Mikulski MD
Sam Nunn GA
Donald Rumsfeld MI
Jim Sasser TN
Paul Wellstone MN

August 26, 1992

Mr. Peter Morton
510 N. Robertson Blvd.
Los Angeles, CA 90048

Dear Peter:

Thank you for your very generous contribution to the Democratic Senatorial Campaign Committee.

Your help couldn't be more welcome - or timely - in this important and challenging election year. Your support of the committee really makes a difference, enabling us to be fully competitive in Senate races throughout the country.

My colleagues and I greatly appreciate your assistance.

Sincerely,

Charles S. Robb

96043764511



Established in London

Los Angeles • Chicago • Sydney • Aspen • Honolulu • Houston • San Francisco • New Orleans • Maui • San Diego • Las Vegas • Newport Beach

July 30, 1992

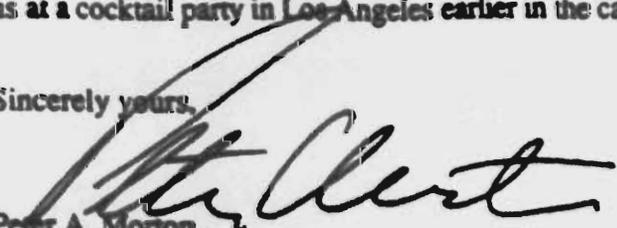
Governor Bill Clinton
Clinton Campaign Headquarters
112 West 3rd Street
Little Rock, AR 72201

Dear Governor Clinton,

I am enclosing herewith a check for \$100,000 for your campaign. My only interest in this and further donations are that you act upon your proposals and turn our great country around.

When you called me on July 15th I did want to mention to you that Gary Belz introduced us at a cocktail party in Los Angeles earlier in the campaign.

Sincerely yours,


Peter A. Morton
Chairman

PAM/srb
Encl.

cc: Rahm Emanuel
Jerry Stern
Gary Belz

96043764512



CALIFORNIA FINANCE COMMITTEE
1015 GAYLEY AVENUE SUITE 1178
LOS ANGELES, CALIFORNIA 90024
TELEPHONE NUMBER: (310) 824-2383
FAX NUMBER: (310) 208-1197

(310) 443 6178
443-6333

TELECOPIER COVER LETTER

Please deliver the following:

TO: Peter Morton DATE: 7/29/92

COMPANY: _____

CITY: _____

TELEPHONE #: _____

FAX#: 310 652-8747

FROM: Mary Leslie

Number of pages including this cover: _____

If you do not receive all pages, please call (310) 824-2383

Attached is an explanation
of the DNC Victory Fund -
Your check should be made
out to: DNC Victory 92 / Non-
Federal Acct
(see you tomorrow) 2:pm

HRC202

... tomorrow 2:00

96043764513

**Democratic National Committee
DNC VICTORY FUND '92**

INDIVIDUAL CONTRIBUTIONS

WHO CAN GIVE

Any U.S. citizen or permanent resident alien ("green card" holder) may contribute an unlimited amount to the Democratic National Committee. Federal (individual) checks are preferred. Each donor must fill out and sign a donor card including the following information:

- Full name and address
- Occupation and name of employer
- Name of person who solicited check

FEDERAL CONTRIBUTIONS

Individuals may contribute a total of \$25,000 per year to federal candidates, federal political committees and the federal accounts of the DNC and state and local parties. Of this amount, each individual may contribute \$20,000 annually to the DNC Federal Account for use in connection with federal elections (Presidential, Senate and House campaigns).

NON-FEDERAL CONTRIBUTIONS

Individuals may contribute an unlimited amount to the DNC Non-Federal Account. Non-federal dollars are used in connection with state and local elections as permitted by law as well as to pay a portion of generic national party activities such as fundraising and research.

HOW TO WRITE THE CHECK(S)

(A) Federal Contributions from individuals of up to \$20,000 should be made by personal check payable to:

DNC VICTORY '92/FEDERAL ACCOUNT

(B) Non-Federal Contributions from individuals can be made payable to:

DNC VICTORY '92/NON-FEDERAL ACCOUNT

Please note: Individual contributions in excess of \$20,000 require two checks. Each check must be made with the appropriate Federal/Non-Federal designation as outlined above.

PLEASE REMEMBER

In the general election, which is financed with a federal grant, checks solicited or directed specifically to the Clinton/Gore Committee are generally impermissible and cannot be accepted. (However, individuals may contribute up to \$1,000 to the Clinton/Gore Compliance Fund. Such checks may be sent directly to the Clinton/Gore Committee, P.O. Box 618, Little Rock, AK 72203) Federal contributions to the DNC are spent on behalf of the entire ticket including Bill Clinton and Al Gore.

Please Send Contributions to:

**DNC Victory Fund '92
Democratic National Committee Headquarters
430 South Capitol Street, S.E. Third Floor HRC203
Washington, D.C. 20003
(202) 863-8000**

QUESTIONS?

**Please feel free to call:
Carol G. Darr
DNC General Counsel
(202) 479-8113**

Contributions to the Democratic National Committee are not tax deductible as charitable contributions for Federal Income Tax purposes.

96043764514



Democratic National Committee

July 29, 1992

Mr. Peter Morton
Hard Rock Cafe
510 North Robertson Blvd
Los Angeles, CA 90048

Dear Peter:

It was great talking to you this afternoon. I appreciate your interest in helping to raise money for the Democratic National Committee Victory Fund '92. As Finance Chairman for the Committee, I will ensure that you are kept up to date as to what is happening in the campaign. Your contribution will help the Clinton/Gore ticket in November as well as the Democratic Party as a whole.

Enclosed please find a copy of the film shown at the convention introducing Governor Clinton. This is a small gesture of my appreciation of your support.

In terms of how to address the check, please make it out to "DNC/Non-Federal". The address to send the check is:

Democratic National Committee
430 South Capitol Street, SE
Washington, D.C. 20003

Again, Peter, thank you.

Sincerely,

Rahm Emanuel
Finance Chairman

*cc. Rahm Emanuel
Jerry Stern
Gary Bely*

*202
FAX # 8638140*

96043764515

LEVINE CAMPAIGN COMMITTEE

MEMORANDUM

TO: Peter Morton
 FROM: Mel Levine
 DATE: July 27, 1992
 RE: Why I've been trying to reach you

*Peter Morton
Mel*

As you probably know, I've been trying to reach you to discuss the very generous contribution you made to my campaign last year. Unfortunately, the results on June 2nd mean I won't have the opportunity to use the "general election" portion of your donation.

I hope you and Tarleton will consider redesignating your general election contribution to my 1994 Campaign Committee. Although, the political landscape is unclear today -- I am very interested in maintaining my political options. Your willingness to redesignate your contribution would be a huge help and truly appreciated.

Please sign below to indicate your permission to redesignate the \$2000 contribution and knowledge that unless you had agreed to this redesignation I would be required to refund the contribution to you within 60 days of the primary election.

Once you've signed, I'd be grateful if you could fax this as soon as possible to my attention at (310) 652-0451. If you have any questions, please don't hesitate to call me. Today, I can be reached at (310) 393-6060. I will be in my Washington office the rest of the week and can be reached at (202) 225-6451.

Thanks, again for everything.

Please redesignate my contribution to the 1992 general election contribution to the Levine 1994 Campaign Committee.

[Signature]
 PETER MORTON 7/28/92
 DATE

[Signature]
 TARLETON MORTON 7/28/92
 DATE

96043764516

Hard Rock CAFE

Established in London

Los Angeles • Chicago • Sydney • Aspen • Honolulu • Houston • San Francisco • New Orleans • Maui • San Diego • Las Vegas • Newport Beach

July 15, 1992

Via Facsimile
(212)697-3772

The Honorable Dianne Feinstein
c/o GRAND HYATT
Park Avenue at Grand Central
New York, NY 10017

Dear Diane:

Please find enclosed a copy of the letter and check that was sent to the Democratic Senate Campaign Committee today. It's my hope that, in some small way, this will help towards the success of your candidacy.

Let's work hard to change America.

Best regards,


Peter A. Morton
Chairman

PAM/srb
Enclosures

HRC206

Hard Rock America
Corporate Offices • 510 North Robertson Boulevard, Los Angeles, California USA 90048 • Telephone: 310.854.3366 Fax: 310.652.8747

This message is printed on recycled paper.

96043764517



Established in London

Los Angeles • Chicago • Sydney • Aspen • Honolulu • Houston • San Francisco • New Orleans • Maui • San Diego • Las Vegas • Newport Beach

July 15, 1992

Via Messenger

DEMOCRATIC SENATE CAMPAIGN COMMITTEE

Tricia Riffenburgh
11355 West Olympic Boulevard
Suite 510
Los Angeles, CA 90054

Dear Ms. Riffenburgh:

Per my conversation today with Dianne Feinstein I am enclosing my personal check in the amount of \$10,000 to be credited to her record with the DSCC.

Sincerely,

Peter A. Morton
Chairman

PAM/srb
Encl.

cc: Dianne Feinstein c/o Grand Hyatt, New York

96043764518

HRC207

PETER MORTON



5323

10-77/1220

July 15 1992

PAY **Ten Thousand Dollars & no/100 DOLLARS \$10,000.00

TO THE ORDER OF

Democratic Senate Campaign Committee
Attn: Tricia Riffenburgh
11355 West Olympic Boulevard
Suite 510
Los Angeles, CA 90054
**credit Dianne Feinstein

PETER MORTON

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

DELUXE FORM WVC-8 V-8

DATE	DESCRIPTION	AMOUNT
7/15/92	credit to Dianne FEinstein's record with DSCC	\$10,000.00

96043764519

HRC208

Catherine O'Neill

Thank you so much for your very generous campaign contribution. Your support is greatly appreciated and essential to the success of my campaign.

I look forward to your continued involvement.

My best,



Cathy O'Neill

96043764520

Peter

I appreciate your help -

Do you think the Restaurant Association in your area would support the business which Michael is industrious?
Would you forward a request?

HRC209

9 6 0 4 3 7 6 4 5 2 1

You are cordially invited to attend
a Dinner
honoring
CATHY O'NEILL

candidate for the 23rd State Senate District
on Monday, the twenty-seventh of April
nineteen hundred and ninety-two
at seven in the evening
Michaels Restaurant
1147 Third Street
Santa Monica, California

For further information, call (310) 394-0448

Yes, I'd be delighted to attend Cathy's dinner on Monday, April 27, 1992.
Please reserve _____ ticket(s) at \$500 each.

I am unable to attend. Enclosed is my contribution of \$_____.

The following information is required by law:

Name _____

Home Address _____

City _____ State _____ Zip _____ Phone (____) _____

Occupation _____ Check if self-employed

Employer / Firm _____

Business Address _____

City _____ State _____ Zip _____ Phone (____) _____

ID number, if committee _____

Please make checks payable to
Cathy O'Neill for State Senate, ID # 920577
1460 Fourth Street, Suite 306, Santa Monica, CA 90401
(310) 394-0448

Contributions to Cathy O'Neill for State Senate are not tax deductible
as charitable contributions for federal income tax purposes.

There is no limit on the amount of corporate, personal, or partnership contributions to a candidate for the State Senate. HRC210

ROBERT TANENBAUM

2265 Westwood Blvd., Suite 143, Los Angeles, CA 90064
(310) 859-6010 Fax (310) 859-1960

May 11, 1992

Mr. Peter Morton
510 N. Robertson Blvd.
Los Angeles, CA 90048

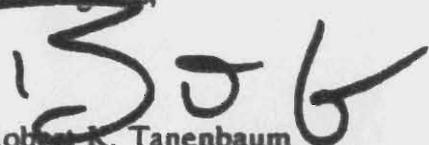
Dear Peter:

Thank you very much for your generous contribution to my campaign for Los Angeles County District Attorney.

I am encouraged by the enthusiastic response to the campaign and grateful to you for your confidence and support. With your help we will be able to bring our campaign message to the voters and take back the streets of Los Angeles from the violent criminals who prey upon them.

Please know how much I appreciate your help.

Best regards,


Robert K. Tanenbaum

96043764522



HAYDEN
STATE SENATE

1 9 9 2

227 Broadway, Suite 301-A
Santa Monica, CA 90401-9916

310 451-5811
Fax 310 451-5812

March 29, 1992

Peter Morton
510 N. Robertson Blvd.
Los Angeles CA 90048

Dear Peter:

Thank you for your contribution to my campaign for the 23rd State Senatorial District.

Your support helps to insure that the cry for a cleaner, safer, healthier and more vital California will be voiced in the State Legislature. If elected I will continue the fight on behalf of the public interest.

There is hope: between prison terms and term limits, the State Senate will be changing in the 90s. This is a moment of historic opportunity. Your mandate will not only send me to Sacramento but encourage a broader wave of needed reform.

Your contribution plays a large part in the fight for California. Thank you for your support.

Very truly yours,


Tom Hayden

9 6 0 4 3 7 6 4 5 2 3

PETER MORTON

November 18, 1992

Via Federal Express

Rahm Emanuel
Executive Director
Presidential Inaugural Committee
Washington, DC 20599-0001

Dear Rahm,

I have passed your letter to my financial advisors.

I am somewhat embarrassed to let you know that my advisors have put their foot down with respect to your request for an \$100,000 advance. They said I should view this loan request as an additional contribution and quite simply, they have pointed out that I have contributed over \$250,000 to various races in this last election and they do not want that figure to be exceeded.

I hope you and President Elect Clinton appreciate how committed and excited I am about the new administration, but I hope you will also appreciate that I have many other charitable financial obligations.

But next year is a new year and every once in a while I am prepared to do battle with my advisors.

Best wishes for the Thanksgiving holidays.

Sincerely yours,



Peter A. Morton

PAM/srb

96043764524

HRC213



Presidential Inaugural Committee
Washington, DC 20599-0001
(202) 252-1000

November 16, 1992

Mr. Peter Morton
Hard Rock Cafe
510 North Robertson Boulevard
Los Angeles, CA 90048

Dear Peter:

It is my distinct pleasure to inform you that planning for the Clinton/Gore Inaugural is now actively underway. The President-elect has appointed the Presidential Inaugural Committee and is proceeding to conduct what we hope will be a joyful and exuberant inaugural celebration for America and a message of genuine hope and great goodwill about the future under President Clinton and Vice-President Gore.

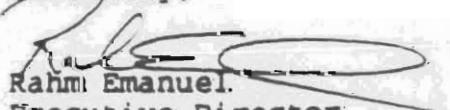
The inaugural activities must be funded privately to a large extent. To generate initial operating funds, we are seeking "founders'" loans. We hope that you will consider being one of our founders. The terms and understandings about the lending program are described briefly but fully in the accompanying memorandum.

Please send your check, made out to the "Presidential Inaugural Committee-1993", along with a signed copy of the accompanying memorandum to me at:

PIC-1993
Attention: Inaugural Fund
Southeast Federal Center
Third and M Streets, SE
Building 159E
Washington, DC 20599

If you have any questions, please call Nancy Jacobson, Director of Finance at the Inaugural Headquarters, telephone (202) 252-1200.

Sincerely,


Rahmi Emanuel
Executive Director

HRC214

96043764505



Presidential Inaugural Committee

Washington, DC 20599-0001

(202) 252-1000

Presidential Inaugural Committee - 1993

Inaugural Guaranty Fund

The inauguration of the President is a national celebration of the values and processes of American Democracy. The event is non-partisan in nature. The Inauguration of Bill Clinton and Al Gore continues in this tradition.

Numerous prior inaugurations have successfully employed a non-interest bearing loan mechanism as a way in which to raise initial operating funds. In the past, time exigencies have made use of such a funding system a virtual necessity. President-elect Clinton's inaugural committee, the Presidential Inaugural Committee-1993 (PIC), intends to follow these precedents.

The Lending Program

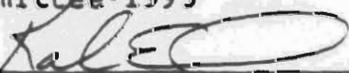
The PIC is seeking loans from individuals, corporations or other organizations. The loans will bear no interest. Repayment is not guaranteed and any loans are without personal recourse against the directors, officers, employees, agents, volunteers and consultants of PIC. Moreover, the timing of any repayment shall be determined in the sole discretion of PIC's board of directors.

Based upon the experiences of several prior inaugurations that have used this financing tool, the prospect of repayment in full is very good and the PIC is dedicated to that result. However, there is no guarantee of repayment, in whole or part.

Terms Agreed to and Accepted

Presidential Inaugural
Committee-1993

By: _____
Lender

By: 
Rahm Emanuel
Executive Director

Date: _____

Date: _____

96043764526



Established in London

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March 15, 1993

Dan Pritikin
Dan Pritikin for City Council
11718 Barrington Court, #411
Los Angeles, CA 90049

Dear Dan:

Enclosed please find a check from the Hard Rock Cafe in support of your campaign for Los Angeles City Council. We wish you success and hope that you will bring about many of the changes needed to revitalize our city.

Sincerely,

Peter Morton
Chairman

Encl.

Hard Rock America
Corporate Offices • 510 North Robertson Boulevard, Los Angeles, California USA 90048 • Telephone: 310.854.3366 Fax: 310.652.8747

This letterhead is printed on recycled paper.

HRC216

96043764527

LAURA LAKE for Assembly

42nd Assembly District

Laura Lake Biography

Laura Lake combines academic achievement, real-world experience and the willingness to fight to make California safe and prosperous. Laura and her husband Jim, a UCLA molecular biology professor, live in Westwood, where they are raising their two children, Caroline, thirteen, and Jeremy, nine. They are members of Leo Baeck Temple.

Laura's work has not been limited to the Westwood area. She co-founded Heal the Bay, is President of Friends of Westwood, and is a leader in helping to empower communities and plan for the city's infrastructure. She co-founded Not Yet New York, and helped block the LANCER trash incinerator project in South Central Los Angeles, West Los Angeles, and the San Fernando Valley.

An environmental professional as well as an advocate, Laura is a founding board member of Americans for a Safe Future, and has worked as part of a state-wide alliance and with members of the state legislature for the passage of environmental legislation to stop the Ward Valley nuclear dump proposed near Needles, California, near the Colorado River, LA's major water supply. Laura served on the Los Angeles City Council's Citizens' Advisory Committee on Solid Waste Management, and the Metropolitan Water District-Environmental Defense Fund Source Reduction Research Partnership to protect southern California's groundwater.

Laura is Vice President of the National Council of Jewish Women of Los Angeles and serves on the American Jewish Congress's Commission on Women's Rights and Jewish Feminist Center Board. Women For: recognized Laura's exceptional environmental leadership by honoring her with their "Woman of Achievement" Award.

A leader in historic preservation, open space and urban beautification, Laura worked with community leaders to prevent the commercial development of Pan Pacific Park, and now co-chairs Friends of Pan Pacific Park which seeks to landscape the park and build a seniors center. In 1990, Laura co-founded Wilshire Beautiful to design a tree-lined median for Westwood's Golden Mile.

Laura Lake is 46 years old, a native of Brooklyn, New York. She graduated from the University of Wisconsin in 1967 and received her Ph.D. in political science from Tufts University in Massachusetts in 1972. She left the Ford Foundation in 1976 to join the UCLA faculty in Environmental Science and Engineering where she taught for sixteen years. She is a past national Chair the National Association for Public Administration's Section on Natural Resources and Environmental Administration as well as the United States Department of State-UNESCO Man and the Biosphere Directorate on Grazing Lands.

Laura Lake is committed to creating a favorable business climate while protecting the environment, combatting crime, and reforming public education.

8621 Wilshire Boulevard, Box 143, B.H., CA 90211 Phone/Fax (310) 470-4522
Harald R. Hahn, Treasurer, Campaign ID #931972

HRC214



96043764529

LAURA LOKE for Assembly ●
42nd Assembly District

Peter Morton
510 North Robertson Dr.
Los Angeles, Ca. 90048

January 6, 1994.

Dear Peter,

Delighted to have you on board! As a leading environmentalist, your endorsement and financial support mean a great deal to me. Enclosed are a map of the district, my bio, and a contribution envelope.

My assistant Lisa will be in touch with Susan about upcoming political events and to make arrangements to pick up a check.

Thank you in advance for your generous support.

Warm regards,



Laura Lake

96043 / 6457C

8621 Wilshire Boulevard, Box 143, B.H., CA 90211 Phone/Fax (310) 470-4522
Harald R. Hahn, Treasurer, Campaign ID #931972



HR219

96043764531

DI

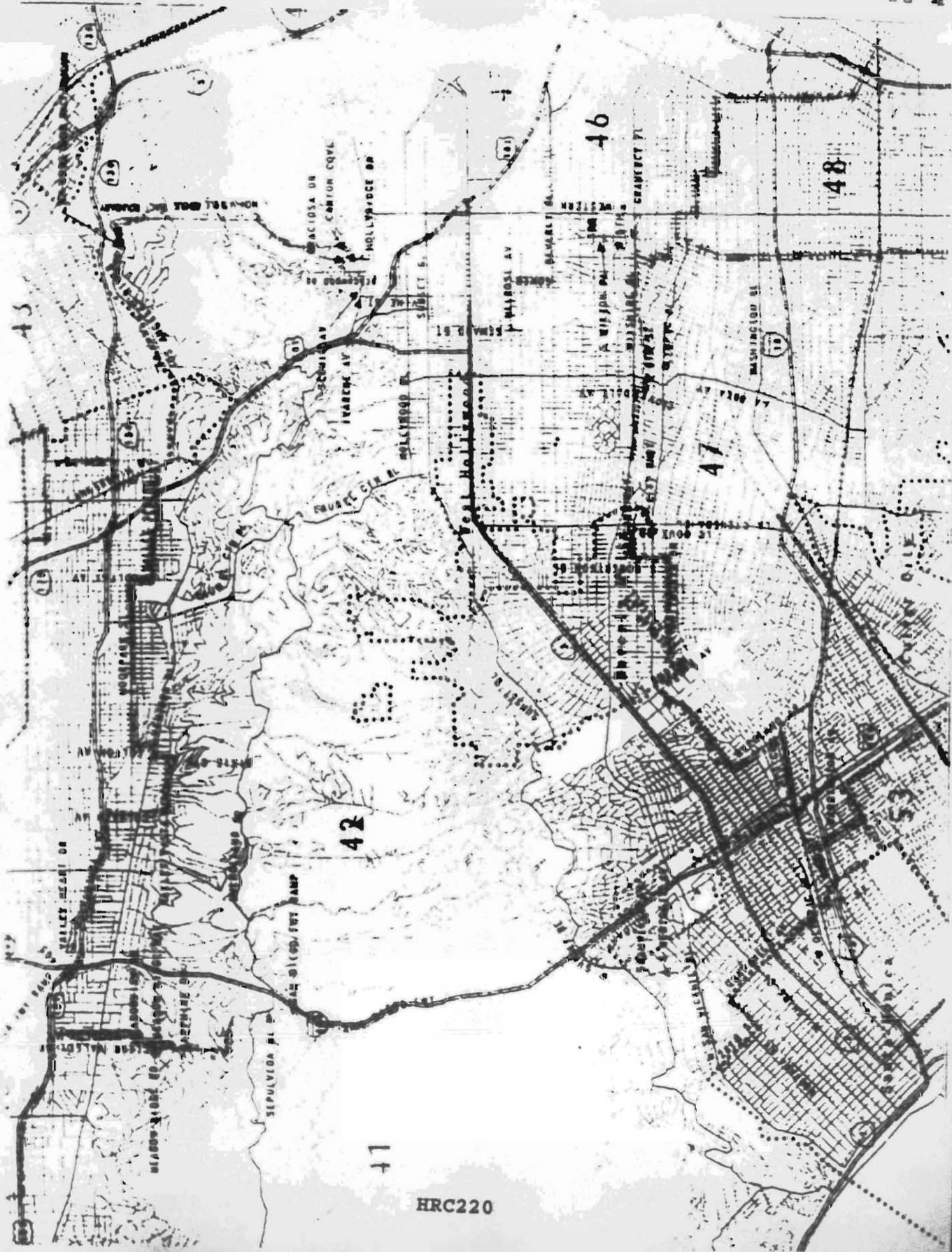
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STATE
 1137
 MICHIGAN

MAP
 STATE DAD

SCALE
 1:50,000
 1963

MAP 1 OF



HRC220

Majority Leader
Richard A. Gephardt

January 3, 1994

Tarlton & Peter Morton
Hard Rock America
510 North Robertson Blvd.
Los Angeles, CA 90048

Dear Tarlton & Peter,

First of all, let me wish you and your family a happy and healthy 1994! I hope that you have received my invitation on behalf of The Effective Government Committee to join Jane and me for a few days of skiing and relaxing in beautiful Telluride, Colorado beginning on February 11. We are asking a small number of couples to join us and I certainly hope that you can attend. A few of my colleagues in the House will also be attending.

Enclosed is a brochure on our mid-mountain accommodations at The Peaks at Telluride, one of the top resorts in the country. In addition to skiing, there will be plenty of time for relaxing, exploring in Historic Telluride, snowmobiling and enjoying good company around the fire.

As a reminder, your commitment to the Effective Government Committee will cover all of your accommodations, your evening meals and numerous other expenditures.

I very much hope you will be able to join us for the trip. If you have any questions or would like to confirm your attendance, please call David Jones at 202-347-6112.

Sincerely,


Richard A. Gephardt

96043764572



Peter A. Morton
Chairman

January 22, 1994

Kathleen Brown
12233 West Olympic Boulevard
Suite 158
Los Angeles, CA 90064

Dear Kathleen,

Please find enclosed my check for \$10,000 for your campaign.

Please give my best to Hillary and your father.

Best regards,

All my Best

Peter Morton

Pete

PAM/srb
Encl.

Hard Rock America
510 North Robertson Boulevard, Los Angeles, California USA 90048 • Telephone: 310.854.3366 Fax: 310.652-8747

HRC222

9 6 0 4 3 7 6 4 5 3 3

SENATOR DAVID ROBERTI
Beat the Recall
I.D. Number 940046

Date: 4/13/94

To: Peter Morton

Fax: 310-652-8747

Number of Pages: 2

Dear Friend, Peter

Thank you very much for your recent contribution commitment to my campaign. Your support of my efforts to Beat the Recall means a great deal to me. Attached is information on the campaign. Your contribution will make a big difference. Please see the attached sheet for information on how to contribute.

If you have any questions, please contact my assistant Renee Hatchwell at (818) 341-3554.

Sincerely,

David
Senator David Roberti

Part 1

Hope to meet with you in person soon
Thank you,

HRC223

96043764574



YAROSLAVSKY FOR SUPERVISOR
15500 Erwin Street Suite 4000
Van Nuys California 91411

(818) 908-5101
FPPC #932189

May 4, 1994

Peter Morton
Hard Rock Cafe America
510 N. Robertson Blvd.
Los Angeles, CA 90048

Dear Peter:

Thank you so much for your generous contribution to the "Yaroslavsky for Supervisor" committee. Your support will make it possible for me to run an aggressive and winning campaign in the upcoming election.

Your support has already made it clear that my candidacy is off to a very strong start. As the coming weeks unfold I will have a broad-based coalition of supporters from all parts of the third supervisorial district, backed up by your generous contribution. I can't tell you how much this support means to my campaign.

Your friendship is important to me and I appreciate all of your help. I look forward to working with you in the coming campaign. Please feel free to call me if you have any thoughts or ideas.

Sincerely,



Zev Yaroslavsky

HRC224

96043164575

BARRY DILLER

1940 Coldwater Canyon Drive
Beverly Hills, California 90210

310 246-1411

June 16, 1994

Dear Peter,

Thank you for your contribution in support of Senator Edward Kennedy and the Democratic Senatorial Campaign Committee.

I know only too well how many requests come your way, and I'm enormously appreciative of your willingness to help. In addition to the DSCC, Ted Kennedy is especially appreciative of your support.

Regards,



Mr. Peter Morton
Hard Rock Cafe
510 North Robertson Boulevard
Los Angeles, CA 90048

HRC225

96043764576

June 30, 1994

Ms. Kate Carr
Democratic Senatorial Campaign Committee
430 South Capitol Street, SE
Washington, DC 20003

Dear Ms. Carr:

I hereby designate 100% of my contribution made payable to the Kennedy/DSCC Victory Fund to the Committee To Re-Elect Senator Edward M. Kennedy '94. In addition, I hereby designate my aggregate personal contribution in excess of the \$1,000 limit to the Primary Election to the General Election.

Sincerely,



96043764577

THE BURKETT GROUP

July 27, 1994

Hard Rock America
510 N. Robertson
Los Angeles, CA 90048

ATTN: Susan

Re: 1994 California Major Donor Campaign Statement

Dear Susan:

Enclosed please find the above-mentioned document. Please ask Mr. Morton to sign and date in the designed space on the first page. I will make arrangements for a messenger to pick up this packet tomorrow.

Thanks for your assistance.

Sincerely,



Rebecca Shehee
Assistant to Bob Burkett

96043764578

9 6 0 4 3 7 6 4 5 1 0

Independent Expenditure and Major Donor Committee Campaign Statement

INDEPENDENT EXPENDITURE AND MAJOR DONOR STATEMENT
Type or Print in ink.
Amounts may be rounded
to whole dollars.

Statement covers period

from 1/1/94

through 6/30/94

CALIFORNIA
1991 FORM **461**

Page 2 of 3

SEE INSTRUCTIONS ON REVERSE

NAME OF FILER

PETER MORTON

IV Expenditures and Contributions (including Loans) Made (If more space is needed, use additional copies of this page for continuation sheets)

DATE	NAME AND ADDRESS OF PAYEE (IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME, AND ADDRESS, ENTER ID NUMBER OR, IF NO ID NUMBER HAS BEEN ASSIGNED, ENTER TREASURER'S NAME & ADDRESS)	DESCRIPTION OF EXPENDITURE OR CONTRIBUTION MADE (INCLUDE INTEREST RATE, IF LOAN)	NAME OF CANDIDATE AND OFFICE (IF NAME OF BALLOT MEASURE AND BALLOT NUMBER OR LETTER)	CHECK ONE		AMOUNT	CLASSIFY EXP.	CLASSIFY AMOUNTS TO DATE	
				REVENUE	EXPENSE			CALENDAR YEAR	OTHER
1/3/94	Friends of Kathleen Brown 12233 W. Olympic, #180 Los Angeles, CA 90064 I.D. # 930757	Monetary Contribution	Kathleen Brown California Governor	X		10,000		CALENDAR YEAR	\$ 10,000
								OTHER	\$ N/A
								CALENDAR YEAR	
								OTHER	
								CALENDAR YEAR	
								OTHER	
								CALENDAR YEAR	
								OTHER	
								CALENDAR YEAR	
								OTHER	

SUBTOTAL \$ 10,000

HR0229

• See instructions on reverse regarding independent expenditures and cumulative amounts

9 6 0 4 3 7 6 4 5 4 1

Independent Expenditure and Major Donor Committee Campaign Statement

INDEPENDENT EXPENDITURE AND MAJOR DONOR STATEMENT

Type or Print in ink.
Amounts may be rounded
to whole dollars.

Statement covers period

from 1/1/94

through 6/30/94

CALIFORNIA 1991 FORM **461**

Page 3 of 3

SEE INSTRUCTIONS ON REVERSE
NAME OF FILER

PETER MORTON

V Loans Forgiven and Loans Guaranteed (If more space is needed, use additional copies of this page for continuation sheets)

DATE	NAME AND ADDRESS OF OFFICER, CANDIDATE OR COMMITTEE (IF COMMITTEE, ENTER THE ID NUMBER OR, IF NO ID NUMBER HAS BEEN ASSIGNED, ENTER THE TREASURER'S NAME & ADDRESS)	OFFICE SOURCE OR INSTITUTION (IF NOT A BUSINESS BANK)	AMOUNT OF LOAN FORGIVEN (US DOLLARS)	AMOUNT OF LOAN GUARANTEED (US DOLLARS)	CUMULATIVE AMOUNTS TO DATE CALENDAR YEAR
	NONE				\$ OTHER CALENDAR YEAR \$ OTHER CALENDAR YEAR \$ OTHER
(Enter the total of Columns (a) and (b) on Line 6, Part II Summary)			SUBTOTALS \$ (a)	\$ (b)	

VI Loan Payments Received (If more space is needed, use additional copies of this page for continuation sheets)

NAME AND ADDRESS OF DEBITOR (IF THE LOAN WAS MADE TO A COMMITTEE, LIST THE COMMITTEE'S NAME, ADDRESS AND ID NUMBER IF NO ID NUMBER HAS BEEN ASSIGNED. LIST THE TREASURER'S NAME AND ADDRESS)	NAME AND ADDRESS OF PERSON WHO REPAYED THE LOAN (IF DIFFERENT THAN DEBITOR)	AMOUNT REPAYED (US DOLLARS)	CUMULATIVE AMOUNTS TO DATE
NONE			\$
			\$
			\$

ERC230



Peter A. Morton
Chairman

September 12, 1994

Richard Blum
Richard Blum Associates
909 Montgomery Street
San Francisco, CA 94133

Dear Richard,

Great talking to you today. Please give Dianne my best wishes.

Sincerely,

Peter A. Morton

PAM/srb
Encl. (check)

HRC231

96043 / 64543

PETER MORTON

Union Bank
Member FDIC
1000 S. Main Street
San Jose, CA 95128

7616

10-77
1220

September 12 19 94

PAY Twenty Thousand Dollars & no/100*****

DOLLARS \$ \$20,000.00

TO THE ORDER OF

Democratic Senatorial Campaign Committee
Dianne Feinstein's Tally



DETACH AND RETAIN THIS STATEMENT
IF YOU REQUEST PUBLIC NOTICE OF THIS RECEIPT UNDER
THE ATTACHMENT TO THE FEDERAL CAMPAIGN DISCLOSURE ACT

PETER MORTON

DELUXE FORM WWC-3 V-2

DATE	DESCRIPTION	AMOUNT
9/12/94	This is for Dianne Feinstein's tally Contribution	\$20,000

Richard C. Blum
909. Montgomery Street, Suite 400
San Francisco, CA 94199

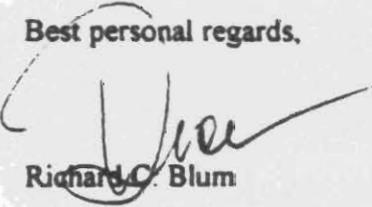
September 13, 1994

Mr. Peter Morton
President
Hard Rock America
510 North Robertson Boulevard
Los Angeles, CA 90048

Dear Peter:

Thank you very much for your contribution to Dianne's re-election campaign. We greatly appreciate your support. Will call you for lunch after things quiet down (in November).

Best personal regards,



Richard C. Blum

RCB:jc

HRC233

96043164544



Peter A. Morton
Chairman

October 18, 1994

Congresswoman Karen Shepherd
255 East 400 South
Salt Lake City, UT 84111

Dear Congresswoman Shepherd,

Enclosed please find a check for \$500 for your re-election campaign.

Best of luck.

Sincerely,

Peter A. Morton

PAM/srb
Encl.

9 6 0 4 3 7 6 4 5 1 5



LAS VEGAS

Peter A. Morton
Chairman

October 18, 1994

Skip Miller
Christiansen, White, Miller, et al
2121 Avenue of the Stars
18th Floor
Los Angeles, CA 90067-5010

Dear Skip,

Please forward this contribution to Barbara Yaroslavsky for me.

Regards,


Peter Morton

PAM/srb
Encl.

96043764516

HARD ROCK HOTEL & CASINO

Executive Offices 510 North Robertson Boulevard Los Angeles, California USA 90048 Telephone: (310) 854-3366 FAX (310) 652-8747

HRC235

PETER FONTON

217 1st St. N. #100
Minneapolis, MN 55401

5396

July 30

92

8/7/92

One Hundred Thousand Dollars & no/100

DOLLARS \$ 100,000.00

Hard Rock Cafe America LP

TO THE ORDER OF



Fonton
NOT NEGOTIABLE

PETER FONTON

REFUXE FORM WCC-8 V2

7/30/92

Reimb. Contribution

\$100,000.00

696927451

DEPOSIT TICKET

ADDRESS **HARD ROCK CAFE**
510 NORTH ROBERTSON BL.
LOS ANGELES, CA. 90048

DATE **7-31-92**

BRANCH **AKAUREH**
Branch Office
1000 Wilshire Blvd
Los Angeles, CA 90017

Union Bank
Member FDIC

CURRENCY

COIN

CHECKS **1677 100,000 -**

*Reimbursement
Peter Moller*

Union Bank
200138

AMOUNT \$100000.00
CHECK NO. 2000158125

HARD ROCK CAFE AMERICA L.P.
TOTAL DEPOSIT **100,000.00**

TOTAL 100,000 -

DEPOSITS MAY NOT BE AVAILABLE FOR IMMEDIATE WITHDRAWAL

96043764518

(202) 737-5333



Peter A. Morton
Chairman

July 9, 1993

David Wilhelm
Chairman
Democratic National Committee
655 15th Street, N.W.
8th Floor, Suite 800
Washington, D.C. 20005

Re: \$25,000 Contribution

Dear Mr. Wilhelm:

This is to confirm that my \$25,000 contribution to the Democratic National Committee that was delivered to Darius Anderson was pledged, promised and earmarked to the Walter Shorenstein event which took place in San Francisco, California on Monday, June 21, 1993.

Please be so kind as to credit my contribution to Mr. Shorenstein's event.

Sincerely,

Peter Morton
Chairman

cc: Darius Anderson
Walter Shorenstein
Bob Burkett

96043764519


CALIFORNIA DEMOCRATIC PARTY
BILL PRESS, Chair

July 12, 1993

Peter Morton
Hardrock Cafe
510 N. Robertson Blvd.
Los Angeles, CA 90249

Dear Peter:

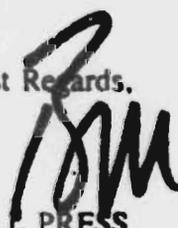
Thank you very much for your participation in our June 21st luncheon with Vice-President Al Gore.

This was my first fundraising event as Chair of the State Party, so the success of this luncheon was especially important to me.

I don't think we could have asked for anything better. The weather was perfect. The setting was beautiful. The food was superb. The crowd was enthusiastic. The Vice-President was at his best. And we raised a lot of money. That's what I call a successful event!

I'm very grateful, Peter, for your help.

Best Regards,


BILL PRESS
Chair

BP:av

*Glad you could make it!
—
mid. Sept.*

HRC239



Peter A. Morton
Chairman

July 28, 1993

Nancy Jacobson
DEMOCRATIC NATIONAL COMMITTEE
655 15th Street, N. W.
8th Floor, Suite 800
Washington, D.C. 20005

Dear Nancy:

As much as I would like to be able to apply my \$25,000 to the Democratic National Committee PAC, I am unfortunately committed to my federal maximum to the Democratic Senatorial Campaign Committee and several other federal PACs.

Therefore, I request that the full amount of my contribution be applied solely to state and local use.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Morton", written over a faint circular stamp.

Peter Morton

PAM/srb

96043764551

FEDERAL REDESIGNATION

July 26, 1993

Mr. Peter Morton
510 North Robertson Boulevard
Los Angeles, CA 90048

Dear Mr. Morton:

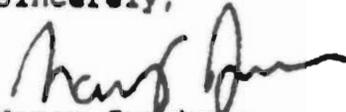
Thank you for your extraordinarily generous contribution to the Democratic National Committee for \$25,000 made in connection with the June 21 Vice Presidential Dinner. Federal election law permits an individual to contribute up to \$20,000 federal money per calendar year. Since your check was written in excess of this amount, the DNC is unable to deposit any portion of your check in our federal account without your written consent. By designating \$20,000 of your contribution to the DNC's federal account, you will help the DNC support federal candidates at all levels of office.

The remaining portion of your contribution will be deposited in an account that is used in connection with state and local elections where such contributions are permitted.

It should be noted that an individual may donate up to \$25,000 per calendar year to all federal candidates and committees, including the DNC's federal account.

If you will permit us to deposit a portion of you contribution into our federal account, please fax this form to immediately to my attention at 202/737-3533 so that we may process your contribution. Once again, thank you for your generous support!

Sincerely,



Nancy Jacobson
Finance Director

*****Redesignation*****
(circle the appropriate amount)

Please designate (1) \$20,000; (2) other \$ _____; of my contribution to the DNC's federal account.

Peter Morton

HRC241

96043 / 64552



Democratic Senatorial Campaign Committee

430 South Capitol Street, S.E., Washington, D.C. 20003 • (202) 224-2447

September 30, 1994

Chairman

Bob Graham FL

In Office

George Mitchell ME

Program Chairs

John D. Rockefeller IV WV

Richard Shelby AL

Madelyn Trust

Chris Dodd CT

Max Baucus MT

Leadership Circle

David Pryor AR

Patry Murray WA

Business Roundtable

Tom Harkin IA

Ben Nighthorse Campbell CO

Labor Council

Barbara Mikulski MD

Barbara Boxer CA

Women's Council

Past Chairs

Charles S. Robb VA

John Breaux LA

John Kerry MA

Mr. Peter Morton
Chairman and Founder
Hard Rock America
510 North Robertson Blvd.
Los Angeles, CA 90048

Dear Peter:

As the Chairman of the Democratic Senatorial Campaign Committee, I would like to thank you for your generous contribution.

As the mid-term elections approach, your support of the DSCC has never been more critical. With some formidable races shaping up, and control of the Senate hanging in the balance, we are facing a full agenda before November. We have tightly contested races for nine open Senate seats. In addition, 16 Democratic incumbents will be tested this fall, as opposed to only ten Republicans.

Your generous financial support is giving us the opportunity to provide valuable resources to our most competitive races and we are most grateful. We look forward to victory in 1994.

With kind regards,

Sincerely,

Bob Graham
Chairman

BG/aok

96043764553

2043

HARD ROCK CAFE AMERICA L.P.
 LOS ANGELES

Union Bank
 Every Bank Required Office
 645 Wilshire Boulevard
 Beverly Hills, CA 90210-7708

6-7/78

Jan. 7, 19 94

PAY FIVE HUNDRED DOLLARS \$ 500.00

TO
 THE
 ORDER
 OF

Laura Case for Assembly
 42nd Assembly Dist.
 3621 Wilshire Blvd.
 Box 143
 Beverly Hills CA 90211

VOID AFTER 90 DAYS

NOT NEGOTIABLE

⑆002043⑆ 1⑆2200077⑆: 2000668028⑆

HARD ROCK CAFE AMERICA L.P.

DELIVER FORM WVC-3 V-6A

DATE	DESCRIPTION	AMOUNT	DEDUCTIONS	
			ACCT. NO.	AMOUNT
1/7/94	Contribution	\$500.00	999.442	7465

ENTERED JAN 25 1994

PERIOD ENDING	EMPLOYEE				TOTAL EARNINGS	DEDUCTIONS				TOTAL DEDUCTIONS	NET PAY
	NAME	DATE	AMOUNT PAID AT REGULAR RATE	OVERTIME AND OTHER		FICA	WITHHOLDING (I.E. INC. TAX)	S.S.I.	STATE INCOME TAX		

DEPOSIT TO
 Cash Account

MAILED

HRC243

95043764554

HARD ROCK CAFE
MANUAL CHECK REQUEST FORM

DATE: 1, 6, 93

INDIVIDUAL REQUESTING CHECK: Peter Norton

RESTAURANT ON WHICH TO BE DRAWN: MO.

AMOUNT: \$ 500.

DISTRIBUTION: SEND TO PAYEE

RETURN TO INDIVIDUAL REQUESTING
CHECK OR RETURN TO: _____

DESCRIPTION: ~~Donation~~
Contribution

PAYEE (as to appear on check) Laura Tate for Assembly

ADDRESS (is to be sent) 42nd Assembly Dist.
8621 Wilshire Blvd
Box 143
B. H. CA 90211

AUTHORIZATION: [Signature]

FOR ACCOUNTING USE ONLY

Checks

Trans. # _____
Rest. # _____
Vendor # _____
Check # _____
Check Date _____
Amount \$ _____
Description _____
Cash Account _____

Rest. # _____
Paid Invoice # _____
Dr. Liability _____
O/L Account _____
Direct Expense _____

MAILED

95043764555

HARD ROCK CAFE LOS ANGELES
3600 BEVERLY BOULEVARD
LOS ANGELES CA 90048

000001769

2/04/94

25003

LINE NUMBER	QUANTITY	DATE	DESCRIPTION	AMOUNT	TAXES	PAYMENT AMOUNT
004	00	2/03/94		150.00	.00	150.00
TOTALS →				150.00	.00	150.00



DATE 2/04/94

UNION BANK
8400 WILSHIRE BL
BEVERLY HILLS, CA

CHECK NO.

25003

AMOUNT

*****150.00

PAY ONE HUNDRED FIFTY AND NO/100 *****

TO THE ORDER OF CALIFORNIA RESTAURANT #2600 000001769
139 WILSHIRE BLVD., #2606
LOS ANGELES CA 90010

NON NEGOTIABLE

VOID AFTER 90 DAYS

⑆025003⑆ ⑆122000496⑆2000158028⑆

Suite 1480
Sacramento CA 95814

AUTHORIZATION: for J. Pees

FOR ACCOUNTING USE ONLY

3.L. ACCOUNT NUMBER: _____

TENDOR NUMBER: _____

MAILED BY: _____

HRC245



#needs to be sent out by Feb. 14th Thanks.

MANUAL CHECK REQUEST FORM

DATE: 2/2/94

INDIVIDUAL REQUESTING CHECK: Jim Rees

RESTAURANT ON WHICH TO BE DRAWN: ~~HR~~ SPIT LA, SD SE NB

AMOUNT: \$ 150.00

DISTRIBUTION: SEND TO PAYEE

RETURN TO INDIVIDUAL REQUESTING CHECK

DESCRIPTION: CRA Political Action Committee Donation

PAYEE (AS TO APPEAR ON CHECK): CRA - PAC

ADDRESS (IF TO BE SENT): 980 Ninth St.
Suite 1480
Sacramento CA 95814

AUTHORIZATION: for J. Rees

FOR ACCOUNTING USE ONLY

G.L. ACCOUNT NUMBER: _____

VENDOR NUMBER: _____

MAILED BY: _____

LA - 37.50
SD - 37.50
SE - 37.50
NB - 37.50

1769
1 - 815 - 161 - 37.50
2 - 815 - 161 - 37.50
2 - 815 - 161 - 37.50
12 - 815 - 161 - 37.50

96043764557



CALIFORNIA RESTAURANT ASSOCIATION
POLITICAL ACTION COMMITTEE
980 NINTH STREET, SUITE 1480 SACRAMENTO
(916) 447-5793

January 26, 1994

DO
S.S.D.
CHECK
REQUEST
1/27/94

Mr. James Rees
Hard Rock Cafe
510 N. Robertson Blvd.
Los Angeles, CA 90048

Dear James:

As you probably know, one of my goals as Chairman of CRA/PAC is to have 100 percent of the State Board members and Chapter Presidents contribute to the PAC each year. And, of course, this year is no exception.

Nineteen hundred ninety-four is an extremely busy election year: 80 Assembly races (plus 15 current Assembly members running for other offices), 20 Senate races, and one or two special elections. CRA/PAC must continue to play a role in the outcome of those elections by actively participating in them.

There will be opportunities to support the PAC later in the year through fundraising events such as the Winemaker Dinner in Costa Mesa, the Gourmet Dinner in Capitola, and the Pasadena BBQ, plus I am hoping to organize an event in conjunction with the October Board meeting in Fresno. However, I am asking that you make a donation to CRA/PAC now so that we will have a large war chest for the June primary elections.

CRA/PAC continues to meet its fundraising goals with the support of Board members like yourself. I hope you will help CRA/PAC off to a great start this year by mailing your donation in the enclosed envelope to CRA's Sacramento office by February 18, 1994. I would be especially proud to announce 100 percent Board participation when we meet in Carmel March 6-8.

I appreciate your commitment to the PAC which is so critical to our health as an industry.

Sincerely,

Jim Pardini
Jim Pardini
Chairman, CRA/PAC

JP sfd

Enclosure

P.S. A minimum \$100 donation would be most helpful by February 18.

Trustees

Jim Pardini, Chairman
Pardini's
Pasadena

Ted Balestracci
Sardine Factory
Monterey

Scott Bowman
M&M Lighthouse
San Diego

Richard P. Birmingham
Sizzler International
Los Angeles

Theodore Burke
Shadowbrook Restaurant
Capitola

Doug Cavanaugh
The Rudy's Restaurant Group
Costa Mesa

Lee W. "Pat" Harman
Harman Management Corp
Los Altos

Ronald F. Higgins
Trans Pacific Restaurants, Inc
Irvine

Eddie Johnson
Eddie's Restaurants, Inc
Sacramento

W. Don Ladd
Marriott Corporation
Washington, D.C.

Ruben Villaverde
R & M Food Services, Inc
Brea

Rich Walsh
General Mills Restaurants
Orlando, FL

96043764558

HARD ROCK CAFE AMERICA L.P.
LOS ANGELES

Union Bank
Primary City Regional Office
440 Wilshire Boulevard
Los Angeles, CA 90015-2701

MAR 17 1994

2158

14-771-223

Feb. 28, 1994

THOUSAND ***** DOLLARS \$10,000.00

ROCK THE VOTE

VOID AFTER 90 DAYS

[Handwritten Signature]
Bianca

⑆002159⑆ ⑆12200077⑆ 2000⑆66028⑆ ⑆0001000000⑆

96043764559

12000000
110528757

OR ACCT 0007871
03/26/94

(310) 550-8300
BANK OF
LOS ANGELES
LOS ANGELES, CA
⑆122200006⑆

VOID AFTER 90 DAYS
VOID AFTER 90 DAYS
VOID AFTER 90 DAYS

VOID AFTER 90 DAYS

HRC248

8800 BEVERLY BOULEVARD
LOS ANGELES CA 90048

89000479

4/13/94

2364

INVOICE NUMBER	REVERSE DATE	AMOUNT	TAXES	PAYMENT AMOUNT
41294	00 4/12/94	1000.00	.00	1000.00
TOTALS →		1000.00	.00	1000.00



DATE 4/13/94

UNION BANK
8400 WILSHIRE BL.
BEVERLY HILLS, CA

CHECK NO.
2364
AMOUNT

PAY ONE THOUSAND, AND NO/100 *****

TO THE ORDER OF
BEAT THE RECALL
7862 OSD AVENUE
CANOGA PARK, CA 91306

89000479

NON NEGOTIABLE

VOID AFTER 90 DAYS

⑆02556⑆ ⑆122000496⑆2000168028⑆



9604376456C



MANUAL CHECK REQUEST FORM

DATE: 4.12.94

INDIVIDUAL REQUESTING CHECK: S. Bushman

RESTAURANT ON WHICH TO BE DRAWN: M.O.

AMOUNT: \$ 1,000.00

DISTRIBUTION: SEND TO PAYEE

RETURN TO INDIVIDUAL REQUESTING CHECK

DESCRIPTION: Contribution ~~to~~ David Robert

0
9463

PAYEE (AS TO APPEAR ON CHECK): Beat The Recall

ADDRESS (IF TO BE SENT): 7862 Oslo Avenue
Canoga Park, CA 91306

AUTHORIZATION: [Signature]

FOR ACCOUNTING USE ONLY

G.L. ACCOUNT NUMBER: _____

VENDOR NUMBER: _____

MAILED BY: _____

96043764561

2187

HARD ROCK CAPE AMERICA L.P.
LOS ANGELES

Union Bank
Security First Regional Office
9400 Wilshire Boulevard
Beverly Hills, CA 90212-1700

16-77 (220)

March 15 19 94

PAY One Thousand Dollars & no/100***** DOLLARS \$ 1,000.00

TO THE ORDER OF

Yaroslavsky for Supervisor
300 North Spring Street
Suite 318
Los Angeles, CA 90012

VOID AFTER 90 DAYS

NOT NEGOTIABLE

#002187# 1:122000771: 2000168028#

HARD ROCK CAPE AMERICA L.P.

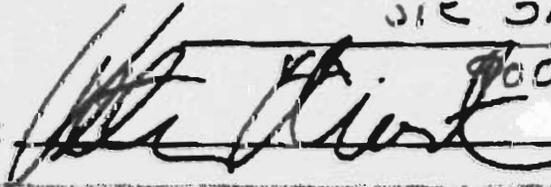
DELUXE FORM WVC-3 V-8A

DATE	DESCRIPTION	AMOUNT	DISTRIBUTION	
			ACCT. NO.	AMOUNT
3/15/94	Contribution			\$1,000
			9465	

EMPLOYEES

PERIOD ENDING	EARNINGS				TOTAL EARNINGS	DEDUCTIONS				TOTAL DEDUCTIONS	NET PAY
	HOURS	RATE	AMOUNT EARNED UP REGULAR RATE	OVERTIME AND OTHER		FICA	FEDERAL I.S. INC. TAX	S.S.I.	STATE INCOME TAX		

96043764562

AUTHORIZATION: 

312 310

KA 90012

FOR ACCOUNTING USE ONLY

G.L. ACCOUNT NUMBER: _____

VENDOR NUMBER: _____

MAILED BY: _____

HRC251



MANUAL CHECK REQUEST FORM

DATE: 3-14-94

INDIVIDUAL REQUESTING CHECK: Peter Morton

RESTAURANT ON WHICH TO BE DRAWN: M.D.

AMOUNT: \$ 1,000.

DISTRIBUTION: SEND TO PAYEE

RETURN TO INDIVIDUAL REQUESTING CHECK

DESCRIPTION: Political Contribution

PAYEE (AS TO APPEAR ON CHECK): Yaroslavsky for

ADDRESS (IF TO BE SENT): Supervisor

200 No. Spring Street
Ste 318

AUTHORIZATION: [Signature] 90012

FOR ACCOUNTING USE ONLY

G.L. ACCOUNT NUMBER: _____

VENDOR NUMBER: _____

MAILED BY: _____

96043764563

HARD ROCK CAFE AMERICA L.P.
LOS ANGELES

Union Bank
Branch 414 National Blvd
1900 Wilshire Boulevard
Beverly Hills, CA 90210-1190

2391

10/17/94

October 18 1994

PAY Five Hundred Dollars & no/100***** DOLLARS \$ 500.00

TO
THE
ORDER
OF

"Barbarin '95"

VOID AFTER 90 DAYS

NOT NEGOTIABLE

⑈002391⑈ ⑆122000771⑆ 2000168028⑈

HARD ROCK CAFE AMERICA L.P.

DELUXE FORM WVC-3 V-6A

DATE	DESCRIPTION	AMOUNT	DEDUCTIONS	
			ACC. NO.	AMOUNT
10/18/94	Contribution - Barbara Yaroslavsky			500
ENTERED 10/24/94			999-587	
			9465	

EMPLOYER

PERIOD ENDING	EARNINGS				TOTAL EARNINGS	DEDUCTIONS				TOTAL DEDUCTIONS	NET PAY
	HOURS	RATE	AMOUNT EARNED AT REGULAR RATE	OVERTIME AND OTHER		F.I.C.A.	WITHHOLDING U.S. INC. TAX	S.S.I.	STATE INCOME TAX		

96043764564

HRC253

HARD ROCK CAFE AMERICA LP.
LOS ANGELES

Union Bank
1000 Broadway
New York, NY 10003
Member FDIC

Cancelled 12-2-94

2392

PAY Five Hundred Dollars & no/1000000

October 18 19 96

DOLLARS \$ 500.00

TO THE ORDER OF
Kaplan Shephard for Congress
P51 East 400 South
Salt Lake City, UT 84111

YOUR OPTION IS DATE

[Handwritten signature]

[Handwritten signature]

#002392# #122000771# 2000158028#

12-2-94

KAPLAN SHEPHARD'S COMMITTEE
RETURNED THIS CHECK. PAPER
WAS A PERSONAL CHECK (NOT REIMBURSED).

9604924096

532 5241

ROBERT REDFORD

\$500:

October 8, 1994

Peter Morton
Hard Rock Cafe
510 North Robertson Blvd.
Los Angeles, CA 90048

Dear Peter,

Toward the end of July, I wrote you about my friend Karen Shepherd who was elected to the House of Representatives in 1992 from Utah. My thanks for your consideration at that time since I know how deluged you are with requests.

I wouldn't be writing you again about Karen if it weren't for the late infusion of \$1 million by opposition to barrage the voters of Utah with TV and radio ads against her. This is the most money ever spent against a Democratic congressional candidate in Utah! I'm worried that in this negative and volatile cycle we're in, another seat will be bought by the GOP unless Karen can remain financially competitive.

Let's face it, the Utah political landscape is far from a progressive bastion and we need to keep Karen in office.

--She was the only member of Utah's Congressional Delegation to dispute the Army's plan to drop 1100 pound rocket castings over the Canyonlands National Park.

--She was the sole member of the Utah Delegation to vote for the Assault Weapons Ban, the Brady Bill, and the Crime Bill.

--She's fought against special interests and for banning gifts from lobbyists, while calling for all Members of Congress to abide by the laws they pass for the rest of us.

--She passed legislation which prevented Utah from becoming a dumping ground for post Cold War chemical weapons.

When I look at the miserable behavior and enormous power of many Western governors, senators, and representatives on important environmental legislation in the 103rd Congress, I say we need Karen even more. It goes way beyond Utah.

HRC255

MacNeil/Lehrer News Hour called Karen Shepherd "a Profile in Courage." I've known Karen for decades, so I wasn't surprised when The Washington Post wrote that she is a member with "honesty and guts... someone who'll do what's right regardless of the political consequences."

Karen is leading in a three way race, but the polls show that in a head-to-head with Merrill Cook (who is calling for a run-off if no one candidate receives 50% of the vote) Karen is trailing by 4 points.

This is indeed a very nasty and expensive campaign and she needs your support. It would make an incredible difference in the closing weeks of the campaign for a person who has earned her national reputation as a principled and effective leader.

I would be so grateful for your consideration of sending her a \$500 check in the enclosed envelope. These final four weeks are a sprint to the finish line.

Best regards,



9.60437645

Requested By: _____

Date of Request: _____

HARD ROCK CAFE POLITICAL CONTRIBUTION AUTHORIZATION

Payee: _____

Mailing Address: _____

Check Amount: _____ Date Needed: _____

To: **Candidate Committee**

Name/Party/State _____

Current Office Held _____

Office Sought _____

Office Type Federal State Local

Election Year _____

Election Type Primary Runoff General

Debt Retirement Special

Multi-Candidate Committee or Party Committee

State/Party _____

Ballot Measure

State/Issue _____

From:

Partnership

Comments: _____
Identify name of contributor

Individual

Comments: _____
Identify name of contributor

Previous Contributions: Amount: _____ Date: _____

Partnership _____ *name* or Individual _____ *name*

Accounting: _____ Date: _____ (Check Number: _____)

Date Mailed/Hand Delivered _____

Hard Rock Cafe Authorization: _____ Date: _____

Legal Authorization: _____ Date: _____

96043764568

PETER MORTON

Union Bank

October 25 1994

PAY Five Hundred Dollars & no/100000000

DOLLARS \$ 500.00

TO THE ORDER OF

Karen Shepherd For Congress
255 East 400 South
Salt Lake City, UT 84111

NOT NEGOTIABLE

PETER MORTON

DELIVER FORM WVC-3 V-8

DATE	DESCRIPTION	AMOUNT
10/24/94	Contribution	500.00

96043764569



HRC257

PETER MORTON

5967

Union Bank

Member of the Republic of the United States
1400 W. Las Colinas Boulevard
Beverly Hills, CA 90212

March 4 19 93

15-77-1022

PAY Five Thousand Dollars & no/100** DOLLARS \$ 55,000.00

TO
THE
ORDER
OF

Carlton Morton



⑈0000500000⑈

96043764570

HRC258

96043764571

111 67128

111

1220000431
SPE 200 S. HOPE LAJ CA
68/04/93
928886326

110206885

MPS

HRC259

Date	Acct	Num	Description	Memo	Category	Clr	Amount
3/1	UNION B	6373	Mariana Moench	Dinner- Ju	Entertain	X	-460.00
10/12	UNION B	6548	Mariana Moench	Dinner Sep	Entertain	X	-400.00
11/1	UNION B	6599	Mariana Moench	Dinner- Oc	Entertain	X	-350.00
11/3	Wayneccr	2229	Mariana Moench	Dinner- KI	Entertain	X	-41.90
Total Business Entertainment							-6,430.40

Campaign Contributions

3/4	UNION B	5967	Tariton Morton	Reimburse	Political Cont	X	-5,000.00
3/5	UNION B	5972	Mike Woo for Ma	Contributi	Political Cont	X	-5,000.00
3/11	UNION B	5985	Barr for State	Contributi	Political Cont	X	-1,000.00
4/1	UNION B		Deposit-Democra	Senate Cam	Political Cont	X	1,000.00
5/4	UNION B	6109	Mike Woo for Ma	Contributi	Political Cont	X	-1,000.00
5/13	UNION B	6125	Friends of the	Donation	Political Cont	X	-45.00
5/14	UNION B	6139	Mike Woo For Ma	Contributi	Political Cont	X	-1,000.00
6/4	UNION B	6205	Mike Woo For Ma	Contributi	Political Cont	X	-1,000.00
6/10	UNION B	6211	Democratic Sena	Tallied Fe	Political Cont	X	-10,000.00
6/10	UNION B	6212	Diane Feinstein	Contributi	Political Cont	X	-2,000.00
7/1	UNION B	6283	Democratic Nati	Contributi	Political Cont	X	-25,000.00
8/3	UNION B	6388	C.R.I.A.	Saga Ponac	Political Cont	X	-800.00
10/1	UNION B	6522	Democratic Nati	Contributi	Political Cont	X	-25,000.00
11/22	UNION B	6679	Alfred Sapsee	Billy Gerb	Political Cont	X	-75.00
Total Campaign Contributions							-76,920.00

Charitable Donations

1/4	UNION B	5802	Christian Child	Sponsorshi	Charity	X	-21.00
1/15	UNION B	5849	The Aspen Found	Sponsorshi	Charity	X	-239.50
1/19	UNION B		Deposit- HRC R	Centinela	Charity	X	100,000.00
1/20	UNION B	5856	Christian Child	Sponsorshi	Charity	X	-21.00
2/24	UNION B	5933	Save The Childr	Sponsorshi	Charity	X	-400.00
2/24	UNION B	5934	Christian Child	Sponsorshi	Charity	X	-21.00
3/4	UNION B	5968	Save The Childr	Sponsorshi	Charity	X	-200.00
3/25	UNION B	6007	The Tony Fitzjo	Donation	Charity	X	-2,000.00
4/12	UNION B	6029	Christian Child	Sponsorshi	Charity	X	-21.00
4/12	UNION B	6041	Save The Childr	Sponsorshi	Charity	X	-200.00
4/13	UNION B	6054	Zero Population	Contributi	Charity	X	-400.00
4/26	UNION B	6076	Curtis School	Father Son	Charity	X	-50.00
5/5	UNION B	6107	Curtis Parents	Donation	Charity	X	-1,000.00
5/7	UNION B	6118	Save The Childr	Sponsorshi	Charity	X	-200.00
5/13	UNION B	6130	Violence Policy	Donation	Charity	X	-1,000.00
5/24	UNION B	6143	Aids Project Lo	Donation-E	Charity	X	-10,000.00
5/24	UNION B	6145	Christian Child	Sponsorshi	Charity	X	-42.00
7/9	UNION B	6313	Save The Childr	Sponsorshi	Charity	X	-200.00
7/13	UNION B	6317	R. P. Internati	Retinitis	Charity	X	-100.00
8/1	UNION B	6371	Christian Child	Sponsorshi	Charity	X	-42.00
8/17	UNION B	6421	Save The Childr	Sponsorshi	Charity	X	-400.00
9/7	UNION B	6449	Christian Child	Sponsorshi	Charity	X	-21.00
9/8	UNION B	6462	Israel Tennis C	Donation	Charity	X	-10,000.00
9/13	UNION B	6473	Save The Childr	Sponsorshi	Charity	X	-200.00

95043764572

DEPOSIT TICKET

P. MORTON

CURRENCY

COIN

CHECKS

250.00

Reimburse donation

PETER MORTON

TOTAL

250.00

PLEASE ENTER TOTAL HERE

Union Bank
 Federal Union Regional Center
 940 Wilshire Boulevard
 Beverly Hills, CA 90212

TOTAL DEPOSIT

1.2

THE MELROSE CORP.

DETACH AND RETAIN THIS STATEMENT
 THE ATTACHED CHECK IS IN PAYMENT OF ITEM DESCRIBED BELOW
 IF NOT CORRECT PLEASE NOTIFY US IMMEDIATELY AND RETURN CHECK

DELUXE FORM WVC-3 V-8

HRC262

DATE	DESCRIPTION	AMOUNT	ACCT NO	DESCRIPTIONS	AMOUNT
1/17/92	PM Reimburse donation	\$250.00			

EMPLOYEE	EARNINGS				TOTAL EARNINGS	DEDUCTIONS				TOTAL DEDUCTIONS	NET PAY
	PERIOD ENDING	HOURS	RATE	AMOUNT PAID AS REGULAR PAY		FICA	UNEMPLOYMENT INS. TAX	SOL	STATE INCOME TAX		
VGA											

7597096

PETER MORTON

Union Bank

Member FDIC
3440 Wilshire Boulevard
Beverly Hills, CA 90212

4888

January 17 19 92

18-77/1220

PAY Two Hundred Fifty Dollars & no/100 DOLLARS \$ 250.00

TO
THE
ORDER
OF

Citizens for Hollings
c o P.O. Box 3455
Universal City, CA 91608

⑈0000025000⑈

96043764574

HRC263

3/4 '93
\$ 200.00
DOLLARS
SECURITY PACIFIC BANK
200000200000

96043764576

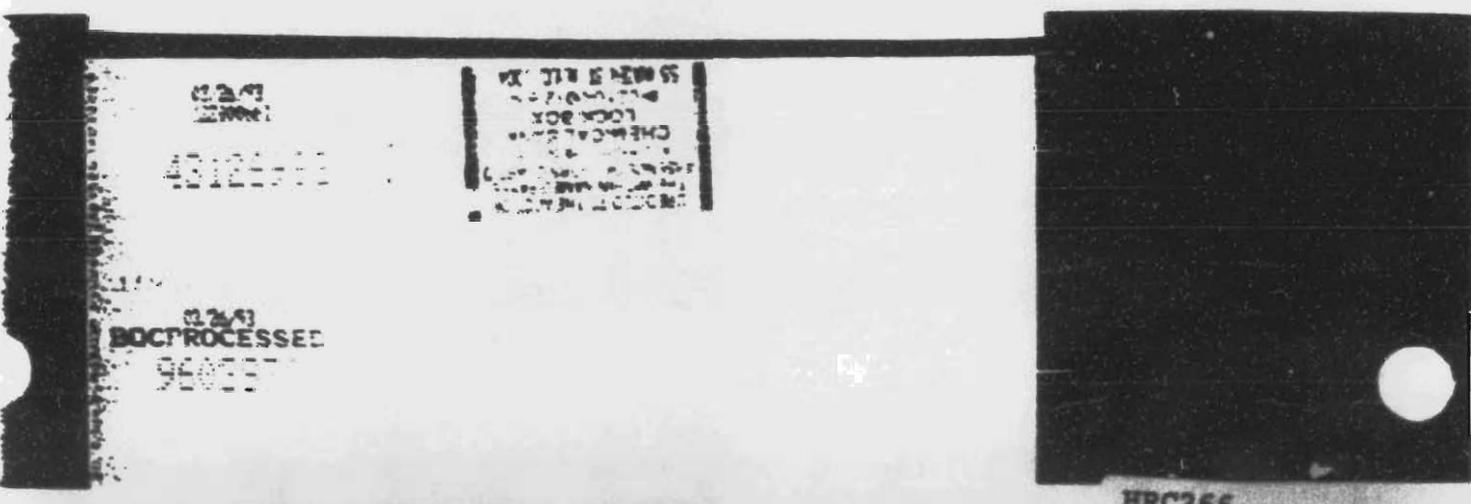
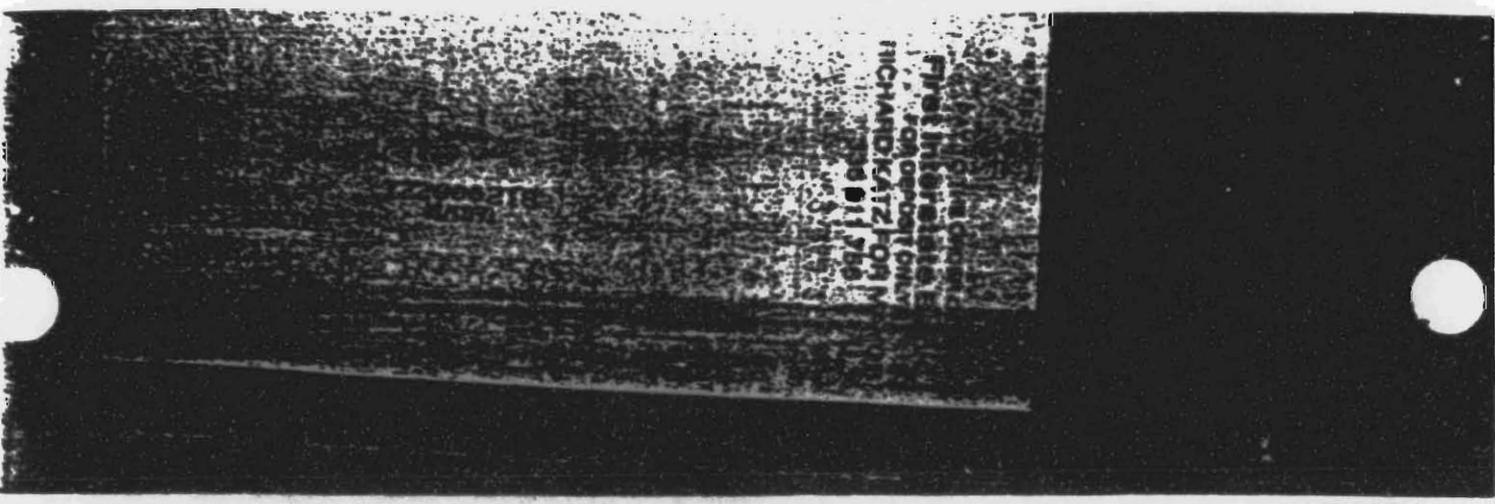
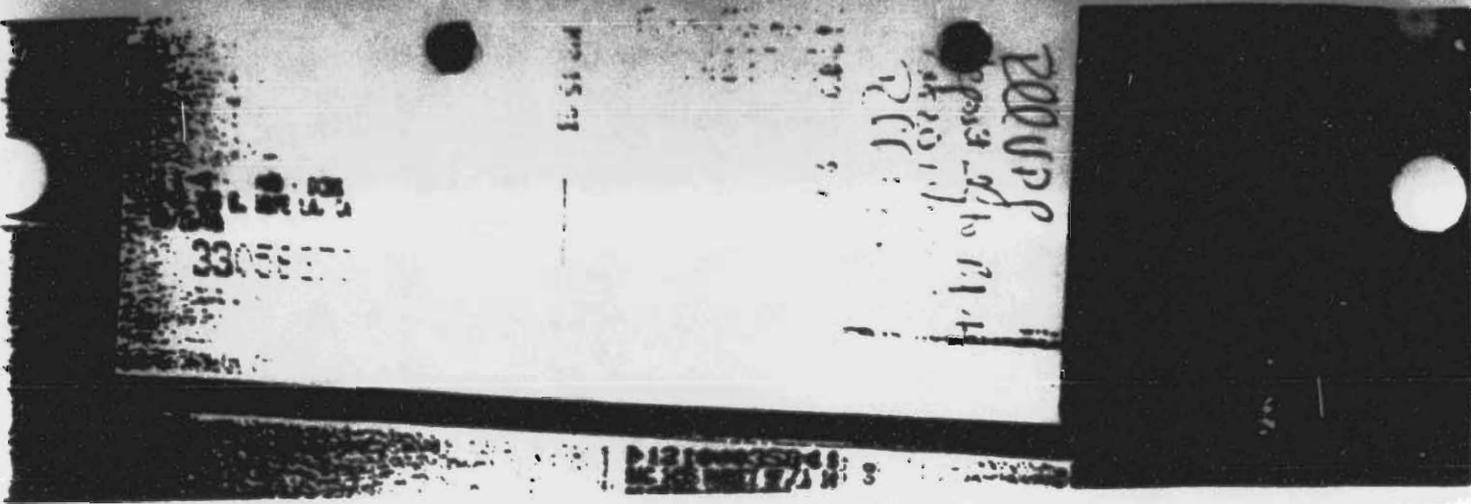
SECURITY PACIFIC BANK

TARLTON PAULEY MORTON
SECURITY PACIFIC BANK
DOLLARS

HRC265

6038721

9 6 0 4 3 7 6 4 5 7 7



HRC266

2325
1,841.05
ONE THOUSAND EIGHT HUNDRED AND FORTY ONE 00/100
SECURITY PACIFIC BANK
[Redacted]
[Redacted]
[Redacted]

78

2308
DSCC Women's Council \$ 5,000.00
Three Thousand and no/100
SECURITY PACIFIC BANK
[Redacted]
Done in tally
[Redacted]

79

2315
TOM PAULEY BORTON
E. Norman Harlow
Five Hundred 00/100
SECURITY PACIFIC BANK
[Redacted]
[Redacted]

80017931

PAY TO THE ORDER OF
GUYANAN BANKING NATIONAL
WASHINGTON, D.C. 20008

FOR DEPOSIT ONLY
CENTRAL BANK OF GUYANA

7/19/72

NATIONSBANK/DO

POST OFFICE BOX 2716

HYATTSVILLE, MD

05-10-0120-4

HRC268

PETER MORTON



Union Bank
Member FDIC
Member of the Sun Life Group
Member of the Sun Life Group
Member of the Sun Life Group

October 1 19 92

5543

16-77/0228

PAY Five Thousand Dollars & no/100** DOLLARS \$ 5,000.00

TO THE ORDER OF

Tarleton Morton

Peter Morton



000005000000

HRC269

9604376459C

96043764501

Deposited to the Credit of the
State of Michigan
S.C. 711 217 08
MICHIGAN BANK

6142
6142
6142
6142
6142
6142
6142
6142
6142
6142

MPSC
10/2/92

0110510721

HRC270

CHK NO.	PAYEE	AMOUNT
1992	POLITICAL CONTRIBUTION BASED ON QUICKEN INFORMATION	
4888	CITIZEN FOR HOLLINGS	250.00
4943	ROSTENKOWSKI FOR CONGRESS	500.00
4949	HANDGUN CONTROL	500.00
5030	JERRY BROWN FOR PRESIDENT	100.00
5031	JERRY BROWN FOR PRESIDENTT	100.00
5032	JERRY BROWN FOR PRESIDENTT	100.00
5035	TOM HAYDEN SENATE CAMPAIGN	1,000.00
5078	RICHARD M. DALEY	1,250.00
5080	MARA GIBBS/ JERRY BROWN FUNDRAISER	100.00
5081	CATHY O'NEILL SENATE CAMPAIGN	250.00
5108	KOSTMAYER FOR CONGRESS	250.00
5149	BOB TANNENBAUM FOR DISTRICT	2,500.00
5316	THE CAMPAIGN FOR A HATE FREE OREGON	200.00
5323	DEMOCRATIC SENATE CAMPAIGN COMMITTEE	10,000.00
5363	TARLON MORTON/ REIMB. POLITICAL CONT. TO LYNN YEAKEL	2,000.00
5364	LYNN YEAKEL FOR SENATE	2,000.00
5365	DEMOCRATIC SENATE CAMPAIGN COMMITTEE	1,000.00
5396	HARD ROCK CAFE AMERICA, LP/ REIMB. CONTRIBUTION	100,000.00
5431	TONY BEILENSON FOR CONFRESS	1,000.00
5473	DEMOCRATIC NATIONAL COMMITTEE	100,000.00
5486	DEMOCRATIC SENATE CAMPAIGN COMMITTEE	10,000.00
5505	EFFECTIVE GOVERNMENT COMMITTE	5,000.00
5543	TARLTON MMORTON/ REIMB. DONATION	5,000.00
		<u>243,100.00</u>

96043764532

9 6 0 4 3 7 6 4 5 3 3

DEPOSIT TICKET

F. MORTON

[REDACTED]

DATE 7/24/92

CURRENCY

COIN

CHECKS

100.00 57
100.00 57

Union Bank
Beverly Hills Regional Office
9400 Wilshire Boulevard
Beverly Hills, CA 90212

[REDACTED]

Handwritten notes:
100.00
100.00
200.00

PETER MORTON

SEP 24 1992
CASH

TOTAL DEPOSIT

4.2

2.00 2.20

TOTAL

3.533 34

PLEASE ENTER TOTAL HERE

THE MELROSE CORP.

DETACH AND RETAIN THIS STATEMENT
 THE ATTACHED CHECK IS PAYMENT OF YOUR DEBITED BALANCE
 IF THIS CHECK IS NOT PAID BY THE DATE OF THIS STATEMENT

DELUXE FORM WVC-3 V-6

DATE	DESCRIPTION	AMOUNT	DEDUCTIONS	
			ACCT NO	AMOUNT
9/23/92	Reim. contribution	\$1,666.67		

EMPLOYEE

PERIOD ENDING	EARNINGS				TOTAL EARNINGS	DEDUCTIONS				TOTAL DEDUCTIONS	NET PAY
	HOURS	RATE	AMOUNT PAID AT REGULAR RATE	OVERTIME AND OTHER		FICA	WITHHOLDING U.S. INC. TAX	SDI	STATE INCOME TAX		

V.G.A.

HARD ROCK CAFE AMERICA L.P.

DETACH AND RETAIN THIS STATEMENT
 THE ATTACHED CHECK IS PAYMENT OF YOUR DEBITED BALANCE
 IF THIS CHECK IS NOT PAID BY THE DATE OF THIS STATEMENT

DELUXE FORM WVC-3 V-6

DATE	DESCRIPTION	AMOUNT	DEDUCTIONS	
			ACCT NO	AMOUNT
9/23/92	1/3 Reim. Contribution	\$1,666.67		

EMPLOYEE

PERIOD ENDING	EARNINGS				TOTAL EARNINGS	DEDUCTIONS				TOTAL DEDUCTIONS	NET PAY
	HOURS	RATE	AMOUNT PAID AT REGULAR RATE	OVERTIME AND OTHER		FICA	WITHHOLDING U.S. INC. TAX	SDI	STATE INCOME TAX		

V.G.A.

ERC274

96043764584

PETER MORTON

Union Bank
SANTA ANA BRANCH OFFICE
1400 WILSON BLVD
SANTA ANA, CA 92703

5505

September 23, 1992

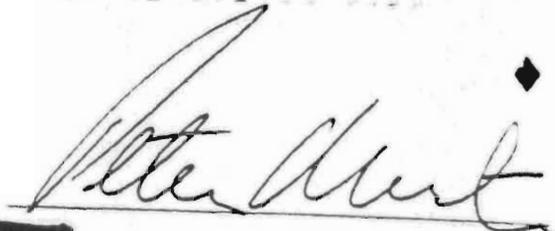
16 77/1020

PAY *Five Thousand Dollars & no/100**

DOLLARS \$ 55,000.00

TO
THE
ORDER
OF

Effective Government Committee
80 F Street, N.W., 8th Floor
Washington, D.C., 20001



⑈0000500000⑈

96043764585

HRC275

100-100000

SEE 92 1

1-1-1220-0016-6 1

0020-0007-8
100-100000: 09-04-50

9
6
0
4
3
7
6
4
5
8
6

HRC276

DEPOSIT TICKET



11/11/72

CURRENCY

COIN

CHECKS

1000 -
1000 -

1000
KE 100

① Breakfast

② Meals / ENR
(turn, 1000)

Union Bank
Records Dept. Department Store
9000 Wilshire Boulevard
Los Angeles, CA 90047

RC 00200

SE

UB

Q1

TOTAL DEPOSIT

6,800 -

PETER MORTON

TOTAL

6,800 -

PLEASE ENTER TOTAL HERE

DEPOSITS MAY NOT BE AVAILABLE FOR IMMEDIATE WITHDRAWAL

96043764587

PETER MORTO

Union Bank

Bank of America
1000 Wilshire Boulevard
Berkeley, CA 94710

5396

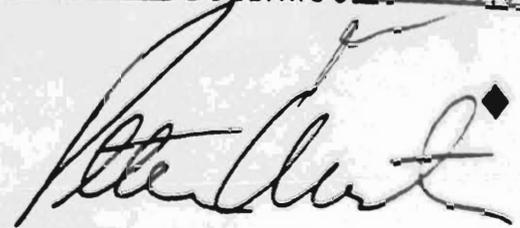
July 30 19 92

10-77/1220

PAY **One Hundred Thousand Dollars & no/100** DOLLARS \$ 100,000.00

TO
THE
ORDER
OF

Hard Rock Cafe America LP



⑈0010000000⑈

96043764588

HRC289

ALLEN L.P.
for Express Only

UNION BANK NTNY PK 91754
▶ 122000496 ◀
FSC 8/14/92

0425331272

236 N. 7th St. 216 7
MILWAUKEE, WI 53201
▶ 122000496 ◀

7001 56771

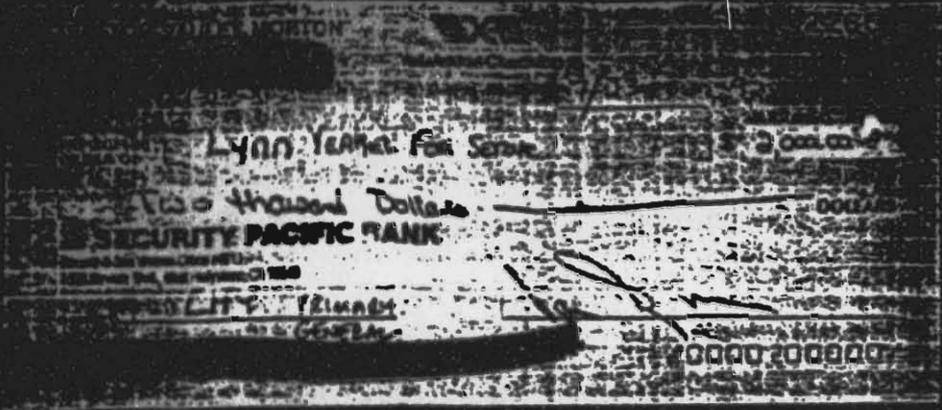
96043 / 64509

HRC281

1992 POLITICAL CONTRIBUTION BASED ON QUICKEN INFORMATION

CHK NO.	PAYEE	AMOUNT
4888	CITIZEN FOR HOLLINGS	250.00
4943	ROSTENKOWSKI FOR CONGRESS	500.00
4949	HANDGUN CONTROL	500.00
5030	JERRY BROWN FOR PRESIDENT	100.00
5031	JERRY BROWN FOR PRESIDENTT	100.00
5032	JERRY BROWN FOR PRESIDENTT	100.00
5035	TOM HAYDEN SENATE CAMPAIGN	1,000.00
5078	RICHARD M. DALEY	1,250.00
5080	MARA GIBBS/ JERRY BROWN FUNDRAISER	100.00
5081	CATHY O'NEILL SENATE CAMPAIGN	250.00
5108	KOSTMAYER FOR CONGRESS	250.00
5149	BOB TANNENBAUM FOR DISTRICT	2,500.00
5316	THE CAMPAIGN FOR A HATE FREE OREGON	200.00
5323	DEMOCRATIC SENATE CAMPAIGN COMMITTEE	10,000.00
5363	TARLON MORTON/ REIMB. POLITICAL CONT. TO LYNN YEAKEL	2,000.00
5364	LYNN YEAKEL FOR SENATE	2,000.00
5365	DEMOCRATIC SENATE CAMPAIGN COMMITTEE	1,000.00
5396	HARD ROCK CAFE AMERICA, LP/ REIMB. CONTRIBUTION	100,000.00
5431	TONY BEILENSON FOR CONFRESS	1,000.00
5473	DEMOCRATIC NATIONAL COMMITTEE	100,000.00
5486	DEMOCRATIC SENATE CAMPAIGN COMMITTEE	10,000.00
5505	EFFECTIVE GOVERNMENT COMMITTE	5,000.00
5543	TARLTQN MMORTON/ REIMB. DONATION	5,000.00
		<u>243,100.00</u>

96043764500



96043764521

HRC283

9 6 0 4 3 7 6 4 5 2 2

LYNN YEAKEL FOR SENATE
FOR DEPOSIT ONLY
1706-6196

HRC284

9 6 0 4 3 7 6 4 5 2 3

PETER MORTON

Union Bank
Bank of California
San Francisco, CA 94112

5363

16-771020

July 22 19 92

DOLLARS \$ 2,000.00

TWO Thousand Dollars & no/100

PAY

TO THE ORDER OF

Peter Morton

Peter Morton

[Redacted Signature]

⑆0000 200000⑆

HRC285

711 217 708
Deposit only

9 6 0 4 3 7 6 4 5 2 4

MPSC
07.24 '02

0110219490

▶ 1220000434 R
518 333 S. HPIE LG, CA
07.23/02 07.12.1708

91623460

HRC286

CHK NO	PAYEE	AMOUNT
1992	POLITICAL CONTRIBUTION BASED ON QUICKEN INFORMATION	
4888	CITIZEN FOR HOLLINGS	250.00
4943	ROSTENKOWSKI FOR CONGRESS	500.00
4949	HANDGUN CONTROL	500.00
5030	JERRY BROWN FOR PRESIDENT	100.00
5031	JERRY BROWN FOR PRESIDENTT	100.00
5032	JERRY BROWN FOR PRESIDENTT	100.00
5035	TOM HAYDEN SENATE CAMPAIGN	1,000.00
5078	RICHARD M. DALEY	1,250.00
5080	MARA GIBBS/ JERRY BROWN FUNDRAISER	100.00
5081	CATHY O'NEILL SENATE CAMPAIGN	250.00
5108	KOSTMAYER FOR CONGRESS	250.00
5149	BOB TANNENBAUM FOR DISTRICT	2,500.00
5318	THE CAMPAIGN FOR A HATE FREE OREGON	200.00
5323	DEMOCRATIC SENATE CAMPAIGN COMMITTEE	10,000.00
5363	TARLON MORTON/ REIMB. POLITICAL CONT. TO LYNN YEAKEL	2,000.00
5364	LYNN YEAKEL FOR SENATE	2,000.00
5365	DEMOCRATIC SENATE CAMPAIGN COMMITTEE	1,000.00
5396	HARD ROCK CAFE AMERICA, LP/ REIMB. CONTRIBUTION	100,000.00
5431	TONY BEILENSON FOR CONFRESS	1,000.00
5473	DEMOCRATIC NATIONAL COMMITTEE	100,000.00
5486	DEMOCRATIC SENATE CAMPAIGN COMMITTEE	10,000.00
5505	EFFECTIVE GOVERNMENT COMMITTE	5,000.00
5543	TARLTON MMORTON/ REIMB. DONATION	5,000.00
		<u>243,100.00</u>

26043764505

SKADON, ARPS, SLATE, MEAGHER & FLOM

1440 NEW YORK AVENUE, N.W.

WASHINGTON, D.C. 20005-2111

3

FAX (202) 393-5760

(202) 371-7000

DIRECT 7007
(202) 371-

BOSTON
CHICAGO
HOUSTON
LOS ANGELES
NEWARK
NEW YORK
SAN FRANCISCO
WILMINGTON

BEIJING
BRUSSELS
BUDAPEST
FRANKFURT
HONG KONG
LONDON
MOSCOW
PARIS
PRAGUE
SYDNEY
TORONTO

December 16, 1994

VIA FAX

Mr. Stephen Pozzi, Sr.
Investigation Division
Nevada Gaming Control Board
1150 E. William Street
Carson City, Nevada 89710

Re: Peter Morton and Hard Rock Cafe

Dear Mr. Pozzi:

Peter Morton has asked me to examine certain political contributions and report those findings to you in connection with his application for a casino license. From 1980 to 1986, I was head of the enforcement division of the Federal Election Commission ("FEC"), the federal agency responsible for the enforcement of the federal campaign finance laws. For the last seven years, I have taught a course on campaign finance and ethics at the George Washington University graduate school. For your information, enclosed is a biography describing my extensive background in the area of campaign finance.

I have conducted a thorough examination of the records containing information concerning political contributions made by Mr. Morton and Hard Rock Cafe America, L.P. and related entities (collectively referred to as "Hard Rock Cafe"). Alan Mazursky, the Chief Operating Officer for Hard Rock Cafe, provided me with much of this information including a listing of contributions prepared by your office.

Based on that review, it appears that Mr. Morton and Hard Rock Cafe have inadvertently violated 2 U.S.C. §§ 441b and 441f. These are provisions of the Federal Election Campaign Act of 1971, as amended, which prohibit corporate contributions to federal candidates and committees (2 U.S.C. § 441b) and contributions made

96043764596

Mr. Stephen Pozzi
December 16, 1994
Page 2

in the name of another (2 U.S.C. § 441f). Contributions made in the name of another occur when one person reimburses another person for a contribution that person has made, and the identity of the reimbursing person is not disclosed to the campaign receiving the contribution.

Similar violations occurred under state and local campaign finance laws in California and in one instance in Chicago. Unlike federal law, however, California state and local campaign finance laws and Chicago's campaign finance law permit corporate political contributions. Therefore, the sole issue in California and Chicago relates to the prohibition on making a contribution in the name of another.

Based on discussions with Mr. Morton and Mr. Mazursky about these contributions and a thorough review of the records, I have concluded that there was no willful or purposeful attempt to evade any law. Rather, Mr. Morton and other employees of the Hard Rock Cafe were ignorant of the applicable federal, state, and local campaign finance laws, and were unaware that they were violating any such laws.

Indeed, there is ample evidence in the records you provided to support the same conclusion. For example, Mr. Morton's and the Hard Rock Cafe employees' ignorance of their violations of the campaign finance laws is corroborated by the documentary evidence which demonstrates that they undertook no effort to hide the purpose of the reimbursements. In addition to this documentary evidence, affidavits will be prepared for submission to the campaign finance enforcement authorities supporting the statements by Mr. Morton and Mr. Mazursky that they were unaware of the applicable provisions of law. Upon the preparation of these statements, we will submit them to you. As far as documentary evidence is concerned, the check stubs accompanying the reimbursement checks clearly state that the reimbursements were for political contributions. In other cases where individuals use reimbursement schemes to evade the prohibitions, limitations, or disclosure requirements of the campaign finance laws, they make efforts to conceal

96043764527

Mr. Stephen Pozzi
December 16, 1994
Page 3

9 6 0 4 3 7 6 4 5 2 8

the true purpose of the reimbursements. For instance, the reimbursements would be made in the form of salary bonuses or payments for seminars or dinner expenses to conceal the true purpose. Also, reimbursement cases where there is intentional misconduct usually involves efforts to evade the \$1,000 per candidate, per election limit on federal contributions. None of the instances involving reimbursements by the Hard Rock Cafe included situations where there was an effort to evade the contribution limits through corporate reimbursements. Furthermore, it is apparent that there was no effort to save Mr. Morton's personal funds by using corporate funds. In fact, in one instance, Hard Rock Cafe made a \$100,000 contribution and Peter Morton reimbursed the corporation. Thus, the net consequence of the reimbursements resulted in the use of more personal money than corporate funds.

Based on my experience as a regulator, the likely and appropriate resolution of these violations will be through a civil conciliation agreement entered into between the FEC and the Hard Rock Cafe and Mr. Morton. Typically, that agreement will also name other individuals involved in making the reimbursed contributions. The agreement will likely include a civil penalty in an amount that should not exceed the amount of reimbursed contributions.

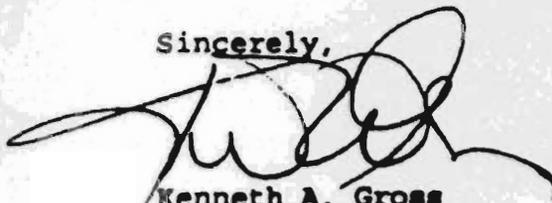
Mr. Morton and Hard Rock Cafe will be taking immediate steps to bring these unintentional violations to the attention of the FEC, do whatever is necessary to rectify the violations, and cooperate fully with the FEC in reaching a conciliation agreement. Also, Hard Rock Cafe is implementing procedures to ensure that no future violations occur when either the Hard Rock Cafe or Mr. Morton make political contributions. See enclosed form that will be used to implement this new procedure. Based on my experience with the FEC, however, it is unlikely that these violations will be resolved through a conciliation agreement before early February when Mr. Morton is scheduled for a hearing before the Nevada Gaming Commission regarding the casino license. Usually, cases such as these take several months to resolve even with the full cooperation of the respondents.

Mr. Stephen Pozzi
December 16, 1994
Page 4

Mr. Morton and Hard Rock Cafe will also be taking similar steps to deal with the reimbursement of contributions involving non-federal candidates and resolving those issues with appropriate state and local campaign finance enforcement agencies.

If you have questions regarding any issue raised in this letter, please do not hesitate to call me.

Sincerely,



Kenneth A. Gross

Enclosure

96043764599



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 12, 1995

Jan Witold Baran, Esq.
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

RE: Pre-MUR 310
Hard Rock Cafe America, L.P.
Hard Rock Cafe, Inc.
Melrose Corporation
Peter Morton

Dear Mr. Baran:

This is to acknowledge receipt of your letter dated January 6, 1995, notifying the Office of the General Counsel that your clients may have violated provisions of the Federal Election Campaign Act (FECA). We have numbered this matter Pre-MUR 310. Please refer to this number in all future communications. You will be notified as soon as the Federal Election Commission takes action on your submission.

If you have any questions, please contact Alva E. Smith at (202) 219-3400. For your information, we have attached a brief description of the Commission's procedures for handling matters such as this.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosure
Procedures

96043764600

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

WILEY, REIN & FIELDING

JAN 20 12 43 PM '95

1776 K STREET, N. W.
WASHINGTON, D. C. 20006
(202) 429-7000

JAN WITOLD BARAN
(202) 429-7330

January 18, 1995

FACSIMILE
(202) 429-7049
TELEX 248349 WYRN UR

BY FACSIMILE & FIRST CLASS MAIL

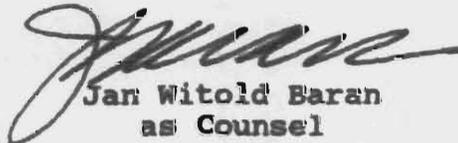
Mary L. Taksar, Esq.
Central Enforcement Docket
Federal Election Commission
Washington, D.C. 20463

Re: Pre-MUR 310
Hard Rock Cafe America, L.P., et al.

Dear Ms. Taksar:

On behalf of our clients in the above-captioned matter and pursuant to 11 C.F.R. § 111.21(a), I hereby submit this written consent to waive the confidentiality provisions of 2 U.S.C. § 437g(a)(12).

Sincerely,


Jan Witold Baran
as Counsel

96043764601



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

Feb 16 12 18 PM '95

February 16, 1995

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
General Counsel

BY: Lois G. Lerner *42*
Associate General Counsel

SUBJECT: Pre-NUR 310
Waiver of Confidentiality

Jan Witold Baran, Esq., submitted a waiver of confidentiality on behalf of his clients, Hard Rock Cafe America, L.P., Hard Rock Cafe, Inc., Melrose Corporation, and Peter Norton, in this sua sponte matter. This waiver pertains to all respondents in this matter.

By making this waiver, all respondents have requested that the Commission not apply the confidentiality provision of 2 U.S.C. § 437g(a)(12)(A) to this matter. However, that section merely provides that any notification or investigation shall not be made public by the Commission without the written consent of the person receiving such notification or the person with respect to whom such investigation is made. By its terms, Section 437g(a)(12)(A) does not impose an affirmative duty on the Commission to publicize this matter at this time as it pertains to the Hard Rock Cafe America, L.P., Hard Rock Cafe, Inc., Melrose Corporation, and Peter Norton. Therefore, this Office will respond to requests for information subject to the following considerations. First, requests must be in writing. Second, such requests would be considered by the Commission subject to the provisions of the Freedom of Information Act, the Government in the Sunshine Act, and all relevant privileges which would limit or preclude the release of such requested information.

RECOMMENDATION

Approve the approved letter.

Attachment
Waiver

96043764602

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Hard Rock Café America, L.P.;)	PRE-MUR 310
Hard Rock Café, Inc.;)	
Melrose Corporation;)	
Peter Morton.)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 22, 1995, the Commission decided by a vote of 6-0 to approve the approved letter, as recommended in the General Counsel's Memorandum dated February 16, 1995.

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

Attest:

2-22-95
Date

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

Received in the Secretariat:	Thurs., Feb. 16, 1995	12:18 p.m.
Circulated to the Commission:	Thurs., Feb. 16, 1995	4:00 p.m.
Deadline for vote:	Wed., Feb. 22, 1995	4:00 p.m.

bjr

96043764603



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 3, 1995

Jan Witold Baran, Esq.
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, DC 20006

RE: Pre-MUR 310
Peter Morton
Hard Rock Cafe America, L.P.
Hard Rock Cafe, Inc.
Melrose Corporation

Dear Mr. Baran:

This is in response to your letter dated January 18, 1995, wherein you submitted written consent to waive your clients' right to confidentiality in the above-captioned matter, pursuant to 2 U.S.C. § 437g(a)(12)(A). The waiver is hereby acknowledged by the Federal Election Commission.

At this time, the Commission will neither place documents on the public record nor issue a public announcement regarding your involvement in this matter. Instead, the Commission will consider requests for information concerning this matter subject to the following: first, requests for documents must be in writing and second, such requests will be considered by the Commission subject to the provisions of all relevant statutes and regulations, such as the Freedom of Information Act and the Government in Sunshine Act, which limit or preclude the release of such requested information.

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

Sincerely,

Andrea Low

Andrea Low
Attorney

9604364604

CITY OF LOS ANGELES
CALIFORNIA



CITY ETHICS COMMISSION

DENNIS E. CURTIS
PRESIDENT
TRESSA WAY DRURY
VICE-PRESIDENT
EVE FISHER
EDWIN GUTHMAN
ANN PETRONI

BENJAMIN BYCEL
EXECUTIVE DIRECTOR

CITY ETHICS COMMISSION
201 NO. LOS ANGELES ST
L.A. MALL - SUITE 2
LOS ANGELES, CA 90012
(213) 237-0310
(213) 485-1093 FAX

April 20, 1995

Ms. Betsy Strange
Office of the General Counsel
Federal Election Commission
999 E Street N.W.
Washington, DC 20463

PRE MUR 310

Dear Ms. Strange:

At its' meeting yesterday the Ethics Commission approved a settlement with Peter Morton and the Hard Rock Cafe. Enclosed is a copy of the Stipulation, Decision and Order.

Please call me if you have any questions, and thank you for the Statute of Limitations materials you sent.

Sincerely,

Laurie Tabachnik

APR 21 10 05 AM '95

FEDERAL ELECTION COMMISSION
OFFICE OF THE GENERAL COUNSEL

96043764605



1 **BEN BYCEL**
Executive Director
2 Los Angeles City Ethics Commission
L.A. Mall, Suite 2
3 Los Angeles, California 90012

4 (213) 237-0310

5 Complainant

APR 21 10 05 AM '95

FEDERAL BUREAU OF INVESTIGATION
COMMUNICATIONS SECTION
OFFICE OF THE ATTORNEY GENERAL

8 **BEFORE THE CITY ETHICS COMMISSION**

9 **CITY OF LOS ANGELES**

10 In the Matter of)
11 **HARD ROCK CAFE AMERICA, L.P.;**)
12 **HARD ROCK CAFE AMERICA (LOS**)
13 **ANGELES) L.P.; THE MELROSE**)
14 **CORPORATION; PETER MORTON,**)

CEC Case No. 95-10

14 Respondents.)
15)
16)

STIPULATION, DECISION
AND ORDER

17 **IT IS HEREBY STIPULATED, AS FOLLOWS:**

18 1. The complainant, Ben Bycel, Executive Director of the Los Angeles City Ethics
19 Commission ("City Ethics Commission") and Respondents, Hard Rock Cafe America, L.P.;
20 Hard Rock Cafe America (Los Angeles) L.P.; The Melrose Corporation; and Peter Morton
21 ("Respondents") hereby agree that this Stipulation will be submitted for consideration by the City
22 Ethics Commission at its meeting on April 19, 1995, and that the agreements herein are
23 contingent upon the approval of this Stipulation and the accompanying Decision and Order by
24 the City Ethics Commission.

25 2. The parties agree to enter into this Stipulation to resolve all factual and legal
26 issues raised in this matter and to reach a final disposition without the necessity of holding an
27 administrative hearing to determine the liability of the Respondents.

28 3. Respondents understand and hereby knowingly and voluntarily waive any and all

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1 procedural rights under Los Angeles City Charter Section 600 O and Los Angeles Administrative
2 Code Section 24.1.2(d) and (e), including but not limited to a determination of probable cause,
3 the issuance and receipt of an accusation, the right to appear personally in any administrative
4 hearing held in this matter, to confront and cross-examine all witnesses testifying at the hearing,
5 to subpoena witnesses to testify at the hearing, and to have the City Ethics Commission or an
6 impartial administrative law judge hear the matter.

7 4. Respondents further understand and hereby acknowledge that this Stipulation is
8 not binding upon any other law enforcement agency and does not preclude the City Ethics
9 Commission from referring this matter to, cooperating with, or assisting any such other agency
10 with regard to this or any other related matters.

11 5. It is further stipulated and agreed that Respondents have violated the Los Angeles
12 City Charter as described in Exhibits 1, 2 and 3, attached hereto and incorporated herein by
13 reference, which are true and correct summaries of the facts in this matter.

14 6. Respondents agree to the issuance of the Decision and Order and imposition by
15 the Los Angeles City Ethics Commission of a fine in the amount of \$12,000. Respondents agree
16 to pay a total of \$12,000 to the City Ethics Commission by cashiers check, payable to the
17 "General Fund of the City of Los Angeles" upon the signing of this Stipulation. The payment
18 submitted herewith will be held by the City Ethics Commission until it issues its Decision and
19 Order.

20 7. The parties agree that in the event the City Ethics Commission refuses to accept
21 this Stipulation, it shall become null and void, and within fifteen (15) working days after the

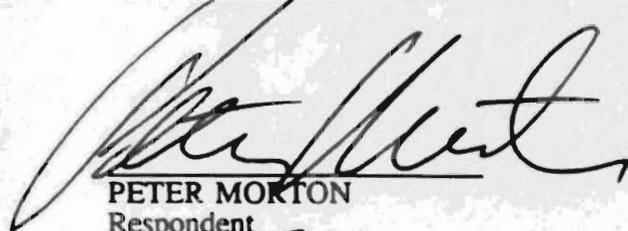
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1 City Ethics Commission meeting at which this Stipulation is rejected, all payments tendered shall
2 be returned to the Respondents. Respondents further stipulate and agree that in the event the
3 City Ethics Commission rejects the Stipulation and a full evidentiary hearing before the City
4 Ethics Commission becomes necessary, no member of the City Ethics Commission or its staff
5 shall be disqualified because of prior consideration of this Stipulation.

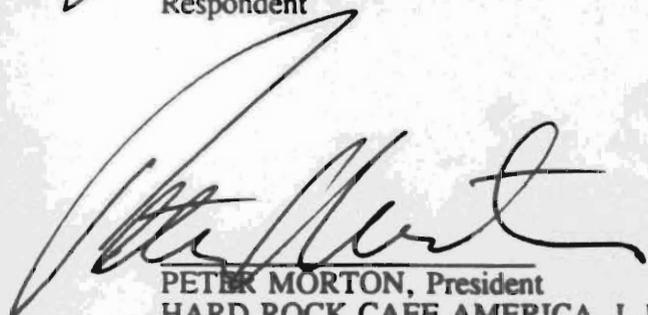
6 DATED: Apr. 17, 1995


BEN BYCEL, Executive Director
CITY ETHICS COMMISSION
Complainant

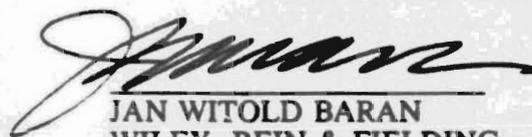
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11 DATED: _____


PETER MORTON
Respondent

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16 DATED: _____


PETER MORTON, President
HARD ROCK CAFE AMERICA, L.P.;
HARD ROCK CAFE AMERICA (LOS
ANGELES) L.P.; THE MELROSE
CORPORATION,
Respondents

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21 DATED: 4/13/95

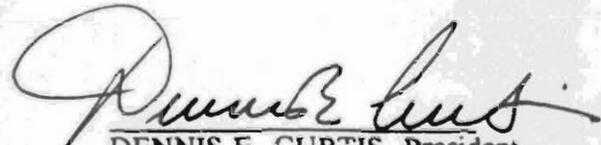

JAN WITOLD BARAN
WILEY, REIN & FIELDING
Attorney for HARD ROCK CAFE
AMERICA L.P.; HARD ROCK CAFE
AMERICA (LOS ANGELES) L.P.; THE
MELROSE CORPORATION; PETER
MORTON,
Respondents

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1 **DECISION AND ORDER**

2 The City Ethics Commission has considered the above Stipulation at its meeting on
3 April 19, 1995. The City Ethics Commission hereby approves the Stipulation and orders that,
4 in accordance with the Stipulation, Respondents agree to pay a fine to the City of Los Angeles
5 in the sum of \$12,000.

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7 DATED: 4/19/95
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DENNIS E. CURTIS, President
CITY ETHICS COMMISSION

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1 EXHIBIT I

2 I.

3 INTRODUCTION

4 This case concerns political money laundering by Respondents Hard Rock Cafe America,
5 L.P.; Hard Rock Cafe America (Los Angeles) L.P.; The Melrose Corporation; and Peter
6 Morton ("Respondents").^{1,2} Respondents concealed the true source of illegal contributions made
7 to Los Angeles City Councilmembers, candidates for City elective office, officeholder and
8 controlled committees during the period August 1987 through October 1992. The statute of
9 limitations has run on the six contributions made by Respondents in 1987, 1988 and 1989 in
10 violation of Los Angeles City Charter ("City Charter") sections 312 L, 312 C 5 and 312 C 8.
11 Therefore, only the two remaining contributions, made in 1991 and 1992, and a third violation
12 of the City Charter section 312 C 8 aggregate contribution limit are included as counts herein.
13 For details of the 1987, 1988 and 1989 violations, see Exhibit 3.

14 During June 1991 through October 1992, individuals associated with Hard Rock Cafe
15 America L.P.; Hard Rock Cafe America (Los Angeles) L.P.; and The Melrose Corporation
16 made what appeared to be two individual contributions to the "Mike Woo for Mayor" committee
17 and to the "Mike Woo's Officeholder Account" committee. The Councilman's campaign
18 committee and officeholder committee recorded them in their campaign statements as
19 contributions from the individuals. The Melrose Corporation and Hard Rock Cafe Investors,
20 Ltd., however, each reimbursed the individuals for one of the contributions. The public was
21 deprived of the knowledge of the true source of the contributions, and Hard Rock Cafe Investors
22

23
24 ¹The Respondents in this action, Hard Rock Cafe America, L.P.; Hard Rock Cafe America (Los Angeles)
25 L.P.; The Melrose Corporation and Peter Morton, will usually be referred to herein collectively as "Respondents."
Where necessary, however, a respondent will be referred to individually. Hard Rock Cafe Investors, Ltd., which
became Hard Rock Cafe America (Los Angeles), L.P. after a July 1992 corporate reorganization, will be referred
to specifically by name throughout.

26
27 ²The term "political money laundering" typically describes conduct of reimbursing another for making a
contribution without disclosure to the public of the true source's identity.

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1 Ltd. and The Melrose Corporation, by contributing monies indirectly through two individuals
2 associated with the corporate entities, circumvented the City Charter contribution limitations.

3 Respondents' own documents show reimbursements to the individual contributors for the
4 contributions they made to the Mike Woo committees, as well as for contributions to the other
5 candidates that are now outside the statute of limitations. Respondents brought this matter to
6 the attention of the City Ethics Commission after the illegal contributions were identified by the
7 staff of the Nevada Gaming Control Board.

8 Respondents admit they violated the City Charter as follows:

9
10 COUNTS 1 AND 2 Making 2 contributions in violation of City Charter section 312 L.

11 COUNT 3 Making 5 contributions in violation of City Charter section 312 C 8.

12
13 II.

14 SUMMARY OF THE LAW

15 City Charter section 312 L provides that a contribution shall not be made, directly or
16 indirectly, by any person or combination of persons, acting jointly in a name other than the
17 name by which they are identified for legal purposes, nor in the name of another person or
18 combination of persons.

19 City Charter section 312 C 8 provides that no person shall make a contribution in a single
20 election that would cause the aggregate amount of contributions by that person to exceed a sum
21 equal to \$500 multiplied by the number of City Council offices appearing on the ballot at that
22 election, plus \$1,000 multiplied by the number of city-wide offices appearing on the ballot at
23 that election. The aggregate limit for the April 1993 Primary Election, based on the above
24 formula, was \$7,000.

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III.

SUMMARY OF THE EVIDENCE

COUNTS 1 AND 2

VIOLATIONS OF SECTION 312 L

Respondents violated City Charter section 312 L with regard to two indirect contributions, without disclosing the true source of the contributions. The indirect contributions are detailed below:

COUNT 1

Contribution to "Mike Woo for Mayor" Committee

The "Mike Woo for Mayor" committee received a \$1,000 contribution from the Melrose Corporation on October 5, 1992. This check, number 9600, dated September 11, 1992, was reflected on the Melrose Corporation accounts as of August 23, 1993. Another \$1,000 contribution was received by the "Mike Woo for Mayor" committee on October 25, 1992 from Tarlton Morton, by personal check number 2302, dated September 25, 1992. The Committee's campaign statement for the period January 1, 1992 through December 31, 1992 listed Tarlton Morton as the contributor.

However, Tarlton Morton was reimbursed \$1,000 by check number 9611, dated September 25, 1992, by The Melrose Corporation, an entity owned in part by Peter Morton.

The Melrose Corporation was the true source of both the \$1,000 contributions.

COUNT 2

Contribution to Councilman Mike Woo's Officeholder Committee

Councilman Mike Woo's Officeholder committee received one \$5,000 contribution on June 22, 1991, made payable to "Councilman Mike Woo's Officeholder Account," from Peter Morton, by personal check number 4387, dated June 20, 1991. The Committee's campaign

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1 statement for the period January 1, 1991 through June 30, 1991 listed Peter Morton as the
2 contributor.

3 However, Peter Morton was reimbursed \$5,000 by check number 3544, dated the same
4 date, June 20, 1991, by Hard Rock Cafe Investors, Ltd..

5 Hard Rock Cafe Investors, Ltd. was the true source of the \$5,000 contribution.

6
7 COUNT 3

8 VIOLATION OF CITY CHARTER SECTION 312 C 8

9 Respondents violated City Charter section 312 C 8 by contributing monies in excess of
10 the \$7,000 aggregate contribution limit in the April 1993 Primary Election.

11
12 Count 3

13 Respondents made five contributions to candidates in the 1993 Primary Election totaling
14 \$9,250.

15 On September 11, 1992, by check number 9600, The Melrose Corporation contributed
16 \$1,000 to "Mike Woo for Mayor." (See Count 1, above.)

17 On September 25, 1992, by check number 2302, Tarlton Morton contributed \$1,000 to
18 "Mike Woo for Mayor." As detailed in Count 1 above, Tarlton Morton was reimbursed \$1,000
19 by The Melrose Corporation on September 25, 1992.

20 On October 16, 1992, by check number 1158, Hard Rock Cafe America (Los Angeles)
21 L.P. contributed \$1,000 to "Nate Holden for Mayor."

22 On March 5, 1993, by check number 5972, Peter Morton contributed \$6,000 to "Mike
23 Woo for Mayor."

24 On March 15, 1993, by check number 1466, Hard Rock Cafe America (Los Angeles)
25 L.P. contributed \$250 to "Daniel Pritikin for City Council."

26 Respondents exceeded the City Charter section 312 C 8 aggregate limit for the 1993
27

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1 Primary Election, which was \$7,000, by \$2,250, in violation of this section.

2
3 IV.

4 FACTORS IN AGGRAVATION

5 The laundering of campaign contributions is one of the most serious violations of the
6 campaign finance provisions of the Los Angeles City Charter. Laundering manifests an intent
7 to conceal from the public the true source of political contributions, and it allows for the
8 circumvention of the campaign contribution limitations enacted by the voters of the City of Los
9 Angeles. However, the Respondents do not admit that their violations of the campaign finance
10 provisions of the Los Angeles City Charter were intentional.

11 The repeated nature of the violations by Respondents over a five year period displays a
12 pattern of laundering activity rather than an isolated incident.³

13
14 V.

15 FACTORS IN MITIGATION

16 Respondents have no prior enforcement history.

17 Respondents, by letter from their attorney dated January 27, 1995, revealed their
18 laundering activities to the City Ethics Commission and offered to cooperate fully in order to
19 bring themselves into full compliance with Los Angeles law. They did so at the request of the
20 staff of the Nevada Gaming Control Board. Respondents identified six Charter violations now
21 outside the statute of limitations. In the course of the City Ethics Commission's ensuing
22 investigation, Respondents furnished all documents and information necessary to promptly and
23 completely resolve this matter.

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27 ³See Exhibits 2 and 3.

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VI.

CONCLUSION

This matter consists of three counts against Respondents. The total fine Respondents will pay in connection with this case is \$12,000. The failure of Respondents to comply with the limitations of the campaign finance provisions of the Los Angeles City Charter justifies the imposition of the agreed upon penalty.

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EXHIBIT II

**HARD ROCK CAFE AMERICA, L.P.; HARD ROCK CAFE AMERICA (LOS ANGELES) L.P.;
THE MELROSE CORPORATION; PETER MORTON
CONTRIBUTIONS TO CITY CANDIDATES**

<u>PURPORTED CONTRIBUTOR</u>	<u>AMOUNT OF CONTRIBUTION</u>	<u>DATE OF REIMB.</u>	<u>REIMB. PARTY</u>	<u>DATE OF CONTRIB.</u>	<u>RECIPIENT</u>	<u>COMMITTEE</u>
THE MELROSE CORPORATION	\$1,000.00	N/A	N/A	09/11/92	MICHAEL WOO	"MIKE WOO FOR MAYOR"
MORTON, TARLTON	\$1,000.00	09/25/92	MELROSE CORP.	09/25/92	MICHAEL WOO	"MIKE WOO FOR MAYOR"
MORTON, PETER	\$5,000.00	6/20/91	HRC INVEST. LTD.	06/20/91	MICHAEL WOO	"COUNCILMAN MIKE WOO'S OFFICEHOLDER ACCOUNT"
HARD ROCK CAFE AMERICA (LOS ANGELES) L.P.	\$1,000.00	N/A	N/A	10/06/92	NATE HOLDEN	"NATE HOLDEN FOR MAYOR 1993"
MORTON, PETER	\$6,000.00	N/A	N/A	03/05/93	MICHAEL WOO	"MIKE WOO FOR MAYOR"
HARD ROCK CAFE AMERICA (LOS ANGELES) L.P.	\$250.00	N/A	N/A	03/15/93	DANIEL PRITIKIN	"DANIEL PRITIKIN FOR CITY COUNCIL"

EXHIBIT III

**HARD ROCK CAFE AMERICA, L.P.; HARD ROCK CAFE AMERICA (LOS ANGELES) L.P.;
THE MELROSE CORPORATION; PETER MORTON
CONTRIBUTIONS TO CITY CANDIDATES
(OUTSIDE THE STATUTE OF LIMITATIONS)**

<u>REPORTED CONTRIBUTOR</u>	<u>AMOUNT OF CONTRIBUTION</u>	<u>DATE OF REIMB.</u>	<u>REIMB. PARTY</u>	<u>DATE CONTRIB. RECEIVED</u>	<u>RECIPIENT</u>	<u>COMMITTEE</u>
HARD ROCK CAFE INVESTORS, LTD.	\$500.00	N/A	N/A	03/03/89	ZEV YAROSLAVSKY	"YAROSLAVSKY FOR CITY COUNCIL"
MORTON, PETER	\$500.00	02/24/89	HRC INVEST. LTD.	03/03/89	ZEV YAROSLAVSKY	"YAROSLAVSKY FOR CITY COUNCIL"
MORTON PETER	\$1,000.00	09/14/90	HRC INVEST. LTD.	10/12/90	ZEV YAROSLAVSKY MARVIN BRAUDE	"CITIZENS FOR A LIVABLE L.A." (A COMMITTEE TO PROHIBIT COASTAL OIL DRILLING)
THE MELROSE CORPORATION	\$500.00	N/A	N/A	08/27/87	STEVE SALTZMAN	"STEVE SALTZMAN FOR CITY COUNCIL"
HARD ROCK CAFE INVESTORS, LTD.	\$500.00	N/A	N/A	08/27/87	STEVE SALTZMAN	"STEVE SALTZMAN FOR CITY COUNCIL"
ZIMMER, DENISE	\$500.00	01/19/88	HRC INVEST. LTD.	02/26/88	STEVE SALTZMAN	"STEVE SALTZMAN FOR CITY COUNCIL"
RICE, HILARY	\$500.00	05/20/88	HRC INVEST. LTD.	06/21/88	STEVE SALTZMAN	"STEVE SALTZMAN FOR CITY COUNCIL"
MAZURSKY, ALAN S.	\$500.00	12/16/88	HRC INVEST. LTD.	12/12/88	STEVE SALTZMAN	"STEVE SALTZMAN FOR CITY COUNCIL"
BROWN, ROBERT W.	\$500.00	12/16/88	HRC INVEST. LTD.	12/12/88	STEVE SALTZMAN	"STEVE SALTZMAN FOR CITY COUNCIL"

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

JUL 20 11 12 AM '95

FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

Pre-MUR 310

DATE COMPLAINT FILED: January 6, 1995

DATE OF NOTIFICATION: January 12, 1995

DATE ACTIVATED: February 16, 1995

STAFF MEMBER: Andrea Low

COMPLAINANTS: Hard Rock Cafe, Inc.
Hard Rock Cafe America, L. P.
Melrose Corporation
Peter Morton

RESPONDENTS: Hard Rock Cafe, Inc.
Hard Rock Cafe America, L. P.
Melrose Corporation
Peter Morton
Alan Mazursky
Tarlton Morton

RELEVANT STATUTES: 2 U.S.C. § 437g(a)(5)(A)
2 U.S.C. § 441a(a)(1)(A)
2 U.S.C. § 441a(a)(1)(B)
2 U.S.C. § 441a(a)(3)
2 U.S.C. § 441b(a)
2 U.S.C. § 441f
11 C.F.R. § 103.3(b)(3)

INTERNAL REPORTS CHECKED: Disclosure Reports
Contributor Index
Dun & Bradstreet

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

This matter was generated from a sua sponte submission filed by Hard Rock Cafe, Inc., Hard Rock Cafe America, L. P., Melrose Corporation (collectively referred to as "Hard Rock"), and their principal, Peter Morton. See Attachment 1. According to the sua sponte submission, in December 1994, the Nevada Gaming Control

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Board reviewed the finances of these corporate entities. As a result of that review, Hard Rock Cafe, Inc., Hard Rock Cafe America, L. P., Melrose Corporation, Peter Morton, Alan Mazursky, and Tarlton Morton ("Respondents") became aware that over several years they may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act").¹ Specifically, Respondents note that the Hard Rock entities reimbursed Peter Morton, his wife, Tarlton Morton, and Chief Financial Officer Alan Mazursky for Federal political contributions, and that Peter Morton may have exceeded Section 441a(a)(3)'s limit in 1992.

II. FACTUAL AND LEGAL ANALYSIS

A. Contributions in the Name of Another

Section 441f of the Act provides that no person shall make a contribution in the name of another or knowingly permit his name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the name of another person. 2 U.S.C. § 441f. Under the Act, it is unlawful for any corporation to make a contribution or expenditure in connection with a Federal election, or for any candidate, political committee, or other person knowingly to accept or receive any prohibited contribution, or for any corporate officer

1. Respondents also reached a settlement with the City of Los Angeles Ethics Commission on April 19, 1995, for similar violations of the Los Angeles City Charter. Respondents admitted to making excessive contributions and contributions in the name of another and agreed to pay a fine of \$12,000. See Attachment 2.

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or director to consent to any such contribution or expenditure. 2 U.S.C. § 441b(a). No person shall make contributions to any candidate and his authorized political committees with respect to any election for Federal office which, in aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A). No person shall make contributions to the political committees established and maintained by a national political party, which are not the authorized political committees of any candidate, in any calendar year which, in the aggregate, exceed \$20,000. 2 U.S.C. § 441a(a)(1)(B).

Respondents have submitted documentation that evidences contributions from corporate entities through Peter Morton, Alan Mazursky, and Tarlton Morton to Federal committees.² See Attachment 1. From this documentation, it appears that sixteen Federal contributions made by Peter Morton, two contributions by Tarlton Morton, and one contribution by Alan Mazursky were reimbursed by Hard Rock during the period 1987 through 1994.

The sua sponte submission admits to the following corporate reimbursements from:

Hard Rock Cafe Investors, Ltd.	\$8,750.00
Hard Rock Cafe Investors, Ltd. II	\$1,000.00

2. The various Hard Rock entities involved in this matter are or were either corporations or limited partnerships with corporations as partners. Hard Rock Cafe America, L. P. is the successor of Hard Rock Cafe Investors Ltd. after a July 1992 reorganization. Mr. Morton is identified as President of Hard Rock Cafe, Inc. and Melrose Corporation. Hard Rock America, L. P. is identified as a limited partnership owned principally by Mr. Morton through a subchapter-S corporation.

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Hard Rock Cafe Investors, Ltd. VII	\$1,000.00
Hard Rock Cafe, Inc.	\$5,666.67
Hard Rock Cafe America, L. P.	\$2,666.67
Melrose Corporation	<u>\$3,416.66</u>
Total	\$22,500.00

See Attachment 1.

According to the FEC contributor index, Alan Mazursky has made only two political contributions during the time period, including the \$500 contribution admittedly reimbursed by Hard Rock Cafe, Inc. The contributor index reveals that Tarlton Morton made numerous contributions to Federal political committees, but our review of the record discloses that only her 1992 contributions to candidate Mel Levine were reimbursed by Peter Morton, who was in turn reimbursed by Hard Rock.

Respondents argue that they "were wholly unaware that their activities might be illegal," and impliedly claim that they believed that corporate contributions were legal in Federal elections, as they are in non-Federal elections in the state of California. Respondents' actions, however, are inconsistent with that claim. Records submitted show that when the Respondent corporate entities made contributions to City Council and other non-Federal election campaigns, they made the contributions in their own names. When using these same corporations' funds to make contributions in Federal elections, however, the contributions were always made in the names of individuals. If, as Respondents claim, they believed that corporate contributions

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in Federal elections were legal, they would have made corporate contributions to Federal candidates in their own names as well, rather than making contributions through conduits such as Peter Morton, Tarlton Morton, and Alan Mazursky. The fact that they made corporate contributions without using conduits in non-Federal elections, but made certain to use conduits in Federal elections belies their argument that they did not know the reimbursement scheme served an illegal purpose. It appears, therefore, that Respondents were knowingly and willfully trying to conceal the origin of the contributions.

Peter Morton admits that he reimbursed Tarlton Morton for contributions that were not in turn reimbursed by Hard Rock entities. While these reimbursements do not appear to violate 2 U.S.C. § 441b because no corporate funds were involved, they nevertheless appear to violate 2 U.S.C. § 441f.

Hard Rock does not raise the issue of excessive contributions to individual candidates and committees, and the chart submitted shows all of Peter Morton's contributions to be within the limits of 2 U.S.C. §§ 441a(a)(1)(A) and 441a(a)(1)(B). However, a review of the contributor index and documents submitted by Hard Rock indicates that Mr. Morton reimbursed Tarlton Morton for her contributions to Lynn Yeakel for Senate 1992 -- \$1,000 for the primary election and \$1,000 for the general election. Mr. Morton also contributed \$1,000 in both the primary and general elections to that campaign. Thus, Mr. Morton's contributions through Ms. Morton, combined with his own contributions to the

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Yeakel campaign, appear to have exceeded the limits of Section 441a(a)(1)(A).

Furthermore, Mr. Morton made several contributions to the Democratic Senatorial Campaign Committee ("DSCC") both directly as well as through Ms. Morton. Mr. Morton contributed \$10,000 on July 22, 1992, \$1,000 on July 29, 1992, and \$10,000 on September 17, 1992 to the DSCC. However, the DSCC's 1992 October Monthly report shows that the DSCC refunded \$1,000 to Mr. Morton on September 30, 1992, within the sixty days by which an excessive contribution is required to be refunded to the contributor pursuant to 11 C.F.R. § 103.3(b)(3). Shortly after the DSCC had refunded \$1,000 to Mr. Morton because it was excessive, Mr. Morton reimbursed Tarlton Morton for an October 17, 1992 contribution of \$3,000 to the DSCC, so he actually contributed \$23,000 to the DSCC during the calendar year of 1992.

Mr. Morton had already contributed the maximum allowable by law to the Yeakel Committee and the DSCC in his own name. The fact that Mr. Morton contributed to these committees through a conduit, Ms. Morton, after he had reached his contribution limit suggests that they both were aware of the limits of Sections 441a(a)(1)(A) and (B), and that they intended to circumvent the limits. Peter and Tarlton Morton's violations appear to be knowing and willful because they appear to have engaged in reimbursements for the purpose of concealing contributions they knew to be excessive.

Therefore, this Office recommends that the Commission find

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reason to believe that Hard Rock knowingly and willfully violated 2 U.S.C. §§ 441b(a) and 441f.³ This Office recommends that the Commission find reason to believe that Peter Morton, as a corporate officer, knowingly and willfully violated 441b(a), and as an individual, knowingly and willfully violated 2 U.S.C. §§ 441a(a)(1)(A), 441a(a)(1)(B), and 441f. This Office further recommends that the Commission find reason to believe that Alan Mazursky and Tarlton Morton knowingly and willfully violated 2 U.S.C. § 441f.

B. Annual Contribution Limit

No individual shall make contributions aggregating more than \$25,000 in any calendar year. Any contribution made to a candidate in a year other than the calendar year in which the election is held with respect to which such contribution is made, is considered to be made during the calendar year in which such election is held. 2 U.S.C. § 441a(a)(3).

Respondents acknowledge that FEC contributor records indicate that Peter Morton contributed \$30,800 to Federal candidates and other Federal political committees in 1992. This Office's review of the contributor index and Respondents' admissions reveals that Mr. Morton, in his own name and through Ms. Morton, contributed \$38,800 to Federal candidates and Federal political committees for 1992. However, the original source of

3. Here, as with the other violations discussed in this report, this Office makes no recommendation as to the political committees that accepted Respondents' contributions.

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many of the contributions comprising the \$38,800 was Hard Rock, not Mr. Morton. Hard Rock admits to reimbursing \$16,500 (\$14,500 contributed in Peter Morton's name and \$2,000 contributed in Tarlton Morton's name), resulting in only \$22,300 (including contributions of \$5,000 made in Tarlton Morton's name) in contributions from Peter Morton as an individual. Therefore, while it appears that Mr. Morton violated the Act as analyzed above, it does not appear that he violated § 441a(a)(3). This Office recommends that the Commission find no reason to believe that Peter Morton violated 2 U.S.C. § 441a(a)(3).

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

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IV. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that Hard Rock Cafe, Inc., Hard Rock Cafe America, L. P., and Melrose Corporation knowingly and willfully violated 2 U.S.C. §§ 441b(a) and 441f.
3. Find reason to believe that Peter Morton, as a corporate officer, knowingly and willfully violated 2 U.S.C. § 441b(a), and as an individual, knowingly and willfully violated §§ 441a(a)(1)(A), 441a(a)(1)(B), and 441f.
4. Find no reason to believe that Peter Morton violated 2 U.S.C. § 441a(a)(3).
5. Find reason to believe that Tarlton Morton knowingly and willfully violated 2 U.S.C. § 441f.
6. Find reason to believe that Alan Mazursky knowingly and willfully violated 2 U.S.C. § 441f, but take no further action, and close the file as it pertains to him.
7. Enter into conciliation with Hard Rock Cafe, Inc., Hard Rock Cafe America, L. P., Melrose Corporation, Peter Morton, and Tarlton Morton prior to a finding of probable cause to believe.
8. Approve the attached factual and legal analyses and

appropriate letters.

Lawrence M. Noble
General Counsel

Date 7/25/95 BY: 
Lois G. Lerner
Associate General Counsel

Attachments

1. Sua Sponte Submission (excerpts)
2. City of Los Angeles Ethics Commission
Stipulation, Decision and Order
3. Conciliation Agreement
4. Factual and Legal Analyses (2)

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FEDERAL ELECTION COMMISSION
WASHINGTON DC 20461

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

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

DATE: JULY 28, 1995

SUBJECT: PRE-MUR 310 - FIRST GENERAL COUNSEL'S REPORT
DATED JULY 25, 1995.

The above-captioned document was circulated to the Commission on Wednesday, July 26, 1995 at 4:00 p.m.

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

Commissioner Aikens	<u>XXX</u>
Commissioner Elliott	_____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Potter	_____
Commissioner Thomas	<u>XXX</u>

This matter will be placed on the meeting agenda for Tuesday, August 1, 1995.

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

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Hard Rock Cafe, Inc.;)
Hard Rock Cafe America, L. P.;)
Melrose Corporation;)
Peter Morton;)
Alan Mazursky;)
Tarlton Morton)

Pre-MUR 310 MUR 4240

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on August 1, 1995, do hereby certify that the Commission decided by a vote of 5-1 to take the following actions with respect to Pre-MUR 310:

1. Open a MUR.
2. Find reason to believe that Hard Rock Cafe, Inc., Hard Rock Cafe America, L. P., and Melrose Corporation knowingly and willfully violated 2 U.S.C. §§ 441b(a) and 441f.
3. Find reason to believe that Peter Morton, as a corporate officer, knowingly and willfully violated 2 U.S.C. § 441b(a), and as an individual, knowingly and willfully violated 2 U.S.C. §§ 441a(a)(1)(A), 441a(a)(1)(B), and 441f.

(continued)

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Federal Election Commission
Certification for Pre-MUR 310
August 1, 1995

Page 2

4. Find no reason to believe that Peter Morton violated 2 U.S.C. § 441a(a)(3).
5. Find reason to believe that Tarlton Morton knowingly and willfully violated 2 U.S.C. § 441f.
6. Find reason to believe that Alan Mazursky knowingly and willfully violated 2 U.S.C. § 441f, but take no further action, and close the file as it pertains to him.
7. Enter into conciliation with Hard Rock Cafe, Inc., Hard Rock Cafe America, L. P., Melrose Corporation, Peter Morton, and Tarlton Morton prior to a finding of probable cause to believe.
8. Approve the factual and legal analyses and appropriate letters as recommended in the General Counsel's July 25, 1995 report.
9. Approve the conciliation agreement attached to the General Counsel's July 25, 1995 report

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

Attest:

8-3-95
Date


Marjorie W. Emmons
Secretary of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

August 7, 1995

Jan Witold Baran, Esq.
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

RE: MUR 4240
Hard Rock Cafe, Inc.
Hard Rock Cafe America, L. P.
Melrose Corporation
Peter Morton
Tarlton Morton

Dear Mr. Baran:

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On August 1, 1995, the Federal Election Commission ("the Commission") found that there is reason to believe your clients violated various provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Commission found reason to believe that Hard Rock Cafe, Inc., Hard Rock Cafe America, L. P., and Melrose Corporation knowingly and willfully violated 2 U.S.C. §§ 441b(a) and 441f. The Commission also found reason to believe that Peter Morton, as a corporate officer, knowingly and willfully violated 2 U.S.C. § 441b(a), and as an individual, knowingly and willfully violated 2 U.S.C. §§ 441a(a)(1)(A), 441a(a)(1)(B), and 441f, but found no reason to believe that he violated 2 U.S.C. § 441a(a)(3). In addition, the Commission found reason to believe that Tarlton Morton knowingly and willfully violated 2 U.S.C. § 441f. The Factual and Legal Analysis, which formed a basis for the Commission's findings, is attached for your information.

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

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

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

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.

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 Andrea Low, the attorney assigned to this matter, at (202) 219-3400.

Sincerely,


Lee Ann Elliott
Vice Chairman

Enclosures
Factual and Legal Analysis
Procedures
Conciliation Agreement

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 4240

RESPONDENTS: Hard Rock Cafe, Inc.
Hard Rock Cafe America, L. P.
Melrose Corporation
Peter Morton
Tarlton Morton

This matter was generated by a sua sponte submission filed with the Federal Election Commission (the "Commission") by Hard Rock Cafe, Inc., Hard Rock Cafe America, L. P., Melrose Corporation, and Peter Morton. The Respondents in this matter are Hard Rock Cafe, Inc., Hard Rock Cafe America, L. P., Melrose Corporation (collectively referred to as "Hard Rock"), Peter Morton, and Tarlton Morton.

Section 441f of the Federal Election Campaign Act of 1971, as amended, (the "Act") provides that no person shall make a contribution in the name of another or knowingly permit his name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the name of another person. 2 U.S.C. § 441f. Under the Act, it is unlawful for any corporation to make a contribution or expenditure in connection with a Federal election, or for any candidate, political committee, or other person knowingly to accept or receive any prohibited contribution, or for any corporate officer or director to consent to any such contribution or expenditure. 2 U.S.C. § 441b(a). No person shall make contributions to any candidate and his authorized political committees with respect to any election for Federal office which, in aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A). No person shall make

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

Respondents have submitted documentation that evidences contributions from corporate entities through Peter Morton, Alan Mazursky, and Tarlton Morton to Federal committees.¹ From this documentation, it appears that sixteen Federal contributions made by Peter Morton, two contributions by Tarlton Morton, and one contribution by Alan Mazursky were reimbursed by Hard Rock during the period 1987 through 1994.

The sua sponte submission admits to the following corporate reimbursements from:

Hard Rock Cafe Investors, Ltd.	\$8,750.00
Hard Rock Cafe Investors, Ltd. II	\$1,000.00
Hard Rock Cafe Investors, Ltd. VII	\$1,000.00
Hard Rock Cafe, Inc.	\$5,666.67
Hard Rock Cafe America, L. P.	\$2,666.67
Melrose Corporation	<u>\$3,416.66</u>
Total	\$22,500.00

According to the FEC contributor index, Alan Mazursky has made only two political contributions during the time period, including the \$500 contribution admittedly reimbursed by Hard Rock

1. The various Hard Rock entities involved in this matter are or were either corporations or limited partnerships with corporations as partners. Hard Rock Cafe America, L. P. is the successor of Hard Rock Cafe Investors Ltd. after a July 1992 reorganization. Mr. Morton is identified as President of Hard Rock Cafe, Inc. and Melrose Corporation. Hard Rock America, L. P. is identified as a limited partnership owned principally by Mr. Morton through a subchapter-S corporation.

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Cafe, Inc. The contributor index reveals that Tarlton Morton made numerous contributions to Federal political committees, but our review of the record discloses that only her 1992 contributions to candidate Mel Levine were reimbursed by Peter Morton, who was in turn reimbursed by Hard Rock.

Respondents argue that they "were wholly unaware that their activities might be illegal," and impliedly claim that they believed that corporate contributions were legal in Federal elections, as they are in non-Federal elections in the state of California. Respondents' actions, however, are inconsistent with that claim. Records submitted show that when the Respondent corporate entities made contributions to City Council and other non-Federal election campaigns, they made the contributions in their own names. When using these same corporations' funds to make contributions in Federal elections, however, the contributions were always made in the names of individuals. If, as Respondents claim, they believed that corporate contributions in Federal elections were legal, they would have made corporate contributions to Federal candidates in their own names as well, rather than making contributions through conduits such as Peter Morton, Tarlton Morton, and Alan Mazursky. The fact that they made corporate contributions without using conduits in non-Federal elections, but made certain to use conduits in Federal elections belies their argument that they did not know the reimbursement scheme served an illegal purpose. It appears, therefore, that Respondents were knowingly and willfully trying to conceal the origin of the contributions.

Peter Morton admits that he reimbursed Tarlton Morton for contributions that were not in turn reimbursed by Hard Rock

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entities. While these reimbursements do not appear to violate 2 U.S.C. § 441b because no corporate funds were involved, they nevertheless appear to violate 2 U.S.C. § 441f.

Hard Rock does not raise the issue of excessive contributions to individual candidates and committees, and the chart submitted shows all of Peter Morton's contributions to be within the limits of 2 U.S.C. §§ 441a(a)(1)(A) and 441a(a)(1)(B). However, a review of the contributor index and documents submitted by Hard Rock indicates that Mr. Morton reimbursed Tarlton Morton for her contributions to Lynn Yeakel for Senate 1992 -- \$1,000 for the primary election and \$1,000 for the general election. Mr. Morton also contributed \$1,000 in both the primary and general elections to that campaign. Thus, Mr. Morton's contributions through Ms. Morton, combined with his own contributions to the Yeakel campaign, appear to have exceeded the limits of Section 441a(a)(1)(A).

Furthermore, Mr. Morton made several contributions to the Democratic Senatorial Campaign Committee ("DSCC") both directly as well as through Ms. Morton. Mr. Morton contributed \$10,000 on July 22, 1992, \$1,000 on July 29, 1992, and \$10,000 on September 17, 1992 to the DSCC. However, the DSCC's 1992 October Monthly report shows that the DSCC refunded \$1,000 to Mr. Morton on September 30, 1992, within the sixty days by which an excessive contribution is required to be refunded to the contributor pursuant to 11 C.F.R. § 103.3(b)(3). Shortly after the DSCC had refunded \$1,000 to Mr. Morton because it was excessive, Mr. Morton reimbursed Tarlton Morton for an October 17, 1992 contribution of \$3,000 to the DSCC, so he actually contributed \$23,000 to the DSCC during the calendar year of 1992.

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Mr. Morton had already contributed the maximum allowable by law to the Yeakel Committee and the DSCC in his own name. The fact that Mr. Morton contributed to these committees through a conduit, Ms. Morton, after he had reached his contribution limit suggests that they both were aware of the limits of Sections 441a(a)(1)(A) and (B), and that they intended to circumvent the limits. Peter and Tarlton Morton's violations appear to be knowing and willful because they appear to have engaged in reimbursements for the purpose of concealing contributions they knew to be excessive.

Therefore, there is reason to believe that Hard Rock Cafe, Inc., Hard Rock Cafe America, L. P., and Melrose Corporation knowingly and willfully violated 2 U.S.C. §§ 441b(a) and 441f. There is reason to believe that Peter Morton, as a corporate officer, knowingly and willfully violated 441b(a), and as an individual, knowingly and willfully violated 2 U.S.C. §§ 441a(a)(1)(A), 441a(a)(1)(B), and 441f. There is also reason to believe that Tarlton Morton knowingly and willfully violated 2 U.S.C. § 441f.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 7, 1995

Mr. Alan Mazursky
27036 Littlefield Drive
Valencia, CA 91354

RE: MUR 4240

Dear Mr. Mazursky:

On August 1, 1995, the Federal Election Commission ("the Commission") found reason to believe that you knowingly and willfully violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed its file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

The Commission reminds you that permitting Hard Rock Cafe, Inc., to use your name to make a federal contribution is a violation of 2 U.S.C. § 441f. You should take steps to ensure that this activity does not occur in the future.

If you have any questions, please contact Andrea Low, the attorney assigned to this matter, at (202) 219-3400.

Sincerely,

A handwritten signature in cursive script that reads "Lee Ann Elliott".

Lee Ann Elliott
Vice Chairman

Enclosure
Factual and Legal Analysis

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 4240

RESPONDENT: Alan Mazursky

This matter was generated by a sua sponte submission filed with the Federal Election Commission (the "Commission") by Hard Rock Cafe, Inc., Hard Rock Cafe America, L. P., Melrose Corporation (collectively referred to as "Hard Rock"), and Peter Morton.

Under the Federal Election Campaign Act of 1971, as amended (the "Act"), no person shall make a contribution in the name of another or knowingly permit his name to be used to effect such a contribution. 2 U.S.C. § 441f. Under the Act, it is unlawful for any corporation to make a contribution or expenditure in connection with a Federal election. 2 U.S.C. § 441b(a).

Hard Rock Cafe, Inc., a corporation, admits that on October 14, 1992, it reimbursed Alan Mazursky \$500 for a contribution to Karen Shepherd for Congress, which he made on October 15, 1992. The Hard Rock entities argue that they "were wholly unaware that their activities might be illegal," and impliedly claim that they believed that corporate contributions were legal in Federal elections, as they are in non-Federal elections in the state of California. Their actions, however, are inconsistent with that claim. Records submitted show that when the Respondent corporate entities made contributions to City Council and other non-Federal election campaigns, they made the contributions in

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their own names. When using these same corporations' funds to make contributions in Federal elections, however, the contributions were always made in the names of individuals. If, as the Hard Rock entities claim, they believed that corporate contributions in Federal elections were legal, they would have made corporate contributions to Federal candidates in their own names as well, rather than making contributions through conduits such as Mr. Mazursky. The fact that they made corporate contributions without using conduits in non-Federal elections, but made certain to use conduits in Federal elections belies their argument that they did not know the reimbursement scheme served an illegal purpose.

In light of the above, it appears that Alan Mazursky knowingly and willfully permitted his name to be used to effect a contribution, the original source of which was Hard Rock Cafe, Inc., and to conceal that source. Therefore, there is reason to believe Alan Mazursky knowingly and willfully violated 2 U.S.C. § 441f.

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WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D. C. 20006
(202) 429-7000

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MAIL ROOM

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August 11, 1995

WRITER'S DIRECT DIAL NUMBER
202-828-3237

FACSIMILE
(202) 429-7049

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

Re: MUR 4240 (Hard Rock Cafe America, L.P.,
Hard Rock Cafe, Inc., Melrose
Corporation, Mr. Peter Morton, Ms.
Tarlton Morton)

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OFFICE OF GENERAL
COUNSEL

Dear Ms. Low:

As you and I discussed on the telephone earlier this week, we would like to make a written submission to you regarding your Factual and Legal Analysis and proposed Conciliation Agreement in this case. We would also like to schedule a meeting with you to learn more about your views of the case and present our interpretation of the relevant facts.

Unfortunately, Mr. Jan Baran, who is primarily responsible for representing Hard Rock Cafe in this matter, will be on vacation from August 14 through September 4. If possible, we would like to arrange a meeting for the week of September 4 -- I will telephone you next week to discuss scheduling. In order to accommodate Mr. Baran's vacation plans and give us the opportunity to hear your views before we make our written submission, we also request a 20-day extension of time in which to file a written response, until September 12.

Thank you in advance for your attention to this matter. Please do not hesitate to call me at the above number if you have any questions or comments.

Sincerely,

Scott S. Harris
Scott S. Harris

cc: Mr. Jan Baran

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 14, 1995

Scott S. Harris, Esq.
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, DC 20006

RE: MUR 4240
Hard Rock Cafe America, L. P.
Hard Rock Cafe, Inc.
Melrose Corporation
Peter Morton
Tarlton Morton

Dear Mr. Harris:

This is in response to your letter dated August 11, 1995, which we received on August 14, 1995, requesting an extension of 20 days to respond to the Commission's reason-to-believe findings. After considering the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on September 12, 1995.

We are available for a meeting to discuss this case during the week of September 4, 1995, as you have requested.

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

Sincerely,

Andrea Tuck Yung Low

Andrea Tuck Yung Low
Attorney

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BEFORE THE FEDERAL ELECTION COMMISSION APR 9 11 57 AM '96

In the Matter of)
)
Hard Rock Cafe, Inc.)
Hard Rock Cafe America, L. P.)
Melrose Corporation)
Peter Morton)
Tarlton Morton)
)

SENSITIVE

MUR 4240

GENERAL COUNSEL'S REPORT

This matter involves a pattern of reimbursements for contributions to federal candidates from 1987 to 1994. Based on a sua sponte submission by respondents, it appeared that contributions were made in the name of others to circumvent limitations on individual contributions and prohibitions on corporate contributions. On August 1, 1995, the Federal Election Commission ("Commission") found reason to believe that Hard Rock Cafe, Inc. Hard Rock Cafe America, L.P., and Melrose Corporation knowingly and willfully violated 2 U.S.C. §§ 441b(a) and 441f. On the same date, the Commission also found reason to believe that Peter Morton knowingly and willfully violated 2 U.S.C. § 441b(a) and as an individual, knowingly and willfully violated 2 U.S.C. § 441a(a)(1)(A), § 441a(a)(1)(B), and § 441f. Furthermore, the Commission found reason to believe that Tarlton Morton knowingly and willfully violated 2 U.S.C. § 441f. In an effort to resolve this matter expeditiously, the Commission did not approve further investigation, but approved pre-probable cause conciliation.

After the Commission made its reason to believe findings, this Office met with counsel for respondents and received a written response. See Attachment. Respondents strongly resist the knowing and willful findings and have indicated that they do not want to participate in pre-

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probable cause conciliation, but prefer to proceed to the probable cause stage. After examination of the response, it seems unlikely that additional discovery would confirm the Commission's knowing and willful findings. Considering the circumstances of this matter, therefore, and to conserve enforcement resources, this Office intends to move to the probable cause stage not based on knowing and willful violations.

Therefore, this Office has terminated pre-probable cause conciliation negotiations and is moving to the next stage of the enforcement process with respect to MUR 4240.

Lawrence M. Noble
General Counsel

Date

4/8/96

BY:



Lois G. Lerner
Associate General Counsel

Attachment

Staff Assigned: J. Bernstein
D. Dillenseger

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FEDERAL ELECTION COMMISSION
Washington, DC 20463

RECEIVED
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COMMISSION
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MAY 9 4 29 PM '96

May 9, 1996

SENSITIVE

Jan Witold Baran, Esq.
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

RE: MUR 4240
Hard Rock Cafe America, L.P., Hard
Rock Cafe, Inc., Melrose Corp.,
Mr. Peter Morton, Ms. Tarlton Morton

Dear Mr. Baran:

Based on your sua sponte submission filed with the Federal Election Commission ("Commission"), the Commission, on August 1, 1995, found that there was reason to believe that Hard Rock Cafe, Inc., Hard Rock Cafe America, L.P., and Melrose Corporation knowingly and willfully violated 2 U.S.C. § § 441b(a) and 441f. On the same date, the Commission also found reason to believe that Peter Morton knowingly and willfully violated 2 U.S.C. § 441b(a) and as an individual, knowingly and willfully violated 2 U.S.C. § 441a(a)(1)(A), § 441a(a)(1)(B), and § 441f, and that Tarlton Morton knowingly and willfully violated 2 U.S.C. § 441f.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that Hard Rock Cafe, Inc., Hard Rock Cafe America, L.P., and Melrose Corporation violated 2 U.S.C. § § 441b(a) and 441f, that Peter Morton violated 2 U.S.C. § § 441b(a) and 441f, and that Tarlton Morton violated 2 U.S.C. § 441f.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

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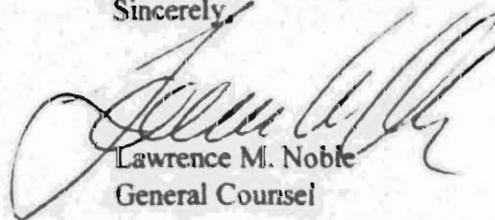
Jan Witold Baran, Esq.
Page 2

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Dominique Dillinseger, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Hard Rock Cafe, Inc.)	
Hard Rock Cafe America, L. P.)	
Melrose Corporation)	MUR 4240
Peter Morton)	
Tarlton Morton)	
)	

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

This matter was generated by a sua sponte submission filed with the Federal Election Commission (the "Commission") by Hard Rock Cafe, Inc., Hard Rock Cafe America, L. P., Melrose Corporation, and Peter Morton. According to the sua sponte submission, in December 1994, the Nevada Gaming Control Board reviewed the finances of these corporate entities. As a result of that review, Hard Rock Cafe, Inc., Hard Rock Cafe America, L. P., Melrose Corporation, Peter Morton, and Tarlton Morton ("Respondents") became aware that over several years they violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act").¹ Specifically, Respondents noted that the Hard Rock entities reimbursed Peter Morton, his spouse Tarlton Morton, and Chief Financial Officer Alan Mazursky for Federal political contributions, and that Peter Morton may have exceeded Section 441a(a)(3)'s limit in 1992. The Commission found reason to believe that the Respondents knowingly and willfully violated 2 U.S.C. §§ 441a(a)(1), 441b(a), and/or 441f, and no reason to believe that Peter Morton violated 2 U.S.C. § 441a(a)(3).

II. ANALYSIS

Section 441f of the Federal Election Campaign Act of 1971, as amended, (the "Act") provides that no person shall make a contribution in the name of another or knowingly permit his or

¹ The various Hard Rock entities involved in this matter are or were either corporations or limited partnerships with corporations as partners. Hard Rock Cafe America, L. P. is the successor of Hard Rock Cafe Investors Ltd. after a July 1992 reorganization. Mr. Morton is identified as President of Hard Rock Cafe, Inc. and Melrose Corporation. Hard Rock America, L. P. is identified as a limited partnership owned principally by Mr. Morton through a subchapter-S corporation.

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her name to be used to effect such a contribution. 2 U.S.C. § 441f. Under the Act, it is unlawful for any corporation to make a contribution or expenditure in connection with a Federal election, or for any corporate officer or director to consent to any such contribution. 2 U.S.C. § 441b(a).

Respondents have submitted documentation that evidences contributions from corporate entities through Peter Morton, Alan Mazursky, and Tarlton Morton to Federal political committees. This documentation shows sixteen Federal contributions made by Peter Morton, two contributions by Tarlton Morton, and one contribution by Alan Mazursky, totaling \$22,500, that were reimbursed by Hard Rock. The contributions Hard Rock made through these individuals are as follows:

<u>NAME</u>	<u>CHECK DATE</u>	<u>RECIPIENT</u>	<u>DATE REIMBURSED</u>	<u>AMOUNT</u>
Peter Morton	3/18/88	McCarthy For U.S. Senate	not available	\$1,000
Peter Morton	5/11/88	Dukakis For President	not available	\$1,000
Peter Morton	10/6/88	McCarthy For U.S. Senate	10/6/88	\$500
Peter Morton	11/2/88	McCarthy For U.S. Senate	not available	\$500
Peter Morton	10/5/89	Bradley For U.S. Senate'90 (Primary)	10/5/89	\$1,000
Peter Morton	10/5/89	Bradley For U.S. Senate'90 (General)	10/5/89	\$1,000
Peter Morton	9/6/90	Gantt For U.S. Senate (General)	9/6/90	\$500
Peter Morton	3/7/91	Friends of Chris Dodd	3/8/91	\$500
Peter Morton	4/26/91	Levine Campaign Committee (Primary)	4/29/91	\$1,000
Peter Morton	4/26/91	Levine Campaign Committee (General)	4/29/91	\$1,000
Tarlton Morton	4/26/91	Levine Campaign Committee (Primary)	4/29/91	\$1,000
Tarlton Morton	4/26/91	Levine Campaign Committee (General)	4/29/91	\$1,000
Peter Morton	11/18/91	Kerrey For President	11/18/91	\$500
Peter Morton	1/17/92	Citizens Committee For Ernest F. Hollings	1/17/92	\$250

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<u>NAME</u>	<u>CHECK DATE</u>	<u>RECIPIENT</u>	<u>DATE REIMBURSED</u>	<u>AMOUNT</u>
Peter Morton	4/27/92	Kostmayer 1990 Committee	4/27/92	\$250
Peter Morton	8/13/92	Beilenson Campaign Cmte	8/23/92	\$1,000
Peter Morton	9/14/92	DSCC (partial reimbmt of \$10,000 contribution)	9/18/92	\$5,000
Peter Morton	9/23/92	Effective Government Cmte.	9/23/92	\$5,000
Alan Mazursky	10/13/92	Karen Shepard For Congress	10/13/92	\$500
			Total:	\$22,500

The aggregated source of these reimbursements are as follows:

Hard Rock Cafe Investors, Ltd.	\$8,750.00
Hard Rock Cafe Investors, Ltd. II	\$1,000.00
Hard Rock Cafe Investors, Ltd. VII	\$1,000.00
Hard Rock Cafe, Inc.	\$5,666.67
Hard Rock Cafe America, L. P.	\$2,666.67
Melrose Corporation	<u>\$3,416.66</u>
Total:	\$22,500.00

The Commission's initial knowing and willful findings principally were based on a pattern of the Hard Rock entities making direct corporate contributions without using conduits in nonfederal elections (where corporate contributions were permissible), but using individual conduits in federal elections, suggesting Respondents intended for the reimbursement scheme to conceal corporate contributions prohibited in federal elections. Indeed, although Mr. Morton claims that he did not

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know corporate contributions to federal candidates were illegal, he received some solicitations which specifically stated that corporate contributions are prohibited.²

Counsel's response included materials and explanations strenuously arguing that the violations were not intentional. Respondents note that 31% of nonfederal contributions and 35% of federal contributions were reimbursed by Hard Rock entities even though corporate contributions are permitted in California. Respondents note that they could have made all of their contributions in California from corporate sources, but only made approximately the same proportion as with federal contributions, thus cutting against the inference that respondents made contributions in the name of another only when they knew they had to do so in order to circumvent legal prohibitions. Although questions remain about the contribution patterns at issue, it is unlikely that further investigation would fully resolve these questions. Under all the circumstances of this matter, this Office is prepared to recommend findings of probable cause to believe no longer based on knowing and willful violations.

Therefore, this Office is prepared to recommend probable cause to believe that Hard Rock Cafe, Inc., Hard Rock Cafe America, L. P., and Melrose Corporation violated 2 U.S.C. §§ 441b(a) and 441f by making corporate contributions and making contributions in the name of another; that Peter Morton violated 2 U.S.C. § 441b(a) by consenting to the corporate contributions and 2 U.S.C. § 441f by allowing his name to be used for the making of the contributions; and that Tarlton Morton violated 2 U.S.C. § 441f by allowing her name to be used.

An additional issue raised in this matter involves Peter Morton's explanation that he reimbursed Tarlton Morton for contributions that were not in turn reimbursed by Hard Rock entities. The following two contributions were made by Tarlton Morton and reimbursed personally by Peter Morton:

² For example, for a Kerry for President reception in November 1991, Melrose Corporation reimbursed Mr. Morton for his personal contribution although the invitation informed him that corporate contributions were prohibited.

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CHECK DATE	RECIPIENT	CONTRIBUTION AMOUNT	DATE (Amount) REIMBURSED
7/23/92	Lynn Yeakel For Senate Committee, \$1,000 Primary, \$1,000 General	\$2,000	7/22/92 (\$2,000)
10/17/92 (?) (illegible check)	DSCC	\$3,000	10/1/92 (\$5,000)

In response to the Commission's reason to believe findings, Respondents argue that the Commission's regulation at 11 C.F.R. § 110.1(i)(1) permits each spouse to contribute even if only one spouse has income, that Peter Morton is the only significant source of income, that Peter Morton's practice of regular payments to Tarlton Morton's account, including specific amounts to fund the campaign contributions, falls within this regulation, and that Tarlton Morton controlled the contributions made in her name.

This Office agrees that the regulation permits a non-income earning spouse to contribute. In light of the particular arrangement here, where there was a regular practice of spousal support and household payments and it appears Peter Morton funded all of Tarlton Morton's spending, where she personally signed the two contribution checks at issue drawn on her separate account, and counsel represents that she controlled these contributions, this Office does not intend to pursue the findings corresponding to these contributions with respect to Peter Morton or Tarlton Morton.³

³ This Office recognizes, however, that under certain circumstances the section 441a contribution limitation as well as the section 441f prohibition might apply to one spouse using the name of the other, where, for example, there is no regular practice of payments to the other spouse's separate account or where there is no donative intent by the other spouse.

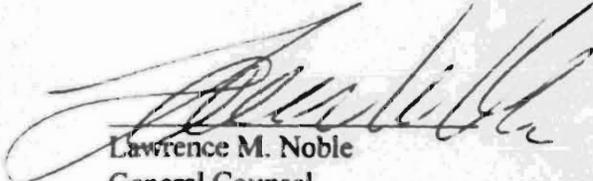
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III. GENERAL COUNSEL'S RECOMMENDATIONS

1. Find probable cause to believe that Hard Rock Cafe, Inc., Hard Rock Cafe America, L. P., and Melrose Corporation violated 2 U.S.C. §§ 441b(a) and 441f.
2. Find probable cause to believe Peter Morton violated 2 U.S.C. §§ 441b(a) and 441f.
3. Find probable cause to believe that Tarlton Morton violated 2 U.S.C. § 441f.

Date

5/9/76


Lawrence M. Noble
General Counsel

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COMMISSION
OFFICE OF GENERAL
COUNSEL

MAY 16 12 32 PM '96

WILEY, REIN & FIELDING

1776 K STREET, N. W.
WASHINGTON, D. C. 20006
(202) 429-7000

JAN WITOLD BARAN
(202) 429-7330

May 15, 1996

FACSIMILE
(202) 429-7049

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

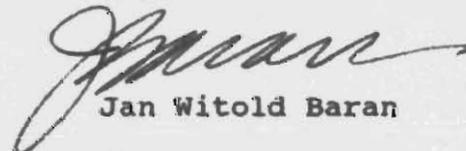
Re: MUR 4240 (Hard Rock Cafe America, L.P.,
Hard Rock Cafe, Inc., Melrose
Corporation, Mr. Peter Morton, Ms.
Tarlton Morton)

Dear Ms. Dillinseger:

This office expects to submit a brief to the Commission in this matter. In order to make a complete evaluation of the views expressed in your brief and coordinate a response with our clients, we hereby request a twenty day extension of time in which to submit our brief. Because your letter was received by this office on May 13, such an extension would make our brief due on June 17.

Thank you in advance for your attention to this matter. Please do not hesitate to call me at the above number if you have any questions or comments.

Sincerely,


Jan Witold Baran

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 17, 1996

VIA FACSIMILE/U.S. MAIL

Jan Witold Baran, Esq.
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, DC 20006

RE: MUR 4240
Hard Rock Cafe America, L. P.
Hard Rock Cafe, Inc.
Melrose Corporation
Peter Morton
Tarlton Morton

Dear Mr. Baran:

This is in response to your letter dated May 15, 1996, which we received on May 16, 1996, requesting an extension of 20 days until June 17, 1996, to respond to the General Counsel's Brief. After considering the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on June 17, 1996.

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

Sincerely,

Dominique Dillenseger
Attorney

96043764654

WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D. C. 20006
(202) 429-7000

June 17, 1996

JAN WITOLD BARAN
(202) 429-7330

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(202) 429-7049
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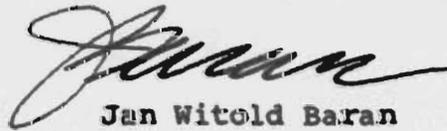
Ms. Marjorie Emmons
Commission Secretary
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 4240 (Hard Rock Cafe America, L.P; Hard
Rock Cafe, Inc.; The Melrose Corp.; Mr. Peter
Morton; Ms. Tarlton Morton)

Dear Ms. Emmons:

Enclosed please find an original and nine copies of the
Respondents' Brief in the above-captioned matter filed pursuant
to 11 C.F.R. § 111.16(c).

Sincerely,


Jan Witold Baran

cc: Lawrence M. Noble (3 copies)

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WILEY, REIN & FIELDING

JUN 17 4 18 PM '96

1776 K STREET, N.W.
WASHINGTON, D. C. 20008
(202) 429-7000

June 17, 1996

JAN WITOLD BARAN
(202) 429-7330

FACSIMILE
(202) 429-7049

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

Re: MUR 4240 (Respondents' Brief)

To the Commission:

This letter will serve as the Respondents' Brief to the Commission in this matter pursuant to 11 C.F.R. § 111.16(c) and on behalf of our clients, Hard Rock Cafe, Inc., Hard Rock Cafe America, L.P., the Melrose Corporation, Peter Morton, and Tarlton Morton.

Summary of Facts

Mr. Peter Morton is the President, Chairman, and principal owner of Hard Rock Cafe America, L.P. For a number of years, Mr. Morton was subject to regular solicitations for political contributions, and he responded to many of those solicitations. In late 1994, Mr. Morton was informed that certain of his political contributions may have violated unspecified campaign finance laws. At that time, he authorized this office to conduct a thorough investigation of all his political contributions to assess any possible violations by Hard Rock Cafe and affiliated entities and individuals. He instructed us to disclose to appropriate governmental agencies all contributions that could conceivably implicate federal, state or local campaign finance laws, including contributions that we did not consider illegal.

Pursuant to these instructions, this office made an extensive submission to the Commission on January 5, 1995. In that submission, we explained that various Hard Rock Cafe entities reimbursed a small number of political contributions by Hard Rock Cafe officers and employees, and that those reimbursements may have violated FECA. We emphasized, however, that those involved had no knowledge that the reimbursements might be illegal.

Soon thereafter, we made similar submissions to the California Fair Political Practices Commission and the Los Angeles Ethics Commission. In addition, we disclosed one

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potentially improper contribution to the Illinois State Board of Elections and the Board of Ethics of the City of Chicago. By May 1995, all of the other agencies had investigated and settled these potential violations without any findings that any violations were intentional.¹ Both the Illinois State Board of Elections and the Board of Ethics of the City of Chicago dismissed their investigations without taking any action against our clients.

In August 1995, however, the Commission found reason to believe that our clients "knowingly and willfully" violated FECA. In hopes of settling this matter without such a finding, we conferred with representatives of the General Counsel's office, and made another submission on September 12, 1995, explaining the evidence that the violations were not intentional. We brought to the General Counsel's attention (1) the fact that the Hard Rock Cafe officials involved have strenuously denied ever being aware that their contributions might be illegal; (2) the fact that Hard Rock Cafe would have had no reason to use reimbursements to save personal funds or to circumvent contribution limits; (3) the fact that company records made no attempt to hide these contributions; and (4) the fact of the similar pattern in Hard Rock Cafe's California (where corporate contributions are permitted) and federal contributions.

In addition, our September 12 submission addressed the Commission's finding of "reason to believe" that Tarlton Morton, Peter Morton's wife, violated FECA. The submission pointed out that, under Commission regulations, a spouse without independent income may make campaign contributions. Because Tarlton Morton controlled all of the contributions at issue, the submission noted that regular payments from Peter to Tarlton in connection with those contributions were not violative of FECA.

The General Counsel's Brief appears to have accepted these arguments and decided (1) not to recommend finding "knowing and willful" violations of FECA; and (2) to recognize that reimbursements from Peter to Tarlton Morton did not violate FECA. However, the General Counsel's Brief asserts that Tarlton violated FECA by "allowing her name to be used" in connection with two corporate contributions.

¹ Copies of the final settlement agreements with the California Fair Political Practices Commission and the Los Angeles Ethics Commission are attached as Exhibits A & B.

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As explained below, we believe the General Counsel's recommendation concerning Tarlton Morton to be insupportable and erroneous. In addition, we urge the Commission to take no further action in this matter beyond the finding of probable cause.

Argument

1. The Commission Should Not Find That Tarlton Morton Violated the Act

Though recognizing that spouses are fully capable of making political contributions in their own name regardless of whether they have an independent source of income, the General Counsel's Brief charges Tarlton Morton with violating § 441f. However, there is no basis for this proposition.

Apparently still at issue for Tarlton Morton are two \$1,000 contributions (one for the primary election and one for the general election) to Mel Levine's 1992 campaign for the United States Senate. These contributions were made on April 26, 1991, in the form of a check to "Mel Levine for Senate." On April 29, 1991, Peter Morton obtained reimbursements for these contributions from four different Hard Rock Cafe entities.²

While Peter Morton and Hard Rock Cafe have acknowledged that these reimbursements may violate §§ 441b(a) and 441f, Tarlton Morton had nothing to do with these reimbursements and never received any money from them. In fact, she has stated under oath that she was entirely unaware that the reimbursements ever took place.³ If Tarlton Morton did not know of the reimbursements, she certainly did not "allow[] her name to be used" in connection with corporate contributions. Therefore, she did not violate § 441f.

² When Mel Levine lost in the 1992 Senate primary, both Peter and Tarlton Morton redesignated their earlier contributions to his general election campaign to his 1994 Campaign Committee. Copies of Mr. Morton's check to the Levine campaign, stubs from four reimbursement checks from Hard Rock Cafe restaurants and the Melrose Corp., Mr. Morton's bank deposit slip for those reimbursements, and the Levine redesignation letter (all of which were included with our January 5, 1995, submission) are enclosed as Exhibit C.

³ A copy of a sworn affidavit from Ms. Morton on this issue is enclosed as Exhibit D. The original of that affidavit will be forwarded to the Commission as soon as it is received by this office.

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2. Because the Violations at Issue Were Unintentional and Because of the Respondents' Extensive Disclosures, the Commission Should Take No Further Action in this Matter

Based upon the Respondents' forthright and comprehensive disclosures to the Commission, we request that the Commission take no action against them beyond the finding of probable cause against Hard Rock Cafe America, L.P., Hard Rock Cafe Inc., the Melrose Corporation, and Mr. Morton. Until learning of these potential violations, the Respondents were largely unaware of the intricacies of campaign finance regulations. These contributions were not subject to prior review by counsel, though Hard Rock Cafe has now instituted internal procedures to ensure that no such violations occur in the future.

In addition, the Commission should recognize that Hard Rock Cafe brought this matter to the attention of the Commission, made a full disclosure of all potentially relevant contributions, and has cooperated fully with the Commission's investigation. While the issue was first raised to Hard Rock Cafe because officials of the Nevada Gaming Commission quite accidentally discovered a small number of reimbursed contributions and suggested that Hard Rock Cafe take further action to remedy the problem, the Respondents certainly were not compelled to make such comprehensive disclosures to the Commission. As is clear from the history of this matter, Mr. Morton and Hard Rock Cafe disclosed to the Commission many contributions and reimbursements that they did not consider to be illegal, but that potentially could expose them to liability. To impose any significant penalties upon the Respondents in this case would not recognize the company's good faith reaction to learning of its violations, and would send a message that coming clean with the Commission will not be appropriately recognized. Therefore, we urge the Commission to consider not seeking any civil penalty under the distinct circumstances of this matter.

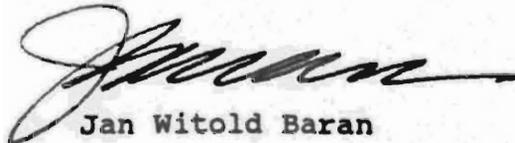
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Conclusion

For the foregoing reasons, the Respondents respectfully request that the Commission:

- (1) accept the General Counsel's conclusion that no violations of FECA by the Respondents were intentional;
- (2) find no probable cause to believe that Tarlton Morton violated FECA; and
- (3) take no action against the other Respondents beyond the finding of probable cause.

Respectfully Submitted,



Jan Witold Baran

Enclosures

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1 DARRYL EAST
 2 MARK T. MORODOMI
 3 FAIR POLITICAL PRACTICES COMMISSION
 4 428 J STREET, SUITE 800
 5 SACRAMENTO, CA 95814
 6 (916) 322-6441

7 BEFORE THE FAIR POLITICAL PRACTICES COMMISSION
 8 STATE OF CALIFORNIA

9
 10 In the Matter of) FPPC NO. 95/028
 11 Hard Rock Cafe America,)
 12 L.P., and the Melrose) STIPULATION, DECISION,
 13 Corporation,) AND ORDER
 14 Respondents.)
 15 _____)

16 The complainant, the Executive Director of the Fair
 17 Political Practices Commission, and respondents
 18 Hard Rock Cafe America, L.P. ("Hard Rock Cafe") and the
 19 Melrose Corporation hereby agree that this Stipulation will be
 20 submitted for consideration by the Fair Political Practices
 21 Commission at its next regularly scheduled meeting.

22 The parties agree to enter into this Stipulation to
 23 resolve all factual and legal issues raised in this matter and
 24 to reach a final disposition without the necessity of holding
 25 an administrative hearing to determine the liability of the
 26 Respondents.

27 Respondents understand and hereby knowingly and
 voluntarily waive any and all procedural rights under Cal.

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2 Gov. Code Sections 83115.5, 11503 and 2 Cal. Code of Regs.
3 Section 18361, including but not limited to a determination of
4 probable cause, the issuance and receipt of an accusation, and
5 the right to appear personally in any administrative hearing
6 held in this matter, to confront and cross-examine all wit-
7 nesses testifying at the hearing, to subpoena witnesses to
8 testify at the hearing and to have an impartial administrative
9 law judge present at the hearing to act as a hearing officer.

10 Respondent further understands and hereby acknowledge
11 that this Stipulation is not binding upon any other law
12 enforcement agency and does not preclude the Commission from
13 referring this matter to, cooperating with, or assisting any
14 such other agency with regard to this or any other related
15 matters.

16 It is further stipulated and agreed that Respondents
17 have violated the Political Reform Act as described in Exhibit
18 I, attached hereto and incorporated herein by reference as if
19 fully set forth herein, which is a true and accurate summary
20 of the facts in this matter.

21 Respondents agree to the issuance of the Decision and
22 Order and imposition by the Commission of a fine in the amount
23 of ten thousand two hundred dollars (\$10,200.00) for Hard Rock
24 Cafe and three thousand four hundred dollars (\$3,400.00) for
25 the Melrose Corporation and a cashier's check for the
26 respective amounts, payable to the "General Fund of the State
27 of California" is submitted herewith to be held by the Commis-
sion until it issues its Decision and Order.

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The parties agree that in the event the Commission refuses to accept this Stipulation, it shall become null and void and not be admissible against respondents, and within fifteen (15) working days after the Commission meeting at which this Stipulation is rejected, all payments tendered shall be returned to the Respondents. Respondents further stipulate and agree that in the event the Commission rejects the Stipulation and a full evidentiary hearing before the Commission becomes necessary, no member of the Commission shall be disqualified because of prior consideration of this Stipulation.

Dated: 5/19/95 Jeewan Sakhu
Acting Executive Director
Fair Political Practices Commission,
Complainant

Dated: 5-17-95 By Alan Saperling
Title CHIEF FINANCIAL OFFICER
Hard Rock Cafe

Dated: 5-17-95 By Alan Saperling
Title VICE PRESIDENT - FINANCE
Melrose Corporation

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Dated: 5/18/95 By *Jan Baran*
Jan Baran
Wiley, Rein & Fielding
Washington, DC
Attorneys for Respondents

IT IS SO ORDERED, effective upon execution by the Chairman of
the Fair Political Practices Commission at Sacramento,
California.

Dated: June 1, 1995 *Ravi Mehta*
Ravi Mehta, Chairman
Fair Political Practices Commission

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EXHIBIT I

INTRODUCTION

Hard Rock Cafe America (Los Angeles), L.P., is the operating partnership for the Los Angeles Hard Rock Cafe restaurant. It became the successor to Hard Rock Cafe Investors, Ltd., after a July 1992 corporate reorganization. Collectively they will be referred to as "Hard Rock Cafe." At all times relevant to this case, Peter Morton was the president of Hard Rock Cafe and the Melrose Corporation.

Hard Rock Cafe reimbursed Peter Morton for contributions that he made to candidates for state and local office. The Melrose Corporation reimbursed Peter Morton, and his wife, Tarlton Morton, for contributions that they made to candidates for state and local office.

The foregoing chain of activity is commonly referred to as "laundering." It undermines the campaign disclosure provisions of the Political Reform Act ("Act")^{1/} by depriving the electorate of essential information regarding who is supporting or opposing a particular candidate or measure.

COUNTS 1 - 6: Hard Rock Cafe violated Government Code Sections 84300(c) and 84301 with regard to six contributions.

RESPONDENT: Hard Rock Cafe

COUNTS 7 - 8: The Melrose Corporation violated Government Code Sections 84300(c) and 84301 with regard to two contributions.

RESPONDENT: Melrose Corporation

SUMMARY OF THE LAW

The purpose of campaign reporting under the Act is that "receipts and expenditures in election campaigns should be fully and truthfully disclosed in order that the voters may be fully informed and improper practices may be inhibited." (Section 81002(a).) Timely and truthful disclosure of the source of campaign contributions is an essential part of the Act's mandate.

In order to obtain disclosure of the true source of campaign contributions, Section 84301 prohibits contributions made, directly or indirectly, by any person in a name other than that by which the contributor is identified for legal purposes. Section

^{1/} The Political Reform Act is contained in Government Code Sections 81000 to 91015. All statutory references are to the Government Code unless otherwise indicated.

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84300(c) prohibits contributions of \$100 or more unless they are made by way of a written instrument containing the names of both the donor and the payee.

SUMMARY OF THE CASE

RESPONDENT HARD ROCK CAFE

COUNTS 1 - 6

COUNTS 1 - 6:

Hard Rock Cafe violated Government Code Sections 84300(c) and 84301 with regard to six contributions made to candidates for state and local office.

Count 1

Contributions to "Citizens for a Livable Los Angeles"

On September 14, 1990, Peter Morton wrote a \$1,000 contribution check to the "Citizens for a Livable Los Angeles" committee.

Hard Rock Cafe admitted to reimbursing Mr. Morton for his contribution and not disclosing to the committee that it was the true source of the contribution.

Count 2

Contribution to "Arlo Smith for Attorney General"

On September 17, 1990, Peter Morton wrote a \$1,000 contribution check to "Arlo Smith for Attorney General."

Hard Rock Cafe admitted to reimbursing Mr. Morton for his contribution and not disclosing to the committee that it was the true source of the contribution.

Count 3

Contribution to "Dianne Feinstein for Governor"

On September 17, 1990, Peter Morton wrote a \$1,000 contribution check to "Dianne Feinstein for Governor."

Hard Rock Cafe admitted to reimbursing Mr. Morton for his contribution and not disclosing to the committee that it was the true source of the contribution.

Count 4

Contribution to Los Angeles City Councilman Mike Woo's Officeholder Committee

On June 20, 1991, Peter Morton wrote a \$5,000 contribution check to Los Angeles City Councilman Mike Woo's Officeholder Committee.

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Hard Rock Cafe admitted to reimbursing Mr. Morton for his contribution and not disclosing to the committee that it was the true source of the contribution.

Count 5

Contribution to Tom Hayden's 1992 State Senate Campaign

On March 23, 1992, Peter Morton wrote a \$1,000 contribution check to Tom Hayden's 1992 State Senate Campaign.

Hard Rock Cafe admitted to reimbursing Mr. Morton for his contribution and not disclosing to the committee that it was the true source of the contribution.

Count 6

Contribution to "Bob Tannenbaum for District Attorney"

On May 7, 1992, Peter Morton wrote a \$2,500 contribution check to "Bob Tannenbaum for District Attorney."

Hard Rock Cafe admitted to reimbursing Mr. Morton for his contribution and not disclosing to the committee that it was the true source of the contribution.

COUNTS 7 - 8:

The Melrose Corporation violated Government Code Sections 84300(c) and 84301 with regard to two contributions.

RESPONDENT:

Melrose Corporation

Count 7

Contribution to Cathy O'Neill's State Senate Campaign

On April 10, 1992, Peter Morton wrote a \$250 contribution check to Cathy O'Neill's State Senate Campaign.

The Melrose Corporation admitted to reimbursing Mr. Morton for his contribution and not disclosing to the committee that it was the true source of the contribution.

Count 8

Contribution to "Mike Woo for Mayor"

On September 25, 1992, Tarlton Morton wrote a \$1,000 contribution check to "Mike Woo for Mayor."

The Melrose Corporation admitted to reimbursing Ms. Morton for her contribution and not disclosing to the committee that it was the true source of the contribution.

FACTORS IN AGGRAVATION

The laundering of campaign contributions is one of the most serious violations of the Political Reform Act.

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FACTORS IN MITIGATION

Respondents have no enforcement history.

Respondents disclosed these violations to the Commission after certain reimbursed contributions were identified by staff of the Nevada Gaming Control Board. Respondents identified to the Commission all of the contributions at issue in this Stipulation and offered to bring themselves into full compliance with law. Since that time, respondents have fully cooperated with the investigation and provided all requested documents.

Campaign contribution limit laws did not apply or limit seven of the eight contributions.

CONCLUSION

This matter consists of eight counts against respondents Hard Rock Cafe and the Melrose Corporation. The failure of respondents to comply with the requirements of the Political Reform Act justifies imposition of the agreed upon penalty of \$13,600.

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1 procedural rights under Los Angeles City Charter Section 600 O and Los Angeles Administrative
2 Code Section 24.1.2(d) and (e), including but not limited to a determination of probable cause,
3 the issuance and receipt of an accusation, the right to appear personally in any administrative
4 hearing held in this matter, to confront and cross-examine all witnesses testifying at the hearing,
5 to subpoena witnesses to testify at the hearing, and to have the City Ethics Commission or an
6 impartial administrative law judge hear the matter.

7 4. Respondents further understand and hereby acknowledge that this Stipulation is
8 not binding upon any other law enforcement agency and does not preclude the City Ethics
9 Commission from referring this matter to, cooperating with, or assisting any such other agency
10 with regard to this or any other related matters.

11 5. It is further stipulated and agreed that Respondents have violated the Los Angeles
12 City Charter as described in Exhibits 1, 2 and 3, attached hereto and incorporated herein by
13 reference, which are true and correct summaries of the facts in this matter.

14 6. Respondents agree to the issuance of the Decision and Order and imposition by
15 the Los Angeles City Ethics Commission of a fine in the amount of \$12,000. Respondents agree
16 to pay a total of \$12,000 to the City Ethics Commission by cashiers check, payable to the
17 "General Fund of the City of Los Angeles" upon the signing of this Stipulation. The payment
18 submitted herewith will be held by the City Ethics Commission until it issues its Decision and
19 Order.

20 7. The parties agree that in the event the City Ethics Commission refuses to accept
21 this Stipulation, it shall become null and void, and within fifteen (15) working days after the

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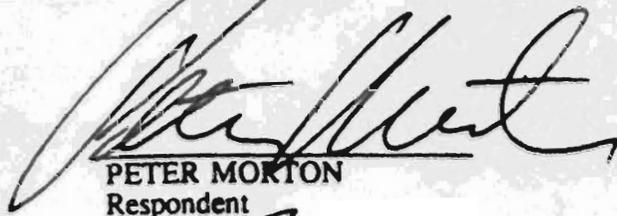
1 City Ethics Commission meeting at which this Stipulation is rejected, all payments tendered shall
2 be returned to the Respondents. Respondents further stipulate and agree that in the event the
3 City Ethics Commission rejects the Stipulation and a full evidentiary hearing before the City
4 Ethics Commission becomes necessary, no member of the City Ethics Commission or its staff
5 shall be disqualified because of prior consideration of this Stipulation.

6 DATED: Apr. 17, 1995



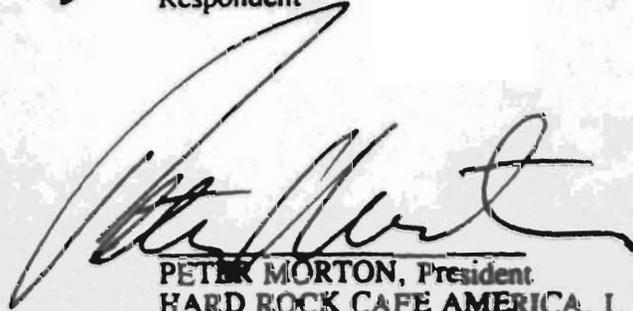
BEN BYCEL, Executive Director
CITY ETHICS COMMISSION
Complainant

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11 DATED: _____



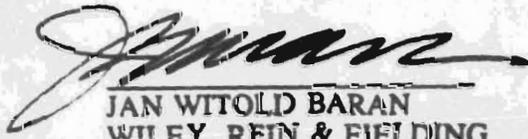
PETER MORTON
Respondent

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16 DATED: _____



PETER MORTON, President
HARD ROCK CAFE AMERICA, L.P.;
HARD ROCK CAFE AMERICA (LOS
ANGELES) L.P.; THE MELROSE
CORPORATION,
Respondents

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22 DATED: 4/13/95



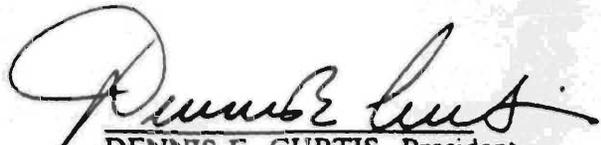
JAN WITOLD BARAN
WILEY, REIN & FIELDING
Attorney for HARD ROCK CAFE
AMERICA L.P.; HARD ROCK CAFE
AMERICA (LOS ANGELES) L.P.; THE
MELROSE CORPORATION; PETER
MORTON,
Respondents

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1 **DECISION AND ORDER**

2 The City Ethics Commission has considered the above Stipulation at its meeting on
3 April 19, 1995. The City Ethics Commission hereby approves the Stipulation and orders that,
4 in accordance with the Stipulation, Respondents agree to pay a fine to the City of Los Angeles
5 in the sum of \$12,000.

6
7 DATED: 4/19/95


DENNIS E. CURTIS, President
CITY ETHICS COMMISSION

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1 EXHIBIT I

2 I.

3 INTRODUCTION

4 This case concerns political money laundering by Respondents Hard Rock Cafe America,
5 L.P.; Hard Rock Cafe America (Los Angeles) L.P.; The Melrose Corporation; and Peter
6 Morton ("Respondents").^{1,2} Respondents concealed the true source of illegal contributions made
7 to Los Angeles City Councilmembers, candidates for City elective office, officeholder and
8 controlled committees during the period August 1987 through October 1992. The statute of
9 limitations has run on the six contributions made by Respondents in 1987, 1988 and 1989 in
10 violation of Los Angeles City Charter ("City Charter") sections 312 L, 312 C 5 and 312 C 8.
11 Therefore, only the two remaining contributions, made in 1991 and 1992, and a third violation
12 of the City Charter section 312 C 8 aggregate contribution limit are included as counts herein.
13 For details of the 1987, 1988 and 1989 violations, see Exhibit 3.

14 During June 1991 through October 1992, individuals associated with Hard Rock Cafe
15 America L.P.; Hard Rock Cafe America (Los Angeles) L.P.; and The Melrose Corporation
16 made what appeared to be two individual contributions to the "Mike Woo for Mayor" committee
17 and to the "Mike Woo's Officeholder Account" committee. The Councilman's campaign
18 committee and officeholder committee recorded them in their campaign statements as
19 contributions from the individuals. The Melrose Corporation and Hard Rock Cafe Investors,
20 Ltd., however, each reimbursed the individuals for one of the contributions. The public was
21 deprived of the knowledge of the true source of the contributions, and Hard Rock Cafe Investors
22

23
24 ¹The Respondents in this action, Hard Rock Cafe America, L.P.; Hard Rock Cafe America (Los Angeles)
25 L.P.; The Melrose Corporation and Peter Morton, will usually be referred to herein collectively as "Respondents."
26 Where necessary, however, a respondent will be referred to individually. Hard Rock Cafe Investors, Ltd., which
27 became Hard Rock Cafe America (Los Angeles), L.P. after a July 1992 corporate reorganization, will be referred
28 to specifically by name throughout.

29
30 ²The term "political money laundering" typically describes conduct of reimbursing another for making a
31 contribution without disclosure to the public of the true source's identity.

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1 Ltd. and The Melrose Corporation, by contributing monies indirectly through two individuals
2 associated with the corporate entities, circumvented the City Charter contribution limitations.

3 Respondents' own documents show reimbursements to the individual contributors for the
4 contributions they made to the Mike Woo committees, as well as for contributions to the other
5 candidates that are now outside the statute of limitations. Respondents brought this matter to
6 the attention of the City Ethics Commission after the illegal contributions were identified by the
7 staff of the Nevada Gaming Control Board.

8 Respondents admit they violated the City Charter as follows:

9
10 COUNTS 1 AND 2 Making 2 contributions in violation of City Charter section 312 L.

11 COUNT 3 Making 5 contributions in violation of City Charter section 312 C 8.

12
13 II.

14 SUMMARY OF THE LAW

15 City Charter section 312 L provides that a contribution shall not be made, directly or
16 indirectly, by any person or combination of persons, acting jointly in a name other than the
17 name by which they are identified for legal purposes, nor in the name of another person or
18 combination of persons.

19 City Charter section 312 C 8 provides that no person shall make a contribution in a single
20 election that would cause the aggregate amount of contributions by that person to exceed a sum
21 equal to \$500 multiplied by the number of City Council offices appearing on the ballot at that
22 election, plus \$1,000 multiplied by the number of city-wide offices appearing on the ballot at
23 that election. The aggregate limit for the April 1993 Primary Election, based on the above
24 formula, was \$7,000.

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III.

SUMMARY OF THE EVIDENCE

COUNTS 1 AND 2

VIOLATIONS OF SECTION 312 L

Respondents violated City Charter section 312 L with regard to two indirect contributions, without disclosing the true source of the contributions. The indirect contributions are detailed below:

COUNT 1

Contribution to "Mike Woo for Mayor" Committee

The "Mike Woo for Mayor" committee received a \$1,000 contribution from the Melrose Corporation on October 5, 1992. This check, number 9600, dated September 11, 1992, was reflected on the Melrose Corporation accounts as of August 23, 1993. Another \$1,000 contribution was received by the "Mike Woo for Mayor" committee on October 25, 1992 from Tarlton Morton, by personal check number 2302, dated September 25, 1992. The Committee's campaign statement for the period January 1, 1992 through December 31, 1992 listed Tarlton Morton as the contributor.

However, Tarlton Morton was reimbursed \$1,000 by check number 9611, dated September 25, 1992, by The Melrose Corporation, an entity owned in part by Peter Morton.

The Melrose Corporation was the true source of both the \$1,000 contributions.

COUNT 2

Contribution to Councilman Mike Woo's Officeholder Committee

Councilman Mike Woo's Officeholder committee received one \$5,000 contribution on June 22, 1991, made payable to "Councilman Mike Woo's Officeholder Account," from Peter Morton, by personal check number 4387, dated June 20, 1991. The Committee's campaign

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1 statement for the period January 1, 1991 through June 30, 1991 listed Peter Morton as the
2 contributor.

3 However, Peter Morton was reimbursed \$5,000 by check number 3544, dated the same
4 date, June 20, 1991, by Hard Rock Cafe Investors, Ltd..

5 Hard Rock Cafe Investors, Ltd. was the true source of the \$5,000 contribution.
6

7 **COUNT 3**

8 **VIOLATION OF CITY CHARTER SECTION 312 C 8**

9 Respondents violated City Charter section 312 C 8 by contributing monies in excess of
10 the \$7,000 aggregate contribution limit in the April 1993 Primary Election.
11

12 Count 3

13 Respondents made five contributions to candidates in the 1993 Primary Election totaling
14 \$9,250.

15 On September 11, 1992, by check number 9600, The Melrose Corporation contributed
16 \$1,000 to "Mike Woo for Mayor." (See Count 1, above.)

17 On September 25, 1992, by check number 2302, Tarlton Morton contributed \$1,000 to
18 "Mike Woo for Mayor." As detailed in Count 1 above, Tarlton Morton was reimbursed \$1,000
19 by The Melrose Corporation on September 25, 1992.

20 On October 16, 1992, by check number 1158, Hard Rock Cafe America (Los Angeles)
21 L.P. contributed \$1,000 to "Nate Holden for Mayor."

22 On March 5, 1993, by check number 5972, Peter Morton contributed \$6,000 to "Mike
23 Woo for Mayor."

24 On March 15, 1993, by check number 1466, Hard Rock Cafe America (Los Angeles)
25 L.P. contributed \$250 to "Daniel Pritikin for City Council."

26 Respondents exceeded the City Charter section 312 C 8 aggregate limit for the 1993
27
28

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1 Primary Election, which was \$7,000, by \$2,250, in violation of this section.
2

3 IV.

4 FACTORS IN AGGRAVATION

5 The laundering of campaign contributions is one of the most serious violations of the
6 campaign finance provisions of the Los Angeles City Charter. Laundering manifests an intent
7 to conceal from the public the true source of political contributions, and it allows for the
8 circumvention of the campaign contribution limitations enacted by the voters of the City of Los
9 Angeles. However, the Respondents do not admit that their violations of the campaign finance
10 provisions of the Los Angeles City Charter were intentional.

11 The repeated nature of the violations by Respondents over a five year period displays a
12 pattern of laundering activity rather than an isolated incident.³
13

14 V.

15 FACTORS IN MITIGATION

16 Respondents have no prior enforcement history.

17 Respondents, by letter from their attorney dated January 27, 1995, revealed their
18 laundering activities to the City Ethics Commission and offered to cooperate fully in order to
19 bring themselves into full compliance with Los Angeles law. They did so at the request of the
20 staff of the Nevada Gaming Control Board. Respondents identified six Charter violations now
21 outside the statute of limitations. In the course of the City Ethics Commission's ensuing
22 investigation, Respondents furnished all documents and information necessary to promptly and
23 completely resolve this matter.
24 //
25 //

26 _____
27 ³See Exhibits 2 and 3.

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VI.

CONCLUSION

This matter consists of three counts against Respondents. The total fine Respondents will pay in connection with this case is \$12,000. The failure of Respondents to comply with the limitations of the campaign finance provisions of the Los Angeles City Charter justifies the imposition of the agreed upon penalty.

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EXHIBIT II

**HARD ROCK CAFE AMERICA, L.P.; HARD ROCK CAFE AMERICA (LOS ANGELES) L.P.;
THE MELROSE CORPORATION; PETER MORTON
CONTRIBUTIONS TO CITY CANDIDATES**

<u>PURPORTED CONTRIBUTOR</u>	<u>AMOUNT OF CONTRIBUTION</u>	<u>DATE OF REIMB.</u>	<u>REIMB. PARTY</u>	<u>DATE OF CONTRIB.</u>	<u>RECIPIENT</u>	<u>COMMITTEE</u>
THE MELROSE CORPORATION	\$1,000.00	N/A	N/A	09/11/92	MICHAEL WOO	"MIKE WOO FOR MAYOR"
MORTON, TARLTON	\$1,000.00	09/25/92	MELROSE CORP.	09/25/92	MICHAEL WOO	"MIKE WOO FOR MAYOR"
MORTON, PETER	\$5,000.00	6/20/91	HRC INVEST. LTD.	06/20/91	MICHAEL WOO	"COUNCILMAN MIKE WOO'S OFFICEHOLDER ACCOUNT"
HARD ROCK CAFE AMERICA (LOS ANGELES) L.P.	\$1,000.00	N/A	N/A	10/08/92	NATE HOLDEN	"NATE HOLDEN FOR MAYOR 1993"
MORTON, PETER	\$6,000.00	N/A	N/A	03/05/93	MICHAEL WOO	"MIKE WOO FOR MAYOR"
HARD ROCK CAFE AMERICA (LOS ANGELES) L.P.	\$250.00	N/A	N/A	03/15/93	DANIEL PRITIKIN	"DANIEL PRITIKIN FOR CITY COUNCIL"

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EXHIBIT III

**HARD ROCK CAFE AMERICA, L.P.; HARD ROCK CAFE AMERICA (LOS ANGELES) L.P.;
THE MELROSE CORPORATION; PETER MORTON
CONTRIBUTIONS TO CITY CANDIDATES
(OUTSIDE THE STATUTE OF LIMITATIONS)**

<u>PURPORTED CONTRIBUTOR</u>	<u>AMOUNT OF CONTRIBUTION</u>	<u>DATE OF REIMB.</u>	<u>REIMB. PARTY</u>	<u>DATE CONTRIB. RECEIVED</u>	<u>RECIPIENT</u>	<u>COMMITTEE</u>
HARD ROCK CAFE INVESTORS, LTD.	\$500.00	N/A	N/A	03/03/89	ZEV YAROSLAVSKY	"YAROSLAVSKY FOR CITY COUNCIL"
MORTON, PETER	\$500.00	02/24/89	HRC INVEST. LTD	03/03/89	ZEV YAROSLAVSKY	"YAROSLAVSKY FOR CITY COUNCIL"
MORTON PETER	\$1,000.00	09/14/90	HRC INVEST. LTD.	10/12/90	ZEV YAROSLAVSKY MARVIN BRAUDE	"CITIZENS FOR A LIVABLE L.A." (A COMMITTEE TO PROHIBIT COASTAL OIL DRILLING)
THE MELROSE CORPORATION	\$500.00	N/A	N/A	08/27/87	STEVE SALTZMAN	"STEVE SALTZMAN FOR CITY COUNCIL"
HARD ROCK CAFE INVESTORS, LTD.	\$500.00	N/A	N/A	08/27/87	STEVE SALTZMAN	"STEVE SALTZMAN FOR CITY COUNCIL"
ZIMMER, DENISE	\$500.00	01/19/88	HRC INVEST. LTD.	02/26/88	STEVE SALTZMAN	"STEVE SALTZMAN FOR CITY COUNCIL"
RICE, HILARY	\$500.00	05/20/88	HRC INVEST. LTD.	06/21/88	STEVE SALTZMAN	"STEVE SALTZMAN FOR CITY COUNCIL"
MAZURSKY, ALAN S.	\$500.00	12/16/88	HRC INVEST. LTD.	12/12/88	STEVE SALTZMAN	"STEVE SALTZMAN FOR CITY COUNCIL"
BROWN, ROBERT W.	\$500.00	12/16/88	HRC INVEST. LTD.	12/12/88	STEVE SALTZMAN	"STEVE SALTZMAN FOR CITY COUNCIL"

2

PETER MORTON



Union Bank
Member FDIC
San Francisco, CA 94103

April 26 1991

16-771220

4209

PAY Four Thousand & no/100

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DOLLARS \$ 4,000.00

TO THE ORDER OF

Mel Levine for Senate
291 So. La Cienega Blvd.
Suite 212
Beverly Hills, CA 90212

(107)

⑆000004000000⑆



18949724096

PAY TO THE ORDER OF
BANK OF LOS ANGELES
LOS ANGELES, CA 90069
▶ 122239005 ◀
FOR DEPOSIT ONLY
LEVINE CAMPAIGN COMMITTEE
0100061119

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(213) 550 8900
BANK OF
LOS ANGELES
LOS ANGELES CA
▶122239005◀

MAR 91 14
122000496
MPSC

DN 10Z21 CR ACCT 1061119
05/14/91

HRC085

HARD ROCK CAFE INVESTORS LTD.
LOS ANGELES

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

DELUXE FORM WVC-3 V-6

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT NO	AMOUNT
4/29/91	Reimbursement donation Mel Levene-Senate	\$1,000.00		

ERC087

EMPLOYEE

PERIOD ENDING	EARNINGS				TOTAL EARNINGS	DEDUCTIONS				TOTAL DEDUCTIONS	NET PAY
	HOURS	RATE	AMOUNT EARNED AT REGULAR RATE	OVERTIME AND OTHER		FICA	WITHHELD U.S. INC. TAX	SDI	STATE INCOME TAX		

V&A

THE MCLROSE CORP.

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

DELUXE FORM WVC-3 V-6

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT NO	AMOUNT
4/29/91	Reimbursement donation Mel Levene-Senate	\$1,000.00		

EMPLOYEE

PERIOD ENDING	EARNINGS				TOTAL EARNINGS	DEDUCTIONS				TOTAL DEDUCTIONS	NET PAY
	HOURS	RATE	AMOUNT EARNED AT REGULAR RATE	OVERTIME AND OTHER		FICA	WITHHELD U.S. INC. TAX	SDI	STATE INCOME TAX		

V&A

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HARD ROCK CAFE INVESTORS LTD. VII
SAN DIEGO

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

DELUXE FORM DVC-3 V-8

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT NO	AMOUNT
4/29/91	Reimbursement donation Mel Levene-Senate	\$1,000.00		

ERC088

EMPLOYEE _____

PERIOD ENDING	EARNINGS				TOTAL EARNINGS	DEDUCTIONS				TOTAL DEDUCTIONS	NET PAY
	HOURS	RATE	AMOUNT EARNED AT REGULAR RATE	OVERTIME AND OTHER		FICA	WITHHOLDING U.S. INC. TAX	SDI	STATE INCOME TAX		

V 6 A

HARD ROCK CAFE INV. LTD. II

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

DELUXE FORM WYC-3 V-8

DATE	DESCRIPTION	AMOUNT	DISTRIBUTIONS	
			ACCT NO	AMOUNT
4/29/91	Reimbursement donation Mel Levene-Senate	\$1,000.00		

EMPLOYEE _____

PERIOD ENDING	EARNINGS				TOTAL EARNINGS	DEDUCTIONS				TOTAL DEDUCTIONS	NET PAY
	HOURS	RATE	AMOUNT EARNED AT REGULAR RATE	OVERTIME AND OTHER		FICA	WITHHOLDING U.S. INC. TAX	SDI	STATE INCOME TAX		

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DEPOSIT TICKET

ADDRESS P. MORTON
[REDACTED]
3000 4/

CURRENCY _____

COIN _____

CHECKS _____

1000 00
1000 00
1000 00
1000 00

Union Bank
Branch: Main Branch
9500 Wilshire Boulevard
Beverly Hills, CA 90212

OLIVERH A/30/910110

\$4,000.00 0

HILL MORTON
K...
K... Club

APR 30 91

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TOTAL DEPOSIT

4,000 00

42

PETER MORTON

TOTAL 4,000 00

PLEASE ENTER TOTAL HERE
DEPOSITS MAY NOT BE AVAILABLE FOR IMMEDIATE WITHDRAWAL

LEVINE CAMPAIGN COMMITTEE

MEMORANDUM

TO: Peter Morton

FROM: Mel Levine

DATE: July 27, 1992

RE: Why I've been trying to reach you

*Peter Morton
Mel*

As you probably know, I've been trying to reach you to discuss the very generous contribution you made to my campaign last year. Unfortunately, the results on June 2nd mean I won't have the opportunity to use the "general election" portion of your donation.

I hope you and Tarleton will consider redesignating your general election contribution to my 1994 Campaign Committee. Although, the political landscape is unclear today -- I am very interested in maintaining my political options. Your willingness to redesignate your contribution would be a huge help and truly appreciated.

Please sign below to indicate your permission to redesignate the \$2000 contribution and knowledge that unless you had agreed to this redesignation I would be required to refund the contribution to you within 60 days of the primary election.

Once you've signed, I'd be grateful if you could fax this as soon as possible to my attention at (310) 652-0451. If you have any questions, please don't hesitate to call me. Today, I can be reached at (310) 393-6060. I will be in my Washington office the rest of the week and can be reached at (202) 225-6451.

Thanks, again for everything.

Please redesignate my contribution to the 1992 general election contribution to the Levine 1994 Campaign Committee.

[Signature] 7/28/92
 _____ DATE
 PETER MORTON

[Signature] 7/28/92
 _____ DATE
 TARLETON MORTON

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AFFIDAVIT OF TARLTON NORTON

I, Tarlton Norton, hereby state under penalty of perjury that:

1. I am the wife of Peter Norton, the President and Chairman of Hard Rock Cafe America, L.P. Though Peter is my principal source of income, I have maintained ultimate control over all political contributions made in my name.

2. I am familiar with the Federal Election Commission's allegation that I violated federal law by "allowing my name to be used" in connection with my contributions to Mel Levine's Senate campaign in 1991. However, at that time I had no knowledge that either Hard Rock Cafe or the Malrose Corporation reimbursed my husband for these personal contributions.

The foregoing statements are true, complete and correct to the best of my knowledge and belief, and are made in good faith.

Date: _____


Tarlton Norton

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BEFORE THE FEDERAL ELECTION COMMISSION

JUL 16 10 06 AM '96

In the Matter of

Hard Rock Cafe, Inc.)	
Hard Rock Cafe America, L. P.)	
Melrose Corporation)	MUR 4240
Peter Morton)	
Tarlton Morton)	

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Acting on a sua sponte submission, on August 1, 1995, the Commission found that there was reason to believe that Hard Rock Cafe, Inc., Hard Rock Cafe America, L.P., and Melrose Corporation ("Hard Rock entities") knowingly and willfully violated 2 U.S.C. §§ 441b(a) and 441f. On the same date, the Commission found reason to believe that Peter Morton, as a corporate officer, knowingly and willfully violated 2 U.S.C. § 441b(a) and, as an individual, knowingly and willfully violated 2 U.S.C. §§ 441a(a)(1)(A), 441a(a)(1)(B), and 441f. The Commission also found reason to believe that Peter Morton's spouse, Tarlton Morton, knowingly and willfully violated 2 U.S.C. § 441f.

Respondents were provided with the General Counsel's Brief on May 13, 1996, which is incorporated herein by reference. See General Counsel's Brief, dated May 9, 1996 ("GC Brief"). The GC Brief does not recommend that the Commission find probable cause to believe that any of the violations were knowing and willful, for reasons set forth therein. GC Brief at 3-4. Also for the reasons set forth in the GC Brief, this Office does not recommend pursuing Peter Morton with respect to the Section 441a findings. *Id.* at 4-5. However, the GC Brief recommends that the Commission find probable cause to believe that the Hard Rock entities and Peter Morton

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violated 2 U.S.C. §§ 441b(a) and 441f. The GC Brief also recommends that the Commission find probable cause to believe Tarlton Morton violated 2 U.S.C. § 441f. Respondents submitted their Reply Brief on June 17, 1996. See Attachment 1.

II. ANALYSIS OF REPLY BRIEF

In their Reply Brief, respondents first request that the Commission not pursue Tarlton Morton with respect to the Section 441f violation which relates to \$2,000 in contributions given to Mel Levine's 1992 Senate campaign. In support of this request, respondents have presented a signed statement from Mrs. Morton asserting that she "maintained ultimate control over all political contributions made in [her] name" and that she "had no knowledge" that the corporations had reimbursed her husband, who in turn reimbursed her for these contributions. Attachment 1 at 33. In the GC Brief this Office concludes that Peter Morton appears to have provided regular financial support to Tarlton Morton. See GC Brief at 4-5. In light of that conclusion and Mrs. Morton's signed statement claiming to have no knowledge regarding the corporate source of the reimbursements, and given the unlikelihood of confirming these assertions without further discovery, this Office recommends that the Commission take no further action against Tarlton Morton with respect to the Section 441f finding and close the file with respect to her.

The Reply Brief additionally requests that the Commission take no further action beyond the probable cause findings and seek no civil penalty against the Hard Rock entities or Peter Morton. In support of this request, respondents contend that: (1) they brought this matter to the Commission's attention; (2) they made "extensive disclosures" of "all potentially relevant contributions, and cooperated fully with the Commission's investigation;" (3) they "were largely

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unaware of the intricacies of campaign finance regulations” and the violations were unintentional; and (4) the Commission should recognize “the company’s good faith reaction to learning of its violations.”

This matter involves serious violations, arising out of a pattern of making sizable corporate reimbursements over a number of years. In addition, as stated in the GC Brief, Mr. Morton’s claim that he did not know corporate contributions to federal candidates were illegal is undermined by evidence that he received solicitations which specifically stated that corporate contributions are prohibited. GC Brief at 3-4. Although the factors set forth in the Reply Brief may be mitigating, they provide an insufficient basis to warrant no further action beyond probable cause findings. Accordingly, this Office recommends that the Commission find probable cause to believe that Peter Morton, Hard Rock Cafe, Inc., Hard Rock Cafe America, L.P., and Melrose Corporation each violated 2 U.S.C. §§ 441b(a) and 441f, and approve the attached proposed conciliation agreement which contains admissions of the violations and provides for a civil penalty. Attachment 2.

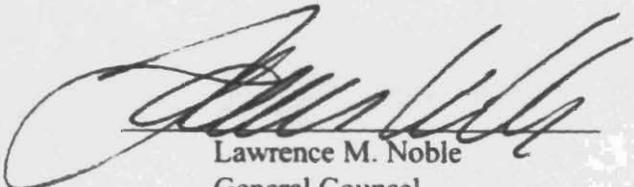
III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

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IV. RECOMMENDATIONS

- 1. Find probable cause to believe that Hard Rock Cafe, Inc., Hard Rock Cafe America, L. P., and Melrose Corporation violated 2 U.S.C. §§ 441b(a) and 441f.
- 2. Find probable cause to believe that Peter Morton violated 2 U.S.C. §§ 441b(a) and 441f.
- 3. Take no further action against Tarlton Morton and close the file as it pertains to her.
- 4. Approve the attached conciliation agreement and appropriate letter.

Date 7/15/96


Lawrence M. Noble
General Counsel

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Attachments:

1. Reply Brief, dated June 17, 1996
2. Conciliation Agreement

Staff assigned: Dominique Dillenseger

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL *MWD*

FROM: MARJORIE W. EMMONS/ MARY W. DOVE
COMMISSION SECRETARY

DATE: July 19, 1996

SUBJECT: MUR 4240 - GENERAL COUNSEL'S REPORT
DATED JULY 15, 1996

The above-captioned document was circulated to the Commission
on: TUESDAY, JULY 16, 1996 at 4:00 p.m.

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

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

This matter will be placed on the meeting agenda for:
TUESDAY, JULY 30, 1996

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

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 4240
Hard Rock Cafe, Inc.;)
Hard Rock Cafe America, L.P.;)
Melrose Corporation;)
Peter Morton;)
Tarlton Morton)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on July 30, 1996, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in MUR 4240:

1. Find probable cause to believe that Hard Rock Cafe, Inc., Hard Rock Cafe America, L.P., and Melrose Corporation violated 2 U.S.C. §§ 441b(a) and 441f.
2. Find probable cause to believe that Peter Morton violated 2 U.S.C. §§ 441b(a) and 441f.
3. Take no further action against Tarlton Morton and close the file as it pertains to her.

(continued)

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4. Approve the conciliation agreement and the appropriate letter as recommended in the General Counsel's report dated July 15, 1996

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

Attest:

7-31-96
Date

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

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FEDERAL ELECTION COMMISSION
Washington, DC 20463

August 2, 1996

Jan Witold Baran, Esq.
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

RE: MUR 4240
Hard Rock Cafe, Inc.
Hard Rock Cafe America, L. P.
Melrose Corporation
Peter Morton

Dear Mr. Baran:

On July 30, 1996, the Federal Election Commission found that there is probable cause to believe your clients violated various provisions of the Federal Election Campaign Act of 1971, as amended, ("the Act"). The Commission found probable cause to believe that Hard Rock Cafe, Inc., Hard Rock Cafe America, L.P., and Melrose Corporation violated 2 U.S.C. §§ 441b(a) and 441f. The Commission also found probable cause to believe that Peter Morton violated 2 U.S.C. § 441b(a) and 441f. In addition, the Commission decided to take no further action against Tarlton Morton and to close the file as it pertains to her.

The Commission has a duty to attempt to correct such violations for a period of 30 to 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement during that period, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission within ten days. I will then recommend that the Commission accept the agreement. Please make the check for the civil penalty payable to the Federal Election Commission.

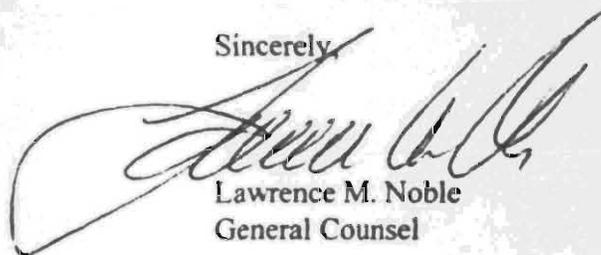
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Page 2

Jan Witoid Baran, Esq.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Dominique Dillenseger, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

96043764697



RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

AUG 26 12 51 PM '96

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HARD ROCK AMERICA
Corporate Offices
510 N. Robertson Bl.
Los Angeles, CA 90048
310 854 3366
Fax: 310 652 8747
mail@hardrock.com

August 21, 1996

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

Re: MUR 4240 (Hard Rock Cafe America, L.P.,
Hard Rock Cafe, Inc., The Melrose
Corporation, Mr. Peter Morton, Ms. Tarlton Morton)

Dear Ms. Low:

This letter responds to the correspondence received from the Commission regarding my involvement in the above referenced matter, including the August 7, 1995 letter from Vice Chairman Lee Ann Elliott and the Factual and Legal Analysis enclosed with that letter. While I appreciate the Commission's decision to take no action against me, I feel compelled to make two points concerning the Commission's position. The passage of time is in no way an indication of the profound conviction with which these points are made.

First, my understanding is that the Commission's finding of a "reason to believe" that I have violated 2 U.S.C. §44f is a preliminary finding and a statutory prerequisite to an investigation as to whether there is probable cause to believe a violation occurred. It is not, as I understand it, a legal or factual adjudication of a violation. Indeed, the Commission's action was taken without allowing me the opportunity to present any evidence concerning my side of the story.

Second, had the Commission undertaken a review of the circumstances of my single \$500 contribution to Karen Shepherd's 1992 campaign for Congress, I am confident that you would have seen that I did not "knowingly and willfully" violate the law in making this contribution. While my contribution was reimbursed by Hard Rock Cafe, I was unaware at the time that such a reimbursement was improper. As the Chief Financial Officer for Hard Rock Cafe, I have had very little involvement in the world of political contributions beyond

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August 21, 1996
Andrea Low, Esq.
Page 2

this case, and the contribution and reimbursement were not subject to prior review by counsel. Unfortunately, I viewed the contribution to the Shepherd campaign as a business expense at the time and treated it as such because it was solicited from me in my capacity as a Hard Rock Cafe official.

If you have any further questions of me, feel free to contact me or Jan W. Baran, Hard Rock Cafe's counsel in this matter. Thank you for your attention and cooperation.

Sincerely,

Alan S. Mazursky
Chief Financial Officer

ASM/cy

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WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D. C. 20008
(202) 429-7000

JAN WITOLD BARAN
(202) 429-7330

September 11, 1996

FACSIMILE
(202) 429-7049

VIA HAND DELIVERY

Dominique Dillenseger, Esq.
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20483

Re: MUR 4240 (Hard Rock Cafe America, L.P., Hard
Rock Cafe, Inc., Melrose Corporation, Mr.
Peter Morton, Ms. Tarlton Morton)

Dear Ms. Dillenseger:

Enclosed please find a signed copy of the Conciliation Agreement proposed by the Commission in this matter, along with a check from Hard Rock Cafe in the amount of \$23,000. Upon your execution of the agreement, this matter should be entirely resolved.

If you have any questions, please do not hesitate to call me at the above number.

Sincerely,


Jan Witold Baran

Enclosures

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SEP 16 9 43 AM '96

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
 Hard Rock Cafe, Inc.) MUR 4240
 Hard Rock Cafe America, L.P.)
 Melrose Corporation)
 Peter Morton)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Jan Witold Baran, Counsel for the above Respondents.

The attached agreement contains no changes from the agreement approved by the Commission on July 30, 1996. Attachment 1. A check in the amount of Twenty-three thousand dollars (\$23,000.00) for the civil penalty has been received. Attachment 2.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Hard Rock Cafe, Inc., Hard Rock Cafe America, L.P., Melrose Corporation, and Peter Morton.
2. Close the file.
3. Approve the appropriate letters.

Lawrence M. Noble
General Counsel

Date 9/13/96

BY: 
Lois G. Lerner
Associate General Counsel

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Attachments

- 1. Conciliation Agreement**
- 2. Photocopy of civil penalty check.**

Staff Assigned: Dominique Dillenseger

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Hard Rock Cafe, Inc.;)	MUR 4240
Hard Rock Cafe America, L.P.;)	
Melrose Corporation;)	
Peter Morton.)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 19, 1996, the Commission decided by a vote of 5-0 to take the following actions in MUR 4240:

1. Accept the conciliation agreement with Hard Rock Cafe, Inc., Hard Rock Cafe America, L.P., Melrose Corporation, and Peter Morton, as recommended in the General Counsel's Report dated September 13, 1996.
2. Close the file.
3. Approve the appropriate letters, as recommended in the General Counsel's Report dated September 13, 1996.

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

Attest:

9-19-96
Date

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

Received in the Secretariat:	Mon.,	Sept. 16, 1996	9:43 a.m.
Circulated to the Commission:	Mon.,	Sept. 16, 1996	11:00 a.m.
Deadline for vote:	Thurs.,	Sept. 19, 1996	4:00 p.m.

bjr

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FEDERAL ELECTION COMMISSION
Washington, DC 20463

September 30, 1996

Alan Mazursky
27036 Littlefield Drive
Valencia, CA 91354

RE: MUR 4240

Dear Mr. Mazursky:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. Your letter of August 21, 1996, has been received and will appear on the public record. If you wish to submit any additional factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

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

Sincerely,

Dominique Dillenseger

Dominique Dillenseger
Attorney

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FEDERAL ELECTION COMMISSION
Washington, DC 20463

September 30, 1996

VIA FACSIMILE & U.S. MAIL

Shawn Reid
Gaming Control Board
Suite 108, 1150 E. William St.
Carson City, Nevada 89710

RE: MUR 4240
Hard Rock, Inc., et. al.

Dear Mr. Reid:

As we discussed by telephone on September 25, 1996, the above-referenced matter is now closed. Enclosed is a copy of the signed conciliation agreement. I am also faxing you a copy today. If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Dominique Dillenseger
Dominique Dillenseger
Attorney

Enclosure
Conciliation Agreement

96043764706



FEDERAL ELECTION COMMISSION
Washington, DC 20463

September 30, 1996

Jan Witold Baran, Esq.
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

RE: MUR 4240
Hard Rock Cafe, Inc.
Hard Rock Cafe America, L. P.
Melrose Corporation
Peter Morton
Tarlton Morton

Dear Mr. Baran:

On September 19, 1996, the Federal Election Commission accepted the signed conciliation agreement and civil penalty check you submitted on behalf of Hard Rock Cafe, Inc., Hard Rock Cafe America, L.P., Melrose Corporation, and Peter Morton, in settlement of violations of 2 U.S.C. §§ 441b(a) and 441f, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Accordingly, the file has been closed as to all respondents in this matter, including Tarlton Morton.

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.

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Page 2

Jan Witold Baran, Esq.

Information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. ~~Sec 2~~ U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record. Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Dominique Dillenseger

Dominique Dillenseger
Attorney

Enclosure
Conciliation Agreement

96043764708

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Hard Rock Cafe, Inc.,) MUR 4240
Hard Rock Cafe America, L.P.)
Melrose Corporation)
Peter Morton)

CONCILIATION AGREEMENT

This matter was initiated by a sua sponte submission by Hard Rock Cafe, Inc., Hard Rock Cafe America, L. P., Melrose Corporation, and Peter Morton. The Federal Election Commission ("Commission") found probable cause to believe that Hard Rock Cafe, Inc., Hard Rock Cafe America, L. P., and Melrose Corporation violated 2 U.S.C. §§ 441b(a) and 441f. The Commission also found probable cause to believe that Peter Morton, as a corporate officer, violated 2 U.S.C. § 441b(a), and as an individual, violated 2 U.S.C. § 441f.

NOW, THEREFORE, the Commission and Hard Rock Cafe, Inc., Hard Rock Cafe America, L. P., Melrose Corporation, and Peter Morton (the "Respondents"), having duly entered into conciliation pursuant to 2 U.S.C. § 437g(a)(4)(A)(i), do hereby agree as follows:

- I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding, and this agreement has been entered pursuant to 2 U.S.C. § 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. Hard Rock Cafe, Inc. is a corporation.
2. Peter Morton is President of Hard Rock Cafe, Inc.
3. Hard Rock Cafe America, L. P. is a limited partnership with partners which are corporations.
4. Hard Rock Cafe America, L. P. is the successor of Hard Rock Cafe Investors Ltd., after a July 1992 reorganization.
5. Peter Morton is the principal owner of Hard Rock Cafe America, L. P. through a subchapter-S corporation.
6. Hard Rock Cafe Investors, Ltd. II was a limited partnership with partners which were corporations.
7. Hard Rock Cafe Investors, Ltd. VII was a limited partnership with partners which were corporations.
8. Melrose Corporation is a corporation.
9. Peter Morton is President of Melrose Corporation.
10. Under the Federal Election Campaign Act of 1971, as amended (the "Act"), it is unlawful for any corporation to make a contribution or expenditure in connection with a federal election, or for any corporate officer or director to consent to any such contribution or expenditure. 2 U.S.C. § 441b(a).
11. Section 441f of the Act provides that no person shall make a contribution in the name of another or knowingly permit his name to be used to effect such a contribution. 2 U.S.C. § 441f. No person shall knowingly assist any person in making a contribution in the name of another. 11 C.F.R. § 110.4(b)(1)(ii).

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12. Hard Rock Cafe, Inc. reimbursed Peter Morton for contributions to federal political committees in the amount of \$5,166.67.

13. Hard Rock Cafe, Inc. reimbursed Alan Mazursky for a contribution to a federal political committee in the amount of \$500.

14. Hard Rock Cafe America, L. P. reimbursed Peter Morton for contributions to federal political committees in the amount of \$2,666.67.

15. Hard Rock Cafe Investors, Ltd. reimbursed Peter Morton for contributions to federal political committees in the amount of \$8,750.

16. Hard Rock Cafe Investors, Ltd. II reimbursed Peter Morton for a contribution to a federal political committee in the amount of \$1,000.

17. Hard Rock Cafe Investors, Ltd. VII reimbursed Peter Morton for a contribution to a federal political committee in the amount of \$1,000.

18. Melrose Corporation reimbursed Peter Morton for contributions to federal political committees in the amount of \$3,416.66.

V. 1. Respondents Hard Rock Cafe, Inc., Hard Rock Cafe America, L. P., Melrose Corporation and their predecessors made contributions of \$22,500 to federal political committees, in violation of 2 U.S.C. § 441b(a).

2. Respondents Hard Rock Cafe, Inc., Hard Rock Cafe America, L. P., Melrose Corporation and their predecessors made contributions of \$22,500 to federal political committees in the names of Peter Morton, Tarlton Morton and Alan Mazursky in violation of 2 U.S.C. § 441f.

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3. Respondent Peter Morton, as a corporate officer, violated 2 U.S.C. § 441b(a) by consenting to the making of corporate contributions of \$22,500 to federal political committees.

4. Respondent Peter Morton violated 2 U.S.C. § 441f by permitting contributions to be made in his name and by assisting in the making of contributions in the names of others.

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of twenty-three thousand dollars (\$23,000), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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

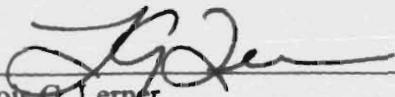
IX. Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

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

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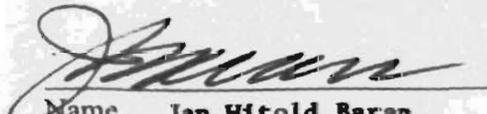
FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

9/30/96
Date

FOR THE RESPONDENTS:


Name **Jan Witold Baran**
Position **Counsel to the Respondents**

September 11, 1996
Date

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FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

THIS IS THE END OF MUR # 4240

DATE FILMED 11-7-96 CAMERA NO. 4

CAMERAMAN JMN

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