



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 1024

Date Filmed 5/16/80 Camera No. --- 2

Cameraman gpc

00040100740

SENDER Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

The following service is requested (check one)

☒ Show to whom and date delivered

☒ Show to whom, date, and address of delivery

☐ RESTRICTED DELIVERY

☒ Show to whom and date delivered

☐ RESTRICTED DELIVERY

☒ Show to whom, date, and address of delivery

(CONSULT POSTMASTER FOR FEES)

ARTICLE ADDRESSED TO:
John A. Morrow

ARTICLE DESCRIPTION

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>944643</i>	

Always obtain signature of addressee or agent.

I have received the article described above

☒ Signature *J. E. Lillard* ☐ Authorized agent

5/5/20

POSTMARK

CLERK'S INITIALS

1024

Levin

SENDER Complete items 1, 2, and 3.
Add your address in the RETURN TO space on reverse.

The following service is requested (check one).
☐ Show to whom and date delivered
☐ Show to whom, date, and address of delivery
☒ RESTRICTED DELIVERY
 Show to whom and date delivered
☒ RESTRICTED DELIVERY
 Show to whom, date, and address of delivery \$
 (CONSULT POSTMASTER FOR FEES)

2 ARTICLE ADDRESSED TO:
 Mr. John A. Morrow, Jr.
 Suite 109, Law Bldg
 895 Broadway
 El Centro, CA 92243

3 ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 644694

(Always obtain signature of addressee or agent)
 I have received the article described above.
 SIGNATURE ☐ Addressee ☐ Authorized agent

4 DATE OF DELIVERY
 5/5/82

5 ADDRESS (Complete only if requested)

6 UNABLE TO DELIVER BECAUSE

CLERK'S INITIALS

POSTMARK

1-78 3811 Aug 1978

RETURN RECEIPT REGISTERED INSURED AND CERTIFIED MAIL

GPO: 1975-272-162

MUR-1624

Levin

PS Form 3811 Aug 1978

● SENDER Complete items 1, 2, and 3
Add your address in the "RETURN TO" space on reverse

1 The following service is requested (check one)

☐ Show to whom and date delivered ☐

☐ Show to whom, date, and address of delivery ☐

☐ RESTRICTED DELIVERY

☐ Show to whom and date delivered ☐

☐ RESTRICTED DELIVERY

☐ Show to whom, date, and address of delivery ☐

(CONSULT POSTMASTER FOR FEES)

2 ARTICLE ADDRESSED TO
Mr. C. A. Swain, Treas.
141 South 7th
El Centro, CA 92243

3 ARTICLE DESCRIPTION

REGISTERED NO. CERTIFIED NO. INSURED NO.

644645

(Always obtain signature of addressee or agent)

I have received the article described above

SIGNATURE ☐ Addressee ☐ Authorized agent

DATE OF DELIVERY 5/3/80

POSTMARK

4 ADDRESS (Complete only if requested)

5 UNABLE TO DELIVER BECAUSE

CLERK'S INITIALS

RETURN RECEIPT (REGISTERED, CERTIFIED AND AIR-MAILED MAIL)

GPO 1978-272-382

MAR-1024 Levin

SENDER Complete items 1, 2, and 3
Add your address in the "RETURN TO" space on reverse

1 The following service is requested (check one):
☐ Show to whom and date delivered
☐ Show to whom, date, and address of delivery
☒ RESTRICTED DELIVERY
☐ Show to whom and date delivered
☐ RESTRICTED DELIVERY
☐ Show to whom, date, and address of delivery
 (CONSULT POSTMASTER FOR FEES)

2 ARTICLE ADDRESSED TO:
 Mr. Tom Remington, Manager
 Hartman & Williams
 P.O. Box 752
 Calexico, CA 92231

3 ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 944689

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE ☐ Addressee ☐ Authorized agent
 X Pamela [Signature]

DATE OF DELIVERY POSTMARK
 61

5 ADDRESS (Complete only if requested)

6 REASON FOR NON DELIVERY BECAUSE
 CLERK'S INITIALS
 [Signature]

10/18/71 AUG 1972
 PERIODIC RETURN
 REGISTERED MAIL
 REGISTERED MAIL

1024 Kevin

SENDER Complete items 1, 2, and 3
Add your address in the "RETURN TO" space on reverse

The following service is requested (check one):
☐ Show to whom and date delivered
☐ Show to whom, date, and address of delivery
☒ RESTRICTED DELIVERY
 Show to whom and date delivered
☒ RESTRICTED DELIVERY
 Show to whom, date, and address of delivery \$
 (CONSULT POSTMASTER FOR FEES)

2 ARTICLE ADDRESSED TO:
 Win. J. Brandenburg, Manager
 903 W. Highway 98
 Calexico, CA 92231

1 ARTICLE DESCRIPTION
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 644696

(Always obtain signature of addressee or agent)
☒ I have received the article described above
 SIGNATURE ☐ Addressee ☐ Authorized agent
 W. J. Brandenburg

DATE OF DELIVERY MAY '6 - 1980 POSTMARK
 CALEXICO MAY 1980

3 ADDRESS (Complete only if requested)

4 UNABLE TO DELIVER BECAUSE
 CLERK'S INITIALS

95-001 RPT Aug 1978

RETURN RECEIPT REGISTERED MAIL AND CERTIFIED MAIL

GPO: 1978-272-382

-E-111

MUR-1024-



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 30, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Tamarack Feedyards, Inc.
1024 E. Highway 98
Calexico, CA 92231

Re: MUR 1024

Dear Sir:

This is to acknowledge receipt of your response to the Commission's reason to believe notification and to advise you of the Commission's determination in this matter. After considering the circumstances of the contribution by Tamarack Feedyards, Inc. to the Republican Central Committee of Imperial County, the Commission decided, on April 24, 1980, to take no further action and to close its file in this matter.

The Commission reminds you that making a corporate contribution to a political committee is nevertheless a violation of section 441b(a) of the Federal Election Campaign Act of 1971, as amended and that civil penalties may be imposed in such situations.

If you have any questions, please direct them to Jonathan Levin at 523-4060.

Sincerely,


Charles N. Steele
General Counsel

00040100746

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Tamarack Feedyards, Inc.
1024 E. Highway 98
Calxico, CA 92231

Re: MUR 1024 *JS*

Dear Sir:

This is to acknowledge receipt of your response to the Commission's reason to believe notification and to advise you of the Commission's determination in this matter. After considering the circumstances of the contribution by Tamarack Feedyards, Inc. to the Republican Central Committee of Imperial County, the Commission decided, on 1980 to take no further action and to close its file in this matter.

The Commission reminds you that making a corporate contribution to a political committee is nevertheless a violation of section 441b(a) of the Federal Election Campaign Act of 1971, as amended and that civil penalties may be imposed in such situations.

If you have any questions, please direct them to Jonathan Levin at 523-4060.

Sincerely,

Charles N. Steele
General Counsel

00040190747



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 30, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. William J. Brandenburg, Manager
Brandenberg Feed Yard
903 W. Highway 98
Calexico, CA 92231

Re: MUR 1024

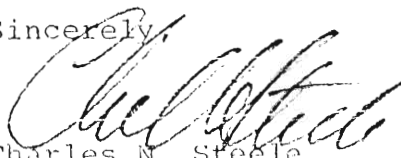
Dear Mr. Brandenburg:

This is to acknowledge receipt of your response to the Commission's reason to believe notification and to advise you of the Commission's determination in this matter. After considering the circumstances of the contribution by Brandenberg Feed Yard to the Republican Central Committee of Imperial County, the Commission decided, on April 24, 1980, to take no further action and to close its file in this matter.

The Commission reminds you that making a corporate contribution to a political committee is nevertheless a violation of section 441b(a) of the Federal Election Campaign Act of 1971, as amended and that civil penalties may be imposed in such situations.

If you have any questions, please direct them to Jonathan Levin at 523 4060.

Sincerely,


Charles N. Steele
General Counsel

0017190748

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. William J. Brandenburg, Manager
Brandenberg Feed Yard
903 W. Highway 98
Calxico, CA 92231

Re: MUR 1024

Dear Mr. Brandenburg:

This is to acknowledge receipt of your response to the Commission's reason to believe notification and to advise you of the Commission's determination in this matter. After considering the circumstances of the contribution by Brandenberg Feed Yard to the Republican Central Committee of Imperial County, the Commission decided, on , 1960 to take no further action and to close its file in this matter.

The Commission reminds you that making a corporate contribution to a political committee is nevertheless a violation of section 441b(a) of the Federal Election Campaign Act of 1971, as amended and that civil penalties may be imposed in such situations.

If you have any questions, please direct them to Jonathan Levin at 523-4060.

Sincerely,

Charles N. Steele
General Counsel

00040190749



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 30, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Tom Remington, Manager
Hartman and Williams
P.O. Box 752
Calexico, CA 92231

Re: MUR 1024

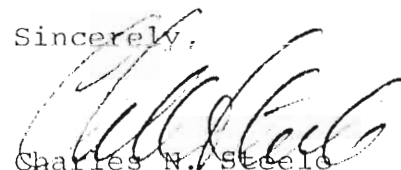
Dear Mr. Remington:

This is to acknowledge receipt of your response to the Commission's reason to believe notification and to advise you of the Commission's determination in this matter. After considering the circumstances of the contribution by Hartman and Williams to the Republican Central Committee of Imperial County, the Commission decided, on April 24, 1980, to take no further action and to close its file in this matter.

The Commission reminds you that making a corporate contribution to a political committee is nevertheless a violation of section 441b(a) of the Federal Election Campaign Act of 1971, as amended and that civil penalties may be imposed in such situations.

If you have any questions, please direct them to Jonathan Levin at 523-4060.

Sincerely,


Charles N. Steele
General Counsel

00101900750

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Tom Remington, Manager
Hartman and Williams
P.O. Box 752
Callexico, CA 92231

Re: MUR 1024 *JS*

Dear Mr. Remington:

This is to acknowledge receipt of your response to the Commission's reason to believe notification and to advise you of the Commission's determination in this matter. After considering the circumstances of the contribution by Hartman and Williams to the Republican Central Committee of Imperial County, the Commission decided, on , 1980 to take no further action and to close its file in this matter.

The Commission reminds you that making a corporate contribution to a political committee is nevertheless a violation of section 441b(a) of the Federal Election Campaign Act of 1971, as amended and that civil penalties may be imposed in such situations.

If you have any questions, please direct them to Jonathan Levin at 523-4060.

Sincerely,

Charles N. Steele
General Counsel

00040190751



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 30, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. C.A. Swain, Treasurer
Republican Central Committee
of Imperial County
141 South 7th
El Centro, CA 92243

Re: MUR 1024

Dear Mr. Swain:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on July 16, 1979, found reason to believe that your committee violated section 441b(a) of the Federal Election Campaign Act of 1971, as amended ("the Act") when it received contributions from a number of corporations.

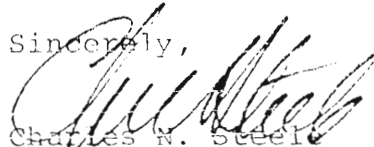
After considering all the evidence available to the Commission with respect to the receipt by your committee of a contribution from K-Ranches, the Commission decided, on April 24, 1980, to find no probable cause to believe that a violation has occurred with respect to the contribution.

Furthermore, the Commission, after considering the circumstances of this matter, decided on the same date to take no further action with respect to the other contributions involved in the reason to believe finding and is, therefore, closing its file in this matter.

The Commission reminds you that receipt of corporate contributions by a political committee, even if refunded as in this matter, is nevertheless a violation of section 441b(a) of the Act and that civil penalties may be imposed in such situations.

If you have any questions, please direct them to Jonathan Levin at 202-523-4060.

Sincerely,


Charles W. Steele
General Counsel

0042190752

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Mr. C.A. Swain, Treasurer
Republican Central Committee
of Imperial County
141 South 7th
El Centro, CA 92243

Re: MUR 1024 *JS*

Dear Mr. Swain:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on July 16, 1979, found reason to believe that your committee violated section 441b(a) of the Federal Election Campaign Act of 1971, as amended ("the Act") when it received contributions from a number of corporations.

After considering all the evidence available to the Commission with respect to the receipt by your committee of a contribution from K-Ranches, the Commission decided, on , 1980, to find no probable cause to believe that a violation has occurred with respect to the contribution.

Furthermore, the Commission, after considering the circumstances of this matter, decided on the same date to take no further action with respect to the other contributions involved in the reason to believe finding and is, therefore, closing its file in this matter.

The Commission reminds you that receipt of corporate contributions by a political committee, even if refunded as in this matter, is nevertheless a violation of section 441b(a) of the Act and that civil penalties may be imposed in such situations.

If you have any questions, please direct them to Jonakhan Levin at 202-523-4060.

Sincerely,

Charles N. Steele
General Counsel

00040190753



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 30, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John A. Morrow, Jr.
Attorney at Law
Suite 109 Law Building
895 Broadway
El Centro, CA 92243

Re: MUR 1024

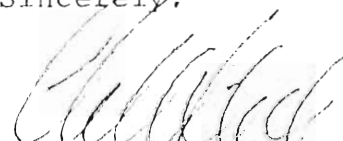
Dear Mr. Morrow:

This is to acknowledge receipt of your response to the Commission's reason to believe notification and to advise you of the Commission's determination in this matter. After considering the circumstances of the contribution by your client, 3-Rivers Land & Cattle Co., to the Republican Central Committee of Imperial County, the Commission decided, on April 24, 1980, to take no further action and to close its file in this matter.

The Commission reminds you that making a corporate contribution to a political committee is nevertheless a violation of section 441b(a) of the Federal Election Campaign Act of 1971, as amended, and that civil penalties may be imposed in such situations.

If you have any questions, please direct them to Jonathan Levin at 202-523-4060.

Sincerely,


Charles N. Steele
General Counsel

0010190754

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John A. Morrow, Jr.
Attorney at Law
Suite 109 Law Building
895 Broadway
El Centro, CA 92243

Re: MUR 1024 JS

Dear Mr. Morrow:

This is to acknowledge receipt of your response to the Commission's reason to believe notification and to advise you of the Commission's determination in this matter. After considering the circumstances of the contribution by your client, 3-Rivers Land & Cattle Co., to the Republican Central Committee of Imperial County, the Commission decided on , 1980 to take no further action and to close its file in this matter.

The Commission reminds you that making a corporate contribution to a political committee is nevertheless a violation of section 441b(a) of the Federal Election Campaign Act of 1971, as amended, and that civil penalties may be imposed in such situations.

If you have any questions, please direct them to Jonathan Levin at 202-523-4060.

Sincerely,

Charles N. Steele
General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 30, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

J. Wiley Jones
Attorney at Law
Financial Square
600 "B" Street - Suite 2200
San Diego, CA 92101

Re: MUR 1024

Dear Mr. Jones:

After considering all the evidence available, the Commission decided, on April 24, 1980, that there was no probable cause to believe that your client, K-Ranches, violated section 441b(a) of the Federal Election Campaign Act of 1971, as amended, in connection with its contribution to the Republican Central Committee of Imperial County. The Commission is closing its file in this matter.

If you have any questions, please direct them to Jonathan Levin at 202-523-4060.

Sincerely,

Charles N. Steele
General Counsel

001190756

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

J. Wiley Jones
Attorney at Law
Financial Square
600 "B" Street - Suite 2200
San Diego, CA 92101

Re: MUR 1024 *27*

Dear Mr. Jones:

After considering all the evidence available, the Commission decided, on , 1980, that there was no probable cause to believe that your client, K-Ranches, violated section 441b(a) of the Federal Election Campaign Act of 1971, as amended, in connection with its contribution to the Republican Central Committee of Imperial County. The Commission is closing its file in this matter.

If you have any questions, please direct them to Jonathan Levin at 202-523-4060.

Sincerely,

Charles N. Steele
General Counsel

00040190757

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
The Republican Central)
Committee of Imperial)
County, et al.)

MUR 1024

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on April 28, 1980, the Commission decided by a vote of 6-0 to take the following actions regarding MUR 1024:

1. Find NO PROBABLE CAUSE TO BELIEVE that the Republican Central Committee of Imperial County and K-Ranches violated 2 U.S.C. §441b(a) with respect to K-Ranches' contribution.
2. Take no further action against the Republican Central Committee of Imperial County, Hartman and Williams, Brandenburg Feed Yard, Tamarack Feed-yard, Inc., and 3-Rivers Land & Cattle Co., Inc.
3. Close the file.
4. Approve the letters as attached to the General Counsel's Report dated March 27, 1980.

Voting for this determination were Commissioners Aikens, Friedersdorf, Harris, McGarry, Reiche, and Tiernan.

Attest:

4/28/80

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Report signed:

Received in Office of the Commission Secretary: 4-21-80, 2:02

Circulated on 48 hour vote basis: 4-22-80, 11:00



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *mwe*
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*
DATE: APRIL 28, 1980
SUBJECT: REMOVAL OF OBJECTION - MUR 1024

You were notified on April 24, 1980, of an objection by Commissioner Reiche to MUR 1024, General Counsel's Report dated 3-27-80.

Commissioner Reiche removed his objection and cast an affirmative vote for MUR 1024 at 3:02, April 28, 1980. A copy of Commissioner Reiche's memorandum is attached.

Also attached is the certification of approval.

MUR 1024 will be removed from the Executive Session Agenda for Tuesday, April 29, 1980.

ATTACHMENTS:

1. Copy of Memorandum
2. Certification

000-10190759



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

81 APR 28 1980

MEMORANDUM

TO: Commission Secretary
FROM: Commissioner Frank P. Reiche
DATE: April 28, 1980
SUBJECT: MUR 1024

This is to notify you that I am withdrawing my objection to the General Counsel's report in MUR 1024. I wish to be recorded as approving the recommendation.

Frank P. Reiche

0011100760



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *mwe*
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*
DATE: APRIL 24, 1980
SUBJECT: OBJECTION - MUR 1024 - General Counsel's
Report dated 3-27-80; Signed 4-21-80;
Received in OCS 4-21-80, 2:02

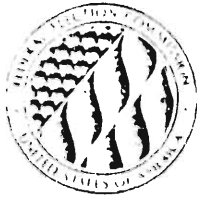
The above-named document was circulated on a 48 hour vote basis at 11:00, April 22, 1980.

Commissioner Reiche submitted an objection at 10:06, this date, thereby placing MUR 1024 on the Executive Session Agenda for April 29, 1980.

A copy of Commissioner Reiche's vote sheet with his comments is attached.

ATTACHMENT:
Copy of Vote Sheet

1980 04 24



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

Date and Time Transmitted: TUESDAY, 4-23-80

11:00

Commissioner FRIEDERSDORF, AIKENS, TIERNAN, McGARRY, REICHE, HARRIS

RETURN TO OFFICE OF COMMISSION SECRETARY BY: THURSDAY, APRIL 24, 1980

11:00

MUR No. 1024 - General Counsel's Report dated 3-27-80; Signed 4-21-80

() I approve the recommendation

(✓) I object to the recommendation

COMMENTS: Believe we should refer to a technical violation.

Date: 4/24/80

Signature: Frank P. Reiche

THE OFFICE OF GENERAL COUNSEL WILL TAKE NO ACTION IN THIS MATTER UNTIL THE APPROVAL OF FOUR COMMISSIONERS IS RECEIVED. PLEASE RETURN ALL PAPERS NO LATER THAN THE DATE AND TIME SHOWN ABOVE TO THE OFFICE OF COMMISSION SECRETARY. ONE OBJECTION PLACES THE ITEM ON THE EXECUTIVE SESSION AGENDA.

0111190762

April 21, 1960

MEMORANDUM TO: Marjorie W. Emmons
W
FROM: Jane Colgrove
SUBJECT: MUR 1024

Please have the attached General Counsel's Report
on MUR 1024 distributed to the Commission on a 24 hour
tally basis.

Thank you.

00040190763

BEFORE THE FEDERAL ELECTION COMMISSION
March 27, 1980

80 APR 21 P 2: 02

In the Matter of)
)
The Republican Central) MUR 1024 (79)
Committee of Imperial)
County, et al.)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

A review by the Reports Analysis Division of the 1978 30 day Post-General Report filed by the Republican Central Committee of Imperial County ("the Committee") indicated the possible receipt of five corporate contributions in violation of 2 U.S.C. §441b(a). The matter was referred by RAD to this office.

The Committee refunded the corporate contributions after the Commission's reason to believe notification was sent on July 16, 1979. On September 17, 1979, after referral to this office, the Commission found reason to believe that the following companies had violated 2 U.S.C. §441b(a): K-Ranches (\$200), Hartman and Williams (\$200), Brandenburg Feed Yard (\$100), Tamarack Feedyard, Inc. (\$100), and 3-Rivers Land & Cattle Co., Inc. (\$100).

Responses were received from all of the respondents. (Attachment 2). Four of the five respondents acknowledged

0010100764

their corporate status. Mr. Charles Kershaw, Jr., a partner in K-Ranches, stated in a letter that his business is a partnership. This statement was verified by a call to the California Secretary of State. 1/

On February 19, 1980, this office sent briefs to K-Ranches and to the Committee stating that there was no probable cause to believe that either respondent violated 2 U.S.C. §441b(a) in connection with K-Ranches' contribution to the Committee. (Attachment 3). On March 7, this office received a reply brief from J. Wiley Jones, the attorney for K-Ranches, agreeing with the statements in our brief. (Attachment 4). No reply was received from the Committee.

II. LEGAL ANALYSIS

Section 441b(a) states that it is unlawful for a corporation to make a contribution to a political committee. In view of the fact that K-Ranches is unincorporated, its contribution was not in violation of the Act. Therefore, we recommend that the Commission find no probable cause to believe that the Committee and K-Ranches violated 2 U.S.C. §441b(a) with respect to this transaction.

Furthermore, because of the small amounts of the four contributions which were from corporations (the four totaled

1/ The Reports Analysis Division was apparently given information on another California business entity, K-Ranch, Inc. This organization does not appear to be related to respondent, K-Ranches. The addresses differed and none of the names of the partners corresponded with the names of the officers of the corporation.

\$500) and because they were returned shortly after the Commission found reason to believe that the Committee violated the Act, we recommend that the Commission take no further action against the Committee, Hartman and Williams, Brandenburg Feed Yard, Tamarack Feedyard, Inc., and 3-Rivers Land & Cattle Co., Inc.

RECOMMENDATIONS

1. Find no probable cause to believe that the Republican Central Committee of Imperial County and K-Ranches violated 2 U.S.C. §441b(a) with respect to K-Ranches' contribution.
2. Take no further action against the Republican Central Committee of Imperial County, Hartman and Williams, Brandenburg Feed Yard, Tamarack Feedyard, Inc., and 3-Rivers Land & Cattle Co., Inc.
3. Close the file.
4. Approve the attached letters.

21 April 1980
Date


Charles N. Steele
General Counsel

ATTACHMENTS

1. Proposed Letters to Respondents (6)
2. Responses from Respondents (5)
3. Briefs of Office of General Counsel (2)
4. Brief of K-Ranches

010190766



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. C.A. Swain, Treasurer
Republican Central Committee
of Imperial County
141 South 7th
El Centro, CA 92243

Re: MUR 1024

Dear Mr. Swain:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on July 16, 1979, found reason to believe that your committee violated section 441b(a) of the Federal Election Campaign Act of 1971, as amended ("the Act") when it received contributions from a number of corporations.

After considering all the evidence available to the Commission with respect to the receipt by your committee of a contribution from K-Ranches, the Commission decided, on , 1980, to find no probable cause to believe that a violation has occurred with respect to the contribution.

Furthermore, the Commission, after considering the circumstances of this matter, decided on the same date to take no further action with respect to the other contributions involved in the reason to believe finding and is, therefore, closing its file in this matter.

The Commission reminds you that receipt of corporate contributions by a political committee, even if refunded as in this matter, is nevertheless a violation of section 441b(a) of the Act and that civil penalties may be imposed in such situations.

If you have any questions, please direct them to Jonathan Levin at 202-523-4060.

Sincerely,

Charles N. Steele
General Counsel

Attachment 1



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

J. Wiley Jones
Attorney at Law
Financial Square
600 "B" Street - Suite 2200
San Diego, CA 92101

Re: MUR 1024

Dear Mr. Jones:

After considering all the evidence available, the Commission decided, on , 1980, that there was no probable cause to believe that your client, K-Ranches, violated section 441b(a) of the Federal Election Campaign Act of 1971, as amended, in connection with its contribution to the Republican Central Committee of Imperial County. The Commission is closing its file in this matter.

If you have any questions, please direct them to Jonathan Levin at 202-523-4060.

Sincerely,

Charles N. Steele
General Counsel

0011319768



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John A. Morrow, Jr.
Attorney at Law
Suite 109 Law Building
895 Broadway
El Centro, CA 92243

Re: MUR 1024

Dear Mr. Morrow:

This is to acknowledge receipt of your response to the Commission's reason to believe notification and to advise you of the Commission's determination in this matter. After considering the circumstances of the contribution by your client, 3-Rivers Land & Cattle Co., to the Republican Central Committee of Imperial County, the Commission decided, on , 1980, to take no further action and to close its file in this matter.

The Commission reminds you that making a corporate contribution to a political committee is nevertheless a violation of section 441b(a) of the Federal Election Campaign Act of 1971, as amended, and that civil penalties may be imposed in such situations.

If you have any questions, please direct them to Jonathan Levin at 202-523-4060.

Sincerely,

Charles N. Steele
General Counsel

100-190769



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. William J. Brandenburg, Manager
Brandenberg Feed Yard
903 W. Highway 98
Calexico, CA 92231

Re: MUR 1024

Dear Mr. Brandenburg:

This is to acknowledge receipt of your response to the Commission's reason to believe notification and to advise you of the Commission's determination in this matter. After considering the circumstances of the contribution by Brandenberg Feed Yard to the Republican Central Committee of Imperial County, the Commission decided, on , 1980, to take no further action and to close its file in this matter.

The Commission reminds you that making a corporate contribution to a political committee is nevertheless a violation of section 441b(a) of the Federal Election Campaign Act of 1971, as amended and that civil penalties may be imposed in such situations.

If you have any questions, please direct them to Jonathan Levin at 523-4060.

Sincerely,

Charles N. Steele
General Counsel

000190770



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Tom Remington, Manager
Hartman and Williams
P.O. Box 752
Calexico, CA 92231

Re: MUR 1024

Dear Mr. Remington:

This is to acknowledge receipt of your response to the Commission's reason to believe notification and to advise you of the Commission's determination in this matter. After considering the circumstances of the contribution by Hartman and Williams to the Republican Central Committee of Imperial County, the Commission decided, on , 1980, to take no further action and to close its file in this matter.

The Commission reminds you that making a corporate contribution to a political committee is nevertheless a violation of section 441b(a) of the Federal Election Campaign Act of 1971, as amended and that civil penalties may be imposed in such situations.

If you have any questions, please direct them to Jonathan Levin at 523-4060.

Sincerely,

Charles N. Steele
General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Tamarack Feedyards, Inc.
1024 E. Highway 98
Calexico, CA 92231

Re: MUR 1024

Dear Sir:

This is to acknowledge receipt of your response to the Commission's reason to believe notification and to advise you of the Commission's determination in this matter. After considering the circumstances of the contribution by Tamarack Feedyards, Inc. to the Republican Central Committee of Imperial County, the Commission decided, on , 1980, to take no further action and to close its file in this matter.

The Commission reminds you that making a corporate contribution to a political committee is nevertheless a violation of section 441b(a) of the Federal Election Campaign Act of 1971, as amended and that civil penalties may be imposed in such situations.

If you have any questions, please direct them to Jonathan Levin at 523-4060.

Sincerely,

Charles N. Steele
General Counsel

000000772

Kevin

904370

REC-4
11266

RECEIVED
FEDERAL ELECTION
COMMISSION

K-RANCHES

CHARLES KERSHAW, JR. • JOHN A. KERSHAW
P.O. BOX 75 - PHONE (714) 340-7400
BRAWLEY, CALIFORNIA 92227

OCT 2 AM 11:53

September 26, 1979

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 "K" Street N.W.
Washington, D.C. 20463

Re: MUR 1024

Dear Mr. Oldaker:

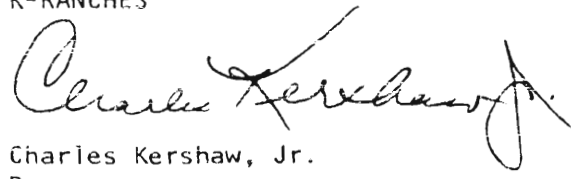
A copy of your September 19th letter regarding a \$200 contribution to the Republican Central Committee is enclosed.

Please be advised that K-Ranches is a partnership and as such it is our understanding that such contribution is lawful. K-Ranches, Inc. is a misnomer.

Since my brother and I are equal and sole partners in K-Ranches, this sum actually represents a \$100 contribution from each of us. We trust this satisfactorily answers your inquiry.

Very truly yours,

K-RANCHES



Charles Kershaw, Jr.
Partner

CHK/lgs
Enclosures

cc Republican Central Committee
141 South 7th
P.O. Box 2552
El Centro, California 92243

79 OCT 2 P 2:34

GENERAL COUNSEL
OFFICE OF THE
FEDERAL ELECTION COMMISSION

Affiliated with Kershaw & Sons, Inc., Brawley, California

Attachment 2

JOHN A. MORROW, JR.
ATTORNEY AT LAW
SUITE 109 LAW BUILDING
898 BROADWAY
EL CENTRO, CALIFORNIA 92243
(714) 352-4403

October 22, 1979

CERTIFIED MAIL NO. PO5 6922850

Federal Election Commission
1325 K Street N. W.
Washington, D. C. 20463

Attention: Mr. William C. Oldaker,
General Counsel

RE: 3-Rivers Land & Cattle Co., Inc.
Post Office Box 2389
El Centro, California 92243
No. MUR-1024

Dear Mr. Oldaker:

Thank you for your letter of September 19, 1979. I received your letter on October 16, 1979.

I am the attorney for 3-Rivers Land & Cattle Co., Inc., Post Office Box 2389, El Centro, California 92243.

3-Rivers Land & Cattle Co., Inc. is a Texas corporation and its officers and directors reside in Texas.

I have determined that the manager of the Calexico, California office of 3-Rivers Land & Cattle Co., Inc. signed a corporate check for \$100 and forwarded it to the Republican Central Committee of Imperial County in November, 1978. The contribution was made by the manager without the knowledge and authorization of the President of the corporation, the Board of Directors of the corporation or any officers of the corporation.

I, as attorney for the corporation, have spoken to the manager and told him that a corporation cannot make a contribution to a political party.

Due to the distance involved between the main office of the corporation in Texas and the Calexico, California office of the corporation, the executive officers of the corporation had not made a practice, in November, 1978, of reviewing checks written by the manager of their Calexico, California office prior to the

RECEIVED
FEDERAL ELECTION
COMMISSION

OCT 25 PM 12:26

MUR 1024
G. LEVINE

046894

714 352-4403

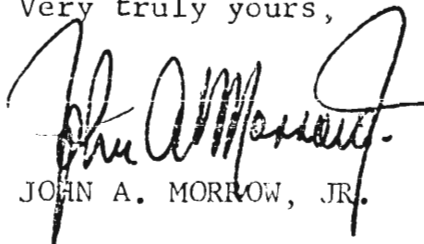
Mr. William C. Oldaker
October , 1979
Page 2

mailing of the checks.

The President and Board of Directors of the corporation have told me to inform you that the manager has been instructed, in the future, not to make donations to political parties without the specific authority of the President of the corporation.

I am enclosing with this letter a Xerox copy of the front and back of the check sent to the Republican Central Committee of Imperial County.

Very truly yours,



JOHN A. MORROW, JR.

JAM/kg

Enclosure

00017190775

BRANDENBERG FEED YARD

TELEPHONE (714) 357-1246
903 W. HIGHWAY 98
CALEXICO, CALIFORNIA 92231

RECEIVED
FEDERAL ELECTION
COMMISSION

'79 OCT 5 PM 12:54
Sept. 27, 1979

Federal Election Commission:

Pertaining to your case number MUR 1024 we feel we have not violated any regulations intentionally. We sent the \$100.00 to the Bar-B-Q without knowing we were not in compliance with the law. We are a small, family-owned corporation so when the check was made out we did not think anything about contributing to the rally. We will make all further contributions from our personal accounts.

If the enclosures are not sufficient to comply with your request we will try to provide further information. If we had known about the rules we would have paid ourselves from the corporations and then donated the money individually. I'm sure this regulation prevents large corporations from influencing all elections since they cannot directly donate large sums anymore. However we should not be compared to a large, publicly held corporation. Therefore we find this to be an unjust and unfortunate regulation.

In short we feel this whole matter is a waste of tax dollars, it should not apply to us anyways and we unknowingly erred in the first place.

Sincerely,

William J. Brandenburg
William J. Brandenburg
Manager

0040199776

MUR 1024
J. L. Linn
GCC#
11303

**HARTMAN &
WILLIAMS**

CATTLE FEEDING

V. V. WILLIAMS
TOM REMINGTON
BOB WILLIAMS

P. O. BOX 782
CALEXICO, CALIF. 92231
TELEPHONE (714) 357-3701

November 5, 1979

01 4050

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street N. W.
Washington, D. C. 20463

Re: MUR 1024

Dear Mr. Oldaker:

This is in response to your letter dated September 19th advising us that we had violated the Federal Election Code by making a \$200.00 contribution to the Republican Central Committee of Imperial County on November 9th, 1978.

We did, in fact, make such contribution by corporate check. It was our understanding at the time that such corporate contributions were lawful. Since then the County Central Committee has refunded us \$200.00, advising us that the contribution was in violation and that they could not accept the contribution. We are sorry to have erred, but we believe that no permanent harm has been done. Since we acted in ignorance and the Central Committee, having returned payment to us, received no net benefit from our contribution, we hope you will accept our apologies and close this matter.

Very truly yours,

HARTMAN & WILLIAMS

Tom Remington
Tom Remington, Manager

TMR:pr

NOV 7 1979

RECEIVED
GENERAL INVESTIGATIVE
DIVISION
NOV 7 1979

BY ENDORSEMENT THIS CHECK WHEN PAID IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING ACCOUNT	
DATE	AMOUNT



TAMARACK FEEDYARD, INC.
 1074 E. HIGHWAY 98
 357-1174 352-7633
 CALEXICO, CALIF. 92231

7189

Oct. 18 1978 90-1325
 1222

PAY TO THE ORDER OF Republican Central Committee

\$100⁰⁰

One Hundred and no/100

DOLLARS

BANK OF AMERICA
 CALEXICO OFFICE
 37 E. SECOND STREET
 CALEXICO, CALIF. 92231

Thomas M. Remington
State Director

⑈007689⑈ ⑆1222⑈ 6325⑈ 09533⑈ 00646⑈ ⑆0000060000⑈

0001190778

Respondent sent in a copy of
 the contribution check but did not
 send a letter

BEFORE THE FEDERAL ELECTION COMMISSION
January 31, 1980

In the Matter of
K-Ranches

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)

MUR 1024

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

A review by the Commission's Reports Analysis Division of the 1978 30 Day Post-General Report filed by the Republican Central Committee of Imperial County ("the Committee") revealed a contribution by K-Ranches of \$200 to the Committee on November 9, 1978, in possible violation of section 441b(a) of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Committee refunded the contribution on July 26, 1979.

On September 17, 1979, after referral of the matter of the Office of General Counsel, the Commission found reason to believe that K-Ranches had violated section 441b.

In response to a notification of this finding, Mr. Charles Kershaw, Jr., a partner in K-Ranches, stated in a letter dated September 26, 1979 that his company was a partnership. In order to verify this information, a call was placed to the Office of the Secretary of State of California. This office was informed that there is a K-Ranch, Inc. in California with its principal place of business in Newport Beach. Furthermore, the names of this corporation's officers

Attachment 3

and directors, as supplied by the Secretary of State, did not correspond to any of the names of K-Ranches' partners, Charles Kershaw, Jr. and John R. Kershaw. From this information, it was concluded that K-Ranch, Inc. and respondent K-Ranches were two different companies.

II. LEGAL ANALYSIS

Section 441b(a) states that it is unlawful for a corporation to make a contribution to a political committee. In view of the fact that K-Ranches is unincorporated, its contribution was not in violation of the Act. Therefore, the Office of General Counsel recommends that the Commission find no probable cause to believe that K-Ranches violated 2 U.S.C. §441b(a).

III. GENERAL COUNSEL'S RECOMMENDATIONS

1. Find no probable cause to believe that K-Ranches violated 2 U.S.C. §441b.
2. Send the attached letter.

15 FEB 1980
Date


Charles W. Steele
General Counsel

ATTACHMENTS

Letter to K-Ranches

MUR 1024

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

A review by the Commission's Reports Analysis Division of the 1978 30 Day Post-General Report filed by the Republican Central Committee of Imperial County ("the Committee") revealed the receipt of a \$200 contribution from K-Ranches in possible violation of section 441b(a) of the Federal Election Campaign Act of 1971, as amended ("the Act").

On July 16, 1979, the Commission found reason to believe that the Committee had violated section 441b(a) in connection with this and four other contributions. As a result of this finding the Committee returned the contribution to K-Ranches on July 26, 1979.

In a letter dated September 26, 1979, Mr. Charles Kershaw, Jr., a partner in K-Ranches, stated that his company was a partnership. This information was verified in a telephone call to the Office of the Secretary of State of California. In that call, this office was informed that there is a K-Ranch, Inc. in California with its principal place of business in Newport Beach, California. We were further

informed that none of the names of the corporation's officers and directors corresponded to the names of K-Ranches' partners, Charles Kershaw, Jr. and John R. Kershaw. From this information, it was concluded that K-Ranch, Inc. and K-Ranches were not the same company.

II. LEGAL ANALYSIS

Section 441b(a) states that it is unlawful for a political committee to receive a contribution from a corporation. In view of the fact that K-Ranches is unincorporated, receipt of its contribution was not in violation of the Act. Therefore, the Office of General Counsel recommends that the Commission find no probable cause to believe that Committee violated 2 U.S.C. §441b(a).

III. GENERAL COUNSEL'S RECOMMENDATIONS

1. Find no probable cause to believe that the Republican Central Committee of Imperial County violated 2 U.S.C. §441b with respect to the contribution from K-Ranches.
2. Send the attached letter.

15 February 1970
Date


Charles N. Steele
General Counsel

ATTACHMENTS

Letter to the Republican Central Committee
of Imperial County

6CC#G34

42011

RECEIVED
GENERAL COUNSEL

J. WILEY JONES
A PROFESSIONAL CORPORATION
ATTORNEY AT LAW
FINANCIAL SQUARE
600 "B" STREET-SUITE 2200
SAN DIEGO, CALIFORNIA 92101
(714) 236-1886

30 MAR 7 P3:35

March 4, 1980

Federal Election Commission
Washington, D.C. 20463

Re: MUR 1024
K Ranches

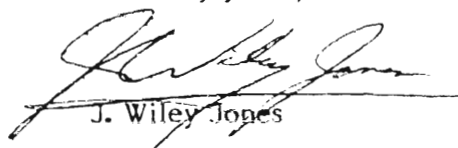
006681

Gentlemen:

Enclosed herewith are ten copies of a brief stating the position of K Ranches. In summary, this brief agrees with the recommendation of the general counsel that there is no probable cause to believe that K Ranches violated 2 USC Section 441b(a) inasmuch as K Ranches is a partnership and not a corporation.

Should you have any questions with regard to this matter, please do not hesitate to contact the undersigned directly.

Sincerely yours,


J. Wiley Jones

JWJ:bt
Encls.

cc: Charles N. Steele, Esq. w/encls.

0012100783

RECEIVED
GENERAL COUNSEL

30 MAR 7 P3:46

30 MAR 7 P3:45

Attachment 4

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
K-Ranches

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MUR 1024

RESPONDENT'S BRIEF

I. STATEMENT OF THE CASE

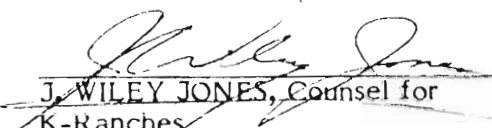
As stated in a letter by Mr. Charles Kershaw, Jr., dated September 26, 1979, K-Ranches is a partnership composed of Charles Kershaw, Jr. and John R. Kershaw. K-Ranches is not a corporation.

II. LEGAL ANALYSIS

Section 441b(a) states it is unlawful for a corporation to make a contribution to a political committee. In view of the fact that K-Ranches is unincorporated, its contribution was not in violation of the Act.

III. RESPONDENT'S POSITION

The Respondent believes there is no probable cause to believe that K-Ranches violated 2 U.S.C. Section 441b.


J. WILEY JONES, Counsel for
K-Ranches

March 4, 1980

66 MAR 7 P 3:45

6CC#G34

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

J. WILEY JONES
A PROFESSIONAL CORPORATION
ATTORNEY AT LAW
FINANCIAL SQUARE
600 "B" STREET - SUITE 2200
SAN DIEGO, CALIFORNIA 92101

30 MAR 7 P 3: 35

(714) 236-1886

March 4, 1980

Federal Election Commission
Washington, D.C. 20463

Re: MUR 1024
K Ranches

008602

Gentlemen:

Enclosed herewith are ten copies of a brief stating the position of K Ranches. In summary, this brief agrees with the recommendation of the general counsel that there is no probable cause to believe that K Ranches violated 2 USC Section 441b(a) inasmuch as K Ranches is a partnership and not a corporation.

Should you have any questions with regard to this matter, please do not hesitate to contact the undersigned directly.

Sincerely yours,


J. Wiley Jones

JWJ:bt
Encls.

cc: Charles N. Steele, Esq. w/encls.

00042190785

7 P 3: 46

30 MAR 7 P 3: 46

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
K-Ranches

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)
)

MUR 1024

RESPONDENT'S BRIEF

I. STATEMENT OF THE CASE

As stated in a letter by Mr. Charles Kershaw, Jr., dated September 26, 1979, K-Ranches is a partnership composed of Charles Kershaw, Jr. and John R. Kershaw. K-Ranches is not a corporation.

II. LEGAL ANALYSIS

Section 441b(a) states it is unlawful for a corporation to make a contribution to a political committee. In view of the fact that K-Ranches is unincorporated, its contribution was not in violation of the Act.

III. RESPONDENT'S POSITION

The Respondent believes there is no probable cause to believe that K-Ranches violated 2 U.S.C. Section 441b.


WILEY JONES, Counsel for
K-Ranches

March 4, 1980

95:8d 1 MAR 10 1980

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

K-Ranches

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MUR 1024

RESPONDENT'S BRIEF

I. STATEMENT OF THE CASE

As stated in a letter by Mr. Charles Kershaw, Jr., dated September 26, 1979, K-Ranches is a partnership composed of Charles Kershaw, Jr. and John R. Kershaw. K-Ranches is not a corporation.

II. LEGAL ANALYSIS

Section 441b(a) states it is unlawful for a corporation to make a contribution to a political committee. In view of the fact that K-Ranches is unincorporated, its contribution was not in violation of the Act.

III. RESPONDENT'S POSITION

The Respondent believes there is no probable cause to believe that K-Ranches violated 2 U.S.C. Section 441b.


J. WILEY JONES, Counsel for
K-Ranches

March 4, 1980

00012190737

J. WILEY JONES

A PROFESSIONAL CORPORATION

ATTORNEY AT LAW

FINANCIAL SQUARE

600 "B" STREET - SUITE 2200

SAN DIEGO, CALIFORNIA 92101



Charles N. Steele, General Counsel
Federal Election Commission
Washington, D.C. 20463

Attention: Jonathan Levin, Esq.

February 19, 1980

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1024

Please have the attached Memo and brief distributed
to the Commission on an informational basis. Thank you.

00040190789



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

80 FEB 19 11:09

February 15, 1980

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele *W*
General Counsel

SUBJECT: MUR #1024

Attached for the Commission's review are briefs stating the position of the General Counsel on the legal and factual issues pertaining to some of the respondents in the above-mentioned matter. Copies of the briefs and letters notifying the respondents of the General Counsel's intent to recommend to the Commission a finding of no probable cause to believe were mailed on February 19, 1980. Following receipt of the respondents' replies to these notices, this Office will make a further report to the Commission.

Attachments

1. Briefs
2. Letters to Respondents



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 15, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Charles Kershaw, Jr., Partner
K-Ranches
P.O. Box 75
Brawley, CA 92227

Re: MUR 1024

Dear Mr. Kershaw:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on September 17, 1979, found reason to believe that your company may have violated section 441b(a) of the Federal Election Campaign Act of 1971, as amended and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues pertaining to this contribution. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies) 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 General Counsel. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Jonathan Levin at (202) 523-4060.

Sincerely,


Charles N. Steele
General Counsel

Enclosure
Brief

00019190791

PS Form 3811 Aug 1978

RETURN RECEIPT REGISTERED INSURED AND CERTIFIED MAIL

SENDER Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.		
1. The following service is requested (check one). ☐ Show to whom and date delivered ☐ Show to whom, date, and address of delivery ☒ RESTRICTED DELIVERY Show to whom and date delivered ☒ RESTRICTED DELIVERY Show to whom, date, and address of delivery \$ (CONSULT POSTMASTER FOR FEES)		
2. ARTICLE ADDRESSED TO: NY 10012-2500, J.C. K. KENNEDY 200 W. 75th St. BRONX, NY 10462		
3. ARTICLE DESCRIPTION		
REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943886	
(Always obtain signature of addressee or agent)		
I have received the article described above. SIGNATURE ☒ Addressee ☐ Authorized agent ME. Lunn		
4. DATE OF DELIVERY	33/07	POSTMARK 1980 JUL 25 FEB
5. ADDRESS (Complete only if requested)		
6. UNABLE TO DELIVER BECAUSE		
		CLERK'S INITIALS S+

BEFORE THE FEDERAL ELECTION COMMISSION
January 31, 1980

In the Matter of
K-Ranches

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)

MUR 1024

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

0040190793
A review by the Commission's Reports Analysis Division of the 1978 30 Day Post-General Report filed by the Republican Central Committee of Imperial County ("the Committee") revealed a contribution by K-Ranches of \$200 to the Committee on November 9, 1978, in possible violation of section 441b(a) of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Committee refunded the contribution on July 26, 1979.

On September 17, 1979, after referral of the matter of the Office of General Counsel, the Commission found reason to believe that K-Ranches had violated section 441b.

In response to a notification of this finding, Mr. Charles Kershaw, Jr., a partner in K-Ranches, stated in a letter dated September 26, 1979 that his company was a partnership. In order to verify this information, a call was placed to the Office of the Secretary of State of California. This office was informed that there is a K-Ranch, Inc. in California with its principal place of business in Newport Beach. Furthermore, the names of this corporation's officers

II. LEGAL ANALYSIS

III. GENERAL COUNSEL'S RECOMMENDATIONS

- 15 Feb 1980
Date


Charles W. Starnes
General Counsel

Letter to K-Ranches



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 15, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. C. A. Swain, Treasurer
Republican Central Committee
of Imperial County
141 South 7th
El Centro, CA 92243

Re: MUR 1024

Dear Mr. Swain:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on July 16, 1979, found reason to believe that your committee may have violated section 441b(a) of the Federal Election Campaign Act of 1971, as amended.

However, after considering all the evidence available to the Commission with respect to the receipt by your committee of a contribution from K-Ranches, the Office of General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred with respect to this contribution.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues pertaining to this contribution. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies) 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 General Counsel. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

If you have any questions, please direct them to Jonathan Levin at (202) 523-4060.

Sincerely,


Charles N. Steele
General Counsel

Enclosure
Brief

0049190795

PS Form 3871, Aug 1978

RETURN RECEIPT IN REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.		
1. The following service is requested (check one) ☐ Show to whom and date delivered ☐ Show to whom, date, and address of delivery ☒ RESTRICTED DELIVERY ☐ Show to whom and date delivered ☐ RESTRICTED DELIVERY ☐ Show to whom, date, and address of delivery (UNDELT POSTMASTER FOR FEES)		
2. ARTICLE ADDRESSED TO <i>Mr. L. H. Sullivan, Texas Republican Central Comm of Imperial County 141 South 7th El Centro, CA 92520</i>		
3. ARTICLE DESCRIPTION REGISTERED NO. <i>943887</i> CERTIFIED NO. INSURED NO. (Always obtain signature of addressee or agent)		
I have received the article described above ☒ Addressee ☐ Authorized agent <i>[Signature]</i>		
4. DATE OF DELIVERY <i>25 1980</i>		POSTMARK
5. ADDRESS (complete only if request-1)		
6. UNABLE TO DELIVER BECAUSE		CLERK'S INITIALS

U.S. GPO: 1978-272-382

00000797

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MUR 1024

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

A review by the Commission's Reports Analysis Division of the 1978 30 Day Post-General Report filed by the Republican Central Committee of Imperial County ("the Committee") revealed the receipt of a \$200 contribution from K-Ranches in possible violation of section 441b(a) of the Federal Election Campaign Act of 1971, as amended ("the Act").

On July 16, 1979, the Commission found reason to believe that the Committee had violated section 441b(a) in connection with this and four other contributions. As a result of this finding the Committee returned the contribution to K-Ranches on July 26, 1979.

In a letter dated September 26, 1979, Mr. Charles Kershaw, Jr., a partner in K-Ranches, stated that his company was a partnership. This information was verified in a telephone call to the Office of the Secretary of State of California. In that call, this office was informed that there is a K-Ranch, Inc. in California with its principal place of business in Newport Beach, California. We were further

informed that none of the names of the corporation's officers and directors corresponded to the names of K-Ranches' partners, Charles Kershaw, Jr. and John R. Kershaw. From this information, it was concluded that K-Ranch, Inc. and K-Ranches were not the same company.

II. LEGAL ANALYSIS

Section 441b(a) states that it is unlawful for a political committee to receive a contribution from a corporation. In view of the fact that K-Ranches is unincorporated, receipt of its contribution was not in violation of the Act. Therefore, the Office of General Counsel recommends that the Commission find no probable cause to believe that Committee violated 2 U.S.C. §441b(a).

III. GENERAL COUNSEL'S RECOMMENDATIONS

1. Find no probable cause to believe that the Republican Central Committee of Imperial County violated 2 U.S.C. §441b with respect to the contribution from K-Ranches.
2. Send the attached letter.

15 February 1970
Date


Charles N. Steele
General Counsel

ATTACHMENTS

Letter to the Republican Central Committee
of Imperial County

000191900798

HARTMAN &
WILLIAMS

CATTLE FEEDING

V. V. WILLIAMS
TOM REMINGTON
BOB WILLIAMS

P. O. BOX 752
CALEXICO, CALIF. 92231
TELEPHONE (714) 387-3701

November 5, 1979

004850

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street N. W.
Washington, D. C. 20463

Re: MUR 1024

Dear Mr. Oldaker:

This is in response to your letter dated September 19th advising us that we had violated the Federal Election Code by making a \$200.00 contribution to the Republican Central Committee of Imperial County on November 9th, 1978.

We did, in fact, make such contribution by corporate check. It was our understanding at the time that such corporate contributions were lawful. Since then the County Central Committee has refunded us \$200.00, advising us that the contribution was in violation and that they could not accept the contribution. We are sorry to have erred, but we believe that no permanent harm has been done. Since we acted in ignorance and the Central Committee, having returned payment to us, received no net benefit from our contribution, we hope you will accept our apologies and close this matter.

Very truly yours,

HARTMAN & WILLIAMS

Tom Remington
Tom Remington, Manager

TMR:pr

57:1 d 2 AON 6/

RECEIVED
OFFICE
GENERAL COUNSEL

00010190799

**HARTMAN &
WILLIAMS**

P. O. BOX 752
CALEXICO, CALIF. 92231



Mr. William C. Oldaker, General Counsel
Federal Election Commission
1325 "K" Street N.W.
Washington, D. C. 20463

Enjoy **BEEF** Every Day!



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *mw*

FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*

DATE: NOVEMBER 6, 1979

SUBJECT: MUR 1024 - Interim Investigative Report,
dated 10-31-79; Signed 11-1-79

The above-named document was circulated to the Commission on a 24-hour no-objection basis at 4:00, November 5, 1979.

There were no objections to the Interim Investigative Report at the time of the deadline.

November 5, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Carr
SUBJECT: MUR 1024

Please have the attached Interim Invest Report on
MUR 1024 distributed to the Commission.

Thank you.

00040190802

BEFORE THE FEDERAL ELECTION COMMISSION
October 31, 1979

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

79 NOV 5 A10: 17

In the Matter of)
)
The Republican Central) MUR 1024
Committee of Imperial)
County, CA, et al.)

INTERIM INVESTIGATIVE REPORT

On September 19, 1979, the Commission found reason to believe that five contributors to the Republican Central Committee of Imperial County violated the section 441b prohibition against corporate contributions and the Commission sent them letters to that effect. Four of the five respondents have replied in written form. The fifth respondent was contacted by phone and a spokesman for the respondent stated that a reply letter would be sent soon. Since no written response has been received, a letter is being sent to the corporation advising it of the Commission's ability to act in the absence of a written response. We are requesting a response within five days.

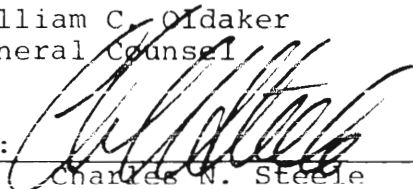
At this time, we are preparing a full report and recommendation which can be made whether or not the fifth respondent has made a submission.

William C. Oldaker
General Counsel

Date

1 November 14 1979

BY:


Charles W. Steele
Associate General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 1, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Hartman and Williams
P.O. Box 752
Calxico, CA 92231

Re: MUR 1024

Dear Sirs:

On September 25, 1979, you received notification that the Commission was conducting an investigation of alleged violations of the Federal Election Campaign Act of 1971, as amended, by you. You were requested to supply front and back copies of the contribution check sent to the Republican Central Committee of Imperial County and you were also notified that you had a reasonable opportunity to demonstrate why no action should be taken against you.

While we acknowledge the statements you made by phone on October 16, 1979 to our staff, as of this date we have received no written response. The Commission intends to conclude its investigation shortly. In the absence of any materials from you, to be sent to us within five days of your receipt of this letter, the Commission will have to decide whether to take further action solely on the basis of information available from other sources.

If you have any questions regarding this matter, please call Jonathan Levin, the staff member assigned to this case, at 202-523-4060.

Sincerely,

William C. Oldaker
General Counsel

BY: Charles N. Steele
Associate General Counsel

0047190804

PS Form 3811, Apr 1977 RETURN RECEIPT REGISTERED INSURED AND CERTIFIED MAIL

SENDER Complete items 1, 2, and 3
Add your address in the "RETURN TO" space on reverse

- 1 The following service is requested (check one).
- ☐ Show to whom and date delivered _____¢
- ☐ Show to whom, date, and address of delivery _____¢
- ☐ RESTRICTED DELIVERY
Show to whom and date delivered _____¢
- ☐ RESTRICTED DELIVERY
Show to whom, date, and address of delivery \$ _____
- (CONSULT POSTMASTER FOR FEES)

2 ARTICLE ADDRESSED TO
Hartman + Williams
P.O. Box 752
Calexico, CA 92231

3 ARTICLE DESCRIPTION
REGISTERED NO. CERTIFIED NO. INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above
SIGNATURE Addressee Authorized agent

4 DATE OF DELIVERY POSTMARK
11-8-79

5 ADDRESS Complete only if requested

6 UNABLE TO DELIVER BECAUSE CLERK'S INITIALS

mul-1024 Levin ☆GPO 1977-0-249-595

JOHN A. MORROW, JR.
ATTORNEY AT LAW
SUITE 109 LAW BUILDING
888 BROADWAY
EL CENTRO, CALIFORNIA 92243
(714) 352-4403

300#
11453
RECEIVED
FEDERAL ELECTION
COMMISSION
'79 OCT 25 PM 12 26

October 22, 1979

CERTIFIED MAIL NO. P05 6922850

Federal Election Commission
1325 K Street N. W.
Washington, D. C. 20463

Attention: Mr. William C. Oldaker,
General Counsel

RE: 3-Rivers Land & Cattle Co., Inc.
Post Office Box 2389
El Centro, California 92243
No. MUR-1024

Dear Mr. Oldaker:

Thank you for your letter of September 19, 1979. I received your letter on October 16, 1979.

I am the attorney for 3-Rivers Land & Cattle Co., Inc., Post Office Box 2389, El Centro, California 92243.

3-Rivers Land & Cattle Co., Inc. is a Texas corporation and its officers and directors reside in Texas.

I have determined that the manager of the Calexico, California office of 3-Rivers Land & Cattle Co., Inc. signed a corporate check for \$100 and forwarded it to the Republican Central Committee of Imperial County in November, 1978. The contribution was made by the manager without the knowledge and authorization of the President of the corporation, the Board of Directors of the corporation or any officers of the corporation.

I, as attorney for the corporation, have spoken to the manager and told him that a corporation cannot make a contribution to a political party.

Due to the distance involved between the main office of the corporation in Texas and the Calexico, California office of the corporation, the executive officers of the corporation had not made a practice, in November, 1978, of reviewing checks written by the manager of their Calexico, California office prior to the

60:8 d 52130 67

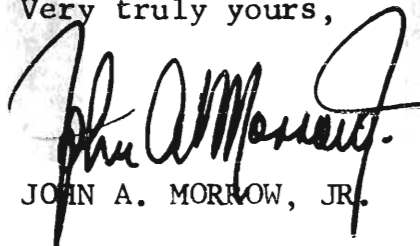
Mr. William C. Oldaker
October , 1979
Page 2

mailing of the checks.

The President and Board of Directors of the corporation have told me to inform you that the manager has been instructed, in the future, not to make donations to political parties without the specific authority of the President of the corporation.

I am enclosing with this letter a Xerox copy of the front and back of the check sent to the Republican Central Committee of Imperial County.

Very truly yours,



JOHN A. MORROW, JR.

JAM/kg

Enclosure

00040190807

00040190808

S. HERRING LAMSON & CO. COMPANY
P. O. BOX 1226
ALBANY, CALIF. 94706

1226

ORDERED BY
UNITED CALIFORNIA BANK
SAN FRANCISCO, CALIF. 94104

OCT. 18, 1978

NO. 1226
1978

Pay to the order of ONE HUNDRED & NO/100 Dollars \$100.00

TO THE
ORDER OF

Republican Central
Committee

NOT NEGOTIABLE

GA222-0455046105867

11

S. HERRING LAMSON
& COMPANY

DELIVERED FROM 11/10/82 11/1

10/18/78

53-11

100.00

REPUBLICAN CENTRAL COMMITTEE
OF IMPERIAL COUNTY
EL CENTRO, CALIF. 92523

3972

8-9-1972 10:21

PAY TO THE ORDER OF 3 Rivers Land and Cattle Co. \$ 100.00
One Hundred and 00/100 DOLLARS

SECURITY PACIFIC NATIONAL BANK
El Centro Office
679 Main St., El Centro, CA 92523

[Signature]

⑆001972⑆ ⑆012200001⑆ ⑆33339⑆ ⑆0107⑆ ⑆01⑆

Return of donation

DEPOSIT TICKET 809

UNITED CALIFORNIA BANK

DOLLARS	CENTS
100	00
90	00
80	00
70	00
60	00
50	00
40	00
30	00
20	00
10	00
00	00
TOTAL	

UNITED CALIFORNIA BANK
MEXICO OFFICE
200 EAST FOURTH STREET, CALIFORNIA 92331

3 RIVERS LAND & CATTLE COMPANY

TOTAL DEPOSIT 100 00

⑆0122000218⑆ ⑆146105867⑆ 30

JOHN A. MORROW, JR.

ATTORNEY AT LAW

SUITE 109 LAW BUILDING

895 BROADWAY

EL CENTRO, CALIFORNIA 92243



CERTIFIED

P05 9922850

MAIL

97-21-4-57 100 61

Federal Election Commission
1325 K Street NW
Washington, D. C. 20463

ATTN: Mr. William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION

11362
'79 OCT 15 AM 9:06

September 19, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

004025

Tamarack Feedyards, Inc.
1024 East Highway 98
Calexico, CA 92231

Re: MUR 1024

Dear Sirs:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that you may have violated section 441b(a) of the Federal Election Campaign Act of 1971, as amended ("the Act"). This section of the Act makes it unlawful for corporations to make contributions to political committees. Specifically it appears that, on or about November 9, 1978, the Tamarack Feedyards, Inc. made a contribution of \$ 100.00 to the Republican Central Committee of Imperial County. Although the contribution in question was reported as returned, the Act was violated when the contribution was made and accepted.

We have numbered this matter MUR 1024. Please refer to this number in all future correspondence.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. In addition, please send us a copy of both the front and the back of the contribution check sent to the Republican Central Committee of Imperial County.

11800 01:21

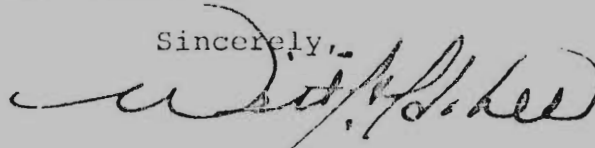
The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification. If no response is received, the Commission may take further action based on the information at hand.

If you have any questions, please contact Jonathan Levin, the staff member assigned to this matter, at 202-523-4523.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

A handwritten signature in dark ink, appearing to read "W. C. Oldaker", written over a horizontal line.

William C. Oldaker
General Counsel

00011190812

BY ENDORSEMENT THIS CHECK WHEN PAID IS ACCEPTED
IN FULL PAYMENT OF THE FOLLOWING ACCOUNT

DATE

AMOUNT



TAMARACK FEEDYARD, INC.

1004 E. HIGHWAY 98

357-1174 352-7633

CALEXICO, CALIF. 92231

7189

Oct. 18 1978

90-1325
1222

PAY
TO THE
ORDER OF

Republican Central Committee

\$100⁰⁰

One Hundred and no/100

DOLLARS

BANK OF AMERICA

CALEXICO OFFICE
37 E. SECOND STREET
CALEXICO, CALIF. 92231

Thomas M. Remington
Beta Club

⑈007189⑈ ⑆1222⑈1325⑈ 09533⑈00141⑈

⑈0000010000⑈

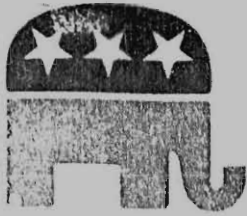
0011190813

0001190814

001-03
AT BOUT BARE, P.E.G.
PACIFIC NATIONAL BANK
LOS ANGELES, CALIF.
1 2128 2240

BA 9271 NOV 09 78 369

1 11 00 00 00



REPUBLICAN

Central Committee

of Imperial County

141 South 7th El Centro, Calif. 92243

P.O. Box 2552 Phone 352-8250

July 26, 1979

Tamarack Feedyards, Inc.
1024 E. Highway 98
Calexico, CA 92231

Gentlemen:

Because of a recent ruling of the Federal Election Commission we are hereby returning the donation of \$100.00.

Federal regulations prohibit the acceptance of corporate contributions for federal elections.

Your donation was for our beef barbeque held October 21, 1978.

We thank you for your time and support.

Sincerely,

Fred B. Humphrey, Sr.
Chairman

Enclosure

REPUBLICAN CENTRAL COMMITTEE
OF IMPERIAL COUNTY
EL CENTRO, CALIF. 92243

3964

Tamarack Feedyards, Inc.
Ch. Rendert and Assoc

7-26

W.D. 100

[Handwritten signature]

RECEIVED
JUL 27 1979
EL CENTRO, CALIF.

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED

004010013
TAMARACK FEEDYARD INC.

1024 EAST HWY. 98
CALEXICO, CALIFORNIA 92231

RECEIVED
FEDERAL ELECTION
COMMISSION

79 OCT 15 AM 3:06

FEDERAL ELECTION COMMISSION

1325 K Street N. W.

Washington, D. C.

20463



RECEIVED
FEDERAL ELECTION
COMMISSION

'79 OCT 5 PM 12:54
Sept. 27, 1979

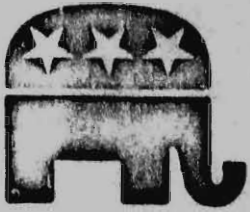
Pertaining to your case number MUR 1024, we feel we have not violated any regulations intentionally. We sent the \$100.00 to the Bar-B-Q without knowing we were not in compliance with the law. We are a small, family-owned corporation so when the check was made out we did not think anything about contributing to the rally. We will make all further contributions from our personal accounts.

If the enclosures are not sufficient to comply with your request we will try to provide further information. If we had known about the rules we would have paid ourselves from the corporations and then donated the money individually. I'm sure this regulation prevents large corporations from influencing all elections since they cannot directly donate large sums anymore. However we should not be compared to a large, publicly held corporation. Therefore we find this to be an unjust and unfortunate regulation.

In short we feel this whole matter is a waste of tax dollars, it should not apply to us anyways and we unknowingly erred in the first place.

Sincerely,

William J. Brandenburg
Manager



REPUBLICAN

Central Committee

of Imperial County

141 South 7th El Centro, Calif. 92243

P.O. Box 2552 Phone 352-8250

July 26, 1979

Brandenberg Feed Yard
903 West Highway 98
Calexico, CA 92231

Gentlemen:

Because of a recent ruling of the Federal Election Commission we are hereby returning the donation of \$100.00.

Federal regulations prohibit the acceptance of corporate contributions for federal elections.

Your donation was for our beef barbeque held October 21, 1978.

We thank you for your time and support.

Sincerely,

Fred B. Pumphrey, Sr.
Fred B. Pumphrey, Sr.
Chairman

Enclosure

REPUBLICAN CENTRAL COMMITTEE
OF IMPERIAL COUNTY
EL CENTRO, CALIF. 92243

3962

PAY
TO THE
ORDER OF

Brandenberg Feed Yard
One Hundred and 00/100

7-26

1979 16-4
1220

\$ 100.00

DOLLARS

SECURITY PACIFIC NATIONAL BANK
El Centro Office
678 Main St., El Centro, CA 92243

⑈003962⑈ ⑆ 122000043⑆ 369⑈ 010740⑈

"I pledge allegiance to the Flag of the United States of America . . .

. . . and to the REPUBLIC for which it stands!"

BY DEPOSITING THIS CHECK WHEN PAID IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING ACCOUNT



BRANDENBERG FEED YARD

903 W. HWY. 98 357-1246
CALEXICO, CALIF. 92231

SECURITY PACIFIC NATIONAL BANK
West El Centro Office
1671 W. Main St., El Centro, CA 92243

16.4
1220

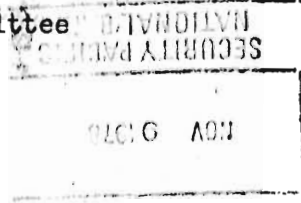
10-18-78 49

No 3836

PAY BRANDENBERG - FEED YARD - 100 DOLS 00 CTS DOLLARS \$ 100.00

TO
THE
ORDER
OF

Republican Central Committee



William Brandenberg

12200004347071814

0000010000

FOR DEPOSIT ONLY
IMPERIAL COUNTY REPUBLICAN
CENTRAL COMMITTEE

90.744
SECURITY PACIFIC NATIONAL BANK
EL CENTRO, CALIF.
ENTER BRANCH

BA 9272 NOV 09 78 369

000109824

BRANDENBERG FEED YARD

903 W. HIGHWAY 98

ALEXICO, CALIFORNIA 92231



10 21 00

FEDERAL ELECTION COMMISSION

1325 "K" Street N.W.

Washington, D.C. 20463

904370

RECEIVED
FEDERAL ELECTION
COMMISSION

K-RANCHES

CHARLES KERSHAW, JR. • JOHN A. KERSHAW
P.O. BOX 75 - PHONE (714) 344-7400
BRAWLEY, CALIFORNIA 92227

2 AM 11:53

REC-4
11266

September 26, 1979

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 "K" Street N.W.
Washington, D.C. 20463

Re: MUR 1024

Dear Mr. Oldaker:

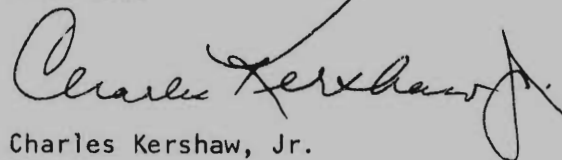
A copy of your September 19th letter regarding a \$200 contribution to the Republican Central Committee is enclosed.

Please be advised that K-Ranches is a partnership and as such it is our understanding that such contribution is lawful. K-Ranches, Inc. is a misnomer.

Since my brother and I are equal and sole partners in K-Ranches, this sum actually represents a \$100 contribution from each of us. We trust this satisfactorily answers your inquiry.

Very truly yours,

K-RANCHES



Charles Kershaw, Jr.
Partner

CHK/lgs
Enclosures

cc Republican Central Committee
141 South 7th
P.O. Box 2552
El Centro, California 92243

19 OCT 2 P 2:34

GENERAL COUNSEL

K-RANCHES

P.O. BOX 31
BRAWLEY, CALIFORNIA 92227
THESE ARE FARM DOLLARS

CHECK

Nº 290

90-820
1222

DATE OCTOBER 18, 1978

PAY TWO HUNDRED AND NO/100

TO THE
ORDER OF

DOLLARS \$ 200.00*

REPUBLICAN CENTRAL COMMITTEE
PO BOX 752
CALEXICO, CA. 92231

BRAWLEY BRANCH

BANK OF AMERICA

NATIONAL TRUST AND SAVINGS ASSOCIATION
351 MAIN STREET
BRAWLEY, CALIF. 92227

⑆1222⑈0820⑆ 01675⑈03340⑈

⑈0000020000⑈

2001019082

FOR DEPOSIT ONLY
IMPERIAL COUNTY REPUBLICAN
CENTRAL COMMITTEE

90-744
AT RENT BANK, P.B.S.
CITY PACIFIC NATIONAL BANK
LOS ANGELES, CALIF.
1 CENTRE BRANCH

BA 9274 NOV 09 78 369

NOV 9 1978

NOV 9 1978

00040190823



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

September 19, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

K-Ranches, Inc.
P.O. Box 31
Brawley, CA 92227

Re: MUR 1024

Dear Sirs:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that you may have violated section 441b(a) of the Federal Election Campaign Act of 1971, as amended ("the Act"). This section of the Act makes it unlawful for corporations to make contributions to political committees. Specifically it appears that, on or about November 9, 1978, the K-Ranches, Inc. made a contribution of \$ 200.00 to the Republican Central Committee of Imperial County. Although the contribution in question was reported as returned, the Act was violated when the contribution was made and accepted.

We have numbered this matter MUR 1024. Please refer to this number in all future correspondence.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. In addition, please send us a copy of both the front and the back of the contribution check sent to the Republican Central Committee of Imperial County.

0010190824

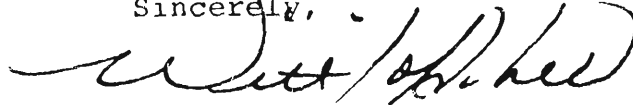
The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification. If no response is received, the Commission may take further action based on the information at hand.

If you have any questions, please contact Jonathan Levin, the staff member assigned to this matter, at 202-523-4523.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

A handwritten signature in dark ink, appearing to read "W. C. Oldaker", written over a horizontal line.

William C. Oldaker
General Counsel

00010100825



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

September 19, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Hartman and Williams, Inc.
P.O. Box 752
Calexico, CA 92231

Re: MUR 1024

Dear Sirs:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that you may have violated section 441b(a) of the Federal Election Campaign Act of 1971, as amended ("the Act"). This section of the Act makes it unlawful for corporations to make contributions to political committees. Specifically it appears that, on or about November 9, 1978, the Hartman and Williams, Inc. made a contribution of \$200.00 to the Republican Central Committee of Imperial County. Although the contribution in question was reported as returned, the Act was violated when the contribution was made and accepted.

We have numbered this matter MUR 1024. Please refer to this number in all future correspondence.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. In addition, please send us a copy of both the front and the back of the contribution check sent to the Republican Central Committee of Imperial County.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification. If no response is received, the Commission may take further action based on the information at hand.

If you have any questions, please contact Jonathan Levin, the staff member assigned to this matter, at 202-523-4523.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
William C. Oldaker
General Counsel

PS Form 3811 Apr 1977 RETURN RECEIPT REGISTERED, INSURED AND CERTIFIED MAIL

SENDER Complete items 1, 2, and 3 Add your address in the "RETURN TO" space on reverse		
1. The following service is requested (check one): ☐ Show to whom and date delivered \$ ☐ Show to whom, date, and address of delivery \$ ☐ RESTRICTED DELIVERY Show to whom and date delivered \$ ☐ RESTRICTED DELIVERY Show to whom, date, and address of delivery \$ (CONSULT POSTMASTER FOR FEES)		
2. ARTICLE ADDRESSED TO: <i>Hartman + Williams, Inc.</i> <i>P.O. Box 752</i> <i>Coleridge, CA 92231</i>		
3. ARTICLE DESCRIPTION REGISTERED NO. <i>743937</i> CERTIFIED NO. INSURED NO.		
(Always obtain signature of addressee or agent)		
I have received the article described above SIGNATURE ☐ Addressee ☐ Authorized agent <i>Sandy Ming</i>		
4. DATE OF DELIVERY <i>SEP 25 1977</i> POSTMARK		
5. ADDRESS (Complete only if requested)		
6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS		

MUR-1024 Levin

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Hartman and Williams, Inc.
P.O. Box 752
Calxico, CA 92231

Re: MUR 1024

Dear Sirs:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that you may have violated section 441b(a) of the Federal Election Campaign Act of 1971, as amended ("the Act"). This section of the Act makes it unlawful for corporations to make contributions to political committees. Specifically it appears that, on or about November 9, 1978, the Hartman and Williams, Inc. made a contribution of \$ to the Republican Central Committee of Imperial County. Although the contribution in question was reported as returned, the Act was violated when the contribution was made and accepted.

We have numbered this matter MUR 1024. Please refer to this number in all future correspondence.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. In addition, please send us a copy of both the front and the back of the contribution check sent to the Republican Central Committee of Imperial County.

JML
9/18/79

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification. If no response is received, the Commission may take further action based on the information at hand.

If you have any questions, please contact Jonathan Levin, the staff member assigned to this matter, at 202-523-4523.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

JMC
9/18/79

00040190830



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

September 19, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Brandenberg Feed Yard, Inc.
903 West Highway 98
Calexico, CA 92231

Re: MUR 1024

Dear Sirs:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that you may have violated section 441b(a) of the Federal Election Campaign Act of 1971, as amended ("the Act"). This section of the Act makes it unlawful for corporations to make contributions to political committees. Specifically it appears that, on or about November 9, 1978, the Brandenberg Feed Yard, Inc. made a contribution of \$ 100.00 to the Republican Central Committee of Imperial County. Although the contribution in question was reported as returned, the Act was violated when the contribution was made and accepted.

We have numbered this matter MUR 1024. Please refer to this number in all future correspondence.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. In addition, please send us a copy of both the front and the back of the contribution check sent to the Republican Central Committee of Imperial County.

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If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
William C. Oldaker
General Counsel

PS Form 3811, Apr. 1977

RETURN RECEIPT REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse

1 The following service is requested (check one).
☐ Show to whom and date delivered c
☐ Show to whom, date, and address of delivery c
☐ RESTRICTED DELIVERY c
Show to whom and date delivered
☐ RESTRICTED DELIVERY
Show to whom, date, and address of delivery \$
(CONSULT POSTMASTER FOR FEES)

2 ARTICLE ADDRESSED TO
Brundenberg Feed Yard, Inc.
903 West Highway 98
Calverico, CA 92231

3 ARTICLE DESCRIPTION:
REGISTERED NO CERTIFIED NO INSURED NO
943738

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
W. C. Oldaker

4 DATE OF DELIVERY
15110
CALVERICO POSTMARK

5 ADDRESS (Complete only if requested)

6 UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

370000 1977-0-249-585

mar-1024

Levin

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Brandenberg Feed Yard, Inc.
903 West Highway 98
Calxico, CA 92231

Re: MUR 1024

Dear Sirs:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that you may have violated section 441b(a) of the Federal Election Campaign Act of 1971, as amended ("the Act"). This section of the Act makes it unlawful for corporations to make contributions to political committees. Specifically it appears that, on or about November 9, 1978, the Brandenberg Feed Yard, Inc. made a contribution of \$ _____ to the Republican Central Committee of Imperial County. Although the contribution in question was reported as returned, the Act was violated when the contribution was made and accepted.

We have numbered this matter MUR 1024. Please refer to this number in all future correspondence.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. In addition, please send us a copy of both the front and the back of the contribution check sent to the Republican Central Committee of Imperial County.

JH:2
9/18/79

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification. If no response is received, the Commission may take further action based on the information at hand.

If you have any questions, please contact Jonathan Levin, the staff member assigned to this matter, at 202-523-4523.

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If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

JML

9/18/79

800340190834



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

September 19, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

K-Ranches, Inc.
P.O. Box 31
Brawley, CA 92227

Re: MUR 1024

Dear Sirs:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that you may have violated section 441b(a) of the Federal Election Campaign Act of 1971, as amended ("the Act"). This section of the Act makes it unlawful for corporations to make contributions to political committees. Specifically it appears that, on or about November 9, 1978, the K-Ranches, Inc. made a contribution of \$ 200.00 to the Republican Central Committee of Imperial County. Although the contribution in question was reported as returned, the Act was violated when the contribution was made and accepted.

We have numbered this matter MUR 1024. Please refer to this number in all future correspondence.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. In addition, please send us a copy of both the front and the back of the contribution check sent to the Republican Central Committee of Imperial County.

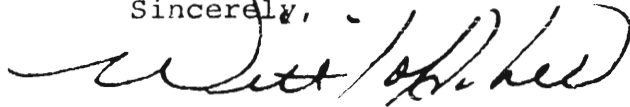
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If you have any questions, please contact Jonathan Levin, the staff member assigned to this matter, at 202-523-4523.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,



William C. Oldaker
General Counsel

PS Form 3811 Apr 1977 RETURN RECEIPT REGISTERED INSURED AND CERTIFIED MAIL

● SENDER Complete items 1, 2, and 3 Add your address in the RETURN TO space on reverse		
1. The following service is requested (check one) ☐ Show to whom and date delivered c ☐ Show to whom, date, and address of delivery c ☐ RESTRICTED DELIVERY Show to whom and date delivered c ☐ RESTRICTED DELIVERY Show to whom, date, and address of delivery \$ (CONSULT POSTMASTER FOR FEES)		
2. ARTICLE ADDRESSED TO K. Ranches, Inc. P.O. Box 31 Brawley, CA 92227		
3. ARTICLE DESCRIPTION REGISTERED NO. CERTIFIED NO. INSURED NO. 943931		
(Always obtain signature of addressee or agent)		
I have received the article described above. SIGNATURE ☐ Addressee ☐ Authorized agent		
4. DATE OF DELIVERY 9/24/79		POSTMARK
5. ADDRESS (Complete only if requested)		
6. UNABLE TO DELIVER BECAUSE		CLERK'S INITIALS

MUR-1824 Levin

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

K-Ranches, Inc.
P.O. Box 31
Brawley, CA 92227

Re: MUR 1024

Dear Sirs:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that you may have violated section 441b(a) of the Federal Election Campaign Act of 1971, as amended ("the Act"). This section of the Act makes it unlawful for corporations to make contributions to political committees. Specifically it appears that, on or about November 9, 1978, the K-Ranches, Inc. made a contribution of \$ to the Republican Central Committee of Imperial County. Although the contribution in question was reported as returned, the Act was violated when the contribution was made and accepted.

We have numbered this matter MUR 1024. Please refer to this number in all future correspondence.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. In addition, please send us a copy of both the front and the back of the contribution check sent to the Republican Central Committee of Imperial County.

JML
9/18/79

00040190837

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification. If no response is received, the Commission may take further action based on the information at hand.

If you have any questions, please contact Jonathan Levin, the staff member assigned to this matter, at 202-523-4523.

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If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

JML
9/18/79

00040190838

MEMORANDUM

FROM: Jonathan Levin

TO: The File

RE: MUR ~~1623~~
1624

The RTB letter sent to the 3-River Land and Cattle Co. was returned to the Commission on October 10, 1979 because the company had changed its address. The letter was sent to the new address on October 11, 1979.

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20563

Official Business

Penalty for Private Use \$300

POSTAGE AND

3-River Land and Cattle Co.
P.O. Box 2389
Picacho, CA 92243

REASON CHECKED

Unclaimed ☒ Refused ☐

Address unknown ☐

Incorrect Address ☐

No such street ☐

No such office in state ☐

No return address in this envelope ☐

Not here



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

September 19, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

3 River Land and Cattle Co.
P.O. Box 2389
El Centro, CA 92243

Re: MUR 1024

Dear Sirs:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that you may have violated section 441b(a) of the Federal Election Campaign Act of 1971, as amended ("the Act"). This section of the Act makes it unlawful for corporations to make contributions to political committees. Specifically it appears that, on or about November 9, 1978, the 3 River Land and Cattle Co. made a contribution of \$ 100.00 to the Republican Central Committee of Imperial County. Although the contribution in question was reported as returned, the Act was violated when the contribution was made and accepted.

We have numbered this matter MUR 1024. Please refer to this number in all future correspondence.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. In addition, please send us a copy of both the front and the back of the contribution check sent to the Republican Central Committee of Imperial County.

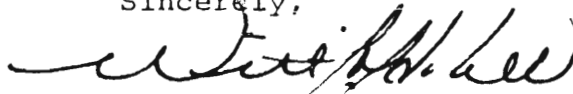
The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification. If no response is received, the Commission may take further action based on the information at hand.

If you have any questions, please contact Jonathan Levin, the staff member assigned to this matter, at 202-523-4523.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,



William C. Oldaker
General Counsel

PS Form 3873, Apr 1977

1. SENDER Complete items 1, 2, and 3. Add your address in the space on the left.		RETURN TO space on the right.	
2. The following service is requested (check one): ☐ Show to whom and date delivered ☐ Show to whom, date, and address of delivery ☐ RESTRICTED DELIVERY ☐ Show to whom and date delivered ☐ RESTRICTED DELIVERY ☐ Show to whom, date, and address of delivery ☐ CONSULT POSTMASTER FOR FEES			
3. ARTICLE ADDRESSED TO: 3-River Land and Cattle Co. c/o John A. Morrow, Jr. 895 Broadway Suite 109 E1 Center, CA 92243			
4. ARTICLE DESCRIPTION REGISTERED NO. 443058	CERTIFIED NO.	INSURED NO.	
(Always obtain signature of addressee or agent)			
I have received the article described above: SIGNATURE  ADDRESS ☒ Authorized agent		POSTMARK	
DATE OF DELIVERY 6/16/79		ADDRESS Complete only if requested	
6. UNABLE TO DELIVER BECAUSE:		CLERK'S INITIALS	

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

7550 1977-0-248-595

MUR 1024 Levin

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

3 River Land and Cattle Co.
P.O. Box 2389
El Centro, CA 92243

Re: MUR 1024

Dear Sirs:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that you may have violated section 441b(a) of the Federal Election Campaign Act of 1971, as amended ("the Act"). This section of the Act makes it unlawful for corporations to make contributions to political committees. Specifically it appears that, on or about November 9, 1978, the 3 River Land and Cattle Co. made a contribution of \$ to the Republican Central Committee of Imperial County. Although the contribution in question was reported as returned, the Act was violated when the contribution was made and accepted.

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JML 9/18/79

00040190842

2 -
The Commission has a duty to investigate this matter expeditiously. Therefore, your response should be submitted ten days after your receipt of this notification. If no response is received, the Commission may take action based on the information at hand.

If you have questions, please contact Jonathan Levin, the staff member assigned to this matter, at 202-523-4523.

This matter will remain confidential in accordance with 2 U.S.C. Section 435(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

JML
9/18/77

00040190343



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

September 19, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Tamarack Feedyards, Inc.
1024 East Highway 98
Calexico, CA 92231

Re: MUR 1024

Dear Sirs:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that you may have violated section 441b(a) of the Federal Election Campaign Act of 1971, as amended ("the Act"). This section of the Act makes it unlawful for corporations to make contributions to political committees. Specifically it appears that, on or about November 9, 1978, the Tamarack Feedyards, Inc. made a contribution of \$ 100,00 to the Republican Central Committee of Imperial County. Although the contribution in question was reported as returned, the Act was violated when the contribution was made and accepted.

We have numbered this matter MUR 1024. Please refer to this number in all future correspondence.

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- 2 -

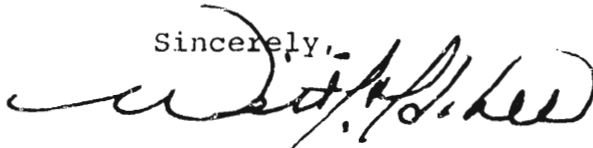
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If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

A handwritten signature in dark ink, appearing to read "W. C. Oldaker", written over the word "Sincerely,".

William C. Oldaker
General Counsel

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Tamarack Feedyards, Inc.
1024 East Highway 98
Calexico, CA 92231

Re: MUR 1024

Dear Sirs:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that you may have violated section 441b(a) of the Federal Election Campaign Act of 1971, as amended ("the Act"). This section of the Act makes it unlawful for corporations to make contributions to political committees. Specifically it appears that, on or about November 9, 1978, the Tamarack Feedyards, Inc. made a contribution of \$ _____ to the Republican Central Committee of Imperial County. Although the contribution in question was reported as returned, the Act was violated when the contribution was made and accepted.

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JML
9/18/79

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If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

Jm1

9/18/79

20040190847

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Republican Central Committee of)
Imperial County, CA)
Hartman and Williams, Inc.)
Brandenberg Feed Yard, Inc.)
K-Ranches, Inc.)
3-River Land and Cattle Co.)
Tamarack Feedyard, Inc.)

MUR 1024

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on September 17, 1979, the Commission determined by a vote of 5-0 to adopt the following recommendations, as set forth in the First General Counsel's Report dated September 12, 1979, regarding the above-captioned matter:

1. Find REASON TO BELIEVE that Hartman and Williams, Inc., Brandenberg Feed Yard, Inc., K-Ranches, Inc., 3-River Land and Cattle Co., and Tamarack Feedyards, Inc., violated 2 U.S.C. §441b(a).
2. Approve the letters attached to the above-named report.

Voting for this determination were Commissioners Friedersdorf, Harris, McGarry, Reiche, and Tiernan.

Attest:

9/17/79

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Received in Office of the Commission Secretary: 9-12-79, 4:12
Circulated on 48 hour vote basis: 9-13-79, 11:00

00017190848

September 12, 1979

MEMORANDUM TO: Marge Emmons

FROM: Elissa T. Carr

SUBJECT: MUR 1024

Please have the attached First GC Report on MUR 1024 distributed to the Commission on a 48 hour tally basis.

Than kyou.

80040190849

FEDERAL ELECTION COMMISSION

FIRST GENERAL COUNSEL'S REPORT

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

DATE AND TIME OF TRANSMITTAL
BY OGC TO COMMISSION

9/12/79

MUR NO. 1024/2
STAFF MEMBER(S) LEVIN 2

SOURCE OF MUR: INTERNALLY GENERATED

RESPONDENT'S NAME: Republican Central Committee of Imperial County, CA;
Hartman and Williams, Inc.;
Brandenberg Feed Yard, Inc.; K-Ranches, Inc.; 3-River
Land and Cattle Co; Tamarack Feedyard, Inc.

RELEVANT STATUTE: 2 U.S.C. §441b(a)

INTERNAL REPORTS CHECKED: Public Records

FEDERAL AGENCIES CHECKED: None

GENERATION OF MATTER

A review of the 30 Day Post-General Report filed by the Republican Central Committee of Imperial County ("the Committee") disclosed receipt of \$764.80 in contributions which appear to be contributions in violation of 2 U.S.C. §441b(a). This matter was referred to the Office of General Counsel by the Report Analysis Division (RAD) on August 28, 1979.

EVIDENCE

The Report disclosed receipt by the Committee of the following contributions from corporations: \$200 from Hartman and Williams, Inc., \$100 from Brandenberg Feed Yard, Inc., \$200 from K-Ranches, Inc., \$100 from 3-River Land and Cattle Co., \$100 from Tamarack Feedyard, Inc, all on November 9, 1978; and \$64.80 from Claypool Distributing Co. on November 27, 1978. This latter contribution was indicated to be in-kind.

The Committee was notified of the surface violation on May 2, 1979 and it submitted a response on May 17, 1979 explaining that the money was received to purchase beef for a barbeque. It did not state that the contributions were refunded. On July 16, 1979, reason to believe was found that the Committee violated 2 U.S.C. §441b because its response was considered inadequate. On July 26, 1979, in response to the reason to believe notice, the Committee notified the Commission by letter that they had refunded the contributions and enclosed copies of the refund letters and checks to all of the corporations except the 3-River Land and Cattle Company. In response to RAD's August 6 telephone inquiry as to why no refund was made to the latter corporation, the Committee treasurer stated that it was not incorporated in California but was a foreign corporation qualified to do business in California. RAD informed him that this distinction made no difference in the applicability of FECA.

Consequently on August 9, 1979, the Committee notified the Commission by letter that it had sent a refund letter and check to "3-River."

The Commission has not notified the corporations of the violations.

PRELIMINARY ANALYSIS

The contributions in question were made and accepted after the Commission had notified candidates and committees in August, 1978 that, in the future, civil penalties might be levied on contributors of 441b contributions totalling \$100 or more and recipients of 441b contributions aggregating \$100 or more. Accordingly, we are recommending that the Commission find reason to believe that all of the corporate contributors, except the Claypool Distributing Company, whose contribution was less than \$100, violated 2 U.S.C. §441b(a). Since reason to believe has already been found that the Committee violated §441b, no additional finding against the Committee need be made at this time.

It will be noted that the attached report of the Committee lists a \$100 contribution from Moore Livestock Co. We have been informed by the Office of the Secretary of State of California that Moore Livestock Co. is on neither its active nor inactive lists of entities incorporated or qualified to do business as a corporation in the State of California. Therefore, this company is not a respondent in this matter.

RECOMMENDATION

1. Find reason to believe that Hartman and Williams, Inc., Brandenburg Feed Yard, Inc., K-Ranches, Inc., 3-River Land and Cattle Co., and Tamarack Feedyards, Inc. violated 2 U.S.C. §441b(a).
2. Approve the attached letters.

ATTACHMENTS

1. Referral
2. Proposed letter to five contributors

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE 8-28-79

ANALYST Lisa Stolaruk

TO: Office of General Counsel

TEAM CHIEF Bobby Werfel

THROUGH: STAFF DIRECTOR

COMPLIANCE REVIEW CBower

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

CANDIDATE/COMMITTEE: Republican Central Committee of Imperial County C00011643

TREASURER: Mr. C.A. Swain

ADDRESS: P.O. Box 2552
El Centro, California 92243

AFFILIATE(S): Republican Associates of Imperial County C00011825

ALLEGATION(S): CITE: ATTACHMENT(S)
Acceptance of corporate contributions 2 U.S.C. 441b 2

MANNER IN WHICH REVIEW WAS INITIATED if other than normal review, AND DATE: 3/27/79

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM January 1, 1978 TO December 31, 1978

TOTAL RECEIPTS \$ 21,650 TOTAL EXPENDITURES \$ 22,452

CASH ON HAND \$ 996.22 (as of Dec. 31) DEBTS \$ 0

HISTORY:

RESULTS OF REVIEW:

3SV1/79-21 (May 2, 1979; 30 Day Post-General Report)

ATTACHMENT

4

3SV2/79-21 (July 16, 1979; 30 Day Post-General Report)

6

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

ATTACHMENT

Telecon: Stolaruk with Swain, 8/6/79

8

REASON(S) FOR REFERRAL:

ATTACHMENT

Contributions exceed threshold for OGC review

Telecon: Stolaruk with Secretary of State, CA (3/22/79)

Response to 3SV1/79-21 (5/17/79)

3

Response to 3SV2/79-21 (7/31/79)

5

Response to 3SV2/79-21 (8/9/79)

7

OTHER PENDING ACTIONS INITIATED BY RAD:

ATTACHMENT

9

NONE

OTHER RELEVANT INFORMATION:

NONE

6 0 0 1 3 1 9 0 2 5 4
FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 1AUG79
PAGE 1

PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
REPUBLICAN CENTRAL COMMITTEE OF IMPERIAL COUNTY								
	✓ 1977 APRIL 10 QUARTERLY	0		872		1JAN77 -31MAR77	4	ID# C00011643 77FEC/051/1756
	✓ JULY 10 QUARTERLY	1,500		1,189		1APR77 -30JUN77	5	77FEC/055/3502
	✓ OCTOBER 10 QUARTERLY	0		504		1JUL77 -30SEP77	4	77FEC/060/2041
	✓ YEAR END REPORT	2,000		945		1OCT77 -31DEC77	6	78FEC/066/3581
	✓ 1978 APRIL 10 QUARTERLY	0		764		1JAN78 -31MAR78	5	78FEC/071/1097
	✓ 10 DAY PRE-PRIMARY	2,000		1,045		1APR78 -22MAY78	5	78FEC/075/5265
	✓ JULY 10 QUARTERLY	0		750		23MAY78 -30JUN78	4	78FEC/080/3936
	✓ OCTOBER 10 QUARTERLY	6,089		4,205		1JUL78 -30SEP78	8	78FEC/089/5057
	✓ 10 DAY PRE-GENERAL		9,787		12,060	1OCT78 -23OCT78	9	78FEC/094/0896
	✓ 30 DAY POST-GENERAL		3,773		3,138	24OCT78 -27NOV78	7	78FEC/098/5375
	✓ REQUEST FOR ADDITIONAL INFORMATION					24OCT78 -27NOV78	3	79FEC/126/3377
	✓ 30 DAY POST-GENERAL - AMENDMENT					24OCT78 -27NOV78	2	79FEC/127/4160
	✓ YEAR END REPORT		0		486	28NOV78 -31DEC78	5	79FEC/119/5485
	TOTAL	11,589	13,560	10,276	15,684		67	TOTAL PAGES

✓ = all reports reviewed

Commission
Washington, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3

Page 1 of 3 for

Line Number 14 (a)

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

REPUBLICAN CENTRAL COMMITTEE OF IMPERIAL COUNTY

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Hartman and Williams <i>INC.</i> P. O. Box 752 Calxico, Ca 92231 <i>10/1/64</i>	Calxico, Ca - 551 Pruett Rd Occupation Cattle Feeders ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 200.00	11/9/76	\$200.00
Receipt for: ☐ Primary ☐ General ☐ Other			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Brandenburg Feed Yard <i>INC.</i> 903 West Hiway 98 Calxico, Ca 92231 <i>3/9/73</i>	903 W. Hiway 98 Calxico, Ca Occupation Cattle Feeder ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 100.	11/9/76	100.00
Receipt for: ☐ Primary ☐ General ☐ Other			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
K. - Panchas <i>INC.</i> P. O. Box 31 Brawley, Ca 92227 <i>7/26/72</i>	Brawley, Ca Occupation Cattle Feeder ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 200.00	11/9/76	200.00
Receipt for: ☐ Primary ☐ General ☐ Other			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
3 River Land and Cattle Co. <i>QUAL</i> P. O. Box 2359 El Centro, Ca 92243 <i>4/29/77 TX</i>	El Centro, Ca Occupation Cattle Feeder ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 100.	11/9/76	100.00
Receipt for: ☐ Primary ☐ General ☐ Other			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Tamarack Feedyards, Inc <i>INC.</i> 1024 E. Hiway 98 Calxico, Ca <i>9/15/69</i>	Calxico, Ca Occupation Cattle Feeder ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 100.	11/9/76	100.00
Receipt for: ☐ Primary ☐ General ☐ Other			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Moore Livestock Co. P. O. Box 1305 Brawley, Ca 92227	Brawley, Ca Occupation Cattle Feeder ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 100.00	11/9/76	100.00
Receipt for: ☐ Primary ☐ General ☐ Other			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Claypool Distributing Co <i>INC.</i> 102 Claypool Dr Imperial, Ca 92251 <i>2/29/76</i>	102 Claypool Dr Imperial, Ca 92251 Occupation Contribution in kind ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$	11/27/76	64.80
Receipt for: ☐ Primary ☐ General ☐ Other			
SUBTOTAL of receipts this page (optional):			\$
TOTAL this period (last page this line number only):			\$ 364.80

DATE: 3/22/79TIME: 11:00COMMITTEE: Republican Central Cmte. of Imperial Cty.PERSON SPOKEN TO: Corp. Division of Sec't. of State - CAFEC'R: Gisa StolarukSUBJECT: Dates of incorporation

The following companies contributed to the above cmte.:

1. Hartman & Williams - 10/1/64
2. Brandenburg Feed Yard - 3/9/73
3. K.-Ranches - 7/26/72 - 0
4. 3-River Land & Cattle Co. - qual. 4/29/77 in TX.
5. Tamarack Feedyard, Inc. - 9/15/69
6. Moore Livestock Co. - not active
7. Claypool Distributing Co. - 7/29/76



REPUBLICAN Central Committee

of Imperial County

141 South 7th St. Imperial, Calif. 92243
P.O. Box 2552 Phone 352-8250

May 17, 1979

Orlando B. Potter, Staff Director
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

RE: 3SV1/79-21

Dear Mr. Potter:

Regarding the corporate contributions: This money was received to purchase beef for our barbeque. The total bill was \$1391.39. This barbeque was for various candidates, and it was held on October 21, 1979 at the California Mid-Winter Fairgrounds, Imperial.

Sincerely,

C. A. Swain
Treasurer



REPUBLICAN Central Committee

of Imperial County

74 South 2nd St. El Centro, Calif. 92243
P.O. Box 2552 Phone 352-8250

July 26, 1979

Robert Fiero
Commissioner
Federal Election Commission
Washington, D.C. 20463

Subject: 3SV2/79-21

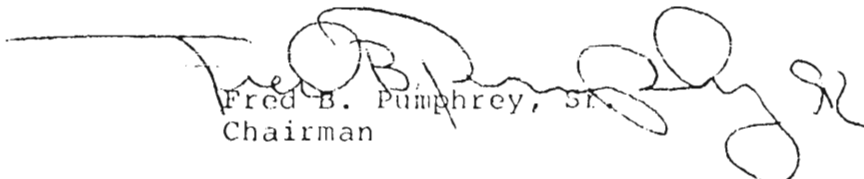
Dear Sir:

Pursuant to your letter dated July 16, 1979 and in reply to our correspondence of May 17, 1979, we are enclosing copies of letters to donors of alleged prohibited contributions and copies of the checks.

If further is needed please advise as soon as possible.

Sincerely,


C. A. Swain
Treasurer


Fred B. Pumphrey, Sr.
Chairman

Enclosures

REPUBLICAN CENTRAL COMMITTEE
OF IMPERIAL COUNTY
EL CENTRO, CALIF. 92243

3961

PAY
TO THE
ORDER OF

Hartman and Williams
Two Hundred and 00/100

7-26 1979 16-4
1220

\$200⁰⁰

DOLLARS

SECURITY PACIFIC NATIONAL BANK
El Centro Office
576 Main St., El Centro, CA 92243

⑈00396⑈ ⑆ ⑆ 122000043⑆ 369⑈ 010740⑈

REPUBLICAN CENTRAL COMMITTEE
OF IMPERIAL COUNTY
EL CENTRO, CALIF. 92243

3962

PAY
TO THE
ORDER OF

Brandenberg Seed Yards
One Hundred and 00/100

7-26 1979 16-4
1220

\$100⁰⁰

DOLLARS

SECURITY PACIFIC NATIONAL BANK
El Centro Office
576 Main St., El Centro, CA 92243

⑈00396⑈ ⑆ ⑆ 122000043⑆ 369⑈ 010740⑈

REPUBLICAN CENTRAL COMMITTEE
OF IMPERIAL COUNTY
EL CENTRO, CALIF. 92243

3963

PAY
TO THE
ORDER OF

K - Ranches
Two Hundred and 00/100

7-26 1979 16-4
1220

\$200⁰⁰

DOLLARS

SECURITY PACIFIC NATIONAL BANK
El Centro Office
578 Main St., El Centro, CA 92243

⑈00396⑈ ⑆ ⑆ 122000043⑆ 369⑈ 010740⑈

REPUBLICAN CENTRAL COMMITTEE
OF IMPERIAL COUNTY
EL CENTRO, CALIF. 92243

3964

PAY
TO THE
ORDER OF

7-26 1972 16-4 1220
Jamarack Feedyards, Inc. \$ 100⁰⁰
One hundred and 00/100 DOLLARS

SECURITY PACIFIC NATIONAL BANK
El Centro Office
576 Main St., El Centro, CA 92243

⑈003964⑈ ⑆ 1 2 2000043 369 0010740 ⑈

REPUBLICAN CENTRAL COMMITTEE
OF IMPERIAL COUNTY
EL CENTRO, CALIF. 92243

3965

PAY
TO THE
ORDER OF

7-26 1972 16-4 1220
Claypool Distributing Co. \$ 64⁰⁰
Sixty four and 00/100 DOLLARS

SECURITY PACIFIC NATIONAL BANK
El Centro Office
576 Main St., El Centro, CA 92243

⑈003965⑈ ⑆ 1 2 2000043 369 0010740 ⑈

P.O. Box 2552

July 26, 1979

K-Ranches
P.O. Box 31
Brawley, CA 92227

Gentlemen:

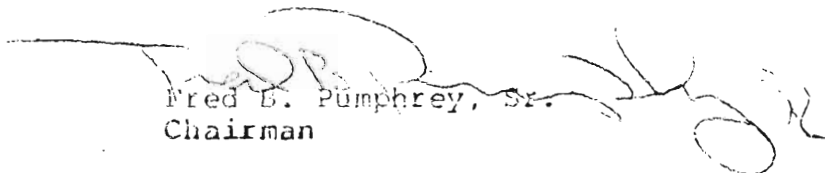
Because of a recent ruling of the Federal Election Commission we are hereby returning the donation of \$200.00.

Federal regulations prohibit the acceptance of corporate contributions for federal elections.

Your donation was for our beef barbeque held October 21, 1978.

We thank you for your time and support.

Sincerely,



Fred B. Pumphrey, Sr.
Chairman

Enclosure

*Same form letter sent by Committee
to other corporate contributors.*

DATE: 8/6/79

TIME: 12:20

COMMITTEE: Republican Central Committee of Imperial County

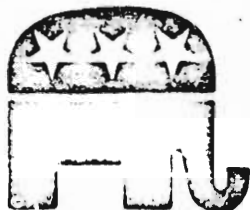
PERSON SPOKEN TO: C.A. Swain, Treasurer (714)352-6585

FEC'R: Lisa Stolaruk

SUBJECT: Corporate contribution

I called Mr. Swain today regarding an SV on several corporate contributions the committee received. Refunds were made on all but one company, 3 River Land and Cattle Company. Mr. Swain said that no refund was made on that particular contribution, because it had a qualification date, rather than an incorporation date listed ~~after~~ after it on the SV. I said that we view incorporation and qualification as ~~xxxx~~ the same things. He said that he will issue a full refund to the company, and will send us the copy of the check and letter.

0010190862



REPUBLICAN Central Committee

of Imperial County

79 1416 South 7th El Centro, Calif. 92243
P.O. Box 2552 Phone 352-8250

August 9, 1979

Robert Fiero
Commissioner
Federal Election Commission
Washington, D.C. 20463

Ref: 3SV2/79-21

Dear Mr. Fiero: ,

Pursuant to your letter dated July 16, 1979 and in reply to our correspondence of May 17, 1979, we are enclosing a copy of a letter to a donor of alleged prohibited contribution and copy of the check.

If further is needed please advise as soon as possible.

Sincerely,

C. A. Swain
Treasurer

August 9, 1979

3 River Land and Cattle Co.
P.O. Box 2389
El Centro, CA 92243

Gentlemen:

Because of a recent ruling of the Federal Election Commission we are hereby returning the donation of \$100.00.

Federal regulations prohibit the acceptance of corporate contributions for federal elections.

Your donation was for our beef barbeque held October 21, 1978.

We thank you for your time and support.

Sincerely,

C. A. Swain
Treasurer

REPUBLICAN CENTRAL COMMITTEE
OF IMPERIAL COUNTY
EL CENTRO, CALIF. 92243

3972

BY ENDORSEMENT THIS CHECK WHEN PAID
IN FULL PAYMENT OF THE FOLLOWING

PAY
TO THE
ORDER OF

3 River Land and Cattle Co.
One Hundred and 00/100

8-9 1072 16-4 1220

\$100.00

DOLLARS

SECURITY PACIFIC NATIONAL BANK
El Centro Office
576 Main St., El Centro, CA 92243

[Signature]
[Signature]

⑈003972⑈ ⑆122000043⑆369⑈010740⑈

08 09 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 00



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Tamarack Feedyards, Inc.
1024 East Highway 98
Calexico, CA 92231

Re: MUR 1024

Dear Sirs:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that you may have violated section 441b(a) of the Federal Election Campaign Act of 1971, as amended ("the Act"). This section of the Act makes it unlawful for corporations to make contributions to political committees. Specifically it appears that, on or about November 9, 1978, the Tamarack Feedyards, Inc. made a contribution of \$ 100,00 to the Republican Central Committee of Imperial County. Although the contribution in question was reported as returned, the Act was violated when the contribution was made and accepted.

We have numbered this matter MUR 1024. Please refer to this number in all future correspondence.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. In addition, please send us a copy of both the front and the back of the contribution check sent to the Republican Central Committee of Imperial County.

*Same letter with appropriate dollar amounts
to be sent to all corporate respondents.*

- 2 -

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification. If no response is received, the Commission may take further action based on the information at hand.

If you have any questions, please contact Jonathan Levin, the staff member assigned to this matter, at 202-523-4523.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

D
RAD

490
92-1412

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

Lisa Stolaruk

DATE 8-28-79

ANALYST Lisa Stolaruk

TO: Office of General Counsel

TEAM CHIEF Bobby Werfel *sp 11 8/6*

THROUGH: STAFF DIRECTOR *BL for ABA*

COMPLIANCE REVIEW *CBauer*

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS *MUR1024*

CANDIDATE/COMMITTEE: Republican Central Committee of Imperial County C00011643

TREASURER: Mr. C.A. Swain

ADDRESS: P.O. Box 2552
El Centro, California 92243

AFFILIATE(S): Republican Associates of Imperial County C00011825

ALLEGATION(S): CITE: ATTACHMENT(S)
Acceptance of corporate contributions 2 U.S.C. 441b 2

MANNER IN WHICH REVIEW WAS INITIATED if other than normal review, AND DATE: 3/27/79

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM January 1, 1978 TO December 31, 1978

TOTAL RECEIPTS \$ 21,650 TOTAL EXPENDITURES \$ 22,452

CASH ON HAND \$ 996.22 (as of Dec. 31) DEBTS \$ 0

HISTORY:

RESULTS OF REVIEW:

	ATTACHMENT
3SV1/79-21 (May 2, 1979; 30 Day Post-General Report)	4
3SV2/79-21 (July 16, 1979; 30 Day Post-General Report)	6

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

	ATTACHMENT
Telecon: Stolaruk with Swain, 8/6/79	8

REASON(S) FOR REFERRAL:

	ATTACHMENT
Contributions exceed threshold for OGC review	
Telecon: Stolaruk with Secretary of State, CA (3/22/79)	3
Response to 3SV1/79-21 (5/17/79)	5
Response to 3SV2/79-21 (7/31/79)	7
Response to 3SV2/79-21 (8/9/79)	9

OTHER PENDING ACTIONS INITIATED BY RAD:

NONE

OTHER RELEVANT INFORMATION:

NONE

FEDERAL ELECTION COMMISSION

DATE 1AUG79
PAGE 1

PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
REPUBLICAN CENTRAL COMMITTEE OF IMPERIAL COUNTY								
✓	1977 APRIL 10 QUARTERLY	0		872		1JAN77 -31MAR77	4	ID# C00011643 77FEC/051/1756
✓	JULY 10 QUARTERLY	1,500		1,189		1APR77 -30JUN77	5	77FEC/055/3502
✓	OCTOBER 10 QUARTERLY	0		506		1JUL77 -30SEP77	4	77FEC/060/2041
✓	YEAR END REPORT	2,000		945		1OCT77 -31DEC77	6	78FEC/066/3581
✓	1978 APRIL 10 QUARTERLY	0		764		1JAN78 -31MAR78	5	78FEC/071/1097
✓	10 DAY PRE-PRIMARY	2,000		1,045		1APR78 -22MAY78	5	78FEC/075/5265
✓	JULY 10 QUARTERLY	0		750		23MAY78 -30JUN78	4	78FEC/080/3936
✓	OCTOBER 10 QUARTERLY	6,089		4,205		1JUL78 -30SEP78	8	78FEC/089/5057
✓	10 DAY PRE-GENERAL		9,787		12,060	1OCT78 -23OCT78	9	78FEC/094/0896
✓	30 DAY POST-GENERAL		3,773		3,138	24OCT78 -27NOV78	7	78FEC/098/5375
✓	REQUEST FOR ADDITIONAL INFORMATION					24OCT78 -27NOV78	3	79FEC/126/3377
✓	30 DAY POST-GENERAL - AMENDMENT					24OCT78 -27NOV78	2	79FEC/127/4160
✓	YEAR END REPORT		0		486	28NOV78 -31DEC78	5	79FEC/119/5485
	TOTAL	11,589	13,560	10,276	15,684		67	TOTAL PAGES

✓ = all reports reviewed

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
Other Income, Loans, Refunds)Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3Page 1 of 1 forLine Number 14 (a)(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

REPUBLICAN CENTRAL COMMITTEE OF IMPERIAL COUNTY

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Hartman and Williams P. O. Box 752 Calxico, Ca 92231 <i>INC. 10/1/64</i>	Calxico, Ca - 551 Pruett Rd Occupation Cattle Feeders ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 200.00	11/9/76	\$200.00
Brandenberg Feed Yard 903 West Hwy 93 Calxico, Ca 92231 <i>INC. 3/9/73</i>	903 W. Hwy 93 Calxico, Ca Occupation Cattle Feeder ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 100.	11/9/76	100.00
K. - Panches P. O. Box 31 Brawley, Ca 92227 <i>INC. 7/26/72</i>	Brawley, Ca Occupation Cattle Feeder ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 200.00	11/9/76	200.00
3 River Land and Cattle Co. P. O. Box 2389 El Centro, Ca 92243 <i>QUAL 4/29/77 TX</i>	El Centro, Ca Occupation Cattle Feeder ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 100.	11/9/76	100.00
Tamarack Feedyards, Inc 1024 E. Hwy 93 Calxico, Ca <i>INC. 9/15/69</i>	Calxico, Ca Occupation Cattle Feeder ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 100.	11/9/76	100.00
Moore Livestock Co. P. O. Box 1305 Brawley, Ca 92227	Brawley, Ca Occupation Cattle Feeder ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 100.00	11/9/76	100.00
Gleypool Distributing Co 102 Gleypool Dr Imperial, Ca 92251 <i>INC. 7/29/76</i>	102 Gleypool Dr Imperial, Ca 92251 Occupation Contribution in kind ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$	11/27/76	64.80
SUBTOTAL of receipts this page (optional)			\$
TOTAL this period (last page this line number only)			\$ 664.80

DATE: 3/22/79TIME: 11:00COMMITTEE: Republican Central Cmte. of Imperial Cty.PERSON SPOKEN TO: Corp. Division of Sec't. of State - CAREC'R: Glenn StolarukSUBJECT: Dates of incorporation

The following companies contributed to the
above cmte.:

1. Hartman & Williams - 10/1/64
2. Brandenburg Feed Yard - 3/9/73
3. K.-Ranches - 7/26/72 - 0
4. 3-River Land & Cattle Co. - qual. 4/29/77 in TX.
5. Tamarack Feedyard, Inc. - 9/15/69
6. Moore Livestock Co. - not active
7. Claypool Distributing Co. - 7/29/76



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20463

May 2, 1979

C.A. Swain
Treasurer
Republican Central Committee of
Imperial County
PO Box 2552
El Centro, California 92243

Dear Mr. Swain:

This letter is prompted by the Commission's analysis of disclosure reports undertaken in the normal course of carrying out its supervisory responsibilities under the Federal Election Campaign Act. During review of the 30 Day Post General Report of Receipts and Expenditures, we noticed entries indicating that you may have accepted contributions from a corporation. Corporate contributions are prohibited by the Act, unless made from a separate segregated fund established by the corporations. A copy of that portion of your report is attached for your review and clarification.

If you have accepted prohibited contributions, you must return the full amounts to the donor. The return of the contributions should be reported immediately by letter and should be reflected as contribution refunds on your next report of receipts and expenditures. If you find that the source of these contributions are permissible under the Federal Election Campaign Act, please submit a statement for the public record which would clarify the source of the contributions and the exact nature of the account upon which the checks were drawn. If the source of these contributions has been reported incompletely or incorrectly, please amend your original report.

Please notify the Commission within fifteen (15) days from the date of this letter of any determination you make on this matter. Enforcement action may be initiated by the Commission for: failure to respond within fifteen (15) days; failure to refund any impermissible contributions; and/or acceptance of labor organization contributions.

If you have any questions concerning this matter, please do not hesitate to contact Lisa Stolaruk (800)424-9530, our Reports Analyst assigned to you. Our local telephone number is 523-4048.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Enclosure
Certified Mail
Return Receipt Requested

0011190874

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3

Page 1 of 1 for

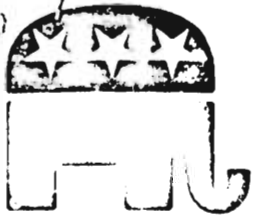
Line Number 14 (n)

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

REPUBLICAN CENTRAL COMMITTEE OF IMPERIAL COUNTY

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Hartman and Williams <i>INC.</i> P. O. Box 752 Calernico, Ca 92231 <i>10/1/64</i>	Calernico, Ca - 551 Pruett Rd Occupation <i>Cattle Feeders</i> ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 200.00	11/9/73	\$200.00
Brandenberg Feed Yard <i>INC.</i> 903 West Hwy 93 Calernico, Ca 92231 <i>3/9/73</i>	903 W. Hwy 93 Calernico, Ca Occupation <i>Cattle Feeder</i> ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 100.	11/9/73	100.00
K.-Ranches <i>INC.</i> P. O. Box 31 Brawley, Ca 92227 <i>7/26/72</i>	Brawley, Ca Occupation <i>Cattle Feeder</i> ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 200.00	11/9/73	200.00
3 River Land and Cattle Co. <i>QUAL.</i> P. O. Box 2309 El Centro, Ca 92243 <i>4/29/77 TX</i>	El Centro, Ca Occupation <i>Cattle Feeder</i> ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 100.	11/9/73	100.00
Tamarack Feedyard, Inc <i>INC.</i> 1024 E. Hwy 93 Calernico, Ca <i>9/15/69</i>	Calernico, Ca Occupation <i>Cattle Feeder</i> ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 100.	11/9/73	100.00
Moore Livestock Co. P. O. Box 1305 Brawley, Ca 92227	Brawley, Ca Occupation <i>Cattle Feeder</i> ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 100.00	11/9/73	100.00
Claypool Distributing Co. <i>INC.</i> 102 Claypool Dr Imperial, Ca 92251 <i>7/29/76</i>	102 Claypool Dr Imperial, Ca 92251 Occupation <i>Contribution in Kind</i> ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$	11/27/73	64.80
SUBTOTAL of receipts this page (optional) ...			\$
TOTAL this period (last page this line number only) ...			\$ 64.80



REPUBLICAN

Central Committee

of Imperial County

141 South 7th St. Imperial, Calif. 92243
P.O. Box 2552 Phone 352-8250

May 17, 1979

Orlando B. Potter, Staff Director
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

RE: 3SV1/79-21

Dear Mr. Potter:

Regarding the corporate contributions: This money was received to purchase beef for our barbeque. The total bill was \$1391.39. This barbeque was for various candidates, and it was held on October 21, 1979 at the California Mid-Winter Fairgrounds, Imperial.

Sincerely,

C. A. Swain
Treasurer



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 16, 1979

C.A. Swain, Treasurer
Republican Central Committee
of Imperial County
P.O. Box 2552
El Centro, CA 92243

Dear Mr. Swain:

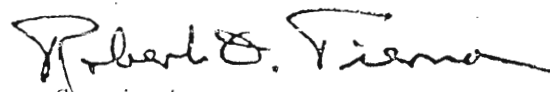
On May 2, 1979, you were notified that certain entries in the 30 Day Post General Report of Receipts and Expenditures filed by your committee raised problems under 2 U.S.C. 441b.

We received a response from you on May 21, 1979, however, we found your response to be inadequate. Your failure to provide an adequate response gives the Commission reason to believe that you may have committed a violation of 2 U.S.C. 441b.

The Commission will take no action against you until you have had a reasonable opportunity to respond to this letter. This response should be mailed to the Commission within ten (10) days or receipt of this letter.

If you have responded to the above or you require additional information, please contact Lisa Stolaruk, our Reports Analyst assigned to you on our toll free number (800)424-9530. Our local number is (202)357-0023.

Sincerely,


Commissioner

Certified Mail:
Return Receipt Requested

0010199878

3541/79-21

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

1. The following service is requested (check one): ☐ Show to whom and date delivered ☐ Show to whom, date, and address of delivery ☐ RESTRICTED DELIVERY ☐ RESTRICTED DELIVERY Show to whom, date, and address of delivery \$ (CONSULT POSTMASTER FOR FEES)	
2. ARTICLE ADDRESSED TO: <i>Repts. Cent. Com. of Imperial City</i>	
3. ARTICLE DESCRIPTION: REGISTERED NO. <i>983574</i> CERTIFIED NO. INSURED NO. (Always obtain signature of addressee or agent) I have received the article described above. SIGNATURE <i>[Signature]</i> ☐ Addressee ☐ Authorized agent	
4. DATE OF DELIVERY <i>JUL 7 - 1979</i>	POSTMARK
5. ADDRESS (Complete only if requested)	
6. UNABLE TO DELIVER BECAUSE:	CLERK'S INITIALS

5/2

☆ GPO : 1977-O-734-337

3542/79-21

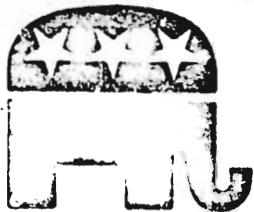
PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

1. The following service is requested (check one): ☒ Show to whom and date delivered <i>45c</i> ☐ Show to whom, date, and address of delivery ☐ RESTRICTED DELIVERY ☐ RESTRICTED DELIVERY Show to whom, date, and address of delivery \$ (CONSULT POSTMASTER FOR FEES)	
2. ARTICLE ADDRESSED TO: <i>Repts. CC of Imperial City</i>	
3. ARTICLE DESCRIPTION: REGISTERED NO. CERTIFIED NO. INSURED NO. (Always obtain signature of addressee or agent) I have received the article described above. SIGNATURE <i>[Signature]</i> ☐ Addressee ☐ Authorized agent	
4. DATE OF DELIVERY <i>JUL 23 1979</i>	POSTMARK <i>JUL 23 1979</i>
5. ADDRESS (Complete only if requested)	
6. UNABLE TO DELIVER BECAUSE:	CLERK'S INITIALS

7/16

☆ GPO : 1977-O-249-695



REPUBLICAN Central Committee

of Imperial County

141 South 2nd St. El Centro, Calif. 92243
P.O. Box 2552 Phone 352-8250

July 26, 1979

Robert Fiero
Commissioner
Federal Election Commission
Washington, D.C. 20463

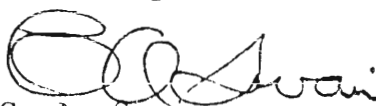
Subject: 3SV2/79-21

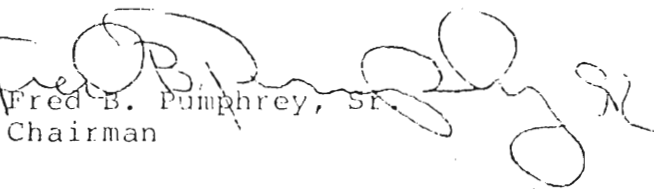
Dear Sir:

Pursuant to your letter dated July 16, 1979 and in reply to our correspondence of May 17, 1979, we are enclosing copies of letters to donors of alleged prohibited contributions and copies of the checks.

If further is needed please advise as soon as possible.

Sincerely,


C. A. Swain
Treasurer


Fred B. Pumphrey, Sr.
Chairman

Enclosures

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3

Page 1 of 3 for

Line Number 14 (a)

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

REPUBLICAN CENTRAL COMMITTEE OF IMPERIAL COUNTY

Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Hartman and Williams <i>INC.</i> P. O. Box 752 Calxico, Ca 92231 <i>10/1/64</i>	Calxico, Ca - 551 Pruett Rd Occupation Cattle Feeders ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 200.00	11/9/78	\$200.00
Brandenberg Feed Yard <i>INC.</i> 903 West Hwy 98 Calxico, Ca 92231 <i>3/9/73</i>	903 W. Hwy 98 Calxico, Ca Occupation Cattle Feeder ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 100.	11/9/78	100.00
K. Ranches <i>INC.</i> P. O. Box 31 Brawley, Ca 92227 <i>7/26/72</i>	Brawley, Ca Occupation Cattle Feeder ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 200.00	11/9/78	200.00
3 River Land and Cattle Co. <i>QUAL.</i> P. O. Box 2369 El Centro, Ca 92243 <i>4/29/77 TX</i>	El Centro, Ca Occupation Cattle Feeder ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 100.	11/9/78	100.00
Tamarack Feedyards, Inc. <i>INC.</i> 1024 E. Hwy 98 Calxico, Ca <i>9/15/69</i>	Calxico, Ca Occupation Cattle Feeder ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 100.	11/9/78	100.00
Moore Livestock Co. P. O. Box 1305 Brawley, Ca 92227	Brawley, Ca Occupation Cattle Feeder ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 100.00	11/9/78	100.00
Claypool Distributing Co. <i>INC.</i> 102 Claypool Dr Imperial, Ca 92251 <i>7/29/76</i>	102 Claypool Dr Imperial, Ca 92251 Occupation Contribution in kind ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$	11/27/78	\$ 64.80
TOTAL of receipts this page (optional)			\$
TOTAL this period (last page this line number only)			\$ 364.80

BY ENDORSEMENT THIS CHECK WHEN PAID IS ACCEPTED
IN FULL PAYMENT OF THE FOLLOWING ACCOUNT

REPUBLICAN CENTRAL COMMITTEE
OF IMPERIAL COUNTY
EL CENTRO, CALIF. 92243

3961

PAY
TO THE
ORDER OF

Hartman and Williams

7-26

1979

16-4
1220

\$200⁰⁰

Two Hundred and 00/100

DOLLARS

SECURITY PACIFIC NATIONAL BANK
El Centro Office
576 Main St., El Centro, CA 92243

[Signature]
Fred B. King

⑈003961⑈ ⑆ 122000043⑆ 369⑈ 010740⑈

BY ENDORSEMENT THIS CHECK WHEN PAID IS ACCEPTED
IN FULL PAYMENT OF THE FOLLOWING ACCOUNT

REPUBLICAN CENTRAL COMMITTEE
OF IMPERIAL COUNTY
EL CENTRO, CALIF. 92243

3962

PAY
TO THE
ORDER OF

Brandenberg Seed Yards

7-26

1979

16-4
1220

\$100⁰⁰

One Hundred and 00/100

DOLLARS

SECURITY PACIFIC NATIONAL BANK
El Centro Office
576 Main St., El Centro, CA 92243

[Signature]
Fred B. King

⑈003962⑈ ⑆ 122000043⑆ 369⑈ 010740⑈

BY ENDORSEMENT THIS CHECK WHEN PAID IS ACCEPTED
IN FULL PAYMENT OF THE FOLLOWING ACCOUNT

REPUBLICAN CENTRAL COMMITTEE
OF IMPERIAL COUNTY
EL CENTRO, CALIF. 92243

3963

PAY
TO THE
ORDER OF

K - Ranches

7-26

1979

16-4
1220

\$200⁰⁰

Two Hundred and 00/100

DOLLARS

SECURITY PACIFIC NATIONAL BANK
El Centro Office
576 Main St., El Centro, CA 92243

[Signature]
Fred B. King

⑈003963⑈ ⑆ 122000043⑆ 369⑈ 010740⑈

REPUBLICAN CENTRAL COMMITTEE
OF IMPERIAL COUNTY
EL CENTRO, CALIF. 92243

3964

DAY
TO THE
ORDER OF

Jamarack Feedyards, Inc.
One hundred and 00/100

7-26

1975

16-4
1220

\$ 100⁰⁰

DOLLARS

SECURITY PACIFIC NATIONAL BANK
El Centro Office
576 Main St., El Centro, CA 92243

[Signature]
Fred B. Humphrey

⑈003964⑈ ⑆ 122000043⑆ 369⑈ 010740⑈

REPUBLICAN CENTRAL COMMITTEE
OF IMPERIAL COUNTY
EL CENTRO, CALIF. 92243

3965

DAY
TO THE
ORDER OF

Claypool Distributing Co.
Sixty four and 80/100

7-26

1975

16-4
1220

\$ 64⁸⁰

DOLLARS

SECURITY PACIFIC NATIONAL BANK
El Centro Office
576 Main St., El Centro, CA 92243

[Signature]
Fred B. Humphrey

⑈003965⑈ ⑆ 122000043⑆ 369⑈ 010740⑈

P.O. Box 2552

July 26, 1979

Hartman & Williams, Inc.
P.O. Box 752
Calexico, CA 92231

Gentlemen:

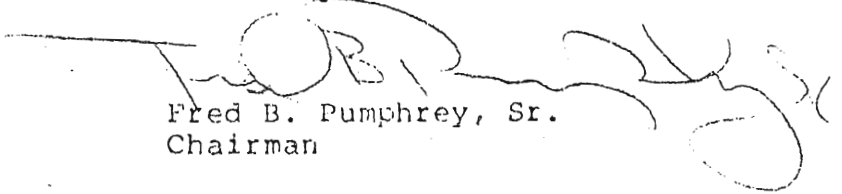
Because of a recent ruling of the Federal Election Commission we are hereby returning the donation of \$200.00.

Federal regulations prohibit the acceptance of corporate contributions for federal elections.

Your donation was for our beef barbeque held October 21, 1978.

We thank you for your time and support.

Sincerely,



Fred B. Pumphrey, Sr.
Chairman

Enclosure

P.O. Box 2552

July 26, 1979

Brandenberg Feed Yard
903 West Highway 98
Calexico, CA 92231

Gentlemen:

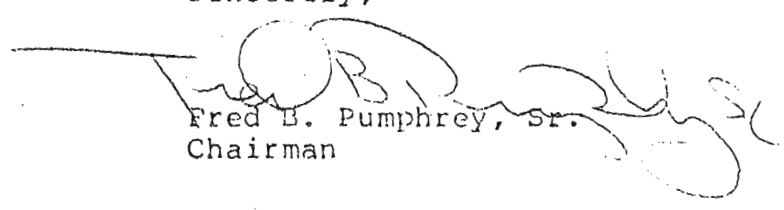
Because of a recent ruling of the Federal Election Commission we are hereby returning the donation of \$100.00.

Federal regulations prohibit the acceptance of corporate contributions for federal elections.

Your donation was for our beef barbeque held October 21, 1978.

We thank you for your time and support.

Sincerely,



Fred B. Pumphrey, Sr.
Chairman

Enclosure

0040191884

P.O. Box 2552

July 26, 1979

K-Ranches
P.O. Box 31
Brawley, CA 92227

Gentlemen:

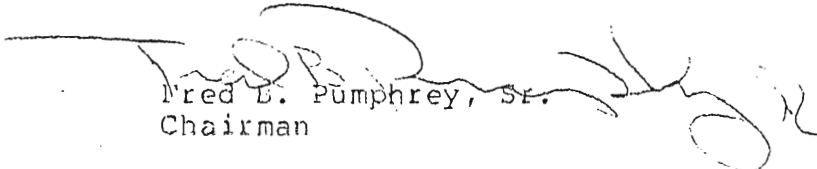
Because of a recent ruling of the Federal Election Commission we are hereby returning the donation of \$200.00.

Federal regulations prohibit the acceptance of corporate contributions for federal elections.

Your donation was for our beef barbeque held October 21, 1978.

We thank you for your time and support.

Sincerely,


Fred E. Pumphrey, Sr.
Chairman

Enclosure

P.O. Box 2552

July 26, 1979

Tamarack Feedyards, Inc.
1024 E. Highway 98
Calexico, CA 92231

Gentlemen:

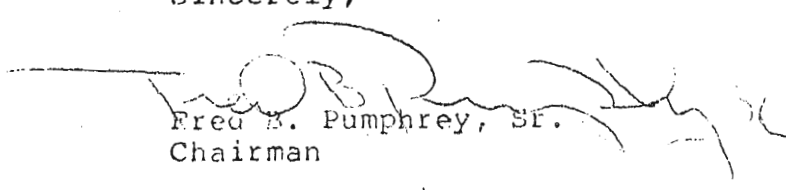
Because of a recent ruling of the Federal Election Commission we are hereby returning the donation of \$100.00.

Federal regulations prohibit the acceptance of corporate contributions for federal elections.

Your donation was for our beef barbeque held October 21, 1978.

We thank you for your time and support.

Sincerely,



Fred B. Pumphrey, Sr.
Chairman

Enclosure

REPUBLICAN

Committee

Imperial County

P.O. Box 2552

Imperial, CA 92243
P.O. Box 2552
Imperial, CA 92250

July 26, 1979

25

Claypool Distributing Co.
102 Claypool Dr.
Imperial, CA 92251

Gentlemen:

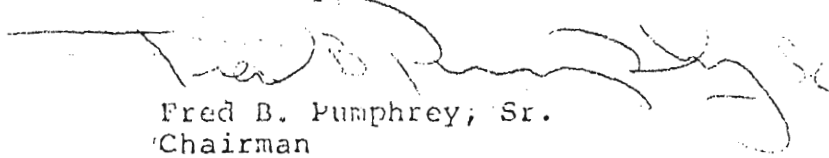
Because of a recent ruling of the Federal Election Commission we are hereby returning the donation of \$64.80.

Federal regulations prohibit the acceptance of corporate contributions for federal elections.

Your donation was for the beer at our barbeque held October 21, 1978.

We thank you for your time and support.

Sincerely,



Fred B. Pumphrey, Sr.
Chairman

Enclosure

United States of America

and to the REPUBLIC for which it stands!"

DATE: 8/6/79

TIME: 12:20

COMMITTEE: Republican Central Committee of Imperial County

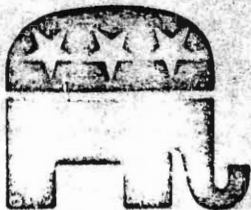
PERSON SPOKEN TO: C.A. Swain, Treasurer (714) 352-6585

FEC'R: Lisa Stolaruk

SUBJECT: Corporate contribution

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8
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REPUBLICAN

Central Committee

of Imperial County

79 146 South 7th El Centro, Calif. 92243
P.O. Box 2552 Phone 352-8250

August 9, 1979

Robert Fiero
Commissioner
Federal Election Commission
Washington, D.C. 20463

Ref: 3SV2/79-21

Dear Mr. Fiero:

Pursuant to your letter dated July 16, 1979 and in reply to our correspondence of May 17, 1979, we are enclosing a copy of a letter to a donor of alleged prohibited contribution and copy of the check.

If further is needed please advise as soon as possible.

Sincerely,

C. A. Swain
Treasurer

August 9, 1979

3 River Land and Cattle Co.
P.O. Box 2389
El Centro, CA 92243

Gentlemen:

Because of a recent ruling of the Federal Election Commission we are hereby returning the donation of \$100.00.

Federal regulations prohibit the acceptance of corporate contributions for federal elections.

Your donation was for our beef barbeque held October 21, 1978.

We thank you for your time and support.

Sincerely,

C. A. Swain
Treasurer

006806100000

REPUBLICAN CENTRAL COMMITTEE
OF IMPERIAL COUNTY
EL CENTRO, CALIF. 92243

3972

BY ENDORSEMENT THIS CHECK WHEN PAID
IN FULL PAYMENT OF THE FOLLOWING:

PAY
TO THE
ORDER OF

3 River Land and Cattle Co.
One hundred and 00/100

8-9

1979

16-4
1220

\$100.00

DOLLARS

SECURITY PACIFIC NATIONAL BANK

El Centro Office

576 Main St., El Centro, CA 92243

⑈003972⑈ ⑆1: 220000043⑆ 369 010740⑈

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100



FEDERAL ELECTION COMMISSION

1125 K STREET NW.
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 1024

Date Filmed 5/16/80 Camera No. --- 2

Cameraman Spe

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