



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1743

Date Filmed 10/29/84 Camera No. --- 2

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FEDERAL ELECTION COMMISSION

4 Blue Cards, Pink Slip, ~~Assignment Sheet~~, Tally Vote Sheet
Assignment Sheet, Address Sheet, Routing Slip, 12 day Report -
6 comment sheets

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act; 5 U.S.C. Section 552(b):

- | | |
|--|---|
| ☐ (1) Classified Information | ☐ (6) Personal privacy |
| ☒ (2) Internal rules and practices | ☐ (7) Investigatory files |
| ☐ (3) Exempted by other statute | ☐ (8) Banking Information |
| ☐ (4) Trade secrets and commercial or financial information | ☐ (9) Well Information (geographic or geophysical) |
| ☐ (5) Internal Documents | |

Signed

Andrew S. McIntire

date

10/22/84

FEC 9-21-77

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SENSITIVE

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

84 SEP 21 12:51

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL BY
OGC TO THE COMMISSION 9-21-84
12:50 pm

MUR 1743
DATE COMPLAINT RECEIVED
BY OCG July 23, 1984
STAFF MEMBER: Andrew Maikovich

COMPLAINANT'S NAME: Gwen Tillemans

RESPONDENTS' NAME: James C. Carey, Jr.
19 W. Micheltorena Street
Santa Barbara, California 93101

James C. Carey, Jr., Inc.
James C. Carey, President
19 W. Micheltorena Street
Santa Barbara, California 93101

Henry W. Mealy, treasurer
Carey for Congress
1522 "A" State Street
Santa Barbara, California 93101

RELEVANT STATUTES: 2 U.S.C. § 441b(a)
2 U.S.C. § 441b(b) (2)
11 C.F.R. § 114.9(a) (2)
11 C.F.R. § 114.9(a) (1) (i) and (iii)

INTERNAL REPORTS CHECKED: Reports of Carey for
Congress Committee

SUMMARY OF ALLEGATIONS

Gwen Tillemans filed a complaint (Attachment 1) on July 23, 1984, alleging that Dr. James C. Carey, Jr., and the Carey for Congress Committee accepted corporate contributions, either in cash or in-kind, from James C. Carey, Jr., Inc., in violation of 2 U.S.C. § 441b(a).

The complaint fails to allege, but it logically follows that James C. Carey, Jr., Inc. violated 2 U.S.C. § 441b(a) if corporate contributions were made to Dr. James C. Carey, Jr., or the Carey for Congress Committee.

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The allegations stem from three incidents: 1) The address and phone number of the Carey for Congress Committee (the "Committee") was the same as those of James C. Carey, Jr., Inc. (the "Corporation"). 2) The Corporation's receptionist worked for the Carey for Congress Committee while on Corporation work time. The complaint alleged the receptionist handed out campaign literature in the office when a visitor asked for campaign information and also answered phone calls to the Carey for Congress Committee. 3) Corporate stationery was used by Dr. Carey when responding to political questions. The complainant enclosed a letter signed by Dr. Carey which is of political concern and bears a Corporate letterhead (Attachment 1, p. 4).

Responses to the allegations were made by Dr. James C. Carey, Jr., (Attachment 2), Victor G. Zilinskas, as designated counsel of Dr. Carey, (Attachment 3), Barbara Jean Carey, Dr. Carey's wife, part-time nurse and receptionist for the Corporation, (Attachment 4) and Henry W. Mealy, treasurer of the Carey for Congress Committee (Attachment 5).

FACTUAL AND LEGAL ANALYSIS

A) FACTS

Dr. James C. Carey, Jr., was a late entrant into the Democratic primary for Representative in California's 19th Congressional District. The Carey for Congress Committee's Statement of Organization, showing \$7,743 in contributions and \$5,071 in expenditures, was dated May 21, 1984, 15 days before

the June 5 primary. The first reported financial activity of the campaign was March 9, 1984.

The Committee's pre-primary address and phone number were identical to those of James C. Carey, Jr., Inc., a professional corporation formed by Dr. Carey, who is its sole practitioner. Statements by Dr. Carey and his wife, Barbara Jean Carey, maintained that the address was used exclusively as a mail drop (Attachment 2, p. 5 and Attachment 4, p. 8). Literature was handed out at Corporate offices on request. Barbara Jean Carey's affidavit maintains this occurred on four or five occasions. According to the complaint, phone calls were answered "Dr. Carey's office." (Attachment 1, p. 2). Campaign materials were not publicly displayed at the office.

Dr. Carey occasionally used personal or corporate funds to pay for primary expenditures. The Committee would then reimburse the purchaser, Dr. Carey or the Corporation. The time period for Committee reimbursements varied. The Committee reimbursed the Corporation \$429 on May 30, for items purchased throughout May (Attachment 6, pgs. 11,12 and 13). The June 8, 1984, reimbursement check totalling \$483.12 was for printing costs and March, April and May long distance telephone bills (Attachment 7, pgs. 14-19). On July 11, 1984, the Committee reimbursed the Corporation \$414.36 for gasoline and printing costs (Attachment 8, p. 20). A final Corporation reimbursement for \$129.18 was made on July 30, 1984, primarily for long distance phone calls (Attachment 9, p. 22).

To reimburse the Corporation, the Committee would endorse a check to Dr. Carey personally, who would then deposit the check directly into a Corporation bank account.

James C. Carey, Jr., won the June 5 Democratic primary over two opponents, garnishing 45.2 percent of the vote.

Committee headquarters moved to 1522 "A" State Street, Santa Barbara, California, on July 13, 1984.

B) LEGAL ANALYSIS

Dr. Carey, the Committee and the Corporation have cooperated in revealing personal files on contributions and expenditures. James C. Carey, Jr., the individual, and James C. Carey, Jr., Inc., the corporation were viewed as one entity in Committee quarterly and primary reports. Using this information, a determination can be made on various issues.

1. Use of Corporate Funds for Campaign Expenses.

Under 2 U.S.C. § 441b(a), it is unlawful for a corporation to make a contribution or expenditure in connection with a Congressional election. It is also unlawful for any officer or director of any corporation to consent to any contribution or expenditure by the corporation. It is correspondingly unlawful for a candidate or political committee to accept corporate contributions. (Id.)

A contribution or expenditure is defined as any direct or indirect payment, distribution, loan, advance, deposit, gift of money, or any services. 2 U.S.C. § 441b(b)(2). James C. Carey, Jr., Inc., purchased a directory, stamps and brochures throughout

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May 1984 (Attachment 6, p. 11). The Corporation was reimbursed \$429 at the end of May. These purchases constitute an advance to the Carey for Congress Committee in violation of 2 U.S.C. § 441b(a).

The Corporation was reimbursed \$483.12 on June 8, 1984, for long distance phone bills paid in March, April and May and for printing costs of date uncertain (Attachment 7, pgs. 14-19). A reimbursement for \$414.36 was made on July 11, 1984, for gasoline and printing costs (Attachment 8, p. 20). A final reimbursement was made on July 31, 1984, for \$129.80, for phone calls and other uncertain purchases (Attachment 9, p. 22). In all three cases, the Corporation advanced money to the Carey for Congress Committee in violation of 2 U.S.C. § 441b(a).

For all reimbursements, James C. Carey, Jr., the individual, was the payee. Dr. Carey directly deposited these funds into a Corporation bank account. The Committee should have endorsed the checks directly to the Corporation.

It is impossible to state categorically whether the Committee reimbursed the Corporation for the stationery enclosed by the complainant (Attachment 1, p. 4). The Office of General Counsel is satisfied, however, that records kept by the Committee and Corporation accurately assessed Corporation expenditures for reimbursement.

Conclusion:

James C. Carey, Jr., Inc., and its President, James C. Carey, Jr. violated 2 U.S.C. § 441b(a) by advancing money restricted by 2 U.S.C. § 441b(b)(2) to the Carey

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for Congress Committee. The Carey for Congress Committee and Henry W. Mealy, treasurer, violated 2 U.S.C. § 441b(a) by accepting said contributions.

2. Use of Corporation Facilities as Campaign Headquarters

Under 2 U.S.C. § 441b(a), it is unlawful for a corporation to make a contribution or expenditure in connection with a Congressional election. It is also unlawful for any officer or director of any corporation to consent to any contribution or expenditure by the corporation. It is correspondingly unlawful for a candidate or political committee to accept corporate contributions. (Id.) A contribution or expenditure is defined as any direct or indirect payment, distribution, loan, advance, deposit, gift of money, or any services. 2 U.S.C. § 441b(b)(2).

It appears that the Corporation was used as campaign headquarters from the beginning of Dr. Carey's candidacy until July 13, 1984, when a separate campaign site was established. The Corporation was used primarily as a mail drop according to Barbara Jean Carey's and Dr. James C. Carey's affidavits (Attachment 4, p. 8 and Attachment 2, p. 5). Corporation facilities were also used, however, to pay bills, make long distance phone calls and distribute literature. Corporation stationery was used for political correspondence.

Corporation facilities may be used by employees and stockholders for individual volunteer activity if it is occasional, isolated or incidental. 11 C.F.R. § 114.9(a). "Occasional, isolated or incidental use" by an employee is

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defined as use which: 1) does not prevent an employee from completing the normal amount of work which that employee usually carries out during such work period; 2) does not exceed one hour per week or four hours per month. (Id.)

The complaint alleges that Barbara Jean Carey would hand out campaign literature upon request. Her affidavit states this occurred on four or five occasions over a period of four to five months. She also stated her duties in handling campaign mail did not exceed one hour per week or four hours per month.

However, 11 C.F.R. § 114.9(a) does not permit a campaign committee to use corporate facilities free of charge as campaign headquarters. The use of Corporation facilities as full-time campaign headquarters is an in-kind corporate contribution under 2 U.S.C. § 441b(a).

Conclusion: James C. Carey, Jr., Inc., and its President, James C. Carey, Jr., violated 2 U.S.C. § 441b(a) by making an in-kind contribution in the form of allowing Corporation facilities to be used as the headquarters for the Carey for Congress Committee. The Carey for Congress Committee, and Henry W. Mealy, treasurer, violated 2 U.S.C. § 441b(a) by accepting said contribution.

RECOMMENDATIONS

Therefore, the Office of General Counsel recommends that the Commission find reason to believe that:

1. James C. Carey, Jr., Inc., and its President, James C. Carey, Jr., violated 2 U.S.C. § 441b(a) by making corporate contributions to the Carey for Congress Committee.

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2. Carey for Congress Committee, and Henry W. Mealy, as treasurer, violated 2 U.S.C. § 441b(a) by knowingly accepting corporate contributions from James C. Carey, Jr., Inc.
3. Approve and authorize the sending of the attached letters.

Charles N. Steele
General Counsel

September 21, 1984
Date

Kenneth A. Gross
By: Associate General Counsel

Attachments

1. Complaint
2. James C. Carey, Jr.'s response
3. Victor G. Zilinskas' response
4. Barbara Jean Carey's response
5. Henry W. Mealy's response
6. Vouchers for first Corporation reimbursement
7. Vouchers for second Corporation reimbursement
8. Vouchers for third Corporation reimbursement
9. Voucher for fourth Corporation reimbursement
10. Letters to Respondents

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GWEN TILLEMANS
Chairman

KATHERINE M. HALEY
Treasurer

DIANE KLINGER
Secretary

J. WILLIAM BEAVER
A.J. DIANI

GEORGEANNE FERINI
ELDON H. HASKELL

MARTHA HICKEY
MARIAN KOONCE

SAMU MIRAMI
CAROLYN SCHULTZ

Vice-Chmn., Santa Barbara Co.

R.R. "HOOT" BENNETT
AL A. GULIN

FRANCIS W. JOHNSON
OSCAR JOHNSON

PAUL LEAVENS, JR.
LEONARD ORTIZ

ALAN TEAGUE
Vice-Chmn., Ventura Co.

MARIAN KOONCE

Finance Chmn., Santa Barbara Co.

FRANCIS W. JOHNSON

Finance Chmn., Ventura Co.

RE-ELECT Lagomarsino TO CONGRESS

84 JUL 28 09:02

MUR 1743

July 17, 1984

GCC #4109

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

Sirs:

I am Gwen Tillemans, Chairman of the Committee to Re-Elect Congressman Lagomarsino, P.O. Box 23, Santa Barbara, CA 93102.

I am filing a complaint, under 11 CFR, against James C. Carey, Jr., Democrat Nominee for U.S. Representative, 19th Congressional District of California; against James C. Carey, Jr., Inc., and against the Carey for Congress Committee; all located at 19 W. Micheltorena, Santa Barbara, CA 93101.

The essence of the complaint is that candidate Carey and his campaign committee have and are continuing to accept contributions, in cash or in kind, from James C. Carey, Jr., Inc., in violation of federal laws and regulations which prohibit corporate contributions to candidates for the office of U.S. Representative.

Attached is a copy of a letter written on an issue of political concern and signed as follows:

James C. Carey, Jr., M.D.
Democratic Nominee for U.S. Representative
19th Congressional District

JCC/bjc

The letter is typed on stationery bearing the letterhead and address:

James C. Carey, Jr., Inc.
Plastic and Reconstructive Surgery
19 W. Micheltorena St.
Santa Barbara, CA 93101
(805)965-1051

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The letter indicates that a copy was sent to a local newspaper.

Also enclosed is a copy of a political pamphlet on behalf of candidate Carey and bearing the legend:

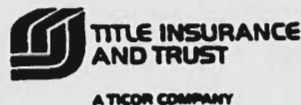
Paid for and authorized by the Carey for Congress Committee, 19 W. Micheltorena, Santa Barbara, CA 93101. (805)965-1051.

19 W. Micheltorena in Santa Barbara, the address listed on the campaign material, is the actual location of Dr. Carey's medical corporation office. The phone number for both the medical corporation and the campaign committee is the same: when a call is placed to the number, it is answered: "Dr. Carey's office." When a visitor goes into the medical corporation office and asks for campaign materials, the material is provided by the medical office receptionist. Clearly, James C. Carey, Jr., Inc. is providing a contribution in cash or in kind to candidate James C. Carey, Jr. and/or the Carey for Congress Committee, in violation of federal law.

I do hereby swear that the information contained in this letter is true to the best of my personal knowledge.

Gwen Tillemans
Gwen Tillemans, Chairman
Committee to Re-Elect Congressman
Lagomarsino

TO 447 CA (4-73)
(Individual)



STATE OF CALIFORNIA }
COUNTY OF VENTURA } SS.

On JULY 19, 1984 before me, the undersigned, a Notary Public in and for said State, personally appeared

GWEN TILLEMANS

known to me

to be the person whose name IS subscribed to the within instrument and acknowledged that she executed the same.

WITNESS my hand and official seal.

Signature *Herbert D. Nowlin*

HERBERT D. NOWLIN
Name (Typed or Printed)



(This area for official notarial seal)

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STAPLE HERE

(2)

THE WOMEN'S MOVEMENT HAS JUST BEGUN

Can we talk here? . . . The Law of Political Survival states that one simply cannot turn one's back on voters and expect their support.

Unfortunately for incumbent Congressman BOB LAGOMARSINO, by voting AGAINST EQUALITY FOR WOMEN last November, he's turned his back on women throughout our 19th District, regardless of race, religion, socio-economic background or political affiliation. (The Equal Rights Amendment to the Constitution, which would guarantee legal equality for women, is today supported by 8 of 10 Democratic women and men, and by 5 of 10 Republican women and men.)

Therefore, come November 6th, Mr. Lagomarsino may have to learn--the hard way--that he simply cannot ignore the increasing commitment of a majority of women and men to a new agenda of equity and fairness.

For when women throughout our progressive District next go to the polls to choose whom they wish representing their best interests in Congress, they may well turn to a new leader . . . with new vision and new ideas about 1) equal pay for equal work; 2) an end to discrimination in promotions, in one's ability to earn enough to support herself, and in getting skilled-labor jobs, and 3) termination of discriminatory practices regarding equity in credit, pensions, insurance rates, and other areas.

Democratic Congressional nominee DR. JIM CAREY-- father of six daughters he praises for their "courage, intelligence, fairness and compassion"--is an uncompromising supporter of women's equality and comparable-pay issues; fully supports Rep. Pat Schroeder's economic equity bill (H.R. 2090) and the Nondiscrimination in Insurance Act (H.R. 100), and following his election to Congress on November 6th, vows to co-sponsor reintroduction of the Equal Rights Amendment "until that body finally makes it the Law of our land."

Looking toward the future, Doctor Carey warns "stale" politicians like Bob Lagomarsino and others who miscalculate that the women's movement has peaked: "The movement has just begun for women's economic, social and legal equality. And anyone who doesn't understand that doesn't deserve to represent women in the Congress of our great nation in the challenging '80s and '90s."



Geraldine Ferraro, Diane Feinstein, Pat Schroeder, and his own six daughters urge you to support and work for Dr. Jim

CAREY FOR CONGRESS

. . . as do Walter Mondale, Gary Hart, Jesse Jackson, Alan Cranston, Ted Kennedy, Tip O'Neill, Jim Wright, (State Sen.) Gary K. Hart, Jack O'Connell, and a host of other women and men far too numerous to mention here. Together, we can control our future. And wild horses should not keep us from it!

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James C. Carey, Jr., Inc.
Plastic and Reconstructive Surgery

June 8, 1984

Supervisor Robert Kallman
105 E. Anapamu St.
County Supervisors Office
Santa Barbara, CA 93101

Dear Supervisor Kallman:

I strongly support efforts to lessen the devastating impacts of the planned oil development in the Santa Barbara County area. I support the consolidation of oil processing and support facilities, the proposed oil pipelines, limiting of tanker use, and other measures which you deem appropriate.

Thank you.

Sincerely,

James C. Carey, Jr., M.D.
Democratic Nominee for U.S. Representative,
19th Congressional District

JCC/bjc

C.C. News Press City Editor

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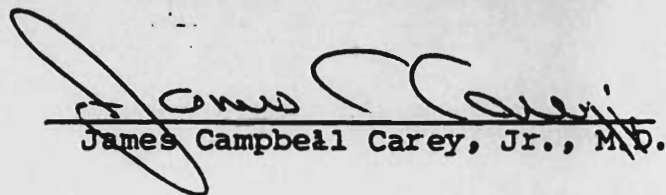
Attachment II

AFFIDAVIT OF JAMES CAMPBELL CAREY, JR., M.D.

I James Campbell Carey, Jr., M.D., declare as follows:

The address on my campaign literature, the same as my medical corporation office, was used only as a mail drop and did not exceed one hour per week as corporate facilities, or interfere with activities or overhead of the corporation.

I declare, under penalty of perjury, that the above is true and correct and that, if called as a witness, I could competently testify to the facts I have set forth above. This declaration is executed on August 14, 1984, in Santa Barbara, California.


James Campbell Carey, Jr., M.D.

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Attachment 3

600-44323
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VICTOR S. ZILINSKAS
JEFFREY HARDING
ROBERT J. BRANTNER
ROBERT A. MULLER
OF COUNSEL
CHARLES B. VOORNIS, II

HARDING & ZILINSKAS
ATTORNEYS AT LAW
200 EAST CARRILLO STREET, SUITE 200
POST OFFICE BOX 300
SANTA BARBARA, CALIFORNIA 93102
AREA CODE 805
TELEPHONE 963-4351

VENTURA OFFICE
274 COUNTY SQUARE DRIVE, SUITE 200 F
VENTURA, CALIFORNIA 93003
AREA CODE 805
TELEPHONE 688-7223

PLEASE REPLY TO
Santa Barbara

August 9, 1984

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

Attn: Kenneth A. Gross
Associate General Counsel

Re: MUR 1743

Dear Mr. Gross:

Dr. Carey has asked me to respond to your letter, and the enclosures, dated July 25, 1984. As such, I am enclosing the Statement of Designation of Counsel executed by Dr. Carey.

I have carefully reviewed the "complaint" brought by Congressman Lagomarsino's chairman, Mrs. Gwen Tillerman, and would like to bring to your attention the following:

1. Dr. James C. Carey, Jr., is a physician practicing in Santa Barbara with his offices located at 19 W. Micheltorena Street in that city. Many years ago he formed a professional corporation under the laws of the State of California.

He is the president and the treasurer of that corporation. The only real asset of that corporation is Dr. Carey's medical practice and he is the only person that receives the earnings generated by his practice.

2. Dr. Carey's wife, Barbara Jean Carey, works as his receptionist and surgical assistant. She is also active in Dr. Carey's campaign.

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Kenneth A. Gross
August 9, 1984
Page 2.

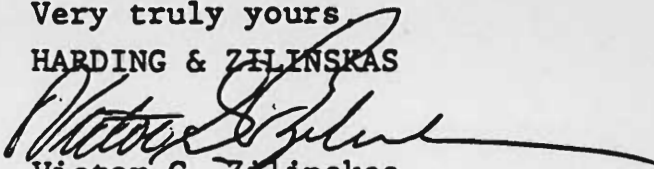
3. Before Dr. Carey's victory in the primary election, his office address was listed as the address of Carey for Congress Committee. However, that address served as nothing but a mail-drop.
4. The letter Dr. Carey sent to Mr. Kallman did list his office address. However, that address, as noted above, was only a mail-drop.
5. Any election expenses incurred by Dr. Carey's professional corporation has been paid for by the Carey for Congress Committee; cancelled checks are available.
6. There are no campaign stickers attached to Dr. Carey's office windows or walls, etc. However, campaign literature is available on request, but is not publically displayed. But Dr. Carey's wife is happy to give campaign materials to anyone who asks. (The complaint is a sworn statement based on personal knowledge. One wonders at the propriety shown by an individual who comes to the doctor's office, who asks for campaign literature, and then files a complaint because the request is granted.)
7. All in all, James C. Carey, Jr., M.D., James C. Carey, Jr., Democratic Nominee for U.S. Representative and James C. Carey, Jr., Inc., are all the same and one. Neither the letter nor the spirit of the applicable law has been violated by Dr. Carey.

Your letter notes that this matter is to remain confidential unless we wish to make the matter public. I don't think our wishes one way or the other matter much since Congressman Lagomarsino issued a press release making the charges contained in the complaint. I request that you advise us if this is proper conduct.

In conclusion, we request that you advise if there are any additional facts or documentation that we can provide you. Further, we do want a fair and full public hearing and determination of the "complaint" and request that Congressman Lagomarinso be invited to participate.

These matters need to be cleared up as soon as possible since Congressman Lagomarinso has already made the charges public and is making political mileage out of them.

Very truly yours,
HARDING & ZILINSKAS


Victor G. Zilinskas

VGZ/sh

AFFIDAVIT OF BARBARA JEAN CAREY

1
2 I, Barbara Jean Carey, declare as follows:

3 I reside at 1667 Las Canoas Road, Santa Barbara, California,
4 and I am the wife of James C. Carey, Jr., Democratic Candidate
5 for U.S. Representative of the 19th District.

6 I am a registered nurse and I work part-time for James C.
7 Carey, Jr., M.D., Inc., as a nurse and secretary. I also do
8 volunteer work for my husband's campaign. I am not paid for
9 working on his campaign by anyone. Further, the work I do on
10 his campaign does not interfere with any part-time employment
11 with my husband's professional corporation.

12 In the last four or five months, four or five people have
13 come to my husband's office and asked for campaign literature.
14 I recall one woman, who I believe is the one that filed the com-
15 plaint, came in and said she had obtained one piece of campaign
16 literature and wanted more. At her request, I gave her a flyer.
17 (The other three or four people are known to me. This woman I
18 am discussing is the only one I do not know.)

19 The address of my husband's corporation was included on
20 some campaign literature, but it is not being done any longer.
21 That mailing address was nothing but a maildrop since, at that
22 time, we had no campaign office.

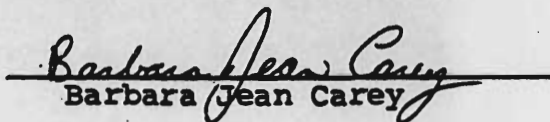
23 I did not utilize any of the time for which I am paid for
24 by my husband's corporation in handling mail that would come in
25 that related to his campaign.

26 My husband's corporation was re-paid any expenses it in-
27 curred in my husband's campaign--specifically, the corporation
28 was paid back for long-distance telephone calls, gasoline ex-

penses, postage expenses, office supplies and copying expenses.
I am attaching cancelled checks to show this.

It is my opinion that my husband's corporation has not
suffered any financial detriment, or incurred any additional ex-
penses as the result of my husband's campaign.

I declare, under penalty of perjury, that the above is true
and correct and that, if called as a witness, I could competently
testify to the facts I have set forth above. This declaration is
executed on August 14, 1984, in Santa Barbara, California.


Barbara Jean Carey

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Attachment 5

HENRY W. MEALY
2525 BORTON DRIVE
SANTA BARBARA, CA 93109

BCC #4327
RECEIVED AT THE FEC
Aug 9, 1984
34 AUG 13 12: 11

Federal Election Commission
1325 K Street, N.W.

Washington, D.C. 20463

ATTN: KENNETH A. GROSS, ASSOCIATE GENERAL COUNSEL

RE: MUR 1743

Dear Mr. Gross:

In reply to your letter of July 25, 1984, I am enclosing a copy of a letter dated August 9, 1984 from Victor Zilinskas, counsel for Dr. James C. Carey Jr. Inasmuch as Dr. Carey and I have received the same complaint, I am hoping that the letter from Mr. Zilinskas will suffice for the both of us. I have reviewed the Zilinskas letter carefully, and find the facts therein to be correctly stated. I respectfully request that no action be taken against the committee or against me individually or as treasurer in this matter.

I can understand why Dr. Carey, the candidate, might want a public hearing on this matter - since he has already been portrayed as guilty in recent radio and newspaper statements that I personally observed.

If you have any further questions of me, please contact me at my home address above.

Sincerely,
Henry W. Mealy

(10)

Attachment 6

#114

CAMPAIGN EXPENDITURES PAID THRU OFFICE

DATE	PAID TO	FOR	AMOUNT
5-1-84	Community Resources	Directory of Social Services	\$17.00
5-18-84	Joe Bruketta	Typesetting & designing of brochure	\$82.10
5-19-84	Bill's Copy Shop	Political Printing	\$49.90
5-22-84	Postmaster	Stamps for political mailing	\$100.00
5-24-84	"	"	\$40.00
5-25-84	Postmaster	Permit to mail without affixing postage stamps	\$40.00
5-25-84	Postmaster	Stamps	\$100.00

\$429.00

#114 - PR

U. S. POSTAL SERVICE
CASH RECEIPT

RECEIVED FROM _____

THE SUM OF \$100.00

FOR _____ Dollars, 100

BY (Signature and title) _____

PS Form Jan. 1971 1096

U. S. G. P. O. 1983-5-6-628

MAY 1984

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7 0 0 SET FILED
CAREY FOR CONGRESS
NUMBER 114
May 30 1984 90-2050/1222
PAY TO THE ORDER OF James B. Carey \$ 429.00
Four Hundred Twenty Nine and 00/100 DOLLARS
SANTA BARBARA BANK & TRUST
DOWNTOWN OFFICE
20 East Carrillo Street, Santa Barbara, Calif. 93101
MEMO
⑆122220593⑆0114⑆01324 334⑆
Henry W. Mesby
⑆0000042900⑆

Postage, etc - (see attached detail)

10-1A TO THE ORDER OF
 THE BANK OF MONTECITO
 DEPOSIT ONLY
 JAMES H. CAREY JR. M.D., INC.
 1220-000-812
 JE 84
 F.B.I. LOS ANGELES
 61-01

42LSM01LA

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90-3478
 JUN 11 1984
 BANK OF MONTECITO
 90-3478

LNMS1L01A

#24
 JUN 04 '84
 90-3478

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Attachment 7

CAREY FOR CONGRESS

NUMBER
125

June 8 1984

PAY TO THE ORDER OF James Carey \$ 483.12

Four Hundred Eighty Three and 12/100 DOLLARS

PAID

SANTA BARBARA BANK & TRUST
DOWNTOWN OFFICE
20 East Carrillo Street, Santa Barbara, Calif. 93101

MEMO Henry W. Weedy

⑆122220593⑆0125⑆01324 334⑆ ⑆0000048312⑆

Telephone + Printing (detail attached)

84040482574

84040482576

BILL'S COPY S. OP.
"A Complete Copying Service"
1501 STATE ST., SUITE C
SANTA BARBARA, CA 93101
(805) 962-5448

ACCOUNTS NAME AND ADDRESS:

JAMES C. CAREY JR. M.D. INC.
19 W. Micheltorena St.
Santa Barbara, CA 93101

PHONE **965-1051**

160.93

Pay to James C. Carey
for reimbursement

GENERAL TELEPHONE COMPANY OF CALIFORNIA
An Equal Opportunity Employer

P.O. BOX 3400, SANTA BARBARA, CA 93130

NAME: **CAREY MD, JAS, C** DIVISION CODE: **71373** ACCOUNT NUMBER: **965-1051** DATE: **APR 04, 1984**

SEE REVERSE SIDE FOR GENERAL EXPLANATIONS.

302PM	3/21	NOVATO	CA	415	892-2386	2	DD	1.07
		FROM-			966-1262			
1125AM	3/23	VENTURA	CA	805	642-6788	1	DD	.24
		FROM-			966-1262			
1208PM	3/26	WASHINGTON	DC	202	822-0661	5	DD	2.70
		FROM-			966-1262			
128PM	3/27	SAN FRAN	CA	415	863-4333	1	DD	.62
		FROM-			966-1262			
931AM	3/27	LA JOLLA	CA	619	456-2661	7	DD	3.08
		FROM-			966-1262			
122PM	3/27	OCEANSIDE	CA	619	729-8251	5	DD	2.13
		FROM-			966-1262			
941AM	3/27	SACRAMENTO	CA	916	381-1325	1	DD	.62
		FROM-			966-1262			
1104AM	3/28	LOSANGELES	CA	213	851-4930	8	DD	2.73
		FROM-			966-1262			
1141AM	3/29	THOUSAOAKS	CA	805	497-0103	1	DD	.38
		FROM-			966-1262			

* * SUBTOTAL \$103.34

***TOTAL LONG DISTANCE CHARGES \$150.62

BILLING SURCHARGE 33.81

PUC FUNDING PER RESOLUTION M-4727 .17

FEDERAL EXCISE TAX 8.35

SANTA BARBARA CITY TAX 14.15

911 STATE TAX .92

***TOTAL CHARGES CURRENT MONTH \$343.71

TOTAL DUE 877.49

A LATE PAYMENT CHARGE WILL APPLY IF
PAYMENT IS NOT RECEIVED BY APR 28, 1984

*****FOR BILLING INQUIRIES CALL AT NO CHARGE 1 800 223-6177*****

no bill of 111 out
Billed 4-4-84

40-35

DETACH HERE RETURN LOWER PORTION WITH PAYMENT IN THE ENCLOSED ENVELOPE

FEDERAL EXCISE TAX 9.02
SANTA BARBARA CITY TAX 17.73
711 STATE TAX 1.21

***TOTAL CHARGES CURRENT MONTH \$366.36
TOTAL DUE 370.81

A LATE PAYMENT CHARGE WILL APPLY IF
PAYMENT IS NOT RECEIVED BY MAY 30, 1984

*****FOR BILLING INQUIRIES CALL AT NO CHARGE 1 800 223-6177*****

DETACH HERE RETURN LOWER PORTION WITH PAYMENT IN THE ENCLOSED ENVELOPE

PLEASE DO NOT STAPLE

FOR BILLING INQUIRIES
CALL AT NO CHARGE

1 800 223-6177

PLEASE INDICATE AMOUNT PAID

\$

AMOUNT DUE
370.81

DO NOT SEND CASH

PLEASE DEDUCT ANY PART OF THIS BILL WHICH HAS BEEN PAID

773

CAREY MD, JAS. C
19 W. MICHELTORENA ST
SANTA BARBARA CA

ACCOUNT NUMBER
965-1051

1984
PAYMENT DUE BY

93101

*Month of April
Billed 5-4-84*

106.76

71373 96501051 840126 762790 3 00037081 1 06 26 H

175.00

O. T

175.08 +
106.76 +
40.35 +
160.93 +
483.12 T

#125

84040482579

DETACH HERE RETURN LOWER PORTION WITH PAYMENT IN THE ENCLOSED ENVELOPE

PLEASE DO NOT STAPLE

FOR BILLING INQUIRIES
CALL AT NO CHARGE

1 800 223-6177

PLEASE INDICATE AMOUNT PAID

\$

430.11

DO NOT SEND CASH

PLEASE DEDUCT ANY PART OF THIS BILL WHICH HAS BEEN PAID

773

CAREY MD, JAS. G
19 W. MICHELTORENA ST
SANTA BARBARA CA

93101

ACCOUNT NUMBER
965-1051

JUN 15 1984

PAYMENT DUE BY

Month of May

71373 96501051 840126 762790 3 00043011 1 06 26

NOTE: These are last pages of
previous bills to Dr. Carey's office.
The dated bill to Dr. Carey's office, but
office. Paid herein check 10/15
are the long distance calls
relating to election campaign.

Mon & 8 May

Billed 6-4-84

175.08

Attachment

CAREY FOR CONGRESS
49 JO MICHAEL TORENA ST. 2
SANTA BARBARA, CA 93101

11 1984

1000000.1436

1222205930 01332 774

000000.1436

Reimburse: Gasoline \$ 330.20
Printing (LUND'S) 84.16
OFFICE SUPPLIES 414.36
L Retain on file 7.

84040482580

8 4 0 4 0 4 8 2 5 8 1

12

10-10 PAY TO THE ORDER OF
BANK OF MONTECITO
FOR DEPOSIT ONLY
SAMUEL C. CAREY JR. M.D., INC.
192-009-2812 1 2 0
JY 1968
P.R. LOS ANGELES
1200-000-1111
90-3478 90-3478
PAYEE'S BANK, P.A.C. 10
1200-000-1111

90-3478 90-3478

JUL 13 1968
FEDERAL RESERVE BANK
SAN FRANCISCO, CALIF.

GOLETA WAS ONCE MEGALITAN

The members of the Portola Expedition of 1769 were the first Europeans to reach the "Good Land" of the Goleta Valley. They found what would be California's largest city forming a Stone Age megalopolis around the borders of the Goleta estuary. Portola encamped on the north rim of a deep-water bay near the present intersection of Fairview and Hollister Avenues. He reported more than a thousand Indians dwelling on tiny Mescalito Island at the mouth of the estuary. Only a fragment of the island remains today. In 1943 it was bulldozed to provide fill dirt for the airport runway.

Walker A. Tompkins

0.54 +
0.51 +
1.97 +
1.15 +
2.07 +
0.62 +
0.99 +
0.62 +
1.07 +
1.97 +
0.24 +
0.24 +
0.30 +
0.62 +
1.74 +
0.42 +
4.12 +
0.60 +

Reimburse
Office

Attachment 9C

Reimburse office

ended for
this copy.
balance.

150

Mobi

SOLD

TICKE

SOLD

25.60
103.58
129.18

150

Pl. to Office on 7/30/84 -
No cancelled check
available till 8/31.

CUSTOMER

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DETACH HERE RETURN LOWER PORTION WITH PAYMENT IN THE ENCLOSED ENVELOPE

PLEASE DO NOT STAPLE

FOR BILLING INQUIRIES
CALL AT NO CHARGE

PLEASE INDICATE AMOUNT PAID

\$

AMOUNT DUE

DO NOT SEND CASH

PLEASE DEDUCT ANY PART OF THIS BILL WHICH HAS BEEN PAID

ACCOUNT NUMBER

CAREY MD, JAS. C

PAYMENT DUE BY

71373 96501051 840126 772790 3 00000000 1 00 00

H

22



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO:

CHARLES N. STEELE, GENERAL COUNSEL

FROM:

MARJORIE W. EMMONS/THERESE M. GREYER *JB*

DATE:

THURSDAY, SEPTEMBER 27, 1984

SUBJECT:

¹⁷⁴³
MUR ~~1741~~ FIRST GENERAL COUNSEL REPORT
DATED SEPTEMBER 21, 1984.

The above-named document was circulated to the
Commission on Monday, September 24, 1984.

Objections have been received from the Commissioners
as indicated by the name(s) checked:

Commissioner Aikens	<u> X </u>
Commissioner Elliott	<u> </u>
Commissioner Harris	<u> </u>
Commissioner McDonald	<u> </u>
Commissioner McGarry	<u> </u>
Commissioner Reiche	<u> </u>

This matter will be placed on the Executive Session
agenda for Tuesday, October 2, 1984.

84040482583



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 18, 1984

Gwen Tillemans
Committee to Re-Elect Congressman Lagomarsino
P.O. Box 23
Santa Barbara, California 93102

RE: MUR 1743

Dear Ms. Tillemans:

The Federal Election Commission has reviewed the allegations contained in your complaint dated July 17, 1984. The Commission considered your complaint on October 2, 1984, and found reason to believe that a violation of the Federal Election Campaign Act of 1971, as amended ("the Act"), was committed.

Due to the circumstances in the case, however, the Commission has decided to close the file in this matter. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Should further information come to your attention which you believe establishes a violation of the Act, please contact Andrew Maikovich, the staff member assigned to this matter at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
First General Counsel's Report

84040482534



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 12, 1984

Carey for Congress Committee
Henry W., Mealy, Treasurer
1522 "A" State Street
Santa Barbara, California 93101

RE: MUR 1743

Dear Mr. Mealy: ..

On October 2, 1984, the Commission found reason to believe that Carey for Congress Committee and you, as treasurer, had violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file.

The file in this matter will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that a corporation advancing money to a political committee nevertheless appears to be a violation of 2 U.S.C. § 441b(a). You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to Andrew Maikovich, the attorney staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Lee Ann Elliott
Lee Ann Elliott
Chairman

Enclosure:

1. First General Counsel's Report

84040482585



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 12, 1984

Victor G. Zilinskas
200 E. Carrillo Street, Suite 205
Santa Barbara, California 93102

MUR 1743

Dear Mr. Zilinskas:

On October 2, 1984, the Commission found reason to believe that Carey for Congress Committee and your client, James C. Carey, Jr., violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file.

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The Commission reminds you that a corporation advancing money to a political committee nevertheless appears to be a violation of 2 U.S.C. § 441b(a). You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to Andrew Maikovich, the attorney staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Lee Ann Elliott
Chairman

Enclosure:

1. First General Counsel's Report

84040482586



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Carey for Congress Committee
Henry W., Mealy, Treasurer
1522 "A" State Street
Santa Barbara, California 93101

RE: MUR 1743

Dear Mr. Mealy: ~

On October 2, 1984, the Commission found reason to believe that Carey for Congress Committee and you, as treasurer, had violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file.

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The Commission reminds you that a corporation advancing money to a political committee nevertheless appears to be a violation of 2 U.S.C. § 441b(a). You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to Andrew Maikovich, the attorney staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Enclosure:

1. First General Counsel's Report

AM

84040482587



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Victor G. Zilinskas
200 E. Carrillo Street, Suite 205
Santa Barbara, California 93102

MUR 1743

Dear Mr. Zilinskas:

On October 2, 1984, the Commission found reason to believe that Carey for Congress Committee and your client, James C. Carey, Jr., violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file.

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The Commission reminds you that a corporation advancing money to a political committee nevertheless appears to be a violation of 2 U.S.C. § 441b(a). You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to Andrew Maikovich, the attorney staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Enclosure:

1. First General Counsel's Report

AM

84040482538

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

James C. Carey, Jr.)

James C. Carey, Jr., Inc.)

Henry W. Mealy, treasurer)

MUR 1743

CERTIFICATION

I, Mary W. Dove, Recording Secretary for the Federal Election Commission Executive Session of October 2, 1984, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 1743:

1. Find reason to believe that James C. Carey, Jr., Inc., and its President, James C. Carey, Jr., violated 2 U.S.C. § 441b(a) by making corporate contributions to the Carey for Congress Committee but take no further action.
2. Find reason to believe that Carey for Congress Committee, and Henry W. Mealy, as treasurer, violated 2 U.S.C. § 441b(a) by knowingly accepting corporate contributions from James C. Carey, Jr., Inc. but take no further action.
3. Close the file.
4. Approve and authorize the sending of the letters attached to the General Counsel's September 21, 1984, report as amended in the meeting of October 2, 1984.

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

Attest:

10-2-84
Date

Mary W. Dove
Mary W. Dove
Recording Secretary

84040482589

HARDING & ZILINSKAS

ATTORNEYS AT LAW
200 EAST CARRILLO STREET, SUITE 208
POST OFFICE BOX 390
SANTA BARBARA, CALIFORNIA 93102
AREA CODE 805
TELEPHONE 963-4351

VICTOR G. ZILINSKAS
JEFFREY HARDING
ROBERT J. BRANTNER
ROBERT A. MULLER
OF COUNSEL
CHARLES B. VOORHIS, II

VENTURA OFFICE
674 COUNTY SQUARE DRIVE, SUITE 208 F
VENTURA, CALIFORNIA 93003
AREA CODE 805
TELEPHONE 998-7823

PLEASE REPLY TO
Santa Barbara

August 22, 1984

Gcc
#4418

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

Attn: Andrew Maikovich

Re: MUR 1743

Dear Mr. Maikovich:

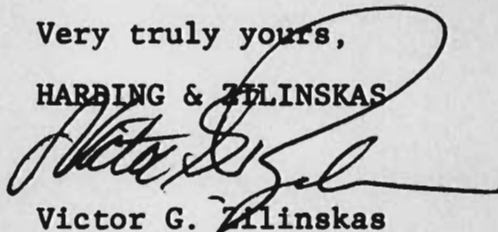
I am sending the enclosed checks by registered mail since they are the original cancelled checks. As you can see the endorsements on the back are for James C. Carey, Jr., M.D., Inc.

Please return these checks by registered mail once you have examined them.

If we can provide any further information to lay this entire matter to rest, then please advise.

Very truly yours,

HARDING & ZILINSKAS


Victor G. Zilinskas

VGZ/sh

Enclosure(s)
Registered Receipt Requested

cc: James Carey, M.D.

84040482590

14 AUG 23 AM 10
RECEIVED
GENERAL COUNSEL
OFFICE OF THE
ATTORNEY GENERAL

CAREY FOR CONGRESS

NUMBER
114

PAY TO THE
ORDER OF

James B. Carey Jr.
Four Hundred Twenty Nine and $\frac{00}{100}$ — DOLLARS

SANTA BARBARA BANK & TRUST
DOWNTOWN OFFICE
20 East Carrillo Street, Santa Barbara, Calif. 93101

MEMO

⑆122220593⑆0114⑆01324 334⑆

⑆0000042900⑆

Henry W. Mealy

CAREY FOR CONGRESS

NUMBER
125

PAY TO THE
ORDER OF

James Carey Jr.
Four Hundred Eighty Three and $\frac{12}{100}$ — DOLLARS

SANTA BARBARA BANK & TRUST
DOWNTOWN OFFICE
20 East Carrillo Street, Santa Barbara, Calif. 93101

MEMO

⑆122220593⑆0125⑆01324 334⑆

⑆0000048312⑆

Henry W. Mealy

CAREY FOR CONGRESS
19005 MICHAEL TOREVA ST. 2
SANTA BARBARA, CA 93101

#136

Pay to the order of James B. Carey Jr.
Four Hundred Fourty Four and $\frac{36}{100}$ — Dollars

SANTA BARBARA BANK & TRUST
DOWNTOWN OFFICE
20 East Carrillo Street, Santa Barbara, Calif. 93101

⑆122220593⑆01332 774⑆

⑆0000041436⑆

Henry W. Mealy

18-18 PAY TO THE ORDER OF
BANK of MONTECITO
FOR DEPOSIT ONLY
C. CAREY JR. M.D. INC.
192-009-812 1 2 0
JY 84 16
P.M. LOS ANGELES
1220-0018
90-3473 90-3478
PAY TO THE ORDER OF
C. CAREY JR. M.D. INC.
192-009-812
90-3473 90-3478

11-31
JUL 13 84
P.M. LOS ANGELES
1220-0018

GOLETA WAS ONCE MEXICAN CALIFORNIA

The members of the Portola Expedition of 1769 were the first Europeans to reach the "Good Land" of the Goleta Valley. They found what was then California's largest city forming a Stone Age megalopolis around the borders of the Goleta estuary. Portola encamped on the north rim of a deep-water bay near the present intersection of Fairview and Hollister Avenues. He reported more than a thousand Indians dwelling on tiny Me-calitan Island at the mouth of the estuary. Only a fragment of the island remains today. In 1913 it was bulldozed to provide fill dirt for the airport runways.

—Walker A. Tompkins

8 4 0 4 0 4 8 2 5 9 2
JE 84 13
P.M. LOS ANGELES
1220-0018
PAY TO THE ORDER OF
BANK of MONTECITO
FOR DEPOSIT ONLY
C. CAREY JR. M.D. INC.
192-009-812

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90-3473 90-3478
PAY TO THE ORDER OF
BANK of MONTECITO
FOR DEPOSIT ONLY
C. CAREY JR. M.D. INC.
192-009-812

JUN 12 84

18-18 PAY TO THE ORDER OF
THE BANK of MONTECITO
FOR DEPOSIT ONLY
JAMES C. CAREY JR. M.D. INC.
192-009-812
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P.M. LOS ANGELES
1220-0018

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90-3473 90-3478
PAY TO THE ORDER OF
BANK of MONTECITO
FOR DEPOSIT ONLY
JAMES C. CAREY JR. M.D. INC.
192-009-812

JUN -4 84

#24
JUN 04 84
90-3478
2

84040482593

CAREY FOR CONGRESS

NUMBER

116

1984

80-2550/1222

PAY TO THE
ORDER OF

James Carey

Two Hundred Four

1820

\$ 204.00

DOLLARS

SANTA BARBARA BANK & TRUST

DOWNTOWN OFFICE

20 East Carrillo Street, Santa Barbara, Calif. 93101

MEMO

Reimb KOB

Henry W. Neely

01222205931011601324 334

0000020400

Personal Reimbursement

8 4 0 4 0 4 8 2 5 9 4

412217312

PAY TO THE ORDER OF
THE BANK OF MONTICELLO
FOR DEPOSIT ONLY
JAMES O. CAREY JR. M.D.
792 - 009 - 812

JE BT 07

3404
34 AUG 23 10:10
HARDING & ZILINSKAS

ATTORNEYS AT LAW

101 ST CARRILLO STREET, SUITE 208

POST OFFICE BOX 380

SANTA BARBARA, CALIFORNIA 93102

RECEIVED AT THE FEC
HAND DELIVERED

84 AUG 23 9:43

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

Attn: Andrew Maikovich

CERTIFIED

P 717 013 769

MAIL

VICTOR G. ZILINSKAS
JEFFREY HARDING
ROBERT J. BRANTNER
ROBERT A. MULLER
OF COUNSEL
CHARLES B. VOORHIS, II

HARDING & ZILINSKAS
ATTORNEYS AT LAW
200 EAST CARRILLO STREET, SUITE 205
POST OFFICE BOX 390
SANTA BARBARA, CALIFORNIA 93103
AREA CODE 805
TELEPHONE 963-4351

6664627
RECEIVED AT THE FEC
84 SEP 10 10:27
VENTURA OFFICE
674 COUNTY SQUARE DRIVE, SUITE 208 F
VENTURA, CALIFORNIA 93003
AREA CODE 805
TELEPHONE 658-7223

PLEASE REPLY TO
Santa Barbara

September 5, 1984

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

Attn: Andrew Maikovich

Re: MUR 1743

Dear Mr. Maikovich:

This letter will serve to confirm the telephone conversation with our office in which we informed you that Dr. James Carey's new address is as follows:

Carey for Congress
1522 "A" State Street
Santa Barbara, CA 93101
(805) 963-1504

This will also confirm that he has been situated at this address since July 13, 1984.

If we can provide any further information, then please advise.

Very truly yours,

HARDING & ZILINSKAS

Victor G. Zilinskas
(S.H.)
Victor G. Zilinskas

VGZ/sh

RECEIVED
OFFICE OF THE
GENERAL COUNSEL
34 SEP 10 10:48

84040482596

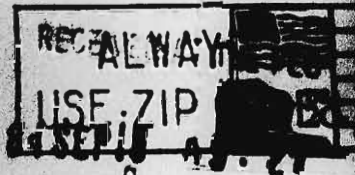
9404048252
HARDING & ZILINSKAS

ATTORNEYS AT LAW

10 EAST CARRILLO STREET, SUITE 205

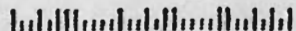
POST OFFICE BOX 390

SANTA BARBARA, CALIFORNIA 93102



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

Attn: Andrew Maikovich





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 27, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

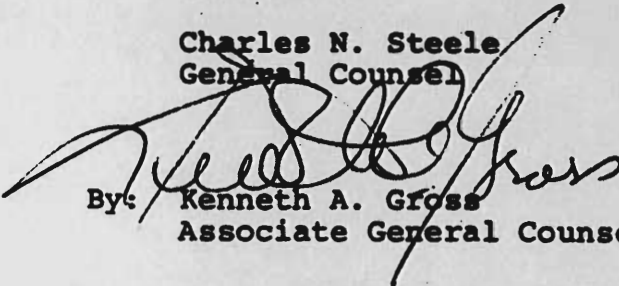
Victor G. Zilinskas
HARDING & ZILINSKAS
Attorneys at Law
200 East Carrillo Street, Suite 205
P.O. Box 390
Santa Barbara, California 93102

Dear Mr Zilinskas:

In reference to your August 22, 1984, letter, you requested that we send back your original cancelled checks. Enclosed you will find the checks.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosures

84040482598

VICTOR G. ZILINSKAS
JEFFREY HARDING
ROBERT J. BRANTNER
ROBERT A. MULLER
OF COUNSEL
CHARLES B. VOORHIS, II

HARDING & ZILINSKAS
ATTORNEYS AT LAW
200 EAST CARRILLO STREET, SUITE 205
POST OFFICE BOX 390
SANTA BARBARA, CALIFORNIA 93102
AREA CODE 805
TELEPHONE 963-4351

RECEIVED AT THE FEC
HAND DELIVERED
84 AUG 17 4:42
VENTURA OFFICE
674 COUNTY SQUARE DRIVE, SUITE 208 F
VENTURA, CALIFORNIA 93003
AREA CODE 805
TELEPHONE 688-7223

Krych

PLEASE REPLY TO
Santa Barbara

August 15, 1984

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

Attn: Kenneth A. Gross
Associate General Counsel

Re: MUR 1743

Dear Mr. Gross:

I am enclosing the affidavits prepared by Dr. and Mrs. Carey as an amendment to the response I had previously filed with your office.

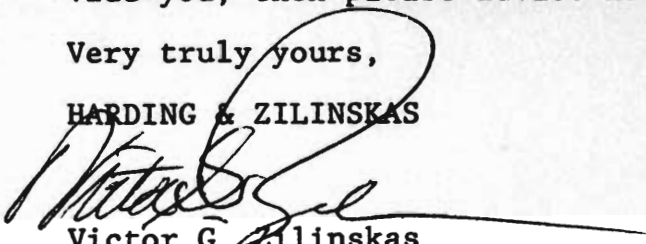
I am also enclosing copies of checks repaying Dr. Carey for the expenses his office incurred on behalf of his campaign.

I hope that the enclosed materials are sufficient to show that the complaint lodged against Dr. Carey is without merit.

If there are any additional materials that I can provide you, then please advise me accordingly.

Very truly yours,

HARDING & ZILINSKAS


Victor G. Zilinskas

VGZ/sh

Enclosure(s)

AUG 17 AM 11:02

84040482599

CAREY FOR CONGRESS

NUMBER
114

90-2050/1222

PAY TO THE
ORDER OF

James B. Carey, Jr.
Four Hundred Twenty Nine and 00/100

\$ **429.00**
DOLLARS

SANTA BARBARA BANK & TRUST
DOWNTOWN OFFICE
20 East Carrillo Street, Santa Barbara, Calif. 93101

MEMO

⑆122220593⑆0114⑆01324 334⑆

DE LUKE CHECK PRINTING CO.

Henry W. Mesley
⑆0000042900⑆

Postage, etc - see attached detail >

84040482600

#24
JUN 04 84
90-3478
2

蘇子瞻

90-3476 90-3476

15

48-217

10715447

THE BANK OF MONTICELLO
JAMES H. SCARLET JR., M.D., INC.
F.P.B. LOS ANGELES 1220
JE OF
REG
6-9-61

71045725

#114

CAMPAIGN EXPENDITURES PAID THRU OFFICE

DATE	PAID TO	FOR	AMOUNT
5-1-84	Community Resources	Directory of Social Services	\$17.00
5-18-84	Joe Bruketta	Typesetting & designing of brochure	\$82.10
5-19-84	Bill's Copy Shop	Political printing	\$49.90
5-22-84	Postmaster	Stamps for political mailing	\$100.00
5-24-84	"	"	\$40.00
5-25-84	Postmaster	Permit to mail without affixing postage stamps	\$40.00
5-25-84	Postmaster	Stamps	\$100.00

\$429.00

#114

U. S. POSTAL SERVICE
CASH RECEIPT

DATE _____

RECEIVED FROM _____

THE SUM OF \$100.00

FOR _____ 100 Dollars,

BY (Signature and title) _____

PS Form 1096 Jan. 1971

U. S. G. P. O. 1983-656-605

84040482602

84040482603

CAREY FOR CONGRESS

NUMBER
125

June 8 1984

PAY TO THE ORDER OF James Carey Jr. \$ 483.12

Four Hundred Eighty Three and 12/100 DOLLARS

PAID

SANTA BARBARA BANK & TRUST
DOWNTOWN OFFICE
20 East Carrillo Street, Santa Barbara, Calif. 93101

MEMO Henry W. Mealy

⑆0000048312⑆

⑆0122220593⑆0125⑆01324 334⑆

REMARKS CHECK PRINTED 10/84

Telephone + Printing (detail attached)

8 4 0 4 0 4 8 2 6 0 4

JE 84 13 1 18-18
F.B.I. LOS ANGELES
12200016

PAY TO THE ORDER OF
BANK OF MONTECITO
FOR DEPOSIT ONLY
C. CAREY JR. M.D. INC.
\$ 100 - 000 - 012

1970 3 0 0 0 9

90-111111-111
BANK OF MONTECITO
MONT. CITO
00-278200-278

JUN 11 84

1551425

0. T

175.08 +
100.76 +
40.35 +
100.93 +
403.12 T

#125

84040482605

DETACH HERE RETURN LOWER PORTION WITH PAYMENT IN THE ENCLOSED ENVELOPE

PLEASE DO NOT STAPLE
FOR BILLING INQUIRIES
CALL AT NO CHARGE

1 800 223-6177

PLEASE INDICATE AMOUNT PAID

\$

AMOUNT DUE
430.11

DO NOT SEND CASH

PLEASE DEDUCT ANY PART OF THIS BILL WHICH HAS BEEN PAID

CAREY MD, JAS. C
19 W. MICHELTORENA ST
SANTA BARBARA CA

773

93101

ACCOUNT NUMBER
965-1051

JUN 1984

PAYMENT DUE BY

Month of ~~May~~ *Mar*

71373 96501051 840126 762790 3 00043011 1 06 26

H

*NOTE: These are last pages of
previous bills to Mr. Carey's office.
This detail bill is in file in his
office. Past herein checks are
are the long distance calls
relating to election campaign.*

Mon & May

Billed 6-4-84

175.08

4

FEDERAL EXCISE TAX 9.02
SANTA BARBARA CITY TAX 17.73
911 STATE TAX 1.21

***TOTAL CHARGES CURRENT MONTH \$366.38
TOTAL DUE 370.81

A LATE PAYMENT CHARGE WILL APPLY IF
PAYMENT IS NOT RECEIVED BY MAY 30, 1984

*****FOR BILLING INQUIRIES CALL AT NO CHARGE 1 800 223-6177*****

DETACH HERE RETURN LOWER PORTION WITH PAYMENT IN THE ENCLOSED ENVELOPE

PLEASE DO NOT STAPLE

FOR BILLING INQUIRIES
CALL AT NO CHARGE

1 800 223-6177

PLEASE INDICATE AMOUNT PAID

\$

AMOUNT DUE
370.81

DO NOT SEND CASH

PLEASE DEDUCT ANY PART OF THIS BILL WHICH HAS BEEN PAID

CAREY MD, JAS. C
19 W. MICHELTORENA ST
SANTA BARBARA CA

773

93101

ACCOUNT NUMBER
965-1051

1984

PAYMENT DUE BY

*Month of April
Billed 5-4-84*

106.76

71373 96501051 840126 762790 3 00037081 1 06 26 H

GENERAL TELEPHONE COMPANY OF CALIFORNIA
An Equal Opportunity Employer

P.O. BOX 3400, SANTA BARBARA, CA 93100

NAME: CAREY MD, JAS, C DIVISION CODE: 71373 ACCOUNT NUMBER: 965-1051 DATE: APR 04, 1984

SEE REVERSE SIDE FOR GENERAL EXPLANATIONS

302PM	3/21	NOVATO	CA	415	892-2386	2	DD	1.07
		FROM-			966-1262			
1125AM	3/23	VENTURA	CA	805	642-6788	1	DD	.24
		FROM-			966-1262			
1208PM	3/26	WASHINGTON	DC	202	822-0661	5	DD	2.70
		FROM-			966-1262			
128PM	3/27	SAN FRAN	CA	415	863-4333	1	DD	.62
		FROM-			966-1262			
931AM	3/27	LA JOLLA	CA	619	456-2661	7	DD	3.08
		FROM-			966-1262			
122PM	3/27	OCEANSIDE	CA	619	729-8251	5	DD	2.13
		FROM-			966-1262			
941AM	3/27	SACRAMENTO	CA	916	381-1325	1	DD	.62
		FROM-			966-1262			
1104AM	3/28	LOSANGELES	CA	213	851-4930	8	DD	2.73
		FROM-			966-1262			
1141AM	3/29	THOUSAND OAKS	CA	805	497-0103	1	DD	.38
		FROM-			966-1262			

* * SUBTOTAL \$103.34

***TOTAL LONG DISTANCE CHARGES \$150.42

BILLING SURCHARGE 33.81

PUC FUNDING PER RESOLUTION M-4727 .17

FEDERAL EXCISE TAX 8.35

SANTA BARBARA CITY TAX 14.15

911 STATE TAX .92

***TOTAL CHARGES CURRENT MONTH \$343.71

TOTAL DUE 877.47

A LATE PAYMENT CHARGE WILL APPLY IF
PAYMENT IS NOT RECEIVED BY APR 28, 1984

*****FOR BILLING INQUIRIES CALL AT NO CHARGE 1 800 823-6177*****

on end of MM out
Billed 4-4-84

40-35

DETACH HERE → RETURN LOWER PORTION WITH PAYMENT IN THE ENCLOSED ENVELOPE

84040482608

BILL'S COPY SHOP
"A Complete Copying Service"
1501 STATE ST., SUITE C
SANTA BARBARA, CA 93101
(805) 962-5448

ACCOUNTS NAME AND ADDRESS:

PHONE: 965-1051

JAMES C. CAREY JR. M.D. INC.
19 W. Micheltorena St.
Santa Barbara, CA 93101

- 160.93 - Pay to James C. ()
for reimbursement

20 Feb 1966

90-2029/132

Quilars

000004 1436

Reimburse: Gasoline \$ 330.20
Printing < LUND'S > 84.16
OFFICE
SUPPLIES 414.36

L Retail on file 7.

84040482609

8 4 0 4 0 4 8 2 6 1 0

10-18 PAY TO THE ORDER OF
BANK OF MONTECITO
FOR DEPOSIT ONLY
JAMES C. GABEY JR. M.D. INC.
1122 000 2812 1 2 0
90-3478 90-3478
BANK OF MONTECITO
P.O. BOX 100
MONTECITO, CALIF.

90-3478 90-3478

8-31

JUL 13 85

GOLETA WAS NCE Mescalitan

The members of the Portola Expedition of 1769 were the first Caucasians to reach the "Good Land" of the Goleta Valley. They found what was then California's largest city forming a Stone Age megalopolis around the borders of the Goleta estuary. Portola encamped on the north rim of a deep-water bay near the present intersection of Fairview and Hollister Avenues. He reported more than a thousand Indians dwelling on tiny Mescalitan Island at the mouth of the estuary. Only a fragment of the island remains today. In 1943 it was bulldozed to provide fill dirt for the airport runway.

—Walker A. Tompkins

0.54 +
0.51 +
1.97 +
1.15 +
2.07 +
0.62 +
0.99 +
0.62 +
1.07 +
1.97 +
0.24 +
0.24 +
0.30 +
0.62 +
1.74 +
0.42 +
4.12 +
0.60 +

Reimburse
Office

Reimburse Office

25.60
103.58
129.18

150

to Office on 7/30/84 -
No cancelled check
available till 8/31.

Store read
ended for
this copy.
balance.

150

page

90

103.58
+ 25.60
129.18

8404048261

1250PM	6/27	LOMPOC	CA	805	733-4137	7	DD
155PM	6/29	LOMPOC	CA	805	688-2338	1	DD
458PM	6/29	SNLUSOBSPD	CA	805	965-1051	10	SCD
334PM	5/31	LOMPOC	CA	805	541-6767	1	DD
		SANTAMARIA	CA	805	688-8554	1	DD
		FROM-			688-8554	1	DD
127PM	5/31	SANTAMARIA	CA	805	733-4137	1	DD
		FROM-			688-8554	1	DD
125PM	5/31	SANTAMARIA	CA	805	733-4137	1	DD
		FROM-			688-8554	1	DD
1152AM	6/11	SANTA YNEZ	CA	805	733-4137	1	DD
		FROM-			688-8554	1	DD
940AM	6/14	SANTA YNEZ	CA	805	733-4137	7	DD
		FROM-			688-8554	7	DD
517PM	6/14	LOMPOC	CA	805	733-4137	14	DE
		FROM-			688-8554	14	DE
404PM	6/18	SANTA YNEZ	CA	805	733-4137	2	DD
		FROM-			688-8554	2	DD

4.59
.27
.87
.27
1.35
2.51
.45

DETACH HERE RETURN LOWER PORTION WITH PAYMENT IN THE ENCLOSED ENVELOPE

PLEASE DO NOT STAPLE

FOR BILLING INQUIRIES
CALL AT NO CHARGE

PLEASE INDICATE AMOUNT PAID

\$

AMOUNT DUE

DO NOT SEND CASH

PLEASE DEDUCT ANY PART OF THIS BILL WHICH HAS BEEN PAID

ACCOUNT NUMBER

CAREY MD, JAS. C

PAYMENT DUE BY

71373 96501051 840126 772790 3 00000000 1 00 00

H

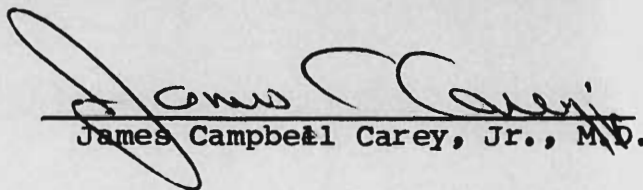
84040482612

AFFIDAVIT OF JAMES CAMPBELL CAREY, JR., M.D.

I James Campbell Carey, Jr., M.D., declare as follows:

The address on my campaign literature, the same as my medical corporation office, was used only as a mail drop and did not exceed one hour per week as corporate facilities, or interfere with activities or overhead of the corporation.

I declare, under penalty of perjury, that the above is true and correct and that, if called as a witness, I could competently testify to the facts I have set forth above. This declaration is executed on August 14, 1984, in Santa Barbara, California.


James Campbell Carey, Jr., M.D.

AFFIDAVIT OF BARBARA JEAN CAREY

I, Barbara Jean Carey, declare as follows:

I reside at 1667 Las Canoas Road, Santa Barbara, California, and I am the wife of James C. Carey, Jr., Democratic Candidate for U.S. Representative of the 19th District.

I am a registered nurse and I work part-time for James C. Carey, Jr., M.D., Inc., as a nurse and secretary. I also do volunteer work for my husband's campaign. I am not paid for working on his campaign by anyone. Further, the work I do on his campaign does not interfere with any part-time employment with my husband's professional corporation.

In the last four or five months, four or five people have come to my husband's office and asked for campaign literature. I recall one woman, who I believe is the one that filed the complaint, came in and said she had obtained one piece of campaign literature and wanted more. At her request, I gave her a flyer. (The other three or four people are known to me.) This woman I am discussing is the only one I do not know.)

The address of my husband's corporation was included on some campaign literature, but it is not being done any longer. That mailing address was nothing but a maildrop since, at that time, we had no campaign office.

I did not utilize any of the time for which I am paid for by my husband's corporation in handling mail that would come in that related to his campaign.

My husband's corporation was re-paid any expenses it incurred in my husband's campaign--specifically, the corporation was paid back for long-distance telephone calls, gasoline ex-

84040482613

AFFIDAVIT OF BARBARA JEAN CAREY

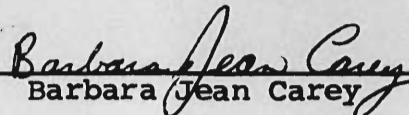
Page 2

penses, postage expenses, ~~supplies~~ supplies and copying expenses.

I am attaching cancelled checks to show this.

It is my opinion that my husband's corporation has not suffered any financial detriment, or incurred any additional expenses as the result of my husband's campaign.

I declare, under penalty of perjury, that the above is true and correct and that, if called as a witness, I could competently testify to the facts I have set forth above. This declaration is executed on August 14, 1984, in Santa Barbara, California.


Barbara Jean Carey

84040482614

HARDING & ZILINSKAS

ATTORNEYS AT LAW

15 EAST CARRILLO STREET, SUITE 208

POST OFFICE BOX 390

SANTA BARBARA, CALIFORNIA 93102

DELIVERED
BY MAIL

940404826

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

Attn: Kenneth A. Gross

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1743

NAME OF COUNSEL: Victor G. Zilinskas

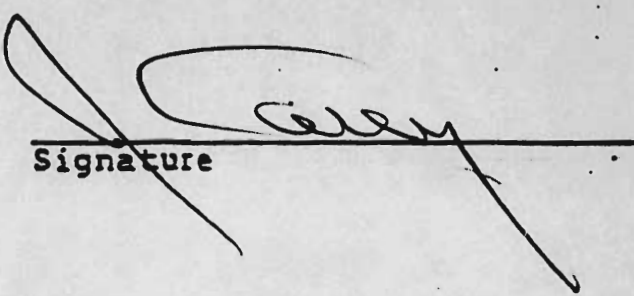
ADDRESS: 200 E. Carrillo Street, Ste. 205

Santa Barbara, CA 93102

TELEPHONE: (805) 963-4351

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

August 9, 1984
Date


Signature

RESPONDENT'S NAME: James C. Carey

ADDRESS: 19 W. Micheltorena Street

Santa Barbara, CA 93101

HOME PHONE: _____

BUSINESS PHONE: (805) 965-1051

84040482616

Federal Election Commission
1325 K Street, N.W.

Washington, D.C. 20463

ATTN: KENNETH A. GROSS, ASSOCIATE GENERAL COUNSEL

RE: MUR 1743

HENRY W. MEALY
2525 BORTON DRIVE
SANTA BARBARA, CA 93109

REC-4327
RECEIVED AT THE FEB
Aug 1, 1984
12:01

AUG 13 P 2:40

Dear Mr. Gross:

In reply to your letter of July 25, 1984, I am enclosing a copy of a letter dated August 9, 1984 from Victor Zilinskas, counsel for Dr. James C. Carey Jr. Inasmuch as Dr. Carey and I have received the same complaint, I am hoping that the letter from Mr. Zilinskas will suffice for the both of us. I have reviewed the Zilinskas letter carefully, and find the facts therein to be correctly stated. I respectfully request that no action be taken against the committee or against me individually or as treasurer in this matter.

I can understand why Dr. Carey, the candidate, might want a public hearing on this matter - since he has already been portrayed as guilty in recent radio and newspaper statements that I personally observed.

If you have any further questions of me, please contact me at my home address above.

Sincerely,
Henry W. Mealy

84040482617

VICTOR G. ZILINSKAS
JEFFREY HARDING
ROBERT J. BRANTNER
ROBERT A. MULLER
OF COUNSEL
CHARLES B. VOORHIS, II

HARDING & ZILINSKAS
ATTORNEYS AT LAW
800 EAST CARRILLO STREET SUITE 205
POST OFFICE BOX 380
SANTA BARBARA, CALIFORNIA 93102
AREA CODE 805
TELEPHONE 963-4381

VENTURA OFFICE
874 COUNTY SQUARE DRIVE, SUITE 208 F
VENTURA, CALIFORNIA 93003
AREA CODE 805
TELEPHONE 688-7883

PLEASE REPLY TO
Santa Barbara

August 9, 1984

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

Attn: Kenneth A. Gross
Associate General Counsel

Re: MUR 1743

Dear Mr. Gross:

Dr. Carey has asked me to respond to your letter, and the enclosures, dated July 25, 1984. As such, I am enclosing the Statement of Designation of Counsel executed by Dr. Carey.

I have carefully reviewed the "complaint" brought by Congressman Lagomarsino's chairman, Mrs. Gwen Tillerman, and would like to bring to your attention the following:

1. Dr. James C. Carey, Jr., is a physician practicing in Santa Barbara with his offices located at 19 W. Micheltorena Street in that city. Many years ago he formed a professional corporation under the laws of the State of California.

He is the president and the treasurer of that corporation. The only real asset of that corporation is Dr. Carey's medical practice and he is the only person that receives the earnings generated by his practice.

2. Dr. Carey's wife, Barbara Jean Carey, works as his receptionist and surgical assistant. She is also active in Dr. Carey's campaign.

84040482618

Kenneth A. Gross
August 9, 1984
Page 2.

3. Before Dr. Carey's victory in the primary election, his office address was listed as the address of Carey for Congress Committee. However, that address served as nothing but a mail-drop.

4. The letter Dr. Carey sent to Mr. Kallman did list his office address. However, that address, as noted above, was only a mail-drop.

5. Any election expenses incurred by Dr. Carey's professional corporation has been paid for by the Carey for Congress Committee; cancelled checks are available.

6. There are no campaign stickers attached to Dr. Carey's office windows or walls, etc. However, campaign literature is available on request, but is not publically displayed. But Dr. Carey's wife is happy to give campaign materials to anyone who asks. (The complaint is a sworn statement based on personal knowledge. One wonders at the propriety shown by an individual who comes to the doctor's office, who asks for campaign literature, and then files a complaint because the request is granted.)

7. All in all, James C. Carey, Jr., M.D., James C. Carey, Jr., Democratic Nominee for U.S. Representative and James C. Carey, Jr., Inc., are all the same and one. Neither the letter nor the spirit of the applicable law has been violated by Dr. Carey.

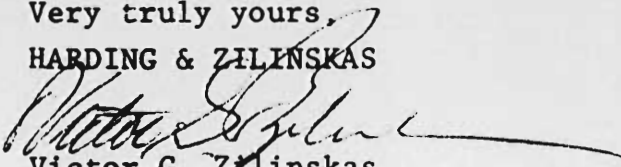
Your letter notes that this matter is to remain confidential unless we wish to make the matter public. I don't think our wishes one way or the other matter much since Congressman Lagomarsino issued a press release making the charges contained in the complaint. I request that you advise us if this is proper conduct.

In conclusion, we request that you advise if there are any additional facts or documentation that we can provide you. Further, we do want a fair and full public hearing and determination of the "complaint" and request that Congressman Lagomarinso be invited to participate.

These matters need to be cleared up as soon as possible since Congressman Lagomarinso has already made the charges public and is making political mileage out of them.

Very truly yours,

HARDING & ZILINSKAS


Victor G. Zilinskas

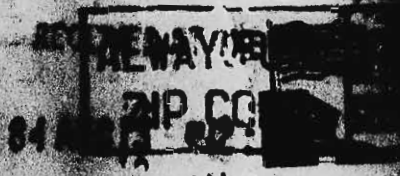
VGZ/sh

*I have reviewed this letter
and find the facts herein
to be correctly stated.*

Henry W. Wealy
TREASURER
CAREY FOR CONGRESS COMMITTEE
8/9/84

84040482619

W. MEALY
BORTON DRIVE
BANGARA, CA 93109



404048262

FEDERAL ELECTION COMMISSION
1325 K STREET, N.W.
WASHINGTON, D.C. 20463

KENNETH A. GROSS, ASSOCIATE GENERAL COUNSEL

602-44323
RECEIVED AT THE FE

01 AUG 13 P12: 48

HARDING & ZILINSKAS

ATTORNEYS AT LAW

200 EAST CARRILLO STREET, SUITE 205

POST OFFICE BOX 390

SANTA BARBARA, CALIFORNIA 93102

AREA CODE 805

TELEPHONE 963-4351

VENTURA OFFICE

674 COUNTY SQUARE DRIVE, SUITE 208 F

VENTURA, CALIFORNIA 93003

AREA CODE 805

TELEPHONE 222-7223

VICTOR G. ZILINSKAS
JEFFREY HARDING
ROBERT J. BRANTNER
ROBERT A. MULLER
OF COUNSEL
CHARLES B. VOORHIS, II

PLEASE REPLY TO
Santa Barbara

August 9, 1984

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

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Associate General Counsel

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2. Dr. Carey's wife, Barbara Jean Carey, works as his receptionist and surgical assistant. She is also active in Dr. Carey's campaign.

11 AUG 13 P2: 40

84040482621

Kenneth A. Gross
August 9, 1984
Page 2.

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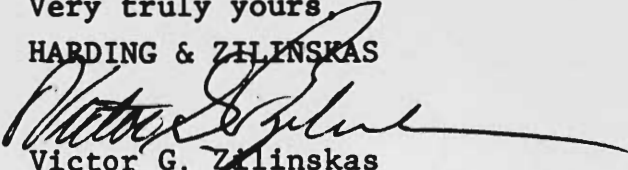
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Very truly yours,

HARDING & ZILINSKAS


Victor G. Zilinskas

VGZ/sh

84040482622

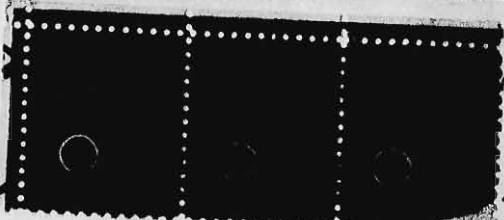
RDING B ZILINSKAS

ATTORNEYS AT LAW

ST CARRILLO STREET, SUITE 208

POST OFFICE BOX 390

SANTA BARBARA, CALIFORNIA 93102



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

CERTIFIED

P 717 013 770

MAIL



JAMES C. CAREY, JR. M.D., F.A.C.S.

19 W. MCNELTONA ST.
SANTA BARBARA, CALIFORNIA 93101
(805) 968-1051

James C. Carey, Jr., Inc.
Plastic and Reconstructive Surgery

June 8, 1984

Supervisor Robert Kallman
105 E. Anapamu St.
County Supervisors Office
Santa Barbara, CA 93101

Dear Supervisor Kallman:

I strongly support efforts to lessen the devastating impacts of the planned oil development in the Santa Barbara County area. I support the consolidation of oil processing and support facilities, the proposed oil pipelines, limiting of tanker use, and other measures which you deem appropriate.

Thank you.

Sincerely,

James C. Carey, Jr., M.D.
Democratic Nominee for U.S. Representative,
19th Congressional District

JCC/bjc

C.C. News Press City Editor

84040482624



FEDERAL ELECTION COMMISSION

July 25, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James C. Carey, Jr., MD
19 W. Micheltorena Street
Santa Barbara, California 93101

Re: MUR 1743

Dear Dr. Carey:

This letter is to notify you that on July 23, 1984 the Federal Election Commission received a complaint which alleges that you, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1743. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against you, in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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.

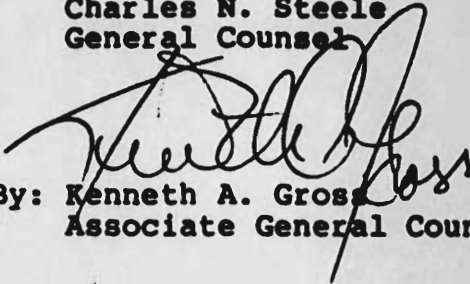
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Gary Johansen, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

84040482626

RE-ELECT Lagomarsino TO CONGRESS

MUR 1743

July 17, 1984

GCC #4109

OWEN TILLEMANS
Chairman
KATHERINE H. HALEY
Treasurer
DIANE KLINGER
Secretary
J. WILLIAM BEAVER
A. J. KAHN
GEORGINNE FERINI
ELSON H. HASKELL
MARTHA HICKEY
MARIAN KOONCE
ISAMU MINAMI
CAROLYN SCHULTZ
Vice-Chrmn., Santa Barbara Co.
R.R. "HOOT" BENNETT
AL A. GULIN
FRANCIS W. JOHNSON
OSCAR JOHNSON
PAUL LEAVENS, JR.
LEONARD ORTIZ
ALAN TEAGUE
Vice-Chrmn., Ventura Co.
MARIAN KOONCE
Finance Chrmn., Santa Barbara Co.
FRANCIS W. JOHNSON
Finance Chrmn., Ventura Co.

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

Sirs:

I am Gwen Tillemans, Chairman of the Committee to Re-Elect Congressman Lagomarsino, P.O. Box 23, Santa Barbara, CA 93102.

I am filing a complaint, under 11 CFR, against James C. Carey, Jr., Democrat Nominee for U.S. Representative, 19th Congressional District of California; against James C. Carey, Jr., Inc., and against the Carey for Congress Committee; all located at 19 W. Micheltorena, Santa Barbara, CA 93101.

The essence of the complaint is that candidate Carey and his campaign committee have and are continuing to accept contributions, in cash or in kind, from James C. Carey, Jr., Inc., in violation of federal laws and regulations which prohibit corporate contributions to candidates for the office of U.S. Representative.

Attached is a copy of a letter written on an issue of political concern and signed as follows:

James C. Carey, Jr., M.D.
Democratic Nominee for U.S. Representative
19th Congressional District

JCC/bjc

The letter is typed on stationery bearing the letterhead and address:

James C. Carey, Jr., Inc.
Plastic and Reconstructive Surgery
19 W. Micheltorena St.
Santa Barbara, CA 93101
(805)965-1051

84040482627

The letter indicates that a copy was sent to a local newspaper.

Also enclosed is a copy of a political pamphlet on behalf of candidate Carey and bearing the legend:

Paid for and authorized by the Carey for Congress Committee, 19 W. Micheltorena, Santa Barbara, CA 93101. (805)965-1051.

19 W. Micheltorena in Santa Barbara, the address listed on the campaign material, is the actual location of Dr. Carey's medical corporation office. The phone number for both the medical corporation and the campaign committee is the same; when a call is placed to the number, it is answered: "Dr. Carey's office." When a visitor goes into the medical corporation office and asks for campaign materials, the material is provided by the medical office receptionist. Clearly, James C. Carey, Jr., Inc. is providing a contribution in cash or in kind to candidate James C. Carey, Jr. and/or the Carey for Congress Committee, in violation of federal law.

I do hereby swear that the information contained in this letter is true to the best of my personal knowledge.

Gwen Tillemans

Gwen Tillemans, Chairman
Committee to Re-Elect Congressman
Lagomarsino

TO 447 CA (4-79)
(Individual)

STATE OF CALIFORNIA }
COUNTY OF VENTURA } SS.

On JULY 19, 1984 before me, the undersigned, a Notary Public in and for said State, personally appeared GWEN TILLEMANS

to be the person whose name IS subscribed to the within instrument and acknowledged that she executed the same.

WITNESS my hand and official seal.

Signature

Herbert D. Nowlin

HERBERT D. NOWLIN

Name (Typed or Printed)

**TITLE INSURANCE
AND TRUST**
A TICOR COMPANY



(This area for official notarial seal)

THE WOMEN'S MOVEMENT HAS JUST BEGUN

Can we talk here? . . . The Law of Political Survival states that one simply cannot turn one's back on voters and expect their support.

Unfortunately for incumbent Congressman BOB LAGOMARSINO, by voting AGAINST EQUALITY FOR WOMEN last November, he's turned his back on women throughout our 19th District, regardless of race, religion, socio-economic background or political affiliation. (The Equal Rights Amendment to the Constitution, which would guarantee legal equality for women, is today supported by 8 of 10 Democratic women and men, and by 5 of 10 Republican women and men.)

Therefore, come November 6th, Mr. Lagomarsino may have to learn--the hard way--that he simply cannot ignore the increasing commitment of a majority of women and men to a new agenda of equity and fairness.

For when women throughout our progressive District next go to the polls to choose whom they wish representing their best interests in Congress, they may well turn to a new leader . . . with new vision and new ideas about 1) equal pay for equal work; 2) an end to discrimination in promotions, in one's ability to earn enough to support herself, and in getting skilled-labor jobs, and 3) termination of discriminatory practices regarding equity in credit, pensions, insurance rates, and other areas.

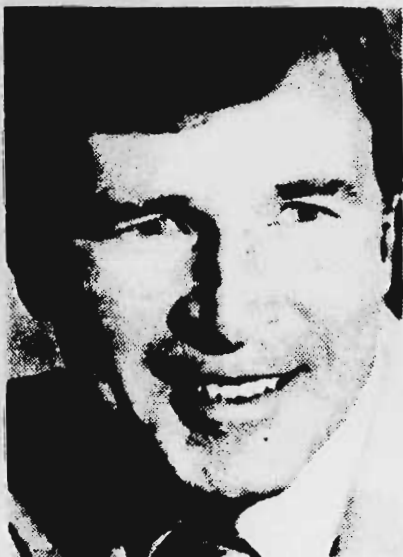
Democratic Congressional nominee DR. JIM CAREY--father of six daughters he praises for their "courage, intelligence, fairness and compassion"--is an uncompromising supporter of women's equality and comparable-pay issues; fully supports Rep. Pat Schroeder's economic equity bill (H.R. 2090) and the Nondiscrimination in Insurance Act (H.R. 100), and following his election to Congress on November 6th, vows to co-sponsor reintroduction of the Equal Rights Amendment "until that body finally makes it the Law of our land."

Looking toward the future, Doctor Carey warns "stale" politicians like Bob Lagomarsino and others who miscalculate that the women's movement has peaked: "The movement has just begun for women's economic, social and legal equality. And anyone who doesn't understand that doesn't deserve to represent women in the Congress of our great nation in the challenging '80s and '90s."

Geraldine Ferraro, Diane Feinstein, Pat Schroeder, and his own six daughters urge you to support and work for Dr. Jim

CAREY FOR CONGRESS

. . . as do Walter Mondale, Gary Hart, Jesse Jackson, Alan Cranston, Ted Kennedy, Tip O'Neill, Jim Wright, (State Sen.) Gary K. Hart, Jack O'Connell, and a host of other women and men far too numerous to mention here. Together, we can control our future. And wild horses should not keep us from it!





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 25, 1984

Gwen Tillemans
Chairman
Committee to Re-Elect
Congressman Lagomarsino
P.O. Box 23
Santa Barbara, California 93102

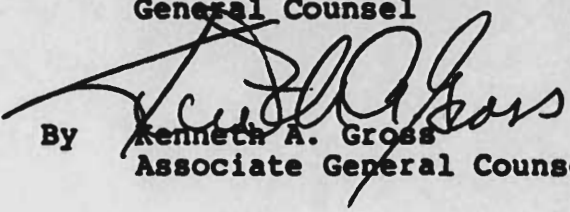
Dear Ms. Tillemans:

This letter is to acknowledge receipt of your complaint which we received on July 23, 1984, against Henry W. Mealy, Carey for Congress, James C. Carey, Jr., Inc., and James C. Carey, Jr., MD, which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondent will be notified of this complaint within five days.

You will be notified as soon as the Commission takes final action on your complaint. Should you have or receive any additional information in this matter, please forward it to this office. We suggest that this information be sworn to in the same manner as your original complaint. For your information, we have attached a brief description of the Commission's procedure for handling complaints. If you have any questions, please contact Barbara A. Johnson at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By 
Kenneth A. Gross
Associate General Counsel

Enclosure

84040482630



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 25, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Henry W. Mealy
Treasurer
Carey for Congress
19 W. Micheltorena Street
Santa Barbara, California 93101

Re: MUR 1743

Dear Mr. Mealy:

This letter is to notify you that on July 23, 1984 the Federal Election Commission received a complaint which alleges that the committee and you, individually, and as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1743. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against the committee and you, individually, and as treasurer, in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

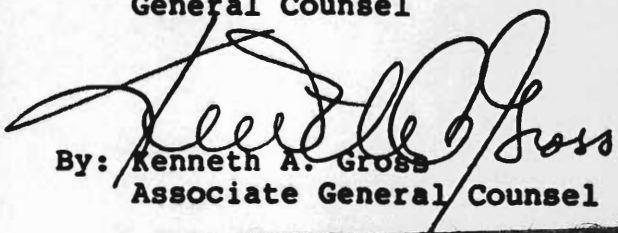
If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

84040482631

If you have any questions, please contact Gary Johansen, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

By: 
Kenneth A. Gross
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

84040482632

Nov 17-84

1. The following service is requested:	
☐ Show to whom and date delivered	
☒ RESTRICTED DELIVERY (The restricted delivery fee is charged on the return receipt fee)	
2. ARTICLE ADDRESSED TO: Henry W. Michelmore Treasurer Congress for Congress 19 W. Michelmore St. Santa Barbara, CA 93101	
3. TYPE OF SERVICE: ☒ Registered ☐ Insured ☐ Signature ☐ COD ☐ Express Mail	
I have received the article described above. SIGNATURE:  ADDRESS: 19 W. MICHELMORE ST. SANTA BARBARA, CA 93101	
DATE OF DELIVERY: 7/30/84	
1. ADDRESSER'S ADDRESS (Only if returned)	
19 W. MICHELMORE ST. SANTA BARBARA, CA 93101	
2. UNABLE TO DELIVER REASON:	
7/25/84	



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 25, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James C. Carey, Jr., MD
President
James C. Carey, Jr., Inc.
19 W. Micheltorena Street
Santa Barbara, California 93101

Re: MUR 1743

Dear Dr. Carey:

This letter is to notify you that on July 23, 1984 the Federal Election Commission received a complaint which alleges that your corporation and you, as president, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1743. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your corporation and you, as president, in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

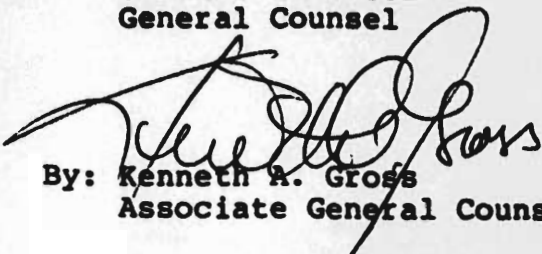
If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

84040482633

If you have any questions, please contact Gary Johansen, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

84040482634

MAY 1973

* SEND: Complete Items 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.	
Add your address in the space provided on the back.	
* (OPTIONAL POSTAGE PAID PERMIT NO. 1000 WASHINGTON, D.C. 20540)	
1. The following service is requested (check one): ☐ Show to whom and date delivered ☒ Show to whom, date, and address of delivery ☐ RESTRICTED DELIVERY (The restricted delivery fee is charged in addition to the return receipt fee)	
TOTAL \$	
2. ARTICLE ADDRESSED TO: James C. Carey, Jr., MD President James C. Carey, Jr., Inc. 19 W. Mitchell Avenue Santa Barbara, CA 93101	
3. TYPE OF SERVICE: ☐ REGISTERED ☐ REGISTERED MAIL ☒ REGISTERED MAIL ☐ REGISTERED MAIL ☐ REGISTERED MAIL	ARTICLE NUMBER 943268
(Always obtain signature of addressee or agent)	
I have received the article described above. SIGNATURE ☐ Addressee ☒ Authorized agent 	
4. DATE OF DELIVERY MAY 1973	POSTAGE PAID
5. ADDRESSEE'S ADDRESS (Only if required) 19 W. Mitchell Avenue S.B., CA 93101	
6. UNABLE TO DELIVER REASON: None	7. DELIVERY DETAILS None

7/25/74

840 RE-ELECT BOB S

Lagomarsino

TO CONGRESS

P. O. Box 23, Santa Barbara, CA 93102

P. O. Box 8088, Ventura, CA 93008

P. O. Box 1628, Santa Maria, CA 93456

JUL 23 AID: 37

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



84040482636



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1743

Date Filmed 10/29/04 Camera No. --- 2

Cameraman JRL