

06C 1320

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FEDERAL ELECTION COMMISSION
MAIL ROOM

91 MAY 27 AM 10:17

BANKRUPTCY DEPARTMENT
(818) 915-8907

LAW OFFICES
OF
ROBERT E WEISS INCORPORATED
920 VILLAGE OAKS DRIVE
POST OFFICE BOX 3269
COVINA CALIFORNIA 91722
(818) 967-4302
FAX (818) 967-9216

ROBERT E WEISS
CRIS A KLINGERMAN
EDWARD A TREDER
STEPHEN E ENSBERG

May 23, 1991

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE COUNSEL
91 MAY 28 PM 3:00

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

Attention: Office of General Counsel

Gentlemen:

I am the Treasurer for the Alliance for Representative Government, ID # C00156927. We now wish to terminate the Committee.

In a discussion with Mr. Scott of the FEC Office, I was informed that upon termination, remaining funds may be used for the the following:

1. Payment of Attorney's Fees;
2. Contribution to another candidate, either federal, state or local (so long as the contribution is within the appropriate regulations); or
3. A contribution to a charity.

By this inquiry, I wish to be advised if the residue funds may be paid over to the principal proponent of the Committee. That person at this time is not an officeholder and he was never a federal candidate/officeholder.

Your earliest response would be appreciated.

Very truly yours,


Robert E. Weiss, Treasurer

REW:bh/6



FEDERAL ELECTION COMMISSION

WASHINGTON D C 20463

June 13, 1991

Robert E. Weiss
920 Village Oaks Drive
P. O. Box 3269
Covina, CA 91722

Dear Mr. Weiss:

This responds to your letter dated May 23, 1991, requesting advice as to the termination of Alliance for Representative Government which is registered with the Commission as a political committee under the Federal Election Campaign Act of 1971, as amended ("the Act").

Your letter states that you are the treasurer of this committee. You ask whether the residual funds of the committee may be paid over to the "principal proponent of the Committee." You do not identify such person, but you explain that he is not an officeholder at this time. You also add that he was never a Federal "candidate/officeholder."

The Act authorizes the Commission to issue an advisory opinion in response to a "complete written request" from any person with respect to a specific transaction or activity by the requesting person. 2 U.S.C. §437f(a). The request must concern a specific transaction or activity that "the requesting person plans to undertake or is presently undertaking and intends to undertake in the future." 11 CFR 112.1(b). Inquiries presenting only a general question of interpretation or the activities of third parties do not qualify as advisory opinion requests. The regulations also explain that such a request "shall include a complete description of all facts relevant to the specific transaction or activity with respect to which the request is made." 11 CFR 112.1(c). The regulations further explain that this office shall determine if a request is incomplete or otherwise not qualified as an advisory opinion request. 11 CFR 112.1(d).

It is not clear from your letter whether you wish to request an advisory opinion from the Commission in response to your question. If you wish to request such an opinion, you will need to respond to the following inquiries.

1) Identify the "principal proponent" of the committee. Explain the meaning and significance of that term.

2) Has this individual been a state or local officeholder during the life of the committee? If so, identify the office(s) held and state the period(s) of time each office was held.

3) Describe the purposes for which the committee was established and for which it solicited contributions. Provide copies of any bylaws or similar documents that governed the committee's activities.

4) What is the approximate cash amount that the committee expects to distribute to the "principal proponent?"

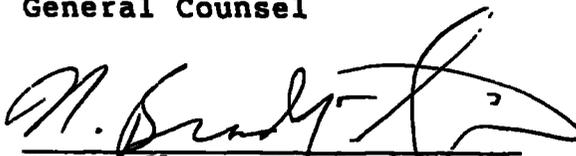
5) Are there noncash assets of the committee that may also be distributed? If so, provide a list of such assets which itemizes those with a fair market value in excess of \$200.

Upon receiving your responses to the above questions, this office and the Commission will give further consideration to your inquiry as an advisory opinion request. If you have any questions concerning the advisory opinion process, or this letter, please contact the undersigned.

Sincerely,

Lawrence M. Noble
General Counsel

BY:


N. Bradley Litchfield
Associate General Counsel

06C 1806

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE SERVICES BRANCH

LAW OFFICES
OF

ROBERT E WEISS INCORPORATED

91 JUL -8 AM 9:19
BANKRUPTCY DEPARTMENT
(818) 915-8907

ROBERT E WEISS
CRIS A KLINGERMAN
EDWARD A TREDER
STEPHEN E ENSBERG

920 VILLAGE OAKS DRIVE
POST OFFICE BOX 3269
COVINA CALIFORNIA 91722
(818) 967-4302
FAX (818) 967-9216

July 2, 1991

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

Attention: N. Bradley Litchfield
Associate General Counsel

Gentlemen:

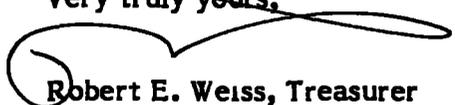
AOR
1991-21

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF LEGAL COUNSEL
91 JUL -8 AM 11:30

Thank you for your letter of June 13, 1991. I apologize for the lack of clarity in our letter of May 23, 1991. I will answer the questions that you have set forth on page two of your letter in the numerical sequence in which they are posed.

1. The principal proponent is Peter F. Schabarum, formerly Supervisor of the First District, County of Los Angeles. Mr. Schabarum left office on March 8, 1991. He did not seek re-election. By principal proponent, it is intended to mean that Mr. Schabarum was the person who formed the Committee and was involved in fundraising for the Committee.
2. As stated in the answer to question #1, Mr. Schabarum was an officeholder in the State of California, County of Los Angeles, beginning March 3, 1972 through March 8, 1991. Prior to that he had been an Assemblyman for the State of California, 49th District for approximately six years.
3. The Committee was established for the purpose of supporting Congressional Candidates having similar political philosophies as those of Mr. Schabarum. There were no by-laws or similar documents governing the Committee's activities. The Committee's activities were somewhat limited.
4. The approximate cash amount expected to be disbursed to the "principal proponent" will be in the range of \$30,000 to \$35,000.
5. There are no noncash assets owned by the Committee to be distributed, or otherwise.

Thank you for your early attention and your ongoing cooperation and courtesy.

Very truly yours,

Robert E. Weiss, Treasurer

REW:bh/6