



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2100

DATE FILMED 2/24/87 CAMERA NO. 2

CAMERAMAN AS

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PUBLIC RECORD INDEX - MUR 2100

1. Ltr, 4 Nov 85, Jan W. Baran (Counsel to National Republican Senatorial Committee (NRSC)) to FEC, w/encl (Complaint).
2. Ltrs, 8 Nov 85, Kenneth A. Gross (Associate General Counsel, FEC) to: a) Hon. John Evans; b) Teamsters Joint Council #37; c) Kaiser Aluminum, N.W. Regional Office; d) Robert L. Harvey; e) J.C. Penney, Inc., Store #1206-2. f) Patrick Vaughan, as Treas, The Evans Cmte; g) Hubert Coats, as Treas, John Evans for Senate Cmte; h) Jan W. Baran.
3. Telegram, 8 Nov 85, H.S. Coats to FEC designating Robert F. Bauer as counsel to Evans for Senate Cmte.
4. Ltr, 25 Nov 85, Edward A. Cohen (Counsel to Teamsters Joint Council 73) to FEC, w/encs.
5. Ltr, 25 Nov 85, Leo J. Driscoll (Counsel to Kaiser Aluminum Corp.) to FEC, w/encs.
6. Ltr, 27 Nov 85, W. Anthony Park (Counsel to John Evans for Senate Cmte (H. Coats, Treas) and The Evans Cmte (P. Vaughan, Treas) to FEC, w/encs.
7. Ltr, 6 Dec 85, Raymond A. Messina (Counsel to J. C. Penney Co., Inc) to FEC w/encl.
8. Ltr, 6 Mar 86, W. A. Park to FEC.
9. First General Counsel's Report, 24 Mar 86.
10. Memorandum, 25 Mar 86, Office of Commission Secretary (OCS) to Office of General Counsel (OGC), Subject: Objection to MUR 2100, 1st GC Rpt, signed Mar 24, 1986.
11. Certification of Cmsn Action, 2 Apr 86 (RTB).
12. Ltrs, 7 Apr 86, K.A. Gross to: a) E.A. Cohen (No RTB - Teamster Joint Council 73); b) R.A. Messina (no RTB - J.C. Penney Co., Inc.); c) R.L. Harvey (no RTB); d) L.J. Driscoll (no RTB - Kaiser Aluminum).
13. Ltrs, 7 Apr 86, Joan D. Aikens (Chairman, FEC) to: a) W.A. Park (RTB - John Evans for Senate Cmte, Hubert Coats, Treas.); b) W.A. Park (RTB - The Evans Cmte, Patrick Vaughan, Treas.).
14. Ltr, 13 Apr 86, W.A. Park to FEC (Request for "pre-probable cause" conciliation for John Evans for Senate Cmte (H. Coats, Treas) and The Evans Cmte (P. Vaughan, Treas.)).

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15. General Counsel's Report, 8 May 86.
16. Memo, 8 May 86, OGC to OCS, Subject: MUR 2100, General Counsel's Report.
17. Certification of Cmsn Action, 14 May 86.
18. Ltr, 16 May 86, K.A. Gross to W.A. Park.
19. Ltr, 9 May 86 (rec'd at FEC 16 May 86), P.D. Costello to FEC, w/encls.
20. Memo, 19 May 86, Reports Analysis Division to OGC, Subject: Proposed RFAI to John Evans for Senate Cmte.
21. G.C. Report, 7 Nov 86.
22. Memo, 7 Nov 86, OGC to OCS, Subject: MUR 2100 - G.C. Rpt.
23. Ltr, 2 Dec 86, C.N. Steele (Gen. Coun., FEC) to W.A. Park, w/encl (PCTB Brief - The Evans Cmte and Patrick Vaughan, Treas.).
24. Ltr, 2 Dec 86, C.N. Steele to W.A. Park, w/encl (PCTB Brief - Evans for Senate Cmte and Hubert Coats, Treas.).
25. Memo, 3 Dec 86, OGC to Commission, Subject: MUR 2100 (PCTB Briefs).
26. Respondent's Reply Brief, 16 Dec 86.
27. Memo, 12 Jan 87, RAD to OGC, Subject: MUR 2100 (Proposed RFAI to John Evans for Senate Cmte.).
28. G.C. Report, 3 Mar 87.
29. Memo, 3 Mar 87, OGC to OCS, Subject: MUR 2100 - G.C. Report.
30. Certification of Comsn. Action, 11 Mar 87.
31. Ltr, 16 Mar 87, C.N. Steele to W.A. Park.
32. Ltr, 25 Mar 87, P.D. Costello to FEC.
33. G.C. Report, 27 May 87.
34. Memo, 27 May 87, OGC to OCS, Subject: MUR 2100 - G.C. Report.

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PRI MUR 2100

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35. Certification of Cmsn Action, 2 Jun 87.
36. Closing ltrs, 4 June 87, L.M. Noble to: a) E.A. Cohen; b) R.L. Harvey; c) R.A. Messina; d) L.J. Driscoll.
37. Closing ltr, 4 Jun 87, L.M. Noble to J.W. Baran.
38. Closing ltr, 4 Jun 87, L.M. Noble to P.D. Costello w/encls (Conciliation Agreements (2)).

-END-

NOTE: In preparing its file for the public record, O.G.C. routinely removes those documents in which it perceives little or no public interest, and those documents, or portions thereof, which are exempt from disclosure under the Freedom of Information Act.

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GCC# 8859

WILEY & REIN

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

WRITER'S DIRECT DIAL NUMBER

(202) 429-7330

November 4, 1985

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

NOV 4 3:37

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

Re: Complaint of National Republican Senatorial
Committee Against The John Evans for Senate
Committee and The Evans Committee

Dear Mr. Steele:

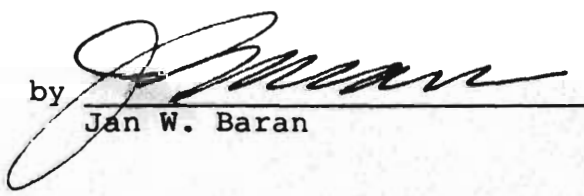
This office represents the National Republican
Senatorial Committee ("NRSC").

Pursuant to 11 C.F.R. § 111.4 we hereby submit the
enclosed complaint and three copies filed by NRSC against The
John Evans for Senate Committee and The Evans Committee.

Sincerely,

WILEY & REIN

by


Jan W. Baran

JWB/njl
Enclosures
cc: James K. Wholey, Esquire

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BEFORE THE
FEDERAL ELECTION COMMISSION

COMPLAINT

NATIONAL REPUBLICAN	)	
SENATORIAL COMMITTEE,	)	
	)	
Petitioner,	)	
	)	
v.	)	MUR No.
	)	
JOHN EVANS FOR SENATE	)	
COMMITTEE, THE EVANS	)	
COMMITTEE	)	
	)	
Respondents.	)	
	)	

I. INTRODUCTION

The National Republican Senatorial Committee ("NRSC") files this complaint pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"), 2 U.S.C. § 437g(a)(1), alleging violations of the Act by the John Evans for Senate Committee ("Evans Senate Committee")¹ and The Evans Committee ("Evans Gubernatorial Committee"),² the authorized committees of John V. Evans ("Governor Evans")³.

1 The John Evans for Senate Committee is officially registered with the Federal Election Commission ("FEC") as the principal campaign committee of the candidacy of John V. Evans of Idaho for the United States Senate. See Attachment A.

2 The Evans Committee "was the principal campaign committee for Governor John V. Evans' 1982 campaign for re-election as Governor of Idaho," according to a registration filing with the FEC by the Committee. See Attachment B.

3 John Victor Evans has registered with the FEC as of March 18, 1985 as a candidate for the United States Senate from Idaho. See Attachment A. He is currently Governor of the State of Idaho.

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The NRSC alleges that Governor Evans' committees have caused contributions to be made to a Federal candidate contrary to the provisions of the Act. The NRSC further alleges that the Evans committees filed statements with the FEC falsely stating the date of the transfer of funds from the Evans Gubernatorial Committee to the Evans Senate Committee, in an apparent attempt to obscure the illegal transfer.

Specifically, the NRSC states that reports on file show that the Evans Gubernatorial Committee transferred funds to the Evans Senate Committee; that these funds included at least three contributions (one from a corporation, one from a labor union, and one in excess of federal limits) which could not legally be transferred to a federal campaign; and that thereafter the Evans Committee apparently altered financial records and claimed instead that the funds had been distributed directly to Democratic organizations in a legal manner.

The NRSC seeks immediate Commission action to rectify these violations, including expedited investigation, prompt conciliation with the respondents, and the imposition of appropriate civil penalties. Illegal activity by a candidate in the opening stages of a campaign for federal office is a serious offense, but may be mitigated should the Commission find it was genuinely inadvertent. However, a deliberate attempt to conceal such illegal activity, which is what is at issue here, should be a cause of grave concern to the Commission charged with ensuring that full and truthful records of campaign finances are available to the public.

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II. THE TRANSFER OF FUNDS FROM
THE EVANS GUBERNATORIAL COMMITTEE
TO THE EVANS SENATE COMMITTEE

On March 18, 1985, John V. Evans registered with the FEC as a candidate for the Democratic nomination for the United States Senate from Idaho. (See Attachment A.) Two days later, on March 20, 1985, The Evans Gubernatorial Committee filed with the State of Idaho a "Campaign Financial Disclosure Report", certifying that the Gubernatorial Committee's account had been closed, and that its funds (\$11,308.97) had been transferred to the Evans Senate Committee on March 18, 1985. This report was for the period January 1, 1985 to March 18, 1985. (See Attachment C, "Termination Report").

Although the Evans Gubernatorial Committee had thus certified that its account was closed as of March 18, 1985, and the \$11,308.97 therein transferred to the Evans Senate Committee on that date (the same date that Governor Evans became a candidate), two subsequent filings attempt to hide that fact. A second ("amended") "Termination Report" was later filed, (see Attachment D) for the period January 1, 1985 to March 31, 1985, purporting to show instead that \$7,350.32 was transferred to the Evans Senate Committee on March 29, 1985 (eleven days after the account was closed). The same filing indicates that the Evans Gubernatorial Committee made two contributions on March 28, 1985 (from the same closed account), in the amounts of \$2,000.00 to the

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Democratic Governor's Association ("dues"), and \$1,958.65 to the Idaho State Democratic Party. These three alleged transfers from an account previously certified as empty and closed total \$11,308.97, the exact sum reported transferred to the Evans Senate Committee ten days earlier.⁴

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4 An even later amended filing with the Idaho Secretary of State's Office, for the same January 1, 1985 to March 31, 1985 period, retains the same figures for the transfers to the Democratic Governor's Association and the Idaho State Democratic Party, but without explanation alters the sum transferred to the Evans Senate Committee to \$7,314.07. (See Attachment E, "2nd Amendment".) However, a careful reading of the first amended report (Attachment D) and the second (Attachment E) reveals that the figure transferred to the Evans Senate Committee was arbitrarily altered to account for a change in the income from the Idaho Bank & Trust Co. Thus, the first amendment lists \$213.48 in income from Idaho Bank & Trust, and a \$7,350.32 transfer to the Evans Senate Committee (see Attachment D), while the second amendment lists \$177.23 in income from Idaho Bank & Trust, and \$7,314.07 transfer to the Evans Senate Committee. In short, the decrease in income from the bank (\$36.25) causes a change in the amount transferred to the Evans Senate Committee of exactly the amount (\$36.25). The significance of this transaction is that, months after the transfer of cash to the Senate Committee occurred, the Evans Gubernatorial Committee was still altering the reported figures in an attempt to balance the books; an attempt made considerably more difficult by the fact that the sum supposedly transferred (either \$7,350.32 or \$7,314.07) came from an empty account certified empty on the date the transfer purportedly occurred, and after the transfer from the Evans Gubernatorial Committee to the Evans Senate Committee had already been reported as a full \$11,308.97.

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Some of these transfers were officially filed with the FEC on June 25, 1985 (see Attachment B). The filing stated that the Evans Gubernatorial Committee had "\$11,272.72" of remaining funds as of "March 15, 1985," that \$2,000 was sent to the Democratic Governor's Association, \$1,958.65 was given to the Idaho State Democratic Party, and that, after determining that "at least \$7,314.07 qualified as permissible campaign funds under Federal Election Campaign Laws," that amount was transferred to the Evans Senate Committee. This report, significantly, omits the dates of all of these alleged transactions.

The reason for the confusion created by these contradictory filings can readily be found in the reports submitted by the Evans committees to the FEC. There (see Attachment F) the Evans Gubernatorial Committee identifies the sources of its itemized receipts. These include one contribution in excess of the limit established by 2 U.S.C. 441a(a)(1)(A)⁵ -- Robert L. Harney's contribution in the amount of \$1,050.00. The list also includes contributions from two corporations -- \$1,000.00 from J. C. Penny Co., Inc., and \$250.00 from Kaiser Aluminum (and apparently a direct contribution from a labor union as well - \$1,936.46 from the Teamsters Joint Council #37 Political Fund). The Act prohibits candidates from receiving funds from either corporations

5 "No person shall make contributions to any candidate and his authorized political committees with respect to any election for federal office which, in the aggregate, exceed \$1,000." 2 U.S.C. § 441a(a)(1)(A).

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or labor unions. 2 U.S.C. § 441b(a).⁶

Although these contributions are prohibited in Federal campaigns, federal law does not govern contributions to state campaigns. The Evans Gubernatorial Committee could properly accept such contributions, as it did. However, since such contributions may not be made to a federal candidate, such contributions may not be transferred from a state fund (the Evans Gubernatorial Committee) to a Federal fund (the Evans Senate Committee).

11 C.R.F. § 110.3(a)(2)(iv).⁷

Thus, the FEC filing of the Evans Senate Committee attempts to show that no contributions in excess of federal limits were transferred. The method used, however, is simply to omit the names of the offending two corporations and one labor union, and to alter the records of the contribution made by Robert L. Harney so that the contribution of \$1,050.00 made on November 30, 1982

6 "It is unlawful...for any corporation whatever, or any labor organization, to make a contribution or expenditure in connection with any election at which...a Senate or representative in...Congress are to be voted for, or in connection with any primary election or political convention or caucus held to select candidates for any of the foregoing offices, or for any candidate, political committee, or other person knowingly to accept or receive any contribution prohibited by this section..." 2 U.S.C. § 441b(a).

7 "This part shall not limit transfers between...[a] candidate's previous campaign committee and his or her currently registered principal campaign committee or other authorized committee, as long as none of the funds transferred contain contributions which would be in violation of the Act." 11 C.F.R. § 110.3(a)(2)(iv).

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(see Attachment G) becomes instead a contribution of \$277.81 (still allegedly made on November 30, 1982). Having simply deleted or altered the identities of those whose contributions would be illegal under federal law, the Evans filing with the FEC then lists a contribution of \$5,435.34 as "Memo Entry Unitemized" in order to reach the sum of \$7,314.07, which is the amount allegedly transferred from the Evans Gubernatorial Committee to the Evans Senate Committee.

III. THE IMPORT OF THE CONTRADICTION FILINGS

As this complaint has already demonstrated, it was not, however, \$7,314.07 that was transferred from the Evans Gubernatorial Committee to the Evans Senate Committee, but rather \$11,308.97. Only after that transfer occurred (on March 18, 1985), did the Evans committees evidently determine that the funds transferred included money not legally permitted in a federal campaign.

At that point, the Evans Committees could have refunded the illegal funds from the Evans Senate Committee account to the Gubernatorial Committee. Instead, it appears that both committees may have entered into a concerted attempt to conceal the initial transfer and to falsify their records so as to show two transfers on March 28 from the closed Evans Gubernatorial Committee account,

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and a final transfer on March 29 of some \$7,000.00⁸, supposedly without the illegal contributions.

The sum of the contributions supposedly transferred out of the Gubernatorial Committee's empty account on March 28, 1985 reveals the contradiction. The two transfers (to the Democratic Governors Association and the Idaho Democratic Party) total \$3,958.65--the exact sum of the contributions from corporations, labor unions, and individuals declared by the Evans Gubernatorial Committee (see Attachment F) but not by the Evans Senate Committee (see Attachment G).

Thus, the Evans committees chose to amend their filings to deny the March 18, 1985 transfer of illegal funds, and instead to claim those funds were properly distributed by the Evans Gubernatorial Committee on March 28, 1985, showing a "clean" transfer of remaining campaign funds from the Evans Gubernatorial Committee to the Evans Senate Committee on March 29, 1985. That showing is refuted, however, by the existence in the public records of the Idaho Secretary of State's Office of the March 18, 1985 filing admitting the \$11,308.97 transfer, and certifying the closing of the Evans Gubernatorial Committee's accounts.

⁸ See Note 4, *supra*, for a discussion of the untimely and artificial creation of the final sum allegedly transferred.

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IV. SUMMARY

Governor Evan's campaign committees have acted contrary to Federal law, 2 U.S.C. § 441a(f)⁹, in illegally transferring corporate, labor, and excessive individual campaign contributions from a state to a federal campaign fund. Worse, they appear to have attempted to conceal from the FEC, and from the public that the Commission exists to protect, the transfer of these funds through a complex series of apparently false and misleading filings with the FEC, as well as with Idaho authorities. The evidence strongly indicates that the John Evans for Senate Committee and The Evans Committee have violated the Act in the following manner:

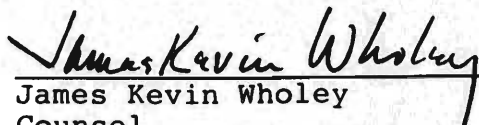
1. Violation of 2 U.S.C. § 441a(a)(1)(A). A contribution in excess of \$1,000.00, made by Robert L. Harney, was transferred from the Evans Gubernatorial Committee to the Evans Senate Committee on March 18, 1985;

2. Violation of 2 U.S.C. § 441b(a). Prohibited contributions from corporations and a labor union were transferred from the Evans Gubernatorial Committee to the Evans Senate Committee on March 18, 1985;

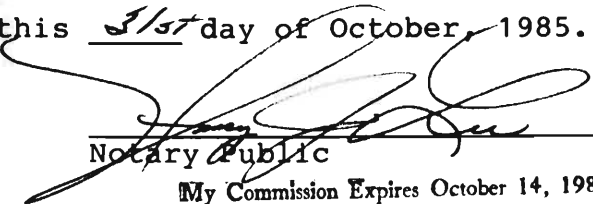
9 "No candidate or political action committee shall knowingly accept any contribution or make an expenditure in violation of the provisions of this section. 2 U.S.C. § 441a(f).

3. Impose any and all appropriate penalties grounded in violations alleged in this Complaint.

Respectfully submitted,

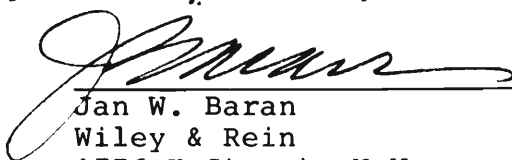

James Kevin Wholey
Counsel
National Republican Senatorial
Committee

Subscribed and sworn to me on this 31st day of October, 1985.


Notary Public

My Commission Expires October 14, 1987

OF COUNSEL


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

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STATEMENT OF CANDIDACY

(see reverse side for instructions)

1. (a) Name of Candidate (in Full) John Victor Evans	2. Identification No. To be assigned
(b) Address (Number and Street) 1805 North Twenty-First Street	3. Party Affiliation Democratic
(c) City, State and ZIP Code Boise, Idaho 83702	4. Office Sought U.S. Senate
	5. District & State of Candidate Idaho

DESIGNATION OF PRINCIPAL CAMPAIGN COMMITTEE

6. I hereby designate the following named political committee as my Principal Campaign Committee for the 1986 election(s).
(Year of Election)

NOTE: This designation must be filed with the appropriate office listed below.

(a) Name of Committee (in Full)
John Evans for Senate Committee

(b) Address (Number and Street)

P.O. Box 1002

(c) City, State and ZIP Code

Boise, Idaho 83701

DESIGNATION OF OTHER AUTHORIZED COMMITTEES

7. I hereby authorize the following named committee, which is NOT my principal campaign committee, to receive and expend funds on behalf of my candidacy.

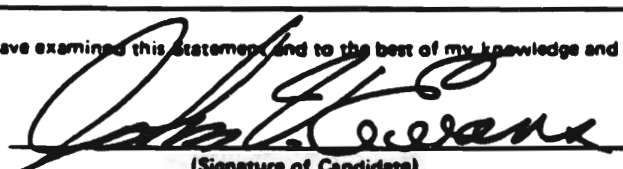
NOTE: This designation should be filed with the principal campaign committee.

(a) Name of Committee (in Full)

(b) Address (Number and Street)

(c) City, State and ZIP Code

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


(Signature of Candidate)

March 15, 1985
(Date)

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

CANDIDATES FOR -

President mail to:

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

U.S. Senate mail to:

Secretary of the Senate
119 D Street, N.E.
Washington, D.C. 20510

U.S. House of Representatives
mail to:

Clerk of the House
1036 Longworth Office Bldg.
Washington, D.C. 20515

For further
information
contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-623-4068

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FEC FORM 2 (3/80)

RECEIVED
SEC. OF STATE

85 JUL 31 PM 4 47



July 25, 1985

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

Dear Sir or Madam:

Enclosed please find for filing a Statement of Organization, Itemized Receipts, and Reports of Receipts and Disbursements for "The Evans Committee".

The Evans Committee was the principal campaign committee for Governor John V. Evans' 1982 campaign for re-election as Governor of Idaho. It was organized and operated according to the laws of the State of Idaho.

On March 15, 1985 the "John Evans for Senate Committee" was formed as the principal campaign committee authorized by John Evans to support his potential candidacy for the U. S. Senate. At that time, The Evans Committee determined it would wind up its affairs, terminate its organization, and transfer its remaining funds to the John Evans for Senate Committee. The Evans Committee had at that time \$11,272.72 in remaining funds, the sources of which were determined according to the "first in - first out" method, have been derived as follows:

Contributions	:	\$ 6,547.38
Honoraria	:	1,000.00
Interest and Miscellaneous Receipts	:	3,725.34

as more fully appears in the enclosed schedules.

July 25, 1985

After reviewing the sources of these funds it appeared that at least \$7,314.07 qualified as permissible campaign funds under the Federal Election Campaign Laws and 11 C.F. R. Subchapter A. After disbursing \$2,000.00 to the Democratic Governors' Association (dues payment) and \$1,958.65 to the Idaho State Democratic Party, the remaining \$7,314.07 was transferred to the John Evans for Senate Committee. Thereafter, The Evans Committee filed a termination report with the Idaho Secretary of State's Office.

Because The Evans Committee no longer exists, the \$7,314.07 already transferred to the new committee is obviously the only expenditure it will be making for a federal election campaign. However, because 11C.F.R. §100.5 appears to require any committee which makes expenditures in excess of \$1,000.00 on behalf of a federal candidate to register with the Federal Election Commission, I am submitting for filing the enclosed Statement of Organization and supporting documents on behalf of The Evans Committee.

Please notify me if anything additional is required by you from The Evans Committee.

Sincerely,


Patrick J. Vaughan



CAMPAIGN FINANCIAL DISCLOSURE REPORT

(Please Print or Type)

The Evans Committee Governor
 Name of Candidate or Political Committee Office Sought (if candidate) District (if any)

John V. Evans 208-334-2100
 Address of Candidate or Political Committee Chairman Home Phone Work Phone

Patrick J. Vaughan 208-342-7162 208-334-2100
 Name of Political Treasurer Home Phone Work Phone

4098 Hawthorne Way Boise, Idaho 83703
 Address of Political Treasurer Zip Code

TYPE OF REPORT

Directions: To indicate the type of report being filed fill in the appropriate dates and check the appropriate boxes. The 30 Day Post-Primary Report is filed only by candidates who lose the primary. See the instructional manual for reporting periods and due dates.

This report is for the period from 1-1-85 thru 3-18-85

- ☐ 7 Day Pre-Primary Report
☐ 30 Day Post-Primary Report
☐ 7 Day Pre-General Report
☐ 30 Day Post-General Report
☐ Annual Report (Due Jan. 31st)
☒ Termination Report

Is this Report an Amendment?

☐ Yes ☒ No

STATEMENT OF NO CONTRIBUTIONS OR EXPENDITURES

Directions: If you had no contributions or expenditures during this reporting period check the box next to the statement below. fill in the appropriate dates and sign this report. Be sure to carry forward the appropriate "Calendar Year to Date" figures in Column II on the Summary Page.

☐ I hereby certify that I have received no contributions and have made no expenditures during this reporting period from _____ thru _____

CERTIFICATION

I Patrick J. Vaughan hereby certify that the information in this report
 Name of Political Treasurer
 is a true, complete, and correct Campaign Financial Disclosure Report as required by law.

Signature of Political Treasurer

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**SCHEDULE 7
CONTRIBUTIONS**

Directions: Before completing this schedule please refer to the instructional manual. If you do not have enough space to report the required information in Section A2, attach another sheet of paper to this report indicating clearly the section and all other required information. A contribution entered in one section of this schedule should never be entered in the other section of this schedule.

SECTION A1: Contributions of Fifty Dollars (\$50.00) or Less

LINE 1. Total Number of Contributors This Period - 0 -
LINE 2. Total Amount of Contributions This Period \$ - 0 -

SECTION A2: Contributions of More Than Fifty Dollars (\$50.00)

Date	Name and Address of Contributor	Amount This Period	Calendar Year to Date
2-28-85	Idaho Bank & Trust P. O. Box 2800 Boise, Idaho	\$190.63	\$190.63
		\$ 190.63	

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SCHEDULE B EXPENDITURES

Directions: Before completing this schedule please refer to the instructional manual. If you do not have enough space to report the required information in section B2, attach another sheet of paper to this report indicating clearly the section and all other required information. An expenditure entered in one section of this schedule should never be entered in the other section of this schedule.

SECTION B1: Expenditures of Less Than Twenty-Five Dollars (\$25.00) This Period

LINE 4. Total Number of Expenditures

-0-

LINE 5. Total Amount of Expenditures

\$ -0-

SECTION B2: Expenditures of Twenty-Five Dollars (\$25.00) or More This Period

Date	Name and Address of Recipient	Purpose of Expenditure	Amount of Expenditure
1-25-85	Peter D. Hart - Research 1724 Connecticut Ave. Washington, D. C.	Travel	\$ 716.76
3-15-85	Idaho Dept. of Revenue & Taxation Boise, Idaho	Tax on Interest Earned	62.00
3-15-85	U. S. Internal Revenue Service Ogden, Utah	Tax on Interest Earned	314.00
3-18-85	John Evans for Senate Committee P. O. Box 1002 Boise, Idaho	Transfer (Close) Account	11,308.97

\$ 12,401.73

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SCHEDULE C
SUMMARY PAGE

Directions: Please refer to the instructional manual before completing this page. To obtain the appropriate column II figures in Sections A and B add column II of last report to column I of this report.

	COLUMN I THIS PERIOD	COLUMN II CALENDAR YEAR TO DATE
SECTION A: SUMMARY OF CONTRIBUTIONS		
LINE 7. Contributions of \$50.00 or Less (enter amount from line 2)	\$ -0-	\$ -0-
LINE 8. Contributions of More Than \$50.00. (enter amount from line 3)	\$ 190.63	\$ 190.63
LINE 9. Total Contributions (add lines 7 and 8)	\$ 190.63 ✓	\$ 190.63 ✓
SECTION B: SUMMARY OF EXPENDITURES		
LINE 10. Expenditures of Less Than \$25.00 (enter amount from line 5)	\$ -0-	\$ -0-
LINE 11. Expenditures of \$25.00 or More (enter amount from line 6)	\$ 12,401.73	\$ 12,401.73
LINE 12. Total Expenditures (add lines 10 and 11)	\$ 12,401.73 ✓	\$ 12,401.73 ✓
SECTION C: CASH BALANCE SUMMARY		
LINE 13. Enter cash balance as of January 1, This Year*	\$XXXXXXXXXXXXX	\$ 12,211.10
LINE 14. Enter cash balance at close of last period*	\$ 12,211.10 198.25	\$XXXXXXXXXXXXX
LINE 15. Total Contributions (enter amount from line 9)	\$ 190.63	\$
LINE 16. Add lines 13, 14 and 15	\$ 12,401.73	\$
LINE 17. Total Expenditures (enter amount from line 12)	\$ 12,401.73	\$
LINE 18. Cash balance at close of period (subtract line 17 from line 16)	\$ -0-	\$ -0-
COLUMNS I and II LINE 18 MUST BE THE SAME FIGURE		

*If this is a new candidate's or new political committee's first report, enter on lines 13 and 14 the amount of cash on hand at date of certification. This same figure should be entered on line 13 of all reports filed this calendar year.

BE SURE YOU HAVE SIGNED THIS REPORT

Return This Report to:
Pete T. Conarum
Secretary of State
Statehouse
Salem, Idaho 83720



CAMPAIGN FINANCIAL DISCLOSURE REPORT

(Please Print or Type)

<u>The Evans Committee</u>	<u>GOVERNOR</u>	
Name of Candidate or Political Committee	Office Sought (if candidate)	District (if any)
<u>John V. Evans</u>	<u>345-2815</u>	<u>334-2100</u>
Address of Candidate or Political Committee Chairman	Home Phone	Work Phone
<u>Patrick J. Vaughan</u>	<u>(208) 342-7162</u>	<u>(208) 334-2100</u>
Name of Political Treasurer	Home Phone	Work Phone
<u>4098 Hawthorne Way</u>	<u>Boise, Idaho</u>	<u>83703</u>
Address of Political Treasurer		Zip Code

TYPE OF REPORT

Directions: To indicate the type of report being filed fill in the appropriate dates and check the appropriate boxes. The 30 Day Post-Primary Report is filed only by candidates who lose the primary. See the instructional manual for reporting periods and due dates.

This report is for the period from January 1, 1985 thru March 31, 1985

- ☐ 7 Day Pre-Primary Report
☐ 30 Day Post-Primary Report
☐ 7 Day Pre-General Report
☐ 30 Day Post-General Report
☐ Annual Report (Due Jan. 31st)
☒ Termination Report

Is this Report an Amendment?

☒ Yes ☐ No

STATEMENT OF NO CONTRIBUTIONS OR EXPENDITURES

Directions: If you had no contributions or expenditures during this reporting period check the box next to the statement below. fill in the appropriate dates and sign this report. Be sure to carry forward the appropriate "Calendar Year to Date" figures in Column II on the Summary Page.

☐ I hereby certify that I have received no contributions and have made no expenditures during this reporting period from _____ thru _____

CERTIFICATION

I Patrick J. Vaughan hereby certify that the information in this report
Name of Political Treasurer

is a true, complete, and correct Campaign Financial Disclosure Report as required by law.

Patrick J. Vaughan
Signature of Political Treasurer

87040551624

SCHEDULE A CONTRIBUTIONS

Directions: Before completing this schedule please refer to the instructional manual. If you do not have enough space to report the required information in Section A2, attach another sheet of paper to this report indicating clearly the section and all other required information. A contribution entered in one section of this schedule should never be entered in the other section of this schedule.

SECTION A1: Contributions of Fifty Dollars (\$50.00) or Less

LINE 1. Total Number of Contributors This Period

-0-

LINE 2. Total Amount of Contributions This Period

\$ -0-

SECTION A2: Contributions of More Than Fifty Dollars (\$50.00)

Date	Name and Address of Contributor	Amount This Period	Calendar Year to Date
2-28-85	Idaho Bank & Trust P.O. Box 2800 Boise, Idaho	\$ 213.48	\$ 213.48

87040551625

**SCHEDULE B
EXPENDITURES**

Directions: Before completing this schedule please refer to the instructional manual. If you do not have enough space to report the required information in section B2, attach another sheet of paper to this report indicating clearly the section and all other required information. An expenditure entered in one section of this schedule should never be entered in the other section of this schedule.

SECTION B1: Expenditures of Less Than Twenty-Five Dollars (\$25.00) This Period

LINE 4. Total Number of Expenditures

-0-

LINE 5. Total Amount of Expenditures

\$ -0-

SECTION B2: Expenditures of Twenty-Five Dollars (\$25.00) or More This Period

Date	Name and Address of Recipient	Purpose of Expenditure	Amount of Expenditure
1-25-85	Peter D. Hart - Research 1724 Connecticut Avenue Washington, D.C.	Travel	\$ 716.76
3-15-85	Idaho Department of Revenue & Taxation Boise, Idaho	Tax on Interest Earned	62.00
3-15-85	U.S. Internal Revenue Service Ogden, Utah	Tax on Interest Earned	314.00
3-28-85	Democratic Governor's Assn. 20 Ivy Street S.E. Washington, D.C. 20003	Dues	2000.00
3-28-85	Idaho State Democratic Party 1020 West Franklin Boise, Idaho	Contribution	1958.65
3-29-85	John Evans for Senate Comm. P.O. Box 1002 Boise, Idaho 83701	Transfer Account	7350.32

812,401.71

87040351626

SCHEDULE C SUMMARY PAGE

Directions: Please refer to the instructional manual before completing this page. To obtain the appropriate column II figures in Sections A and B add column II of last report to column I of this report.

	COLUMN I <u>THIS PERIOD</u>	COLUMN II <u>CALENDAR YEAR TO DATE</u>
SECTION A: SUMMARY OF CONTRIBUTIONS		
LINE 7. Contributions of \$50.00 or Less (enter amount from line 2)	\$ -0-	\$ -0-
LINE 8. Contributions of More Than \$50.00. (enter amount from line 3)	\$ 213.48	\$ 213.48
LINE 9. Total Contributions (add lines 7 and 8)	\$ 213.48 ✓	\$ 213.48 ✓
SECTION B: SUMMARY OF EXPENDITURES		
LINE 10. Expenditures of Less Than \$25.00 (enter amount from line 5)	\$ -0-	\$ -0-
LINE 11. Expenditures of \$25.00 or More (enter amount from line 6)	\$ 12,401.73	\$ 12,401.73
LINE 12. Total Expenditures (add lines 10 and 11)	\$ 12,401.73 ✓	\$ 12,401.73 ✓
SECTION C: CASH BALANCE SUMMARY		
LINE 13. Enter cash balance as of January 1, This Year*	\$ XXXXXXXXXXXXX	\$ 12,188.25
LINE 14. Enter cash balance at close of last period*	\$ 12,188.25	\$ XXXXXXXXXXXXX
LINE 15. Total Contributions (enter amount from line 9)	\$ 213.48	\$ 213.48
LINE 16. Add lines 13, 14 and 15	\$ 12,401.73	\$ 12,401.73
LINE 17. Total Expenditures (enter amount from line 12)	\$ 12,401.73	\$ 12,401.73
LINE 18. Cash balance at close of period (subtract line 17 from line 16)	\$ -0- ✓	\$ -0- ✓
COLUMNS I and II LINE 18 MUST BE THE SAME FIGURE		

*If this is a new candidate's or new political committee's first report, enter on lines 13 and 14 the amount of cash on hand at date of certification. This same figure should be entered on line 13 of all reports filed this calendar year.

BE SURE YOU HAVE SIGNED THIS REPORT

Return This Report to:
Pete T. Conarman
Secretary of State
Statehouse
Boise, Idaho 83726

87040351627



CAMPAIGN FINANCIAL DISCLOSURE REPORT

(Please Print or Type)

RECEIVED
SEC. OF STATE

Governor

The Evans Committee

Name of Candidate or Political Committee

85 JUL 26 PM 3 52

Office Sought (if candidate)

District (if any)

John V. Evans

345-2815

334-2100

Address of Candidate or Political Committee Chairman

Home Phone

Work Phone

Patrick J. Vaughan

(208) 342-7162

(208) 334-2100

Name of Political Treasurer

Home Phone

Work Phone

4098 Hawthorne Way

Boise, Idaho

83703

Address of Political Treasurer

Zip Code

TYPE OF REPORT

Directions: To indicate the type of report being filed fill in the appropriate dates and check the appropriate boxes. The 30 Day Post-Primary Report is filed only by candidates who lose the primary. See the instructional manual for reporting periods and due dates.

This report is for the period from January 1, 1985 thru March 31, 1985

- ☐ 7 Day Pre-Primary Report
- ☐ 30 Day Post-Primary Report
- ☐ 7 Day Pre-General Report
- ☐ 30 Day Post-General Report
- ☐ Annual Report (Due Jan. 31st)
- ☐ Termination Report

Is this Report an Amendment?

☒ Yes ☐ No
2nd Amendment

STATEMENT OF NO CONTRIBUTIONS OR EXPENDITURES

Directions: If you had no contributions or expenditures during this reporting period check the box next to the statement below fill in the appropriate dates and sign this report. Be sure to carry forward the appropriate "Calendar Year to Date" figures in Column II on the Summary Page.

☐ I hereby certify that I have received no contributions and have made no expenditures during this reporting period from _____ thru _____

CERTIFICATION

I Patrick J. Vaughan
Name of Political Treasurer

hereby certify that the information in this report

is a true, complete, and correct Campaign Financial Disclosure Report as required by law.

Signature of Political Treasurer

8704051628

SCHEDULE A CONTRIBUTIONS

Directions: Before completing this schedule please refer to the instructional manual. If you do not have enough space to report the required information in Section A2, attach another sheet of paper to this report indicating clearly the section and all other required information. A contribution entered in one section of this schedule should never be entered in the other section of this schedule.

SECTION A1: Contributions of Fifty Dollars (\$50.00) or Less**LINE 1. Total Number of Contributors This Period**

-0-

LINE 2. Total Amount of Contributions This Period

-0-

SECTION A2: Contributions of More Than Fifty Dollars (\$50.00)

Date	Name and Address of Contributor	Amount This Period	Calendar Year to Date
2-28-85	Idaho Bank & Trust - P. O. Box 2800 Boise, Idaho 83702	\$177.23	\$177.23

887040551629

SCHEDULE L EXPENDITURES

Directions: Before completing this schedule please refer to the instructional manual. If you do not have enough space to report the required information in section B2, attach another sheet of paper to this report indicating clearly the section and all other required information. An expenditure entered in one section of this schedule should never be entered in the other section of this schedule.

SECTION B1: Expenditures of Less Than Twenty-Five Dollars (\$25.00) This Period

SECTION B2: Expenditures of Twenty-Five Dollars (\$25.00) or More This Period

Date	Name and Address of Recipient	Purpose of Expenditure	Amount of Expenditure
1-25-85	Peter D. Hart - Research 1724 Connecticut Avenue Washington, D. C.	Travel	\$ 716.76
3-15-85	Idaho Department of Revenue & Taxation Boise, Idaho	Tax on Interest Earned	62.00
3-15-85	U.S. Internal Revenue Service Ogden, Utah	Tax on Interest Earned	314.00
3-28-85	Democratic Governor's Assn. 20 Ivy Street S. E. Washington, D. C. 20003	Dues	2000.00
3-28-85	Idaho State Democratic Party 1020 West Franklin Boise, Idaho	Contribution	1958.65
3-29-85	John Evans for Senate Comm. P. O. Box 1002 Boise, Idaho 83701	Transfer Account	7314.07

LINE 6 Total B2 This Period

\$12,365.43

87040551630

**SCHEDULE C:
SUMMARY PAGE**

Directions: Please refer to the instructional manual before completing this page. To obtain the appropriate column II figures in Sections A and B add column II of last report to column I of this report.

	<u>COLUMN I</u> <u>THIS PERIOD</u>	<u>COLUMN II</u> <u>CALENDAR YEAR TO DATE</u>
SECTION A: SUMMARY OF CONTRIBUTIONS		
LINE 7. Contributions of \$50.00 or Less (enter amount from line 2)	\$ -0-	\$ -0-
LINE 8. Contributions of More Than \$50.00. (enter amount from line 3)	\$ 177.23	\$ 177.23
LINE 9. Total Contributions (add lines 7 and 8)	\$ 177.23	\$ 177.23
SECTION B: SUMMARY OF EXPENDITURES		
LINE 10. Expenditures of Less Than \$25.00 (enter amount from line 5)	\$ -0-	\$ -0-
LINE 11. Expenditures of \$25.00 or More (enter amount from line 6)	\$ 12,365.48	\$ 12,365.48
LINE 12. Total Expenditures (add lines 10 and 11)	\$ 12,365.48	\$ 12,365.48
SECTION C: CASH BALANCE SUMMARY		
LINE 13. Enter cash balance as of January 1, This Year*	\$ xxxxxxxxxxxxxx	\$ 12,188.25
LINE 14. Enter cash balance at close of last period*	\$ 12,189.25	\$ xxxxxxxxxxxxxx
LINE 15. Total Contributions (enter amount from line 9)	\$ 177.23	\$ 177.23
LINE 16. Add lines 13, 14 and 15	\$ 12,365.48	\$ 12,365.48
LINE 17. Total Expenditures (enter amount from line 12)	\$ 12,365.48	\$ 12,365.48
LINE 18. Cash balance at close of period (subtract line 17 from line 16)	\$ -0-	\$ -0-
	COLUMNS I and II LINE 18 MUST BE THE SAME FIGURE	

*If this is a new candidate's or new political committee's first report, enter on lines 13 and 14 the amount of cash on hand at date of certification. This same figure should be entered on line 13 of all reports filed this calendar year.

BE SURE YOU HAVE SIGNED THIS REPORT

Return This Report to:
Pete T. Conarran
Secretary of State
Statehouse
Boise, Idaho 83720

8704051631

REPORTS OF RECEIPTS AND DISBURSEMENTS
For Authorized Committee

(Summary Page)

ALIGN AREA 1. Name of Committee (in Full) JOHN EVANS FOR SENATE COMMITTEE Address (Number and Street) P. O. Box 1002 City, State and Zip Code Boise, Idaho 83701	ALIGN AREA 2. FEC Identification Number C00194472 3. Is this Report an Amendment? ☐ YES ☒ NO
--	---

TYPE OF REPORT

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

This report contains activity for - ☒ Primary Election ☐ General Election ☐ Special Election ☐ Runoff Election

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. Covering Period <u>3/31/85</u> through <u>6/30/85</u>		
8. Net Contributions (other than loans)		
5. (a) Total Contributions (other than loans) (From Line 11 (a))	\$ 76,058.50	\$ 76,058.50
(b) Total Contribution Refunds (from Line 20 (d))	-0-	-0-
(c) Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a))	76,058.50	76,058.50
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	41,844.84	41,844.34
(b) Total Offsets to Operating Expenditures (from Line 14)	373.00	373.00
(c) Net Operating Expenditures (subtract Line 7 (b) from 7 (a))	41,471.84	41,471.34
8. Cash on Hand at Close of Reporting Period (from Line 27)	42,301.28	42,301.29
9. Debts and Obligations Owed TO The Committee (itemize all on Schedule C or Schedule D)	-0-	-0-
10. Debts and Obligations Owed BY The Committee (itemize all on Schedule C or Schedule D)	-0-	-0-

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

For further information, contact:
Federal Election Commission
Toll Free 800 424 9530
Local 202 523 4068

Hubert S. Coats
Type or Print Name of Treasurer
Hubert S Coats
SIGNATURE OF TREASURER

7-26-85
Date

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

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

FEC FORM 3 (3-80)

SCHEDULE A

ITEMIZED RECEIPTS

TRANSFERS FROM OTHER AUTHORIZED COMMITTEES

LINE NUMBER _____
(Use separate schedules for each category of the Detailed Summary Page)

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

Name of Committee (in Full)

JOHN EVANS FOR SENATE COMMITTEE

C00194472

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Patrick Vaughan 4098 Hawthorne Way Boise, Idaho 83703	State of Idaho		
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Chief of Staff	12/31/84	250.00
	Aggregate Year-to-Date—\$		
B. Full Name, Mailing Address and ZIP Code Idaho AFL-CIO COPE 225 North 16th Boise, Idaho 83703	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation	11/13/84	250.00
	Aggregate Year-to-Date—\$		
C. Full Name, Mailing Address and ZIP Code Rose Bowman 1624 Warm Springs Boise, Idaho 83712	Name of Employer State of Idaho	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation State Employee	11/2/84	250.00
	Aggregate Year-to-Date—\$		
D. Full Name, Mailing Address and ZIP Code John D. Hatfield Soda Springs, Idaho 83276	Name of Employer Self-Employed - Soda Springs Phosphate	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation	8/30/84	500.00
	Aggregate Year-to-Date—\$		
E. Full Name, Mailing Address and ZIP Code Robert L. Harney Box 368 Twin Falls, Idaho 83343	Name of Employer Self-Employed	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Funeral Director	11/30/92	277.81
	Aggregate Year-to-Date—\$		
F. Full Name, Mailing Address and ZIP Code Dan Emborg 11358 Tioga Street Boise, Idaho 83709	Name of Employer State of Idaho	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation State Employee	11/30/82	350.92
	Aggregate Year-to-Date—\$		
G. Full Name, Mailing Address and ZIP Code Memo Entry Unitemized	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		5435.34
	Aggregate Year-to-Date—\$		
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			\$7,314.07

STATEMENTS OF RECEIPTS AND DISBURSEMENTS For Authorized Committee

(Summary Page)

ALIGN AREA

1 Name of Committee (in Full)

THE EVANS COMMITTEE

Address (Number and Street)

P. O. Box 1002

City, State and Zip Code

Boise, Idaho 83701

RECEIVED
SEC. OF STATE

85 JUL 91 11 17 27

2 FEC Identification Number

TO BE ASSIGNED

3. Is this Report an Amendment?

☐ YES

☐ NO

4

TYPE OF REPORT

☐ April 15 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year End Report

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

☐ Twelfth day report preceding

(Type of Election)

election on in the State of

☐ Thirtieth day report following the General Election on

in the State of

☒ Termination Report

This report contains activity for -

☒ Primary Election

☐ General Election

☐ Special Election

☐ Runoff Election

SUMMARY

5. Covering Period 3/28/85 through 6/30/85

6. Net Contributions (other than loans)

(a) Total Contributions (other than loans) (From Line 11 (a))

(b) Total Contribution Refunds (from Line 20 (d))

(c) Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a))

7. Net Operating Expenditures

(a) Total Operating Expenditures (from Line 17)

(b) Total Offsets to Operating Expenditures (from Line 14)

(c) Net Operating Expenditures (Subtract Line 7 (b) from 7 (a))

8. Cash on Hand at Close of Reporting Period (from Line 27)

9. Debts and Obligations Owed TO The Committee
(Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY The Committee
(Itemize all on Schedule C or Schedule D)

COLUMN A
This Period

COLUMN B
Calendar Year-to-Date

\$ 6,547.38

\$ 6,547.38

-0-

-0-

6,547.38

\$ 6,547.38

-0-

-0-

-0-

-0-

-0-

-0-

-0-

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-0-

-0-

-0-

-0-

-0-

-0-

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

For further information, contact:
Federal Election Commission
Toll Free 800 424 9530
Local 202 523 4088

Patrick J. Vaughan

Type and Name of Treasurer

SIGNATURE OF TREASURER

7/26/85

Date

NOTE: Submission of false erroneous or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 5457c

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

FEC FORM 3 501

SCHEDULE A

ITEMIZED RECEIPTS

LINE NUMBER _____
 (Use separate schedules for each category of the Categorized Summary Page)

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

Name of Committee (in Full)

THE EVANS COMMITTEE

A. Full Name, Mailing Address and ZIP Code Patrick Vaughan 4098 Hawthorne Way Boise, Idaho 83703		Name of Employer State of Idaho	Date (month, day, year) 12/31/84	Amount of Each Receipt This Period \$ 250.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):		Occupation State Employee	Aggregate Year-to-Date—\$	
B. Full Name, Mailing Address and ZIP Code Rose Bowman 1624 Warm Springs Boise, Idaho 83712		Name of Employer State of Idaho	Date (month, day, year) 11/13/84	Amount of Each Receipt This Period 250.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):		Occupation State Employee	Aggregate Year-to-Date—\$	
C. Full Name, Mailing Address and ZIP Code John D. Hatfield Soda Springs, Idaho 83276		Name of Employer Self Employed	Date (month, day, year) 8/30/84	Amount of Each Receipt This Period 500.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):		Occupation Phosphate	Aggregate Year-to-Date—\$	
D. Full Name, Mailing Address and ZIP Code Robert L. Harney Box 368 Twin Falls, Idaho 83343		Name of Employer Self Employed	Date (month, day, year) 11/30/82	Amount of Each Receipt This Period 1050.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):		Occupation Funeral Director	Aggregate Year-to-Date—\$	
E. Full Name, Mailing Address and ZIP Code Dan Emborg 11358 Tioga Street Boise, Idaho 83709		Name of Employer State of Idaho	Date (month, day, year) 11/30/82	Amount of Each Receipt This Period 350.92
Receipt For: ☒ Primary ☐ General ☐ Other (specify):		Occupation State Employee	Aggregate Year-to-Date—\$	
F. Full Name, Mailing Address and ZIP Code J. C. Penny Co., Inc. Store #1206-2 Sunrise Center, 6100 Sunrise Blvd. Citrus Heights, CA 95610		Name of Employer Corporation	Date (month, day, year) 8/17/84	Amount of Each Receipt This Period 1000.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):		Occupation	Aggregate Year-to-Date—\$	
G. Full Name, Mailing Address and ZIP Code Kaiser Aluminum N.W. Regional Office 303 Washington Mutal Bldg. Spokane, Washington 99201		Name of Employer Corporation	Date (month, day, year) 3/28/83	Amount of Each Receipt This Period 250.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):		Occupation	Aggregate Year-to-Date—\$	
SUBTOTAL of Receipts This Page (optional)				
TOTAL This Period (last page this line number only)				

3650.92

SCHEDULE A

ITEMIZED RECEIPTS

 LINE NUMBER _____
 (Use separate schedules for each category of the Detailed Summary Page)

OTHER POLITICAL COMMITTEES

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

Name of Committee (in Full)

THE EVANS COMMITTEE

A. Full Name, Mailing Address and ZIP Code

 Idaho AFL CIO COPE
 225 North 16th
 Boise, Idaho 83702

Name of Employer

Date (month,
day, year)

11/13/94

Amount of Each
Receipt this Period

250.00

Occupation

Aggregate Year-to-Date—\$

Receipt For:

☐ Primary☐ General☐ Other (specify):

B. Full Name, Mailing Address and ZIP Code

 Teamsters Joint Council #37
 Political Fund
 707 Summit Ave.
 Union City, NJ 07087

Name of Employer

Date (month,
day, year)

11/23/92

Amount of Each
Receipt This Period

1936.46

Occupation

Aggregate Year-to-Date—\$

Receipt For:

☐ Primary☐ General☐ Other (specify):

C. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt This Period

Occupation

Aggregate Year-to-Date—\$

Receipt For:

☐ Primary☐ General☐ Other (specify):

D. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt This Period

Occupation

Aggregate Year-to-Date—\$

Receipt For:

☐ Primary☐ General☐ Other (specify):

E. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt This Period

Occupation

Aggregate Year-to-Date—\$

Receipt For:

☐ Primary☐ General☐ Other (specify):

F. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt This Period

Occupation

Aggregate Year-to-Date—\$

Receipt For:

☐ Primary☐ General☐ Other (specify):

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt This Period

Occupation

Aggregate Year-to-Date—\$

Receipt For:

☐ Primary☐ General☐ Other (specify):

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

\$2,186.46



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 8, 1985

The Honorable John Evans,
Governor of Idaho
P.O. Box 1002
Boise, Idaho 83701

Re: MUR 2100

Dear Governor Evans:

This letter is to notify you that on November 4, 1985, 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 2100. 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 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.

2a

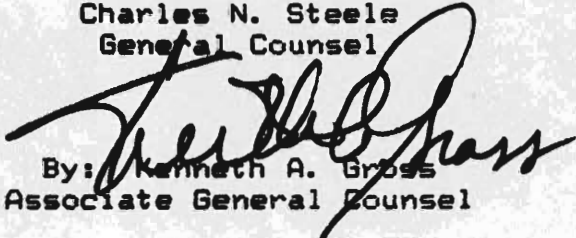
87040551637

-2-

If you have any questions, please contact Patricia Reilly, the staff member 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
Complaint
Procedures
Designation of Counsel Statement

87040551638

2a



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 8, 1985

Teamsters Joint Council #37
Political Fund
707 Summit Avenue
Union City, NJ 07087

Re: MUR 2100

Dear Sirs:

This letter is to notify you that on November 4, 1985, 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 2100. 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 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.

24

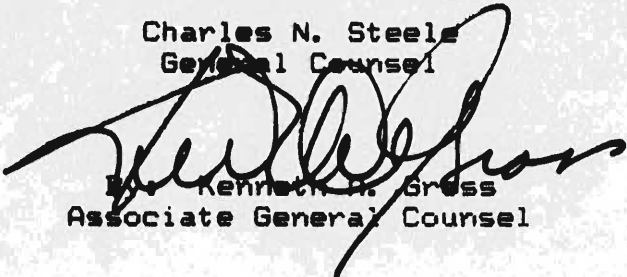
87040551639

-2-

If you have any questions, please contact Patricia Reilly, the staff member 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



Kenneth H. Gross
Associate General Counsel

Enclosures
Complaint
Procedures
Designation of Counsel Statement

87040351640

26



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 8, 1985

Kaiser Aluminum
N.W. Regional Office
303 Washington Mutual Building
Spokane, Washington 99201

Re: MUR 2100

Dear Sir:

This letter is to notify you that on November 4, 1985, 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 2100. 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 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.

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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.

2c

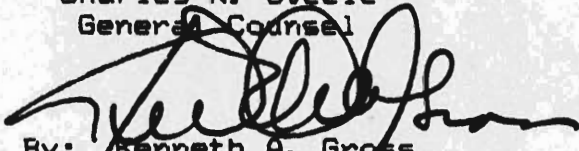
8704051641

-2-

If you have any questions, please contact Patricia Reilly, the staff member 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
Complaint
Procedures
Designation of Counsel Statement

87040551642

20



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 8, 1985

Mr. Robert L. Harvey
P.O. Box 368
Twin Falls, Idaho 83343

Re: MUR 2100

Dear Mr. Harvey:

This letter is to notify you that on November 4, 1985, 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 2100. 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 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.

2d

87040551643

-2-

If you have any questions, please contact Patricia Reilly, the staff member 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
Complaint
Procedures
Designation of Counsel Statement

87040551644

2d



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 8, 1985

J.C. Penny Co., Inc.
Store #1206-2, Sunrise Center
6100 Sunrise Boulevard
Citrus Heights, CA 95610

Re: MUR 2100

Dear Sirs:

This letter is to notify you that on November 4, 1985, 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 2100. 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 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.

2e

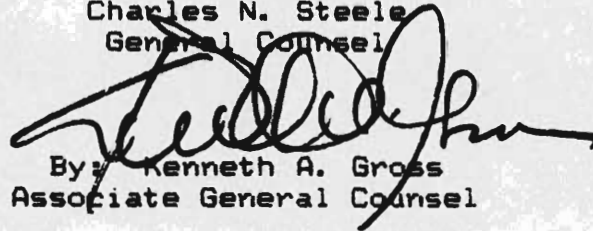
87040551645

-2-

If you have any questions, please contact Patricia Reilly, the staff member 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
Complaint
Procedures
Designation of Counsel Statement

87040551646

2e



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 8, 1985

Patrick Vaughan, as Treasurer
The Evans Committee
P.O. Box 1002
Boise, Idaho 83701

Re: MUR 2100

Dear Mr. Vaughan:

This letter is to notify you that on November 4, 1985, the Federal Election Commission received a complaint which alleges that The Evans Committee and you, 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 2100. 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 Evans Committee and you, as Treasurer, in 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.

2f

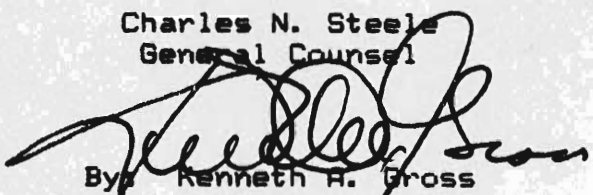
87040551647

-2-

If you have any questions, please contact Patricia Reilly, the staff member 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
Complaint
Procedures
Designation of Counsel Statement

cc: Hon. John Evans, Governor

87040551648

2f



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 8, 1985

Hubert Coates, as Treasurer
John Evans for Senate Committee
P.O. Box 1002
Boise, Idaho 83701

Re: MUR 2100

Dear Mr. Coates:

that the Federal Election Commission received a complaint which alleges that the John Evans for Senate Committee and you, 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 2100. 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 John Evans for Senate Committee and you, as Treasurer, in 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.

29

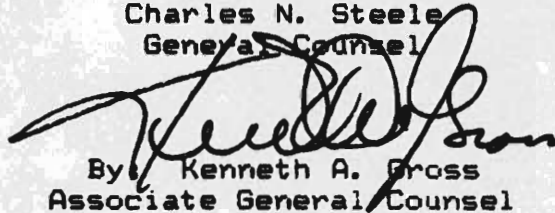
87040551649

-2-

If you have any questions, please contact Patricia Reilly, the staff member 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
Complaint
Procedures
Designation of Counsel Statement

cc: Hon. John Evans, Governor

29

87040651650



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 8, 1985

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

Dear Mr. Baran:

This letter will acknowledge receipt of a complaint filed by you on behalf of the National Republican Senatorial Committee which we received on November 4, 1985, which alleges possible violations of the Federal Election Campaign laws by The John Evans for Senate Committee and The Evans Committee. A staff member has been assigned to analyze your allegations. The respondents 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 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. We have numbered this matter under review MUR 2100. Please refer to this number in all future correspondence. If you have any questions, please contact Lorraine F. Ramos at (202) 523-4075.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure

2h

87040351651

GCC# 8907



Telegram

1-011049A312 11/08/85
ICS IPHWGND WSH
02071 11-08 0127P EST
ICS IPHWGNK
1-007840I312 11/08/85
TWX ESL62906594

Reilly
MUR 2100(E)

5 NOV 8 2 P 2:14

GENERAL COUNCIL

PHS FEDERAL ELECTION COMMISSION E
-- PHYSICAL DELIVERY --
OFFICE OF GENERAL COUNCIL
1325 K STREET N.W.
WASHINGTON DC 20463

ATTN: MR. KEN GROSS

DEAR MR. GROSS:

THIS WILL AUTHORIZE MR. ROBERT F. BAUER TO SERVE AS
WASHINGTON D.C. LEGAL COUNCIL FOR THE EVANS FOR SENATE
CAMPAIGN, WITH RESPECT TO THE FEDERAL ELECTION COMMISSION.

/S/ HUBERT S. COATS
TREASURER
EVANS FOR SENATE COMMITTEE

W.U. 1201-SF (R5-69)



Telegram

CC: ROBERT F. BAUER
DEMOCRATIC SENATORIAL CAMPAIGN COMMITTEE
430 SOUTH CAPITOL STREET, S.E.
WASHINGTON, D.C. 20003

STATE OF IDAHO
COUNTY OF ADA

/S/ CINDY STANDWOOD RESIDING AT BOISE, IDAHO.
NOTARY PUBLIC

COMMISSION EXPIRES: JUNE 16, 1987

1312 EST

1334 EST

W.U. 1201-SF (R5-69)

RECEIVED AT THE FEC
85 NOV 25 9:27

SCHNEIDER, COHEN & SOLOMON
COUNSELLORS AT LAW
501 SUMMIT AVENUE
JERSEY CITY, N. J. 07306

ZACHARY SCHNEIDER"
EDWARD A. COHEN
DAVID SOLOMON
J. SHELDON COHEN

AREA CODE 201
656-6241

EAST BRUNSWICK OFFICE
646 ROUTE 18
SUITE 101
EAST BRUNSWICK, N. J. 08816
AREA CODE 201
254-6702

BRUCE D. LEDER"
PAUL MONTALBANO
STEVEN W. FIRSICHBAUM
ROBIN JILL SCHNEIDER
DONALD RAYMAR
MICHAEL T. TORNEY
JEFFREY DAVID KOTLER"
DAVID GROSSMAN"
MARK SCHNEIDER
LORI A. SAMILSON"
Diane McKernan

ATLANTIC CITY OFFICE
1 S. NEW YORK AVENUE
ATLANTIC CITY, N. J. 08401
(609) 348-3383

November 20, 1985

"ALSO N.Y. BAR
"ALSO PA. BAR

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

Re: MUR-2100

Dear Ms. Reilly:

This office is counsel to Teamsters Joint Council 73. Teamsters Joint Council 73 received your letter dated November 8, 1985, in connection with the above referenced matter. The letter is addressed to Teamsters Joint Council 37 which is located in Portland, Oregon, not 707 Summit Avenue, Union City, New Jersey.

The attachments to the letter of November 8, 1985 make reference, in one of the schedules, to a contribution by Teamsters Joint Council 37 (with the address of Teamsters Joint Council 73) in the amount of \$1,936.46 in November of 1982.

Teamsters Joint Council 73 never made such a contribution and assumes that it is not the proper party to whom the letter of November 8, 1985 is addressed. If such is not the case, please advise me immediately and a statement of designation of counsel for Teamsters Joint Council 73 will be executed and forwarded to you.

Teamsters Joint Council 73 did make a contribution in the sum of \$200.00 by check dated November 1, 1982 for the gubernatorial re-election of Governor John Evans. I am enclosing herewith a copy of that check together with the letter which Teamsters Joint Council 73 received soliciting the contribution. This contribution was not for a federal election and does not appear to be the subject of the letter of November 8, 1985 and the attachments thereto.

Mr. Patricia Reilly
Page Two
November 20, 1985

I would very much appreciate being advised whether the complaint is supposed to refer to Teamsters Joint Council 73 and if not, to be so advised so that I may close my file on this matter.

Yours very truly,

Edward A. Cohen / f.c.
EDWARD A. COHEN

EAC:fc
Enclosures

cc: Teamsters Joint Council 73, IBT
707 Summit Avenue
Union City, New Jersey 07087
Attn: Frank Carracino, Pres.

37040551654

JOINT COUNCIL NO. 73
 INTERNATIONAL ORDER OF TEAMSTERS
 CHAUFFEURS, WAREHOUSEMEN & HELPERS OF AMERICA
 787 SUMMIT AVENUE
 UNION CITY, NEW JERSEY 07087

Nº 5528

89-32/212

November 1, 1982

PAY TO THE
 ORDER OF

Robert L. Montgomery, Treasurer-Governor John Evans

Contribution for

\$200.00

***** Two Hundred and 00/100 *****

DOLLARS



BANKEN STATE NATIONAL BANK
 PARAMUS, NEW JERSEY
 SEVENTH STREET OFFICE PARAMUS, NEW JERSEY

Salvatore P. ...

Jack Spina

NOT NEGOTIABLE

⑆021200326⑆ 110 1 00240 8⑈

DETACH AND RETAIN THIS STATEMENT

THE ATTACHED CHECK IS IN FULL PAYMENT OF FEES DESCRIBED
 BELOW AND THE PAYEE ACCEPTS IT AS SUCH. NO RECEIPT REQUIRED

JOINT COUNCIL NO. 73

37040551535

FINANCE NUMBER	DESCRIPTION	AMOUNT	DEDUCTIONS		NET AMOUNT
			PARTICULARS	AMOUNT	
	Donation	200.00			

REX A MURDOCK
PRESIDENT

ALVIN E. HILL
SECRETARY-TREASURER

Teamsters, Chauffeurs, Warehousemen and Helpers

UNION NO. 983
Pocatello and Idaho Falls, Idaho

MEETINGS:
IDAHO FALLS. FIRST WEDNESDAY
POCATELLO. FIRST THURSDAY
232-6891



BRANCH OFFICE
325 CHAMBERLAIN
P. O. BOX 698
IDAHO FALLS, IDAHO
83401

MAIN OFFICE
515 EAST CENTER
P. O. BOX 1085
POCATELLO, IDAHO
83201

September 16, 1982

AFFILIATED WITH THE
I B OF T C W AND M OF A

RECEIVED

SEP 27 1982

Ans'd.....

Mr. Jack Spero, Secy-Treas.
Joint Council of Teamsters Local No. 73
707 Summit Ave., Room 401
Union City, NJ 07087

Dear Brother Spero:

Labor in the State of Idaho has a Governor, John V. Evans, that we are very proud of. He has always been a good friend of labor. The following story exemplifies his actions and promises.

In the State of Idaho we have fought "Right to Work" Legislation every year since 1957. The enemies of labor feel that if they can get "Right to Work" enacted in Idaho, they can spread into Washington, Oregon, California and Montana with greater success. Governor Evans has always said he opposes any form of "Right to Work."

In the last session of the State legislature, the Freedom to Work Committee through the conservative Republican-controlled House and Senate ramrodded through a very stringent "Right to Work" Bill that was passed by both the House and Senate by a substantial margin.

Governor Evans, true to his word, vetoed that legislation (House Bill 523). he did that facing very great odds, this being his election year and more significantly, there was only one Democratic vote to sustain his veto. The veto was sustained in the Senate by one vote. (A copy of his Veto Message is enclosed).

Governor Evan's opponent in this election year is a man named Phil Batt. He has said publicly that he will sign any "Right to Work" Legislation. He is well financed by the National Right to Work Committee and other anti-labor groups. In fact, he can outspend Governor Evans two to one.

"Have It Delivered"

4

37040551656

Teamsters Union Local No. 983 has engaged in several fund raising drives for Governor Evans, among them a buffalo barbeque. Out of that function, we had the buffalo head mounted with the thought in mind to give the mounted head to our General President, Roy L. Williams, on behalf of all the Local Unions and Joint Councils that would donate whatever they could to the campaign for the re-election of Governor John Evans.

You can see that we need to keep Governor Evans as our Governor. Without him, Idaho will have a "Right to Work" Bill enacted next year. Governor Evans does need any amount of money you can find in your hearts to donate to ensure his re-election. Your help will be greatly appreciated no matter how small or large.

When sending your contributions, please check your laws governing political contributions. In the State of Idaho, any political contributions in the amount of \$500.00 or more must be accompanied by a statement of names and addresses of persons who donated the money.

Please make all contributions payable to:

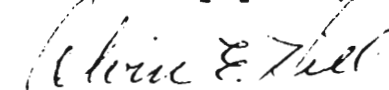
ROBERT L. MONTGOMERY, TREASURER - CONTRIBUTION FOR GOVERNOR JOHN EVANS

Mail your contributions to my office:

Teamsters Union Local No. 983
P. O. Bx 1085
Pocatello, Idaho 83204
Attention: Al Hill.

Thank you in advance, I remain

Fraternally yours,



ALVIN E. HILL
Secretary-Treasurer

AEH/ch
enclosure

RECEIVED BY THE FEC
GCC#9115
85 DEC 3 AB: 33

of counsel
Joseph J. Rekolke
Patrick H. Winston
Leo N. Cashatt (1977)

Winston & Cashatt
LAWYERS

SEAFIRST FINANCIAL CENTER
SPOKANE, WASHINGTON 99201-0695
(509) 838-6131
TELECOPIER (509) 838-1416

C. Matthew Andersen
Maris Baltins
Robert P. Beschel
James P. Connelly
Michael J. Cronin
Leo J. Driscoll
J. J. Dullanty, Jr.
Robert A. Dunn
James A. Figh
Paul R. Grable
Richard P. Guy
Tim M. Higgins
Joel C. McCormick, III
Stanley D. Moore
Mal R. Moulton
Michael F. Nienstedt
Fred C. Pfanz
Lynden O. Rasmussen
Richard W. Relyea
Stanley R. Schultz
Patrick A. Sullivan
Lawrence H. Vance, Jr.
Lucinda S. Whaley
Robert H. Whaley
Meriwether D. Williams
Patricia C. Williams

November 25, 1985

Federal Election Commission
Washington, DC 20463

Re: MUR 2100

Dear Commission Members:

We represent Kaiser Aluminum & Chemical Corporation ("Kaiser"). I am advised that on November 18, 1985, Kaiser received your letter dated November 8, 1985, signed by your Associate General Counsel, Kenneth A. Gross.

In response, we enclose the following documentation provided by Kaiser: (1) a copy of Kaiser's letter dated March 16, 1983, under which Kaiser made a \$250.00 contribution to the Governor John Evans political committee (The Evans Committee) for purposes of his re-election as Governor of Idaho, and (2) a copy of letter dated April 7, 1983, with enclosures, from the Evans Committee, evidencing receipt and appropriate reporting.

The complaint which you enclosed with your letter does not allege or purport to allege any violation by Kaiser of the Federal Election Campaign Act of 1971, or of any other law. We were advised by your staff member, Ms. Patricia Reilly, that you customarily mail such letters to notify any party whose name appears in the complaint, in whatever context, primarily as a courtesy and for purposes of information. Accordingly, we assume that your letter to Kaiser was a form type letter. We respectfully suggest that in the future, in sending informational copies to those whom the complaint does not charge with any violation, you would wish to change the first sentence of the letter, which states that your Commission has

Federal Election Commission
November 25, 1985
Page 2

"... received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act")." (Emphasis ours)

Very truly yours,



LEO J. DRISCOLL

LJD:mg
Enclosures
cc: James Glann
Chris Carlson

87040551659

5

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2100

NAME OF COUNSEL: Leo Driscoll

ADDRESS: Winston & Cashatt Lawyers
1900 Seafirst Financial Center
Spokane, WA 99201

TELEPHONE: 509-838-6131

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.

KAISER ALUMINUM & CHEMICAL CORPORATION

11/25/85
Date

By: David Chris Carlson
Signature Vice President

RESPONDENT'S NAME: c/o KAISER ALUMINUM & CHEMICAL CORPORATION
David Chris Carlson

ADDRESS: Vice President
Kaiser Aluminum
Northwest Regional Office
303 Washington Mutual Building
Spokane, WA 99201

HOME PHONE: 509-448-5101

BUSINESS PHONE: 509-624-3116

87040551660

**KAISER ALUMINUM
& CHEMICAL CORPORATION**

RECEIVED

NOV 19 1983

WINSTON & CASHATT

March 16, 1983

The Evans Committee
P. O. Box 1002
Boise, ID 83701

I am enclosing herein Kaiser Aluminum & Chemical Corporation's check in the amount of \$250.00 as a contribution to Governor John Evans' political committee. Kaiser Aluminum's contribution shall be utilized by the committee solely for reelection efforts.

Be certain that ^{you} the political ^{campaign} committee properly reports this contribution to the ~~Public Disclosure Commission~~ pursuant to ~~RCW 42.17~~. Please remit to us a copy of the appropriate document indicating that Kaiser's contribution has been reported. Kaiser will treat the acceptance of its check as an agreement on your part to comply with the above conditions on its donation.

Section 67-
6610,
Idaho Code

Very truly yours,

Dennis P. Bracy

Dennis P. Bracy
Public Relations Manager
Northwest Region

DPB/plr

Enclosure

Evans 152

5

NORTHWEST REGIONAL OFFICE

303 WASHINGTON MUTUAL BUILDING, SPOKANE, WASHINGTON 99201, 509-624-3111

RECEIVED
HAWTHORNE REGIONAL OFFICE

APR 11 1983

2 F 4
3 5

4098 Hawthorne Way
Boise, Idaho 83703
April 7, 1983

Mr. Dennis P. Bracy
Public Relations Manager
Kaiser Aluminum & Chemical Corp.
Northwest Regional Office
303 Washington 99201

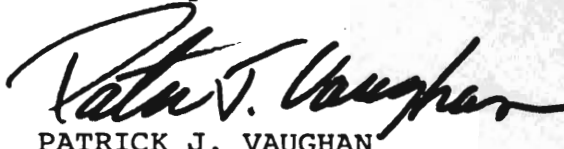
Dear Mr. Bracy:

Thank you for the contribution from the Kaiser Aluminum
& Chemical Corporation to the Evans Committee.

I am enclosing a copy of the Committee's latest Campaign
Financial Disclosure Report. The report documents that
the contribution has been properly reported.

Again, thank you for your continued support of Governor
Evans. It is sincerely appreciated.

Sincerely,



PATRICK J. VAUGHAN
Treasurer
The Evans Committee

87040551662



CAMPAIGN FINANCIAL DISCLOSURE REPORT

(Please Print or Type)

The Evans Committee Governor
 Name of Candidate or Political Committee Office Sought (if candidate) District (if any)

John V. Evans Statehouse 208-334-2100
 Address of Candidate or Political Committee Chairman Home Phone Work Phone

Patrick J. Vaughan 208-342-7162 208-334-2100
 Name of Political Treasurer Home Phone Work Phone

4098 Hawthorne Way Boise, Idaho 83703
 Address of Political Treasurer Zip Code

TYPE OF REPORT

Directions: To indicate the type of report being filed fill in the appropriate dates and check the appropriate boxes. The 30 Day Post-Primary Report is filed only by candidates who lose the primary. See the instructional manual for reporting periods and due dates.

This report is for the period from January 1, 1983 thru March 31, 1983

PRIMARY ELECTION REPORTS

- ☐ 7 Day Pre-Primary Report
- ☐ 30 Day Post-Primary Report

GENERAL ELECTION REPORTS

- ☐ 7 Day Pre-General Report
- ☐ 30 Day Post-General Report

QUARTERLY REPORTS

- ☒ First Quarterly Report
 (Due April 10)
- ☐ Second Quarterly Report
 (Due July 10)

- ☐ Third Quarterly Report
 (Due October 10)
- ☐ Fourth Quarterly Report
 (Due January 10)

SPECIAL REPORTS

- ☐ Termination Report
- ☐ Amended Report

CERTIFICATION OF NO CONTRIBUTIONS OR EXPENDITURES

Directions: If you had no contributions or expenditures during this reporting period check the box next to the statement below. fill in the appropriate dates and sign this report. Be sure to carry forward the appropriate "Calendar Year to Date" figures in Column II on the Summary Page.

- ☐ I hereby certify that I have received no contributions and have made no expenditures during this reporting period from _____ thru _____

VERIFICATION BY OATH OR AFFIRMATION

I Patrick J. Vaughan hereby certify that the information in this report
 Name of Political Treasurer
 is a true, complete, and correct Campaign Financial Disclosure Report as required by law.

Patrick J. Vaughan
 Signature of Political Treasurer

SCHEDULE A CONTRIBUTIONS

Directions: Before completing this schedule please refer to the instructional manual. If you do not have enough space to report the required information in Section A2, attach another sheet of paper to this report indicating clearly the section and all other required information. A contribution entered in one section of this schedule should never be entered in the other section of this schedule.

SECTION A1: Contributions of Fifty Dollars (\$50.00) or Less

LINE 1. Total Number of Contributors This Period 7
LINE 2. Total Amount of Contributions This Period \$ 104.63

SECTION A2: Contributions of More Than Fifty Dollars (\$50.00)

Date	Name and Address of Contributor	Amount This Period	Calendar Year to Date
1-17-83	Mountain Bell Box 7888 Boise ID 83707 (Telephone refund)	693.51	693.51
1-17-83	Mountain Bell Box 7888 Boise ID 83707 (Telephone refund)	912.54	1,606.05
3-28-83	Kaiser Aluminum NW Regional Office 303 Washington Mutual Building Spokane Washington 99201	250.00	250.00
3-31-83	Money Market Savings A/C interest	193.09	193.09
LINE 3. Total A2 This Period		\$ 2,049.14	

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**SCHEDULE B
EXPENDITURES**

Directions: Before completing this schedule please refer to the instructional manual. If you do not have enough space to report the required information in section B2, attach another sheet of paper to this report indicating clearly the section and all other required information. An expenditure entered in one section of this schedule should never be entered in the other section of this schedule.

SECTION B1: Expenditures of Less Than Twenty-Five Dollars (\$25.00) This Period

LINE 4. Total Number of Expenditures

3

LINE 5. Total Amount of Expenditures

\$ 43.29

SECTION B2: Expenditures of Twenty-Five Dollars (\$25.00) or More This Period

Date	Name and Address of Recipient	Purpose of Expenditure	Amount of Expenditure
1-13-83	Butler 1406 Goldengate Pocatello ID 83201	Reimbursement of expenses	50.00
1-17-83	Mountain Bell Box 7888 Boise ID	Last payment on phone bill	152.05
1-7-83	State of Idaho Department of Employment	Payroll	40.60
1-7-83	State of Idaho	Withholding Tax	145.30
1-7-83	Global Travel	Travel expense	596.00
1-12-83	First Tuesday 17 Thomas Rd. Phoenix Arizona	Media final payment	980.97
1-17-83	Betsy Hall 240 Horizon Dr. Boise ID	Services and computer cards	183.00
1-18-83	Democratic Governor's Conference	Dues	2,000.00
2-1-83	Idaho Camera 816 W. Idaho Boise ID	Photo service	38.62

LINE 6. Total B2 This Period

\$ 4,186.54

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SCHEDULE SUMMARY PAGE

Directions: Please refer to the instructional manual before completing this page. To obtain the appropriate column II figures in Sections A and B add column II of last report to column I of this report.

	COLUMN I THIS PERIOD	COLUMN II CALENDAR YEAR TO DATE
SECTION A: SUMMARY OF CONTRIBUTIONS		
LINE 7. Contributions of \$50.00 or Less (enter amount from line 2)	\$ 104.63	\$ 104.63
LINE 8. Contributions of More Than \$50.00. (enter amount from line 3)	\$ 2,049.14	\$ 2,049.14
LINE 9. Total Contributions (add lines 7 and 8)	\$ 2,153.77	\$ 2,153.77
 SECTION B: SUMMARY OF EXPENDITURES		
LINE 10. Expenditures of Less Than \$25.00 (enter amount from line 5)	\$ 43.29	\$ 43.29
LINE 11. Expenditures of \$25.00 or More (enter amount from line 6)	\$ 4,186.54	\$ 4,186.54
LINE 12. Total Expenditures (add lines 10 and 11)	\$ 4,229.83	\$ 4,229.83
 SECTION C: CASH BALANCE SUMMARY		
LINE 13. Enter cash balance as of January 1, This Year*	\$ XXXXXXXXXXXXX	\$ 13,152.35
LINE 14. Enter cash balance at close of last period*	\$ 13,152.35	\$ XXXXXXXXXXXXX
LINE 15. Total Contributions (enter amount from line 9)	\$ 2,153.77	\$ 2,153.77
LINE 16. Add lines 13, 14 and 15	\$ 15,306.12	\$ 15,306.12
LINE 17. Total Expenditures (enter amount from line 12)	\$ 4,229.83	\$ 4,229.83
LINE 18. Cash balance at close of period (subtract line 17 from line 16)	\$ 11,076.29	\$ 11,076.29

COLUMNS I and II LINE
18 MUST BE THE SAME FIGURE

*If this is a new candidate's or new political committee's first report, enter on lines 13 and 14 the amount of cash on hand at date of certification. This same figure should be entered on line 13 of all reports filed this calendar year.

BE SURE YOU HAVE SIGNED THIS REPORT

Return This Report to:
Pete T. Cenarrusa
Secretary of State
Statehouse
Boise, Idaho 83720

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LAW OFFICES

MARTIN, CHAPMAN, PARK & BURKETT

C. BEN MARTIN
JOHN S. CHAPMAN
W. ANTHONY PARK
F. MICHAEL BURKETT, JR.
CHRISTOPHER W. CLARK

STATEHOUSE CENTER BUILDING
775 N. 8TH STREET • SUITE 200
BOISE, IDAHO 83702

J. F. MARTIN (1893 - 1967)

P.O. BOX 2898
TELEPHONE 343-6465
AREA CODE 208

DEC 5
A9:33
GENERAL COUNSEL

November 27, 1985

Mr. Charles N. Steele
General Counsel
Federal Election Commission
Washington, D. C. 20453

RE: National Republican Senatorial Committee
v. The John Evans for Senate Committee
and The Evans Committee
MUR 2100

Dear Mr. Steele:

Enclosed please find for filing the following documents
relating to the above entitled matter:

1. Designation of Counsel by Respondent John Evans for Senate Committee.
2. Designation of Counsel by Respondent The Evans Committee
3. Original and three copies of Respondents' RESPONSE, sworn statements by Hubert S. Coats, Patrick J. Vaughan, and Patrick D. Costello, and exhibits.

Sincerely,


W. Anthony Park
Martin, Chapman, Park and Burkett
Attorneys for Respondents

cc: Robert F. Bauer, Attorney at Law

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STATEMENT OF DESIGNATION OF COUNSEL

MUR 2100

Co-Counsel

NAME OF COUNSEL: W. Anthony Park
ADDRESS: Martin, Chapman, Park and Burkett
P.O. Box 2898
Boise, Idaho 83701
TELEPHONE: (208) 343-6485

Robert F. Bauer
1110 Vermont Ave. NW
Suite 1200
Washington, DC
20005
(202) 887-9030

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.

November 20, 1985
Date

Hubert S. Coats
Signature

RESPONDENT'S NAME: John Evans for Senate Committee, Hubert Coats
Treasurer

ADDRESS: P.O. Box 1002
Boise, Idaho 83701
(208) 345-1105

HOME PHONE: _____

BUSINESS PHONE: _____

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STATEMENT OF DESIGNATION OF COUNSEL

MUR 2100

NAME OF COUNSEL: W. Anthony Park

ADDRESS: Martin, Chapman, Park and Burkett

P.O. Box 2898

Boise, Idaho 83701

TELEPHONE: (208) 343-6485

Co-Counsel
Robert F. Bauer
1110 Vermont Ave. NW
Suite 1200
Washington, DC 20005
(202) 887-9030

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.

November 20, 1985
Date


Signature

RESPONDENT'S NAME: The Evans Committee, Patrick Vaughan, Treasurer

ADDRESS: P.O. Box 1002

Boise, Idaho 83701

HOME PHONE: _____

BUSINESS PHONE: (208) 345-1105

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BEFORE THE
FEDERAL ELECTION COMMISSION

RESPONSE

NATIONAL REPUBLICAN
SENATORIAL COMMITTEE,

Petitioner,

v.

JOHN EVANS FOR SENATE
COMMITTEE, THE EVANS
COMMITTEE

Respondents.

MUR 2100

COME NOW the Respondents, by and through their attorney W. Anthony Park to RESPOND to the Complaint filed in this matter as follows:

I. INTRODUCTION

On November 4, 1985, the National Republican Senatorial Committee filed a complaint with the Federal Election Commission alleging violations of the Federal Election Campaign Act of 1971 by the respondents. Respondents received notice of this complaint on November 15, 1985. The Respondents make this response to that complaint, pursuant to 11 C.F.R. §111.6(a), in order to demonstrate that no action should be taken by the Commission on the basis of this complaint.

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II. STATEMENT OF FACTS

The attached statements by Respondents Patrick J. Vaughan and Hubert S. Coats, and by Patrick D. Costello, along with the exhibits marked 1 through 10 , are incorporated by this reference as if fully set out herein. Those statements and documents, together with the exhibits submitted by the petitioner, establish the following facts material to the Commission's review of this matter:

On Friday, March 15, 1985, The John Evans for Senate Committee was designated by Governor John V. Evans as his principal campaign committee for the 1986 election for the office of U. S. Senator. (Petitioner's Exhibit A). That same day Hubert S. Coats executed a Statement of Organization on behalf of The John Evans for Senate Committee, with Mr. Coats designated as Treasurer (Respondents' Exhibit 1). The following business day, Monday, March 18, 1985, Patrick J. Vaughan, Treasurer of The Evans Committee, principal campaign committee for Governor Evans 1982 re-election campaign, authorized Idaho Bank and Trust to change the account names for two bank accounts from "The Evans Committee" to "The John Evans for Senate Committee." (Respondent Vaughan statement of November 26, 1985). That same day Hubert S. Coats signed signature cards for the two accounts (Respondent Coats statement of November 26, 1985). The two accounts had at that time a combined balance of \$11,272.72 (Vaughan statement, p.

2). The next day (March 19, 1985) Mr. Vaughan filed a termination report for The Evans Committee with the Idaho Secretary of State's Office (Petitioner's Exhibit C). Later that day or the following day, Mr. Vaughan was contacted by Deputy Secretary of State Ben Ysursa, who advised Mr. Vaughan to review the most recent contributions to The Evans Committee to determine if the ending cash balance included impermissible contributions. (Vaughan's statement, p.1).

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Prior to March 18, 1985, Respondent Vaughan had had no experience with a federal campaign or the Federal Election Commission. (Vaughan's statement p.3). Neither Vaughan nor Coats were aware that the Evans Committee accounts were composed in part of contributions which were impermissible under the Act until after the accounts had been transferred to The John Evans for Senate Committee. (Vaughan statement p.3 ;Coats statement p.1). As soon as he discovered this fact, Mr. Vaughan promptly notified the Federal Election Commission staff by means of a telephone call on his behalf from Patrick D. Costello to Larry Boyle. (Vaughan's statement, pp.1-2, Costello's statement, p. 1). Mr. Vaughan also promptly notified Mr. Coats (Vaughan's statement, p.2 ; Coats statement p. 1).

Working backward through records of Evans Committee receipts, Mr. Vaughan identified four contributions which could be assumed to be included in whole or in part in The Evans Committee cash on hand and which appeared to be impermissible contributions under the Federal Election Campaign Act. (Respondents' Exhibit 2).

They were:

Date	Contributor	Amount
11/13/84	Idaho AFL-CIO Cope 225 N. 16th Street Boise, Idaho 83702	\$ 250.00
8/17/84	J.C.Penny Co., Inc. Store #1206-2 Sunrise Center 6100 Sunset Blvd. Citrus Heights, Ca. 95610-6973	1000.00
3/28/83	Kaiser Aluminum NW Regional Office 303 Washington Mutual Bldg. Spokane, Wa. 99201	250.00
11/23/82	Teamsters Joint Council #37 Pol.Fund 707 Summit Avenue Union City, N.J. 07087	2500.00

Only a portion of the \$2,500.00 Teamster contribution could be deemed to remain on hand as of March 18, 1985, as later contributions and receipts totalled \$8,947.94, and The Evans Committee cash on hand totalled \$11,272.72. It would have been difficult to ascertain exactly what fraction of the \$2,500.00 contribution remained on hand for two reasons: Four contributions were made on November 23, 1982 and it is not possible to tell with certainty in what order they were received.

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Secondly, as the first amended and second amended termination reports (Petitioner's Exhibits D & E) reflect, it was difficult to pin down exactly how much interest would be credited to The Evans Committee, and therefore exactly what the ending cash balance would be, which in turn would indicate how much of the November 23, 1982 Teamster contribution remained on hand. The July 26, 1985 report filed with the F.E.C. by Mr. Vaughan on behalf of The Evans Committee attributed \$1,936.46 of this contribution to the remaining fund balance. The work sheet prepared for this response indicates that the correct amount of the portion of the Teamster contribution on hand at the time of the transfer was actually \$2,324.78. This discrepancy is inconsequential, however, because the amount later excluded from the committee account was more than sufficient to exclude the three later impermissible contributions (totalling \$1,500.00) and the portion of the Teamster's contribution which could be deemed to be part of the ending cash on hand balance for the Evans Committee.

The exclusion of the impermissible contributions was accomplished on March 28, 1985, when Mr. Coats withdrew \$3,958.65 the Committee's money market savings account, and authorized Mr. Vaughan to receive this sum in the form of two cashier's checks (Respondents Exhibit 3). Mr. Vaughan mailed the cashier's checks to the Idaho State Democratic Party and the Democratic Governor's Association (Vaughan statement, p. 2). The \$3,958.65 was not

therefore used to support any federal campaign activity.

Mr. Vaughan later filed amended termination reports for the Evans Committee with the Idaho Secretary of State reflecting the two March 28, 1985 disbursements, and adjusting downward in a similar sum the amount reported transferred to The John Evans for Senate Committee. (Petitioner's Exhibits D and E). On July 26, 1985 Mr. Vaughan filed an initial and termination report with the F.E.C. for The Evans Committee as an affiliated committee of The John Evans for Senate Committee. (Petitioner's Exhibit F). In that report he disclosed all four contributions he had identified as impermissible (Pennys, Kaiser Aluminum, Idaho AFL-CIO, and Teamsters). He also reported two in-kind contributions in excess of \$200.00 credited as received by The Evans Committee on November 30, 1982: Robert Harney, \$1050.00, and Dan Emborg, \$350.92. (Vaughan statement, p. 3 , Petitioner's Exhibit F).

Mr. Coats executed the first financial disclosure report for The John Evans for Senate Committee on July 26, 1985. (Petitioner's Exhibit G). In that report he disclosed a \$7,314.07 transfer from The Evans Committee, and itemized the contributions greater than \$200.00 which were included in the amount transferred. (Petitioners Exhibit G). He omitted the four impermissible contributions in this report, obviously because he believed they had been effectively excluded. (Coats statement, p. 2). Mr. Coats erroneously listed the two in-kind contributions as being among the sources of the transferred

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funds, and he has corrected that error in his November 27, 1985 amended report. (Respondent's Exhibit 6).

III. THE COMMISSION SHOULD TAKE NO ACTION ON THIS COMPLAINT

Petitioner's complaint alleges that Respondents have violated 2 U.S.C. §441a(f) which states:

"No candidate or political committee shall knowingly accept any contribution or make an expenditure in violation of the provisions of this section."

The complaint also alleges that Respondents have violated 2 U.S.C. §434 by failing to accurately report to the F.E.C. the receipt and sources of all contributions, and by filing false and misleading reports. Respondents assert that each of these allegations lacks merit.

A. ALLEGED VIOLATION OF 2 U.S.C. S 441 a(f)

1. Harney contribution

Petitioner's first allegation is that Respondent's violated §441a (f) by transferring a contribution by Robert L. Harney in excess of \$1,000.00 from The Evans Committee to The John Evans for Senate Committee, in violation of 2 U.S.C. §441a(a)(1)(A).

As pointed out in Mr. Vaughan's statement and in the state campaign financial disclosure report for the period November 13, 1982 to December 31, 1982 (Respondents' Exhibit 7) this contribution was not in fact a cash contribution, but an in-kind contribution of "pilot services". Because 11 C.F.R. §104.13

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requires the reporting of in-kind contributions as a contribution, Mr. Vaughan included the Harney contribution and a second in-kind contribution (Emborg-\$350.92) in his July 26, 1985 Evans Committee filing with the F.E.C.(Vaughan statement, p.3). However, because these contributions were in the form of services rather than cash, The Evans Committee cash on hand cannot be "assumed to be composed" of these contributions pursuant to 11 C.F.R. §104.12. Therefore, the allegation that Respondents have violated 2 U.S.C. §441a(a)(1)(A) by transferring a contribution in excess of \$1,000.00 is untrue because no such transfer occurred.

2. Corporate and Labor Contributions

Petitioners next allege that Respondents have violated 2 U.S.C. §441a(f) by transferring funds which included corporate and labor organization contributions which were prohibited under 2 U.S.C. §441b(a). When respondent Vaughan authorized the change in name of The Evans Committee bank accounts to The John Evans for Senate Committee on March 18, 1985, The Evans Committee cash on hand included two corporate contributions and two labor organization contributions totalling \$3,824.78 (Respondents' Exhibit 2). In order to judge whether in making this transfer either Mr. Vaughan "knowingly" made an illegal contribution or Mr. Coats "knowingly" accepted illegal contributions, the following facts must be considered:

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1. Mr. Vaughan has stated under oath that on March 18, 1985 he "was unaware of the F.E.C. restrictions on transfers from a state campaign committee to a federal campaign committee." (Vaughan statement, p. 3).

2. Mr. Vaughan has also stated that he had had no prior "experience with Federal Election Commission matters." (Vaughan statement, p. 3).

3. Mr. Coats also stated he did not know on March 18, 1985 that "The Evans Committee cash on hand was composed of contributions which were impermissible under the Act." (Coats statement, p. 1).

4. The transfer took place on Monday, March 18, 1985 - the first working day after Mr. Coats executed the "Statement of Organization" for The John Evans for Senate Committee (Respondents' Exhibit 1).

Petitioner concedes that it was "only after that transfer occurred (on March 18, 1985)" that Respondents did "evidently determine that the funds transferred included money not legally permitted in a federal campaign". (Complaint, p. 7). They suggest that at that point Respondents "could have refunded the illegal funds from The Evans Senate Committee account to the

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Gubernatorial Committee". That would not have been as simple as Petitioner suggests. It was only after Mr. Vaughan had filed a termination report for The Evans Committee with the Secretary of State that the question of the composition of The Evans Committee fund balance arose. Not only had the Committee ceased to exist as a legally recognized entity, it also no longer had a bank account in its name.

The method settled on by the two treasurers on March 28, 1985, to exclude the impermissible contributions was to have The John Evans for Senate Committee treasurer authorize a withdrawal from the account in the amount of \$3,958.65, which was returned to The Evans Committee treasurer in the form of two cashiers checks made out to the two Democratic party organizations.

This method was a more reasonable course of action than the alternative which Petitioner now suggests was available. In order to return the transferred sum to The Evans Committee, it would have been necessary to recertify The Evans Committee as a state campaign committee, open a new bank account in the name of The Evans Committee, transfer all or part of The John Evans Committee account, exclude the impermissible funds from that account, return any remaining balance to The John Evans for Senate Committee, and then file a termination report for the newly re-certified Evans Committee with the Secretary of State. Had they pursued this tortuous course of action, the impermissible contributions would not have been any more

effectively "excluded from funds to be used for Federal elections" as required by 11 C.F.R.S104.12 than by the straightforward method employed by Respondents.

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The actions taken by the two treasurers evidence nothing more than a commendable desire to exclude the impermissible funds as quickly and as directly as possible in order to assure that such funds were never put to use in a federal election campaign. Both treasurers used their best efforts to obtain information as quickly and effectively as they could under the circumstances described above. In doing so, they relied in good faith on various Commission advisory opinions concerning transfers from a candidate's authorized state committee to that candidate's principal federal committee. Under 2 U.S.C. §§437f(c)(2), 438 (e) and 432(i) the actions by Respondents in excluding the impermissible contributions were in compliance with the Act.

B. ALLEGED VIOLATION OF 2 U.S.C. §434

Petitioner alleges that Respondents have violated 2 U.S.C. §434 by failing to file accurate reports of the receipt and sources of all contributions, and by filing false and misleading reports. (Complaint, p. 10). Specifically, petitioners allege that Respondents deliberately attempted to conceal the March 18, 1985 transfer by reporting a March 29, 1985 transfer of \$7,314.07, the net amount transferred from The Evans Committee to The John Evans for Senate Committee.

This allegation is demonstrably untrue. Mr. Vaughan had the

March 18, 1985 transaction brought immediately to the attention of the F.E.C. staff as soon as he discovered that impermissible contributions may have been transferred to The John Evans for Senate Committee. (Vaughan statement, p. 2; Costello statement, p. 1). Mr. Vaughan also informed Mr. Coats that the F.E.C. had been notified of the transaction. Mr. Vaughan had already made the March 28, 1985 transfer a matter of public record by reporting it in his March 19, 1985 Evans Committee termination report filed with the Secretary of State's Office.

In view of the fact both treasurers knew that the March 18, 1985 transfer had been disclosed to the F.E.C. and to the Secretary of State, it is inconceivable that they would have intended to conceal this fact from the F.E.C.

Rather, both treasurers only reported the net amount transferred after the March 28, 1985 exclusion because they believed that was the most accurate way to characterize the transaction. (Vaughan statement, p.3 ;Coats statement, p. 2). Both denied that they intended to conceal any material facts about this transaction from the F.E.C. In the letter accompanying his July 26, 1985 Evans Committee F.E.C. report, Mr. Vaughan describes the exclusion of the impermissible funds, and then states:

"Please notify me if anything additional is required by you from The Evans Committee"

(Petitioner's Exhibit B). In a later letter on behalf of The

Evans Committee, Mr. Costello states:

"I hope this letter and the attached letter [Vaughan's July 25 letter] which was sub-mitted with the Committee's report clarify this matter to your satisfaction. If not, please advise us and the Committee will be pleased to take whatever action you deem necessary".

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(Respondents' Exhibit 4). In his July 26, 1985 F.E.C. report, Mr. Vaughan details all four of the impermissible contributions which were included in The Evans Committee ending cash balance. (Petitioner's Exhibit F). Mr. Coats' first report for The John Evans for Senate Committee itemized the sources of the transfer from the Evans Committee, omitting the four impermissible contributions. (Petitioner's Exhibit G). Both committee's reports were filed with the knowledge that F.E.C. staff had been notified of the original transfer. (Vaughan statement, p. 1; Coats statement, p. 1). It is obvious on this record that both treasurers were making every effort to inform the Commission of every detail surrounding this transaction, and to seek Commission guidance as to whether they needed to supplement their reports in any way. It is not possible to point to any evidence that either Respondent ever knowingly or intentionally concealed or misrepresented any material facts in their reporting of this transaction.

In preparing their response to this complaint, both Respondents have discovered a minor discrepancy in each of their

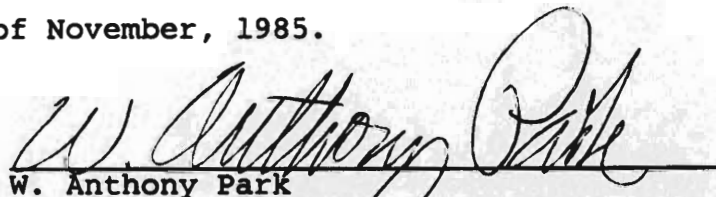
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first reports to the F.E.C. They have prepared amendments to their reports, copies of which are enclosed. (Respondents Exhibits 5 and 6). Neither of these minor errors are material to the allegations under review.

CONCLUSION

All of the issues raised in the Complaint under review relate to actions taken by two treasurers just becoming familiar with Federal Election Commission procedures. From the number and nature of advisory opinions issued by the F.E.C. on the subject of conversion of a candidate's state campaign committee to his principal federal campaign committee it is apparent that this is a difficult and complex transaction. It is therefore not unexpected that the first reports filed by the two committees would be confusing in minor respects. However, both Respondents have acted promptly to correct errors and to keep the Commission informed, and to seek Commission guidance on how to proceed. It is abundantly apparent that both Respondents have used their best efforts to obtain, maintain and submit the information required by the Act, and therefore their records and reports should be considered to be in compliance with the Act. 2 U.S.C. S432 (i). Respondents respectfully urge the Commission to take no action on this matter.

DATED this 27th day of November, 1985.


W. Anthony Park
Martin, Chapman, Park and Burkett
Attorneys for Respondents



November 26, 1985

Mr. Charles N. Steele
General Counsel
Federal Election Commission
Washington, D. C. 20453

RE: MUR 2100

Dear Mr. Steele:

On March 15, 1985, I was appointed treasurer of The John Evans for Senate Committee. I received notice on November 15, 1985 from the Federal Election Commission of the complaint filed in this matter.

On March 18, 1985, I executed signature cards and other documents with Idaho Bank and Trust changing the account name and authorized signatures for Accounts No. 01-010375-4 and 01-700036-7. The accounts were previously in the name of "The Evans Committee" and were changed on that date to "The John Evans for Senate Committee". I did not know at that time that the Evans Committee's cash on hand was composed of contributions which were impermissible under the Federal Elections Act.

Pat Vaughan, Treasurer of The Evans Committee, notified me a day or two later that a question had been raised about the legality of transferring state campaign committee funds to a federal campaign committee. He said the F.E.C. was being notified of the matter and that he would find out from the F.E.C. what action needed to be taken. By March 28, 1985, Mr. Vaughan told me he had determined that some of the funds on hand could be attributed to sources - corporate or labor unions - which could not make direct contributions to a federal campaign committee. On March 28, 1985, I authorized Idaho Bank and Trust to debit account No. 01-70036-7 in the amount of \$3,958.65. I also authorized the return of this amount to Mr. Vaughan in the form of two cashier's checks, copies of which are attached. In this manner, I believed we had effectively excluded this amount from the federal campaign committee's accounts.

In my report to the F.E.C. of July 26, 1985, I reported receipt of \$7,314.07 in transfer from The Evans Committee, which

was the net amount received from The Evans Committee after the March 28, 1985 withdrawal. In that report I indicated that among the sources of the amount transferred from The Evans Committee were all of a \$350.92 contribution from Dan Emborg, and a portion (\$277.81) of a contribution from Robert L. Harney. Only a portion of the original \$1,050.00 Harney contributed was included, as it was the earliest of the contributions assumed to be in the final Evans Committee account balance of \$7,314.07. I have discovered in preparing this response that both of these contributions were "in-kind" contributions which therefore should not be deemed to constitute a portion of the amount transferred to The John Evans for Senate Committee. I am submitting an amendment to that report to correct this error.

At no time did I intend to conceal or mislead the Federal Election Commission regarding the transfer from The Evans Committee. I have attempted to accurately describe and report all receipts and disbursements by The John Evans for Senate Committee. If this transaction should have been reported differently I will be happy to amend the previous reports.

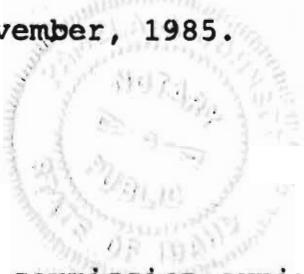
Please let me know if I can provide any further information to assist in your review of this matter.

Sincerely,

Hubert S. Coats

Hubert S. Coats, Treasurer
John Evans for Senate Committee

Subscribed and sworn to before me this 26TH day of
November, 1985.



Dorinda Johnson
Notary Public

My commission expires:
5-11-88



November 26, 1985

Mr. Charles N. Steele
General Counsel
Federal Election Commission
Washington, D. C. 20453

RE: MUR 2100

Dear Mr. Steele:

I have reviewed the complaint filed in M.U.R. 2100. Because the complaint alleges that The Evans committee and The John Evans for Senate Committee attempted to conceal from the F. E. C. a March 18, 1985 transaction, I wish to bring the following information to your attention.

On or about March 20, 1985, Patrick J. Vaughan, Treasurer of The Evans Committee, told me that Deputy Secretary of State, Ben Ysursa had contacted him after reviewing the termination report filed by The Evans Committee on March 19, 1985. Mr. Vaughan told me that Mr. Ysursa had suggested to him that he review the sources of the funds on hand at the termination of The Evans Committee to determine if funds had been included which did not qualify as contributions to a federal campaign committee. Mr. Vaughan asked me to contact the Federal Election Commission to inform the Commission of this transaction and to request the Commission's guidance as to how to proceed. I then discussed the matter with Mr. Ysursa and asked him who to contact at the F.E.C. He suggested I talk to a Mr. Larry Boyle, and gave me the Commission's toll free number.

I placed a call to Mr. Boyle, which Mr. Boyle returned on March 21, 1985. At that time I told Mr. Boyle that The Evans Committee had transferred its bank accounts to the new federal committee, The John Evans for Senate Committee. I told Mr. Boyle that The Evans Committee's treasurer wished to assure that the termination of the state committee and the transfer of funds to the federal committee was accomplished in compliance with Federal Election Commission requirements. Mr. Boyle then discussed with me several advisory opinions issued by the Commission dealing

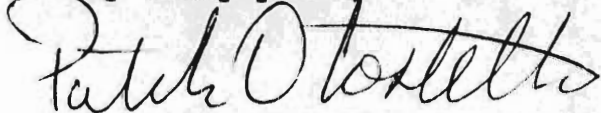
with transfers from state campaign committees to federal committees. He then transferred my call to a person who took my order for copies of some of these advisory opinions.

Several days later I received the copies of the advisory opinions. After reviewing the opinions I met with Mr. Vaughan and reviewed with him his records of contributions and other receipts received by The Evans Committee from November 1982 to present. In doing so it appeared to me that four contributions would not qualify for transfer to the federal committee. Mr. Vaughan agreed and said he would have at least that amount removed from the Committee's bank account and donated to two democratic organizations. In this way, he and I believed we would be complying with the procedure suggested by Advisory Opinion No. 1982-52, which was the approach Mr. Boyle had suggested.

I have since been told by Mr. Ysursa that he too had discussed this transaction in detail with Mr. Boyle on or about March 21, 1985.

I would be pleased to provide you with further information if you desire.

Very truly yours,



Patrick D. Costello
Attorney at Law

Subscribed and sworn to before me this 27th day of November, 1985.


Notary Public

My commission expires: 2/19/91



November 26, 1985

Mr. Charles N. Steele
General Counsel
Federal Election Commission
Washington, D. C. 20453

RE: MUR 2100

Dear Mr. Steele:

On November 29, 1982 I was appointed treasurer of the Evans Committee. I received notice on November 15, 1985 from the Federal Election Commission of the complaint filed in this matter.

On or before March 15, 1985 I contacted Ms. Penny Ysursa in the Elections Division of the Office of the Secretary of State. I asked her how to go about terminating the Evans Committee. I was told in order to terminate, the Committee's bank balance needed to be zeroed out.

On March 18, 1985, I authorized Idaho Bank and Trust to change the name on The Evans Committee's two accounts - a money market savings account (Account No. 01-700036-7) and a checking account (Account No. 01-010374-4) from the Evans Committee to The John Evans for Senate Committee.

On March 19, 1985, I filed a termination report for the Evans Committee with the Office of the Secretary of State (which is reproduced at Tab C of the Complaint). In that report I reported in "Schedule B Expenditures" the following:

3-18-85	John Evans for Senate Committee	Transfer	\$11,308.97
	P. O. Box 1002	(Close)	
	Boise, Idaho 83701	Account	

After I filed this report I was contacted by Deputy Secretary of State Ben Ysursa. Mr. Ysursa recommended that I review the sources of the funds in The Evans Committee accounts to determine if the funds included contributions which would not qualify for transfer to a federal campaign account. I then asked an attorney, Pat Costello to contact the Federal Election

Commission to notify the Commission of the transfer and to seek advice as to how to proceed so as to be in compliance with F.E.C. requirements. I also called Hubert S. Coats, the Treasurer of The John Evans for Senate Committee, to advise him of Mr. Ysursa's suggestion, and that it appeared some of the Evans Committee funds would not qualify for transfer to the new federal committee.

On March 21, 1985, Mr. Costello reported back to me that he had spoken with a staff person at the F.E.C.. Mr. Costello advised me to have a list prepared from the Evans Committee records of the most recent receipts, up to a total of \$11,308.97, which was the amount I then believed was the sum of the two Evans Committee accounts.(1) Mr. Costello also said he expected to receive some materials from the F.E.C. which would assist me in the process for making a transfer of funds from a state committee to a federal committee.

By March 28, 1985, I had compiled the list of receipts I believed could be deemed to make up The Evans Committee's remaining balance. Four contributions - two corporate and two from labor unions - did not appear to qualify for contribution to a federal committee. These four contributions totalled \$4,000.00, although only a portion of the earliest contribution could be deemed included in the ending cash balance. I understood that the sum of these contributions should be excluded from the funds transferred to the new federal committee. I promptly notified Hubert Coats, the Treasurer of The John Evans for Senate Committee, of my determination. Mr. Coats and I agreed that at least this amount should be withdrawn from the account. On March 28, 1985, Mr. Coats authorized the Idaho Bank and Trust Company to debit account No. 01-70036-7, (which was the money market savings account that had been changed on March 18, 1985 from The Evans Committee to The John Evans for Senate Committee) in the amount of \$3,958.65. I asked to receive this sum in the form of two cashier's checks, one made out to the Democratic Governor's Association in the sum of \$2,000.00 and one made out to the Idaho State Democratic Party in the sum of \$1,958.65. I mailed the two cashier's checks to the two organizations. I then filed an amended termination report for The Evans Committee which reflected the two disbursements totalling \$3,958.65 and reporting the amount transferred to the John Evans for Senate Committee as \$7,350.32, which I calculated was the sum of the balance of the two accounts as of March 29,

(1.) This amount was later determined to be \$11,272.72 due to an error in computing accrued interest. See my letter of July 25, 1985 to F.E.C. and second amended termination report filed July 26, 1985 with the Secretary of State. (Copies attached)

1985. I later filed a second amended termination report correcting this amount, as bank statements received after the amended termination report was filed indicated the actual interest earned on the transferred funds was less than I had calculated. The net amount transferred by the Evans Committee to The John Evans for Senate Committee after the two disbursements on March 28, 1985 was \$7,314.07.

At the time of the original transfer of accounts from The Evans Committee to The John Evans for Senate Committee (March 18, 1985) I was unaware of the F.E.C. restrictions on transfers from a state campaign committee to a federal campaign committee. As soon as I learned of these restrictions I took steps to notify the Commission of the transfer, and sought Commission guidance on how to proceed after the transfer was made. I attempted to follow the guidance of the Commission's advisory opinions in excluding non-qualifying funds from the amount transferred from the state committee to the federal committee. I had no intent, and made no attempt, to conceal from the Commission any of the facts surrounding this transfer. I made what I believed to be a full disclosure of the sources of The Evans Committee funds in my July 25, 1985 report. In the letter accompanying that report I attempted to explain the circumstances as completely and accurately as possible. I have attempted to correct all reporting errors promptly and to provide all required information in reports to the F.E.C. and the Secretary of State.

The report I submitted to the F.E.C. on July 25, 1985 included two "in-kind" contributions: one from Robert L. Harney - \$1,050.00 (for "pilot services" as indicated on the attached Idaho campaign financial disclosure report for the period November 13 - December 31, 1982) and one by Dan Emborg - \$350.92 (for "in-kind secretarial" as also indicated on that same report). These in-kind contributions were not deemed to make up the ending cash balance for The Evans Committee and do not affect the amount of impermissible contributions to be excluded. They were reported in the interest of full disclosure because they were received during the period in which the final balance was accumulated. However, they should have been identified as "in-kind" in my report.

This is my first experience with Federal Election Commission matters. As I have indicated in my previous communications to the Commission, I will be pleased to provide any additional information required by the Commission. I am willing and anxious to take all necessary actions the Commission directs in order to comply with applicable law and regulations.

8704051590

Sincerely,

Patrick J. Vaughan

Patrick J. Vaughan
Treasurer, The Evans Committee

Subscribed and sworn to before me this 26TH day of November,
1985.

Samuel Johnson
Notary Public

My commission expires: 5-11-88



87040351691

EXHIBITS

- 37040551692
1. March 15, 1985 Statement of Organization for The John Evans for Senate Committee.
 2. Worksheet: Most recent contributions and receipts deemed included in The Evans Committee ending cash balance.
 3. March 28, 1985, Cashier's Checks/Debit Order, Idaho Bank and Trust.
 4. Letter of September 13, 1985 from Patrick D. Costello to F.E.C. on behalf of The Evans Committee.
 5. November 27, 1985, The Evans Committee amendments to July 26, 1985 report.
 6. November 27, 1985, The John Evans for Senate Committee amendments to mid-year report.
 7. The Evans Committee State Campaign Financial Report for period November 13-December 31, 1982.
 8. The Evans Committee State Campaign Financial Report for period January 1-March 31, 1983.
 9. The Evans Committee State Campaign Financial Report for period April 1-December 31, 1983.
 10. The Evans Committee State Campaign Financial Report for period January 1-December 31, 1984.

(The Evans Committee state campaign financial reports for 1985 were submitted by Petitioner as Exhibits C,D,& E to the Complaint)

STATEMENT OF ORGANIZATION

(see reverse side for instructions)

1. (a) Name of Committee (in Full) ☐ Check if name or address is changed. John Evans for Senate Committee	2. Date March 15, 1985
(b) Address (Number and Street) P.O. Box 1002	3. FEC Identification Number To be assigned
(c) City, State and ZIP Code Boise, Idaho 82701	4. Is this an amended Statement? ☐ YES ☒ NO

5. TYPE OF COMMITTEE (check one):

☒ (a) This committee is a principal campaign committee. (Complete the candidate information below.)

☐ (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate	Candidate Party Affiliation	Office Sought	State/District
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☐ (c) This committee supports/opposes only one candidate _____ and is NOT an authorized committee.
(name of candidate)

☐ (d) This committee is a _____ committee of the _____ Party.
(National, State or subordinate) (Democratic, Republican, etc.)

☐ (e) This committee is a separate segregated fund.

☐ (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund nor a party committee.

6. Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship

If the registering political committee has identified a "connected organization" above, please indicate type of organization:

☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization ☐ Membership Organization ☐ Trade Association ☐ Cooperative

7. Custodian of Records: Identify by name, address (phone number - optional) and position, the person in possession of committee books and records.

Full Name	Mailing Address and ZIP Code	Title or Position
Marsha K. Woods	1016 N. 22nd, Boise, Idaho 83702	Office Manager

8. Treasurer: List the name and address (phone number - optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name	Mailing Address and ZIP Code	Title or Position
Hubert S. Coats	817 Argyll, Boise, Id. 83702	Treasurer

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
Idaho Bank and Trust	P.O. Box 2800 Boise, Idaho 83701

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

Hubert S. Coats		3/15/85
Type or Print Name of Treasurer	SIGNATURE OF TREASURER	Date

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

For further information contact: Federal Election Commission, Toll Free 800-424-9530, Local 202-523-4068

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FEC FORM 1 (3/80)

87040551693

WORKSHEET

(Exhibit 2)

MOST RECENT EVANS COMMITTEE CONTRIBUTIONS AND RECEIPTS

Date	Name and Address of Contributor	Amount of Original Contribution	Included in Ending Cash Balance	Excluded by March 28 Withdrawal	Transferred To Evans For Senate Committee
2/28/85	Interest	177.23	177.23		177.23
2/31/84	Interest	851.25	851.25		851.25
2/31/84	1984 Contributions less than \$50 (14 Contributions)	309.50	309.50		309.50
11/13/84	Patrick Vaughan 4098 Hawthorne Boise, Idaho 83703 (Contribution)	250.00	250.00		250.00
11/13/84	Idaho AFL-CIO COPE 225 N. 16th Boise, Idaho 83702 (Contribution)	250.00	250.00	(250.00)	-0-
11/13/84	Kootenai County Democratic Central Committee Coeur D'Alene, Id. 83814 (Refund)	89.00	89.00		89.00
11/12/84	Idaho Legislative Campaign Committee Box 445 Boise, Idaho 83701 (Refund)	200.50	200.50		200.50
11/2/84	Rose Bowman 1624 Warm Springs Boise, Idaho 83712 (Contribution)	250.00	250.00		250.00
11/2/84	AMPAC Hawaiian Sugar Planter Assn. 723 Investment Bld. Washington, D.C. 20005 (Honorarium)	250.00	250.00		250.00

WORKSHEET

(Exhibit 2)

Date	Name and Address of Contributor	Amount of Original Contribution	Included in Ending Cash Balance	Excluded by March 28 Withdrawal	Transferred To Evans For Senate Committee
11/2/84	A.E. Staley Mfg. Co Decatur, Ill. 62525 (Honorarium)	250.00	250.00		250.00
11/2/84	Archer Daniels Midland Co. Box 1470 DeCatur, Ill. 62525 (Honorarium)	250.00	250.00		250.00
11/2/84	Amalgamated Sugar Co. PAC Box 1520 Ogden, Ut 84402 (Contribution)	500.00	500.00		500.00
8/30/84	John D. Hatfield Soda Springs Phosphate RR#1 Creston, Iowa (Contribution)	500.00	500.00		500.00
8/10/84	J.C. Penny Co., Inc. Store #1206-2 Sunrise Center 6100 Sunrise Blvd. Citrus Heights, Ca 95160-6973 (Contribution)	1000.00	1000.00	(1000.00)	-0-
4/6/84	Joseph J. Ference 1204 E. State St. Boise, Idaho 83712 (Contribution)	150.00	150.00		150.00
3/2/83	1983 Contributions Less Than \$50 (23 contributions after 4/1/83)	348.47	348.47		348.47
3/2/83	Interest	608.22	608.22		608.22

WORKSHEET

(Exhibit 2)

Date	Name and Address of Contributor	Amount of Original Contribution	Included in Ending Cash Balance	Excluded by March 28 Withdrawal	Transferred To Evans For Senate Committee
12/31/83	Patrick & Cecelia Vaughan 4098 Hawthorne Way Boise, Ida. 83703 (Contribution)	150.00	150.00		150.00
2/15/83	Rose Bowman 1624 Warm Springs Boise, Ida. 83702 (Contribution)	150.00	150.00		150.00
3/29/83	Mike Brush 10044 Westview Boise, Ida. 83704 (Contribution)	120.00	120.00		120.00
7/20/83	Paul Cunningham 2827 Bogus Basin Boise, Idaho 83702 (Contribution)	100.00	100.00		100.00
3/31/83	1983 Contributions Less Than \$50 (7 contributions before 4/1/83)	104.63	104.63		104.63
3/31/83	Interest	193.09	193.09		193.09
3/31/88	Kaiser Aluminum NW Regional Office 303 Washington Mutual Bldg. Spokane, Wa 99201 (Contribution)	250.00	250.00	(250.00)	-0-
1/17/83	Mountain Bell (Refund)	912.54	912.54		912.54
1/17/83	Mountain Bell (Refund)	693.51	693.51	(93.87)	599.64

b

WORKSHEET

(Exhibit 2)

Date	Name and Address of Contributor	Amount of Original Contribution	Included in Ending Cash Balance	Excluded by March 28 Withdrawal	Transferred To Evans For Senate Committee
12/3/82	Paul Cunningham 2827 Bogus Basin Boise, Ida. 83702 (Contribution)	40.00	40.00	(40.00)	-0-
11/30/82	Dan & Anita Emborg 11358 Tioga St. Boise, Ida. 83709 (In-Kind Secretarial)	350.92	---	---	----
11/30/82	Robert L. Harney Box 369 Twin Falls, Ida. 83301 (In-Kind Pilot Services)	1050.00	---	---	----
11/23/82	Teamsters Joint Council #37 Political Fund 707 Summit Ave. Union City, NJ 07087 (Contribution)	2500.00	2324.78	(2324.78)	-0-
		\$ 12842.86	\$ 11272.72	\$ (3958.65)	\$ 7314.07

EXHIBIT

3

JOHN EVANS FOR SENATE COMM11
PO BOX 1002
BOISE IDAHO

83701

PO BOX 2800
BOISE, ID
345-8711

DEMAND DEPOSIT STATEMENT OF ACCOUNT

PAGE 1

ACCOUNT NUMBER

01-700036-7

STARTING DATE

02-28-85

SAFEKEEPING

ENDING DATE

03-29-85

TO

83701

Y31-8-001-05505

"TRAVELING IN THE NEAR FUTURE? CALL 1-800-THE-PLUS TO FIND THE NEAREST HANDBANK LOCATION."

ACTION PLUS INTEREST ACCOUNT

PREVIOUS BALANCE	CHECKS & DEBITS NUMBER	AMOUNT	DEPOSITS & CREDITS NUMBER	AMOUNT	SERVICE CHARGE	CURRENT BALANCE
10275.77	1	3958.65	1	53.28	.00	6370.40

-- POSTED CHECKS & DEPOSITS --	
DATE.....AMOUNT	CHECK...DATE.....AMOUNT
03-19 58.09 IP	03-29 15.19 IP
03-28 3958.65 DM	

-- DAILY BALANCE SUMMARY --			
DATE.....BALANCE	DATE.....BALANCE	DATE.....BALANCE	DATE.....BALANCE
03-28 10313.86	03-28 6355.21	03-29 6370.40	
DAILY COLLECTED BALANCE		9781.00	
DM BALANCE		6355.00	

-- SUMMARY INFORMATION --	
MONTHLY INTEREST RECEIVED	53.28
DATE INTEREST RECEIVED	243.91

INTEREST PAID IS CALCULATED ON THE POSTED BALANCE FOR EACH DAY IN THE STATEMENT AT AN ANNUAL RATE OF 5.2504%, EQUAL TO A DAILY RATE OF 0.0143835%. INTEREST ACCRUED DAILY AND PAID ON THE LAST DAY OF THE STATEMENT CYCLE.

6

DEBIT

IDAHO BANK & TRUST CO.

6-10-214

AUTHORIZED BY

PREPARED BY

BRANCH IDENTIFICATION

DATE

EXPLANATION

DEMAND DEPOSIT SYSTEM

Debit acct - 2000-00. Making check 792642
Debit acct 1358 65. Making check 792642

CUSTOMER NAME
MAILING ADDRESS

John & Anne for Lenate
C/O 841-1002
Dancy, Idaho 83701

TOTAL DEBIT	DATE
3958 65	3/28/85
ACCOUNT NUMBER	EIPC
0170000361	ENTER

1124102842:01 700036 711 08 100003958651

8704051699

8704051700

Idaho Bank & Trust Co.

No. 92841

Boise, Idaho, ^{pbf}March 28 19 85

92-155
1241

Pay to the
Order of ***** Democratic Governors Association ***** \$ 2000.00 *****

DOLLARS

Remitter Evans Committee

81-700086-7

CASHIER'S CHECK

pbf

AUTHORIZED SIGNATURE

STANDARD COPY
NOT NEGOTIABLE

⑆124101555⑆ 01 097057 4⑈

Idaho Bank & Trust Co.

No. 92842

Boise, Idaho, ^{pbf}March 28 19 85

92-155
1241

Pay to the
Order of ***** Idaho State Democratic Party ***** \$ 1958.65 *****

DOLLARS

Remitter Evans Committee

81-700036-7

CASHIER'S CHECK

pbf

AUTHORIZED SIGNATURE

STANDARD COPY
NOT NEGOTIABLE

⑆124101555⑆ 01 097057 4⑈

6



September 13, 1985

EXHIBIT

4

Ms. Pat Shepard
Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, D. C. 20463

Re: Your ID #C00197046

Dear Ms. Shepard:

As I indicated to you in our telephone conversation, the two contributions questioned by you in your letter were among those contributions The Evans Committee determined not to transfer to the new federal committee ("John Evans for Senate Committee"). As the attached letter explains, The Evans Committee had \$11,272.72 on hand when the new federal committee was created. Using the "last in - last out" method, it was determined that this amount included four contributions which might not qualify for contributions to a federal committee or federal candidate. These four contributions - two PAC contributions and the two corporate contributions you identified - totalled \$3,436.46. Therefore, before transferring its remaining funds to the new federal committee, The Evans Committee made two disbursements totalling \$3,958.65 to the Democratic Governors Association and the State Party in order to purge its remaining funds of any funds derived from potentially non-qualifying sources. This procedure was suggested by F. E. C. staff whom we consulted as to the proper means to replace a state committee with a federal committee.

I hope this letter and the attached letter which was submitted with the Committee's report clarify this matter to your satisfaction. If not, please advise us and the Committee will be pleased to take whatever action you deem necessary.

Thank you for your assistance in this matter.

Very truly yours,

Patrick D. Costello
Attorney-at-Law

P.O. Box 1002 Boise, ID 83701 (208) 384-5753

Paid for by The Evans Committee Robert L. Montgomery Treasurer

6

672



EXHIBIT

5

November 27, 1985

Ms. Pat Shepard
Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, D. C. 20463

RE: Amendment to Federal Election
Commission July 15, 1985
Quarterly Report for The Evans
Committee ID #C00197046

Dear Ms. Shepard:

Enclosed please find an amended Form 3 and supporting
Schedule A. This amendment corrects the sources of The Evans
Committee's beginning cash on hand to eliminate two "in-kind"
contributions, and to correct mathematical errors.

Please let me know if anything further is required.

Sincerely,


Patrick J. Vaughan

cc: Secretary of Senate

REPORTS OF RECEIPTS AND DISBURSEMENTS
For Authorized Committee

AMENDED 11/27/85
(Summary Page)

ALIGN AREA

ALIGN AREA

1. Name of Committee (in Full) THE EVANS COMMITTEE	2. FEC Identification Number C00197946
Address (Number and Street) P. O. Box 1002	3. Is this Report an Amendment? ☒ YES ☐ NO
City, State and Zip Code Boise, Idaho 83701	
☐ Check if address is different than previously reported.	

4. TYPE OF REPORT

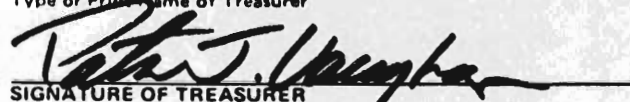
- | | |
|---|--|
| ☐ April 15 Quarterly Report | ☐ Twelfth day report preceding _____
(Type of Election) |
| ☒ July 15 Quarterly Report | election on _____ in the State of _____ |
| ☐ October 15 Quarterly Report | ☐ Thirtieth day report following the General Election on _____
in the State of _____ |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

This report contains activity for -- ☒ Primary Election ☐ General Election ☐ Special Election ☐ Runoff Election

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>3/28/85</u> through <u>6/30/85</u>		
6. Net Contributions (other than loans)	\$ 6,797.38	\$ 6,797.38
(a) Total Contributions (other than loans) (From Line 11 (e))	6,797.38	6,797.38
(b) Total Contribution Refunds (from Line 20 (d)).	-0-	-0-
(c) Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a)) . . .	-0-	-0-
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	-0-	-0-
(b) Total Offsets to Operating Expenditures (from Line 14).	-0-	-0-
(c) Net Operating Expenditures (Subtract Line 7 (b) from 7 (a))	-0-	-0-
8. Cash on Hand at Close of Reporting Period (from Line 27)	-0-	-0-
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D).	-0-	-0-
10. Debts and Obligations Owed BY The Committee (Itemize all on Schedule C or Schedule D).	-0-	-0-

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

For further information, contact:
Federal Election Commission
Toll Free 800 424-9530
Local 202 523 4068

Patrick J. Vaughan
Type or Print Name of Treasurer

SIGNATURE OF TREASURER

11/27/85
Date

NOTE: Submission of false erroneous or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §37g.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

	FEC FORM 3 (3/80)
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8704051703

6

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

AMENDED 11/27/85

Name of Committee (in Full)		Report Covering the Period:		
THE EVANS COMMITTEE		From:	To:	
		COLUMN A Total This Period	COLUMN B Calendar Year-to-Date	
I. RECEIPTS				
11. CONTRIBUTIONS (other than loans) FROM:				
(a) Individuals/Persons Other Than Political Committees		\$ 5,624.78	\$ 5,624.78	11 (a)
(Memo Entry Unitemized \$ 1172.60)				
(b) Political Party Committees				11 (b)
(c) Other Political Committees				11 (c)
(d) The Candidate				11 (d)
(e) TOTAL CONTRIBUTIONS (other than loans (add 11(a), 11(b), 11(c) and 11(d)).		6,797.38	6,797.38	11 (e)
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES		-0-	-0-	12
13. LOANS:				
(a) Made or Guaranteed by the Candidate		-0-	-0-	13 (a)
(b) All Other Loans		-0-	-0-	13 (b)
(c) TOTAL LOANS (add 13 (a) and 13 (b)).		-0-	-0-	13 (c)
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		1,895.55	1,895.55	14
15. OTHER RECEIPTS (Dividends, Interest, etc.)		2,579.79	2,579.79	15
16. TOTAL RECEIPTS (add 11 (e), 12, 13 (c), 14 and 15)		11,272.72	11,272.72	16
II. DISBURSEMENTS				
17. OPERATING EXPENDITURES				17
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES		7,314.07	7,314.07	18
19. LOAN REPAYMENTS:				
(a) Of Loans Made or Guaranteed by the Candidate		-0-	-0-	19 (a)
(b) Of All Other Loans		-0-	-0-	19 (b)
(c) TOTAL LOAN REPAYMENTS (add 19 (a) and 19 (b)).		-0-	-0-	19 (c)
20. REFUNDS OF CONTRIBUTIONS TO:				
(a) Individuals/Persons Other Than Political Committees		-0-	-0-	20 (a)
(b) Political Party Committees		-0-	-0-	20 (b)
(c) Other Political Committees		-0-	-0-	20 (c)
(d) TOTAL CONTRIBUTION REFUNDS (add 20 (a), 20 (b), and 20 (c))		-0-	-0-	20 (d)
21. OTHER DISBURSEMENTS		3,958.65	3,958.65	21
22. TOTAL DISBURSEMENTS (add 17, 18, 19 (c), 20 (d) and 21)		11,272.72	11,272.72	22
III. CASH SUMMARY				
23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD		\$ 11,272.72		23
24. TOTAL RECEIPTS THIS PERIOD (From Line 16)		\$ -0-		24
25. SUBTOTAL (Add Line 23 and Line 24)		\$ 11,272.72		25
26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)		\$ 11,272.72		26
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25)		\$ -0-		27

(6)

SCHEDULE A

ITEMIZED RECEIPTS

LINE NUMBER
(Use separate schedule(s) for each category of the Detailed Summary Page)

AMENDED 11/27/85

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

Name of Committee (in Full)

THE EVANS COMMITTEE

C00197946

A. Full Name, Mailing Address and ZIP Code

Patrick J. Vaughan
4098 Hawthorne Way
Boise, Idaho 83705

Name of Employer

State of Idaho

Date (month, day, year)

11/13/84

Amount of Each Receipt this Period

250.00

Occupation

State Employee

Receipt For: ☒ Primary ☐ General

☐ Other (specify):

Aggregate Year-to-Date-\$ 400.00

B. Full Name, Mailing Address and ZIP Code

Patrick J. Vaughan
4098 Hawthorne Way
Boise, Idaho 83705

Name of Employer

State of Idaho

Date (month, day, year)

12/31/83

Amount of Each Receipt This Period

150.00

Occupation

State Employee

Receipt For: ☒ Primary ☐ General

☐ Other (specify):

Aggregate Year-to-Date-\$ 150.00

C. Full Name, Mailing Address and ZIP Code

Rose Bowman
1624 Warm Springs
Boise, Idaho 83712

Name of Employer

State of Idaho

Date (month, day, year)

11/2/84

Amount of Each Receipt This Period

250.00

Occupation

State Employee

Receipt For: ☒ Primary ☐ General

☐ Other (specify):

Aggregate Year-to-Date-\$ 400.00

D. Full Name, Mailing Address and ZIP Code

Rose Bowman
1624 Warm Springs
Boise, Idaho 83712

Name of Employer

State of Idaho

Date (month, day, year)

12/15/83

Amount of Each Receipt This Period

150.00

Occupation

State Employee

Receipt For: ☒ Primary ☐ General

☐ Other (specify):

Aggregate Year-to-Date-\$ 150.00

E. Full Name, Mailing Address and ZIP Code

John D. Hatfield
Soda Springs Phosphate
RR#1
Creston, Iowa

Name of Employer

Self-Employed

Date (month, day, year)

8/30/84

Amount of Each Receipt This Period

500.00

Occupation

Phosphate

Receipt For: ☒ Primary ☐ General

☐ Other (specify):

Aggregate Year-to-Date-\$ 500.00

F. Full Name, Mailing Address and ZIP Code

Amalgamated Sugar Co. PAC
Box 1520
Ogden, Utah 84402

Name of Employer

Date (month, day, year)

11/12/84

Amount of Each Receipt This Period

500.00

Occupation

Receipt For: ☒ Primary ☐ General

☐ Other (specify):

Aggregate Year-to-Date-\$ 500.00

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period

Occupation

Receipt For: ☐ Primary ☐ General

☐ Other (specify):

Aggregate Year-to-Date-\$

SUBTOTAL of Receipts This Page (optional)

1800.00

TOTAL This Period (last page this line number only)

87040551703

SCHEDULE A
AMENDED 11/27/85

ITEMIZED RECEIPTS

LINE NUMBER
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (in Full) **THE EVANS COMMITTEE** C00197946

A. Full Name, Mailing Address and ZIP Code Idaho AFL-CIO COPE 225 North 16th Boise, Idaho 83702	Name of Employer Occupation	Date (month, day, year) 11/13/84	Amount of Each Receipt this Period 250.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—\$ 250.00		
B. Full Name, Mailing Address and ZIP Code J.C. Penny Co., Inc. (Store 1206-2) 6100 Sunrise Blvd. Citrus Heights, CA 95160-6973	Name of Employer Occupation	Date (month, day, year) 8/17/84	Amount of Each Receipt This Period 1000.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—\$ 1000.00		
C. Full Name, Mailing Address and ZIP Code Kaiser Aluminum N.W. Regional Office 303 Washington Mutual Bldg. Spokane, WA 99201	Name of Employer Occupation	Date (month, day, year) 3/31/83	Amount of Each Receipt This Period 250.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—\$ 250.00		
D. Full Name, Mailing Address and ZIP Code Teamsters Joint Council #37 Political Fund 707 Sumit Ave. Union City, N. J. 07087	Name of Employer Occupation	Date (month, day, year) 11/23/82	Amount of Each Receipt This Period 2324.78
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—\$ 2324.78		
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Aggregate Year-to-Date—\$			
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Aggregate Year-to-Date—\$			
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Aggregate Year-to-Date—\$			
SUBTOTAL of Receipts This Page (optional)			\$3824.78
TOTAL This Period (last page this line number only)			\$5624.78

*These funds included in "Other Disbursements", Line 21, Page 2 FEC Form 3.

EXHIBIT

6



November 27, 1985

Ms. Pat Shepard
Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, D. C. 20463

RE: ID# C00194472

Dear Ms. Shepard:

Enclosed please find an amended Schedule A for The John Evans for Senate Committee. This amendment covers the transfer from an affiliated committee, The Evans Committee. I have made the single entry for the entire amount transferred, as you requested. I also have attached a separate Schedule A detailing the sources of the funds transferred. In my original July 15, 1985 Quarterly Report I incorrectly identified two in-kind contributions as being part of the transferred funds. This amendment corrects that error.

Please contact me if you require additional information or clarification.

Sincerely,

Hubert S. Coats, Treasurer
JOHN EVANS FOR SENATE COMMITTEE

cc: Secretary of Senate

6

SCHEDULE A

ITEMIZED RECEIPTS

Page 01 of 101
LINE NUMBER 12
 (Use separate schedule(s) for each category of the Detailed Summary Page)

Amended 11/27/85

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

Name of Committee (in Full)

JOHN EVANS FOR SENATE COMMITTEE

C00194472

A. Full Name, Mailing Address and ZIP Code The Evans Committee P. O. Box 1002 Boise, Idaho 83701	Name of Employer Occupation	Date (month, day, year) 3/29/85	Amount of Each Receipt this Period \$7,314.07 (sources itemized on Attached Schedule A)
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—\$ 7,314.07		
B. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—\$		
C. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—\$		
D. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—\$		
E. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—\$		
F. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—\$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—\$		
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			\$7,314.07

8704051708

6

SCHEDULE A
(Amended 11/27/85)

ITEMIZED RECEIPTS

LINE NUMBER 12
(Use separate schedule(s) for each category of the Detailed Summary Page)

TRANSFERS FROM OTHER AUTHORIZED COMMITTEES: THE EVANS COMMITTEE

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.			
Name of Committee (in Full) JOHN EVANS FOR SENATE COMMITTEE		C00194472	
A. Full Name, Mailing Address and ZIP Code Patrick J. Vaughan 4098 Hawthorne Way Boise, Idaho 83705		Name of Employer State of Idaho Occupation State Employee	Date (month, day, year) 11/13/84
Receipt For: ☒ Primary ☐ General ☐ Other (specify):		Aggregate Year-to-Date—\$ 400.00	
B. Full Name, Mailing Address and ZIP Code Patrick J. Vaughan 4098 Hawthorne Way Boise, Idaho 83705		Name of Employer State of Idaho Occupation State Employee	Date (month, day, year) 12/31/83
Receipt For: ☒ Primary ☐ General ☐ Other (specify):		Aggregate Year-to-Date—\$ 150.00	
C. Full Name, Mailing Address and ZIP Code Rose Bowman 1624 Warm Springs Boise, Idaho 83712		Name of Employer State of Idaho Occupation State Employee	Date (month, day, year) 11/2/84
Receipt For: ☒ Primary ☐ General ☐ Other (specify):		Aggregate Year-to-Date—\$ 400.00	
D. Full Name, Mailing Address and ZIP Code Rose Bowman 1624 Warm Springs Boise, Idaho 83712		Name of Employer State of Idaho Occupation State Employee	Date (month, day, year) 12/15/83
Receipt For: ☒ Primary ☐ General ☐ Other (specify):		Aggregate Year-to-Date—\$ 150.00	
E. Full Name, Mailing Address and ZIP Code John D. Hatfield Soda Springs Phosphate RR #1 Creston, Iowa		Name of Employer Self Employed Occupation Phosphate	Date (month, day, year) 8/30/84
Receipt For: ☐ Primary ☐ General ☐ Other (specify):		Aggregate Year-to-Date—\$ 500.00	
F. Full Name, Mailing Address and ZIP Code Amalgamated Sugar Co. PAC Box 1520 Ogden, Utah 84402		Name of Employer Occupation	Date (month, day, year) 11/12/84
Receipt For: ☒ Primary ☐ General ☐ Other (specify):		Aggregate Year-to-Date—\$ 500.00	
G. Full Name, Mailing Address and ZIP Code Memo Entry Unitemized		Name of Employer Occupation	Date (month, day, year)
Receipt For: ☐ Primary ☐ General ☐ Other (specify):		Aggregate Year-to-Date—\$	
SUBTOTAL of Receipts This Page (optional)			\$7,314.07
TOTAL This Period (last page this line number only)			\$7,314.07

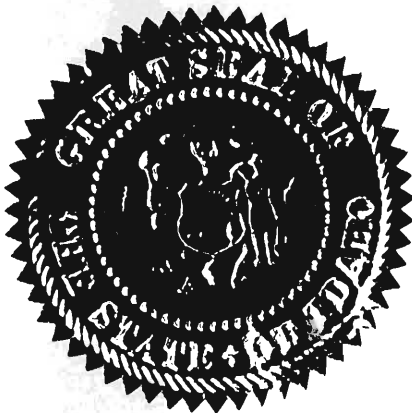
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State of Idaho

Department of State.

C E R T I F I C A T E

I, PETE T. CENARRUSA, Secretary of State of the State of Idaho and custodian of the Seal of the State of Idaho, do hereby certify that the attached, are full, true and complete copies of the 1982 Fourth Quarterly Report filed by The Evans Committee pursuant to Section 67-6608, Idaho Code, as appears of record in this office, which are held by the Secretary of State.



IN TESTIMONY WHEREOF, Have hereunto set my hand and affixed the Great Seal of the State of Idaho. Done at Boise, Idaho, this twenty-sixth day of November, 1985.

Pete T. Cenarrusa
Secretary of State

R 7 0 4 0 5 1 7 1 0



CAMPAIGN FINANCIAL DISCLOSURE REPORT

(Please Print or Type)

83 JAN 10 AM 11:43

THE EVANS COMMITTEE

Governor

Name of Candidate or Political Committee

Office Sought (if candidate)

District (if any)

John V. Evans

Statehouse

STATE

208-334-2100

Address of Candidate or Political Committee Chairman

Home Phone

Work Phone

Patrick J. Vaughan

208-342-7162

208-334-2100

Name of Political Treasurer

Home Phone

Work Phone

4098 Hawthorne Way

Boise, Idaho

83703

Address of Political Treasurer

Zip Code

TYPE OF REPORT

Directions: To indicate the type of report being filed fill in the appropriate dates and check the appropriate box(es). The 30 Day Post-Primary Report is filed only by candidates who lose the primary. See the instructional manual for reporting periods and due dates.

This report is for the period from November 13, 1982 thru December 31, 1982

PRIMARY ELECTION REPORTS

- ☐ 7 Day Pre-Primary Report
☐ 30 Day Post-Primary Report

GENERAL ELECTION REPORTS

- ☐ 7 Day Pre-General Report
☐ 30 Day Post-General Report

QUARTERLY REPORTS

- ☐ First Quarterly Report
(Due April 10)
☐ Second Quarterly Report
(Due July 10)

- ☐ Third Quarterly Report
(Due October 10)
☒ Fourth Quarterly Report
(Due January 10)

SPECIAL REPORTS

- ☐ Termination Report
☐ Amended Report

CERTIFICATION OF NO CONTRIBUTIONS OR EXPENDITURES

Directions: If you had no contributions or expenditures during this reporting period check the box next to the statement below. fill in the appropriate dates and sign this report. Be sure to carry forward the appropriate "Calendar Year to Date" figures in Column II on the Summary Page.

☐ I hereby certify that I have received no contributions and have made no expenditures during this reporting period from _____ thru _____.

VERIFICATION BY OATH OR AFFIRMATION

I Patrick J. Vaughan, hereby certify that the information in this report
Name of Political Treasurer

is a true, complete, and correct Campaign Financial Disclosure Report as required by law.

Patrick J. Vaughan
Signature of Political Treasurer

87040551711

...E EVANS COMMITTEE
CONTRIBUTIONS OVER \$50.00
NOVEMBER 13 THROUGH DECEMBER 31, 1982

PAGE 1

DATE	LAST NAME ADDRESS CITY ST ZIP	FIRST NAME	THIS PER	YTD
11/17	SHAWVER EDEN IDAHO 83325	JAMES	300.00	300.00
11/17	MCCALL BOX 176 FERWOOD ID 83830	NORMAN & HARRIET	250.00	250.00
11/17	ELMORE COUNTY 1345 JUNIPER MTN. HOME ID 83647	DEM.CENT.COMM., C/O M.DALFOUR	400.00	400.00
11/17	IDAHO BOX 1067 BOISE ID 83701	NEWSPAPER ASSOC. (REFUND)	56.75	56.75
11/22	PAPERWORKERS P.O. BOX 1475 NASHVILLE TN 37202	INTERNATIONAL UNION PAC	1000.00	1000.00
11/23	TEAMSTERS 707 SUMMIT AVE. UNION CITY NJ 07087	JOINT COUNCIL 873	200.00	200.00
11/23	SPAULDING 500 SPAULDING BLDG. POCATELLO ID 83201	A. ROBERT	100.00	100.00
11/23	JONES 527 S. 12TH POCATELLO ID 83201	MR. & MRS. DAVID M.	150.00	150.00
11/23	TEAMSTERS 707 SUMMIT AVE. UNION CITY NJ 07087	JOINT COUNCIL 837 POL. FUND	2500.00	2500.00
11/30 IK	HARNEY BOX 368 TWIN FALLS ID 83301	ROBERT L.	1050.00	1050.00
11/30 IK	EMBORG 11358 TI06A ST. BOISE ID 83709	ANITA J. & DAN	350.92	1981.56
12/03	CUNNINGHAM 2827 BOGUS BASIN RD. BOISE ID 83702	PAUL	40.00	740.00

6397.67

8704051713

THE EVANS COMMITTEE
EXPENDITURES \$25.00 AND OVER
NOVEMBER 13 THROUGH DECEMBER 31, 1982

PAGE 1

DATE	RECIPIENT ADDRESS CITY ST ZIP	PURPOSE	AMOUNT
11/15	IB&T BOX 2800 BOISE ID 83701	PAYROLL DEPOSIT	889.50
11/16	POSTMASTER BORAH STATION BOISE ID 83701	STAMPS	60.00
11/16	MARK ARNESON BOX 1141 KAMIAH ID 83536	PHONE & TRAVEL REIMB	174.00
11/17	ANITA J. EMBORG 11358 TIOGA ST. BOISE ID 83709	NOV. SALARY	413.70
11/17	FRANK OLANDER, JR. 5280 N. GLEN LANE BOISE ID 83703	NOVEMBER CONTRACT	2000.00
11/17	JOE FERENGE 1120 PUEBLO BOISE ID 83701	NOVEMBER CONTRACT	1500.00
11/17	BETSY HALL 240 HORIZON DR. BOISE ID 83702	NOVEMBER CONTRACT	500.00
11/17	GMAC BOX 3265 SPOKANE WA 99220	NOV. VAN LEASE	430.00
11/17	HON INVESTMENT CO. 815 W. WASHINGTON BOISE ID 83702	NOVEMBER RENT	250.00
11/18	KBOI BOX 1280 BOISE ID 83701	ADDL. DUE ON ADS	76.50
11/23	IB&T CREDIT CARD DEPT. BOX 1767 POCATELLO ID 83201	TRAVEL EXPENSES	1141.77
11/23	ANITA J. EMBORG 11358 TIOGA ST. BOISE ID 83709	REIMB. FOR EXPENSES	100.00
11/23	SUSAN SLAUGHTER 7201 SWIFT LANE BOISE ID 83704	NOV. EXPENSES	100.00

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THE EVANS COMMITTEE
EXPENDITURES \$25.00 AND OVER
NOVEMBER 13 THROUGH DECEMBER 31, 1982

PAGE 2

DATE	RECIPIENT ADDRESS CITY ST ZIP	PURPOSE	AMOUNT
12/02	IB&T BOX 2800 BOISE ID 83701	NOV. PAYROLL DEPOSIT	110.40
12/06	JENSEN-BRAVES CO. BOX 1704 BOISE ID 83701	OFFICE SUPPLIES	25.53
12/27	IB&T CREDIT CARD DEPT. BOX 1767 POCATELLO ID 83201	TRAVEL EXPENSES	45.45
12/27	POSTMASTER BORAH STATION BOISE ID 83701	STAMPS	30.00
12/28	THE COBLE COMPANY 1701 BROADWAY BOISE ID 83706	GIFT FOR VOLUNTEERS	476.55
12/31	GEORGE TWAY GOVERNOR'S OFFICE BOISE ID 83720	CHECK RETURNED	50.00
11/30	ANITA J. EMBORG 11358 TIIGA ST. BOISE ID 83709	IN KIND SECRETARIAL	350.92
11/30	ROBERT L. HARNEY BOX 368 TWIN FALLS ID 83301	IN KIND PILOT SER.	1050.00
			9774.32

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THE EVANS COMMITTEE
EXPENDITURES \$25.00 AND OVER
NOVEMBER 13 THROUGH DECEMBER 31, 1982

PAGE 1

DATE	RECIPIENT ADDRESS CITY ST ZIP	PURPOSE	AMOUNT
11/15	IB&T BOX 2800 BOISE ID 83701	PAYROLL DEPOSIT	889.50
11/16	POSTMASTER BORAH STATION BOISE ID 83701	STAMPS	60.00
11/16	MARK ARNESON BOX 1141 KAMIAH ID 83536	PHONE & TRAVEL REIMB	174.00
11/17	ANITA J. EMBORG 11358 TIIGA ST. BOISE ID 83709	NOV. SALARY	413.70
11/17	FRANK OLANDER, JR. 5280 N. GLEN LANE BOISE ID 83703	NOVEMBER CONTRACT	2000.00
11/17	JOE FERENGE 1120 PUEBLO BOISE ID 83701	NOVEMBER CONTRACT	1500.00
11/17	BETSY HALL 240 HORIZON DR. BOISE ID 83702	NOVEMBER CONTRACT	500.00
11/17	GNAC BOX 3265 SPOKANE WA 99220	NOV. VAN LEASE	430.00
11/17	HON INVESTMENT CO. 815 W. WASHINGTON BOISE ID 83702	NOVEMBER RENT	250.00
11/18	KBOI BOX 1280 BOISE ID 83701	ADDL. DUE ON ADS	76.50
11/23	IB&T CREDIT CARD DEPT. BOX 1767 POCATELLO ID 83201	TRAVEL EXPENSES	1141.77
11/23	ANITA J. EMBORG 11358 TIIGA ST. BOISE ID 83709	REIMB. FOR EXPENSES	100.00
11/23	SUSAN SLAUGHTER 7201 SWIFT LANE BOISE ID 83704	NOV. EXPENSES	100.00

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THE EVANS COMMITTEE
CONTRIBUTIONS OVER \$50.00
NOVEMBER 13 THROUGH DECEMBER 31, 1982

PAGE 1

DATE	LAST NAME ADDRESS CITY ST ZIP	FIRST NAME	THIS PER	YTD
11/17	SHAWVER EDEN IDAHO 83325	JAMES	300.00	300.00
11/17	MCCALL BOX 176 FERNWOOD ID 83830	NORMAN & HARRIET	250.00	250.00
11/17	ELMORE COUNTY 1345 JUNIPER MTN. HOME ID 83647	DEM.CENT.COMM., C/O M.DALFOUR	400.00	400.00
11/17	IDAHO BOX 1067 BOISE ID 83701	NEWSPAPER ASSOC. (REFUND)	56.75	56.75
11/22	PAPERWORKERS P.O. BOX 1475 NASHVILLE TN 37202	INTERNATIONAL UNION PAC	1000.00	1000.00
11/23	TEAMSTERS 707 SUMMIT AVE. UNION CITY NJ 07087	JOINT COUNCIL #73	200.00	200.00
11/23	SPAULDING 500 SPAULDING BLDG. POCATELLO ID 83201	A. ROBERT	100.00	100.00
11/23	JONES 527 S. 12TH POCATELLO ID 83201	MR. & MRS. DAVID H.	150.00	150.00
11/23	TEAMSTERS 707 SUMMIT AVE. UNION CITY NJ 07087	JOINT COUNCIL #37 POL. FUND	2500.00	2500.00
11/30 IK	HARNEY BOX 368 TWIN FALLS ID 83301	ROBERT L.	1050.00	1050.00
11/30 IK	EMBORG 11358 TIOGA ST. BOISE ID 83709	ANITA J. & DAN	350.92	1981.56
12/03	CUNNINGHAM 2827 BOGUS BASIN RD. BOISE ID 83702	PAUL	40.00	740.00

6397.67

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SCHEDULE EXPENDITURES

Directions: Before completing this schedule please refer to the instructional manual. If you do not have enough space to report the required information in section B2, attach another sheet of paper to this report indicating clearly the section and all other required information. An expenditure entered in one section of this schedule should never be entered in the other section of this schedule.

SECTION B1: Expenditures of Less Than Twenty-Five Dollars (\$25.00) This Period

LINE 4. Total Number of Expenditures	5
LINE 5. Total Amount of Expenditures	\$ 91.87

SECTION B2: Expenditures of Twenty-Five Dollars (\$25.00) or More This Period

Date	Name and Address of Recipient	Purpose of Expenditure	Amount of Expenditure
	See Attached Sheets		
LINE 6. Total B2 This Period			\$ 9,774.32 ✓

87040551718

SCHEDULE C

SUMMARY PAGE

Directions: Please refer to the instructional manual before completing this page. To obtain the appropriate column II figures in Sections A and B add column II of last report to column I of this report.

	COLUMN I THIS PERIOD	COLUMN II CALENDAR YEAR TO DATE
SECTION A: SUMMARY OF CONTRIBUTIONS		
LINE 7. Contributions of \$50.00 or Less (enter amount from line 2)	\$ 91.00	\$ 44,681.60
LINE 8. Contributions of More Than \$50.00. (enter amount from line 3)	\$ 6,397.67	\$ 391,967.96
LINE 9. Total Contributions (add lines 7 and 8)	\$ 6,488.67	\$ 436,649.56

SECTION B: SUMMARY OF EXPENDITURES		
LINE 10. Expenditures of Less Than \$25.00 (enter amount from line 5)	\$ 91.87	\$ 1,309.81
LINE 11. Expenditures of \$25.00 or More (enter amount from line 6)	\$ 9,774.32	\$ 426,369.63
LINE 12. Total Expenditures (add lines 10 and 11)	\$ 9,866.19	\$ 427,679.44

SECTION C: CASH BALANCE SUMMARY		
LINE 13. Enter cash balance as of January 1, This Year*	\$ xxxxxxxxxxxxxx	\$ 4,182.23
LINE 14. Enter cash balance at close of last period*	\$ 16,529.87	\$ xxxxxxxxxxxxxx
LINE 15. Total Contributions (enter amount from line 9)	\$ 6,488.67	\$ 436,649.56
LINE 16. Add lines 13, 14 and 15	\$ 23,018.54	\$ 440,831.79
LINE 17. Total Expenditures (enter amount from line 12)	\$ 9,866.19	\$ 427,679.44
LINE 18. Cash balance at close of period (subtract line 17 from line 16)	\$ 13,152.35	\$ 13,152.35

COLUMNS I and II LINE
18 MUST BE THE SAME FIGURE

*If this is a new candidate's or new political committee's first report, enter on lines 13 and 14 the amount of cash on hand at date of certification. This same figure should be entered on line 13 of all reports filed this calendar year.

BE SURE YOU HAVE SIGNED THIS REPORT

Return This Report to:
Pete T. Cenarrusa
Secretary of State
Statehouse
Boise, Idaho 83720

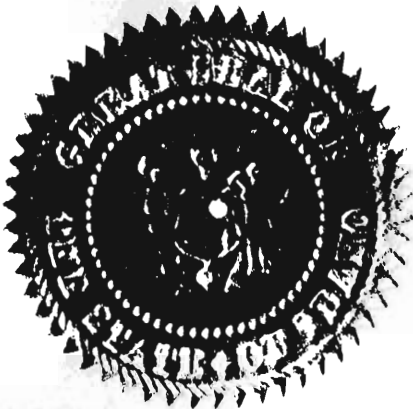
87040551719

State of Idaho

Department of State.

C E R T I F I C A T E

I, PETE T. CENARRUSA, Secretary of State of the State of Idaho and custodian of the Seal of the State of Idaho, do hereby certify that the attached, are full, true and complete copies of the 1983 First Quarterly Report filed by The Evans Committee pursuant to Section 67-6608, Idaho Code, as appears of record in this office, which are held by the Secretary of State.



IN TESTIMONY WHEREOF, Have hereunto set my hand and affixed the Great Seal of the State of Idaho. Done at Boise, Idaho, this twenty-sixth day of November, 1985.

Pete T. Cenarrusa
Secretary of State

3704051720



CAMPAIGN FINANCIAL DISCLOSURE REPORT

(Please Print or Type)

The Evans Committee Governor
Name of Candidate or Political Committee Office Sought (if candidate) District (if any)
John V. Evans Statehouse 208-334-2100
Address of Candidate or Political Committee Chairman Home Phone Work Phone
Patrick J. Vaughan 208-342-7162 208-334-2100
Name of Political Treasurer Home Phone Work Phone
4098 Hawthorne Way Boise, Idaho 83703
Address of Political Treasurer Zip Code

TYPE OF REPORT

Directions: To indicate the type of report being filed fill in the appropriate dates and check the appropriate box(es). The 30 Day Post-Primary Report is filed only by candidates who lose the primary. See the instructional manual for reporting periods and due dates.

This report is for the period from January 1, 1983 thru March 31, 1983

PRIMARY ELECTION REPORTS

- ☐ 7 Day Pre-Primary Report
☐ 30 Day Post-Primary Report

GENERAL ELECTION REPORTS

- ☐ 7 Day Pre-General Report
☐ 30 Day Post-General Report

QUARTERLY REPORTS

- ☒ First Quarterly Report
(Due April 10)
☐ Second Quarterly Report
(Due July 10)

- ☐ Third Quarterly Report
(Due October 10)
☐ Fourth Quarterly Report
(Due January 10)

SPECIAL REPORTS

- ☐ Termination Report ☐ Amended Report

CERTIFICATION OF NO CONTRIBUTIONS OR EXPENDITURES

Directions: If you had no contributions or expenditures during this reporting period check the box next to the statement below. fill in the appropriate dates and sign this report. Be sure to carry forward the appropriate "Calendar Year to Date" figures in Column II on the Summary Page.

☐ I hereby certify that I have received no contributions and have made no expenditures during this reporting period from _____ thru _____.

VERIFICATION BY OATH OR AFFIRMATION

I Patrick J. Vaughan, hereby certify that the information in this report
Name of Political Treasurer
is a true, complete, and correct Campaign Financial Disclosure Report as required by law.

Patrick J. Vaughan
Signature of Political Treasurer

SCHEDULE CONTRIBUTIONS

Directions: Before completing this schedule please refer to the instructional manual. If you do not have enough space to report the required information in Section A2, attach another sheet of paper to this report indicating clearly the section and all other required information. A contribution entered in one section of this schedule should never be entered in the other section of this schedule.

SECTION A1: Contributions of Fifty Dollars (\$50.00) or Less

LINE 1. Total Number of Contributors This Period	7
LINE 2. Total Amount of Contributions This Period	\$ 104.63

SECTION A2: Contributions of More Than Fifty Dollars (\$50.00)

Date	Name and Address of Contributor	Amount This Period	Calendar Year to Date
1-17-83	Mountain Bell Box 7888 Boise ID 83707 (Telephone refund)	693.51	693.51
1-17-83	Mountain Bell Box 7888 Boise ID 83707 (Telephone refund)	912.54	1,606.05
3-28-83	Kaiser Aluminum NW Regional Office 303 Washington Mutual Building Spokane Washington 99201	250.00	250.00
3-31-83	Money Market Savings A/C interest	193.09	193.09
LINE 3. Total A2 This Period		▶ \$ 2,049.14	

87040551722

**SCHEDULE
EXPENDITURES**

Directions: Before completing this schedule please refer to the instructional manual. If you do not have enough space to report the required information in section B2, attach another sheet of paper to this report indicating clearly the section and all other required information. An expenditure entered in one section of this schedule should never be entered in the other section of this schedule.

SECTION B1: Expenditures of Less Than Twenty-Five Dollars (\$25.00) This Period

LINE 4. Total Number of Expenditures 3
 LINE 5. Total Amount of Expenditures \$ 43.29

SECTION B2: Expenditures of Twenty-Five Dollars (\$25.00) or More This Period

Date	Name and Address of Recipient	Purpose of Expenditure	Amount of Expenditure
1-13-83	Butler 1406 Goldengate Pocatello ID 83201	Reimbursement of expenses	50.00
1-17-83	Mountain Bell Box 7888 Boise ID	Last payment on phone bill	152.05
1-7-83	State of Idaho Department of Employment	Payroll	40.60
1-7-83	State of Idaho	Withholding Tax	145.30
1-7-83	Global Travel	Travel expense	596.00
1-12-83	First Tuesday 17 Thomas Rd. Phoenix Arizona	Media final payment	980.97
1-17-83	Betsy Hall 240 Horizon Dr. Boise ID	Services and computer cards	183.00
1-18-83	Democratic Governor's Conference	Dues	2,000.00
2-1-83	Idaho Camera 816 W. Idaho Boise ID	Photo service	38.62
LINE 6. Total B2 This Period			\$ 4,186.54

87040551723

SCHEDULE C SUMMARY PAGE

Directions: Please refer to the instructional manual before completing this page. To obtain the appropriate column II figures in Sections A and B add column II of last report to column I of this report.

	COLUMN I THIS PERIOD	COLUMN II CALENDAR YEAR TO DATE
SECTION A: SUMMARY OF CONTRIBUTIONS		
LINE 7. Contributions of \$50.00 or Less (enter amount from line 2)	\$ 104.63	\$ 104.63
LINE 8. Contributions of More Than \$50.00. (enter amount from line 3)	\$ 2,049.14	\$ 2,049.14
LINE 9. Total Contributions (add lines 7 and 8)	\$ 2,153.77 ✓	\$ 2,153.77
 SECTION B: SUMMARY OF EXPENDITURES		
LINE 10. Expenditures of Less Than \$25.00 (enter amount from line 5)	\$ 43.29	\$ 43.29
LINE 11. Expenditures of \$25.00 or More (enter amount from line 6)	\$ 4,186.54	\$ 4,186.54
LINE 12. Total Expenditures (add lines 10 and 11)	\$ 4,229.83 ✓	\$ 4,229.83
 SECTION C: CASH BALANCE SUMMARY		
LINE 13. Enter cash balance as of January 1, This Year*	\$ xxxxxxxxxxxxxx	\$ 13,152.35
LINE 14. Enter cash balance at close of last period*	\$ 13,152.35	\$ xxxxxxxxxxxxxx
LINE 15. Total Contributions (enter amount from line 9)	\$ 2,153.77	\$ 2,153.77
LINE 16. Add lines 13, 14 and 15	\$ 15,306.12	\$ 15,306.12
LINE 17. Total Expenditures (enter amount from line 12)	\$ 4,229.83	\$ 4,229.83
LINE 18. Cash balance at close of period (subtract line 17 from line 16)	\$ 11,076.29	\$ 11,076.29
COLUMNS I and II LINE 18 MUST BE THE SAME FIGURE		

*If this is a new candidate's or new political committee's first report, enter on lines 13 and 14 the amount of cash on hand at date of certification. This same figure should be entered on line 13 of all reports filed this calendar year.

BE SURE YOU HAVE SIGNED THIS REPORT

Return This Report to:
Pete T. Cenarrum
Secretary of State
Statehouse
Boise, Idaho 83720

87040551724

State of Idaho

Department of State

C E R T I F I C A T E

I, PETE T. CENARRUSA, Secretary of State of the State of Idaho and custodian of the Seal of the State of Idaho, do hereby certify that the attached, are full, true and complete copies of the 1983 Annual Report filed by The Evans Committee pursuant to Section 67-6608, Idaho Code, as appears of record in this office, which are held by the Secretary of State.



IN TESTIMONY WHEREOF, Have hereunto set my hand and affixed the Great Seal of the State of Idaho. Done at Boise, Idaho, this twenty-sixth day of November, 1985.

Pete T. Cenarrusa
Secretary of State

37040551725



CAMPAIGN FINANCIAL DISCLOSURE REPORT

(Please Print or Type)

The Evans Committee		Governor	
Name of Candidate or Political Committee		Office Sought (if candidate)	District (if any)
John V. Evans	Statehouse	208 334-2100	
Address of Candidate or Political Committee Chairman		Home Phone	Work Phone
Patrick J. Vaughan	208 342-7162	208 3342100	
Name of Political Treasurer		Home Phone	Work Phone
4098 Hawthorne Way	Boise, Idaho	83703	
Address of Political Treasurer		Zip Code	

TYPE OF REPORT

Directions: To indicate the type of report being filed fill in the appropriate dates and check the appropriate boxes. The 30 Day Post-Primary Report is filed only by candidates who lose the primary. See the instructional manual for reporting periods and due dates.

This report is for the period from April 1 thru December 31, 1983.

- ☐ 7 Day Pre-Primary Report
- ☐ 30 Day Post-Primary Report
- ☐ 7 Day Pre-General Report
- ☐ 30 Day Post-General Report
- ☒ Annual Report (Due Jan. 31st)
- ☐ Termination Report

Is this Report an Amendment?

- ☐ Yes ☒ No

STATEMENT OF NO CONTRIBUTIONS OR EXPENDITURES

Directions: If you had no contributions or expenditures during this reporting period check the box next to the statement below. fill in the appropriate dates and sign this report. Be sure to carry forward the appropriate "Calendar Year to Date" figures in Column II on the Summary Page.

☐ I hereby certify that I have received no contributions and have made no expenditures during this reporting period from _____ thru _____.

CERTIFICATION

I Patrick J. Vaughan, hereby certify that the information in this report
Name of Political Treasurer
is a true, complete, and correct Campaign Financial Disclosure Report as required by law.

Patrick J. Vaughan
Signature of Political Treasurer

SCHEDULE A CONTRIBUTIONS

Directions: Before completing this schedule please refer to the instructional manual. If you do not have enough space to report the required information in Section A2, attach another sheet of paper to this report indicating clearly the section and all other required information. A contribution entered in one section of this schedule should never be entered in the other section of this schedule.

SECTION A1: Contributions of Fifty Dollars (\$50.00) or Less

LINE 1. Total Number of Contributors This Period

23

LINE 2. Total Amount of Contributions This Period

\$ 348.47

SECTION A2: Contributions of More Than Fifty Dollars (\$50.00)

Date	Name and Address of Contributor	Amount This Period	Calendar Year to Date
7/20/83	Paul Cunningham 2827 Bogus Basin Road Boise, Idaho 83702	100.00	100.00
8/29/83	Mike Brush 10041 Westview Boise, Idaho 83704	120.00	120.00
12/15/83	Rose Bowman 1624 Warm Springs Boise, Idaho 83702	150.00	150.00
12/28/83	Patrick & Cecelia Vaughan 4098 Hawthorne Way Boise, Idaho 83703	150.00	150.00
12/31/83	Money Market Savings Interest Idaho Bank & Trust Co. P. O. Box 2800 Boise, Idaho 83701	608.22	801.31
LINE 3. Total A2 This Period		\$ 1,128.22	

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SCHEDULE EXPENDITURES

Directions: Before completing this schedule please refer to the instructional manual. If you do not have enough space to report the required information in section B2, attach another sheet of paper to this report indicating clearly the section and all other required information. An expenditure entered in one section of this schedule should never be entered in the other section of this schedule.

SECTION B1: Expenditures of Less Than Twenty-Five Dollars (\$25.00) This Period

LINE 4. Total Number of Expenditures	1
LINE 5. Total Amount of Expenditures	\$ 20.00

SECTION B2: Expenditures of Twenty-Five Dollars (\$25.00) or More This Period

Date	Name and Address of Recipient	Purpose of Expenditure	Amount of Expenditure
4/4/83	Internal Revenue Service Ogden, Utah 84401	Employee tax	43.97
4/14/83	House of Flowers 107 E. Idaho Boise, Idaho 83702	Funeral Laura Church	27.50
6/28/83	Pat Costello 2608 Woodlawn Boise, Idaho 83702	Reimbursement for Democratic Fundraiser	30.00
6/29/83	Pat Costello 2608 Woodlawn Boise, Idaho 83702	Pocatello Fundraiser	62.97
10/2/83	State Democratic Party 1020 West Franklin Boise, Idaho 83702	Ticket	500.00
10/9/83	Robert Garrett Photographer 106 N. 6th, Suite 216 Boise, Idaho 83702	Governor and wife's inagural photos	232.50
12/28/83	Global Travel 111 Main Boise, Idaho 83702	Difference-air fare San Diego to Albuquerque New Mexico	46.00
12/28/83	Idaho Bank & Trust Co. P. O. Box 2800 Boise, Idaho 83701	Cashier's check travel for Governor	234.42
LINE 6. Total B2 This Period			\$ 1177.36

SCHEDULE C SUMMARY PAGE

Directions: Please refer to the instructional manual before completing this page. To obtain the appropriate column II figures in Sections A and B add column II of last report to column I of this report.

	COLUMN I THIS PERIOD	COLUMN II CALENDAR YEAR TO DATE
SECTION A: SUMMARY OF CONTRIBUTIONS		
LINE 7. Contributions of \$50.00 or Less (enter amount from line 2)	\$ 348.47	\$ 453.10
LINE 8. Contributions of More Than \$50.00. (enter amount from line 3)	\$ 1128.22	\$ 3177.36
LINE 9. Total Contributions (add lines 7 and 8)	\$ 1476.69	\$ 3630.46
SECTION B: SUMMARY OF EXPENDITURES		
LINE 10. Expenditures of Less Than \$25.00 (enter amount from line 5)	\$ 20.00	\$ 63.29
LINE 11. Expenditures of \$25.00 or More (enter amount from line 6)	\$ 1177.36	\$ 5363.90
LINE 12. Total Expenditures (add lines 10 and 11)	\$ 1197.36	\$ 5427.19
SECTION C: CASH BALANCE SUMMARY		
LINE 13. Enter cash balance as of January 1, This Year*	\$ xxxxxxxxxxxxxx	\$ 13152.35
LINE 14. Enter cash balance at close of last period*	\$ 11073.29	\$ xxxxxxxxxxxxxx
LINE 15. Total Contributions (enter amount from line 9)	\$ 1476.69	\$ 3630.46
LINE 16. Add lines 13, 14 and 15	\$ 12552.98	\$ 16782.81
LINE 17. Total Expenditures (enter amount from line 12)	\$ 1197.36	\$ 5427.19
LINE 18. Cash balance at close of period (subtract line 17 from line 16)	\$ 11355.62	\$ 11355.62
COLUMNS I and II LINE 18 MUST BE THE SAME FIGURE		

*If this is a new candidate's or new political committee's first report, enter on lines 13 and 14 the amount of cash on hand at date of certification. This same figure should be entered on line 13 of all reports filed this calendar year.

BE SURE YOU HAVE SIGNED THIS REPORT

Return This Report to:
Pete T. Cenarrusa
Secretary of State
Statehouse
Boise, Idaho 83720

EXHIBIT

10

State of Idaho

Department of State.

C E R T I F I C A T E

I, PETE T. CENARRUSA, Secretary of State of the State of Idaho and custodian of the Seal of the State of Idaho, do hereby certify that the attached, are full, true and complete copies of the 1984 Annual Report filed by The Evans Committee pursuant to Section 67-6608, Idaho Code, as appears of record in this office, which are held by the Secretary of State.



IN TESTIMONY WHEREOF, Have hereunto set my hand and affixed the Great Seal of the State of Idaho. Done at Boise, Idaho, this twenty-sixth day of November, 1985.

Pete T. Cenarrusa
Secretary of State

8704051730



CAMPAIGN FINANCIAL DISCLOSURE REPORT

(Please Print or Type)

JAN 15 11 21 AM '85

The Evans Committee **Governor**
 Name of Candidate or Political Committee Office Sought (if candidate) District (if any)
John V. Evans Statehouse **208-334-2100**
 Address of Candidate or Political Committee Chairman Home Phone Work Phone
Patrick J. Vaughan **208-342-7162** **208-334-2100**
 Name of Political Treasurer Home Phone Work Phone
4098 Hawthorne Way **Boise, Idaho** **83703**
 Address of Political Treasurer Zip Code

TYPE OF REPORT

Directions: To indicate the type of report being filed fill in the appropriate dates and check the appropriate box(es). The 30 Day Post-Primary Report is filed only by candidates who lose the primary. See the instructional manual for reporting periods and due dates.

This report is for the period from 1/1/84 thru 12/31/84

- ☐ 7 Day Pre-Primary Report
- ☐ 30 Day Post-Primary Report
- ☐ 7 Day Pre-General Report
- ☐ 30 Day Post-General Report
- ☒ Annual Report (Due Jan. 31st)
- ☐ Termination Report

Is this Report an Amendment?

☐ Yes ☒ No

STATEMENT OF NO CONTRIBUTIONS OR EXPENDITURES

Directions: If you had no contributions or expenditures during this reporting period check the box next to the statement below. fill in the appropriate dates and sign this report. Be sure to carry forward the appropriate "Calendar Year to Date" figures in Column II on the Summary Page.

☐ I hereby certify that I have received no contributions and have made no expenditures during this reporting period from _____ thru _____

CERTIFICATION

I Patrick J. Vaughan hereby certify that the information in this report
 Name of Political Treasurer
 is a true, complete, and correct Campaign Financial Disclosure Report as required by law.

Patrick J. Vaughan
 Signature of Political Treasurer

87040551731

SCHEDULE A CONTRIBUTIONS

Directions: Before completing this schedule please refer to the instructional manual. If you do not have enough space to report the required information in Section A2, attach another sheet of paper to this report indicating clearly the section and all other required information. A contribution entered in one section of this schedule should never be entered in the other section of this schedule.

SECTION A1: Contributions of Fifty Dollars (\$50.00) or Less

LINE 1. Total Number of Contributors This Period

14

LINE 2. Total Amount of Contributions This Period

\$ 309.50

SECTION A2: Contributions of More Than Fifty Dollars (\$50.00)

Date	Name and Address of Contributor	Amount This Period	Calendar Year to Date
4/6/84	Joseph J. Ference 1204 E State St. Boise, Idaho 83712	\$150.00	\$150.00
8/17/84	J.C. Penney Co., Inc. Store #1206-2 Sunrise Center 6100 Sunrise Blvd Citrus Heights, CA 95610-6973	1,000.00	1,000.00
8/30/84	John D. Hatfield Soda Springs Phosphate RR #1 Creston, Iowa	500.00	500.00
11/2/84	Amalgamated Sugar Co. PAC Box 1520 Ogden, UT 84402	500.00	500.00
11/2/84	Archer Daniels Midland Co. Box 1470 Decatur, Ill. 62525	250.00	250.00
11/2/84	A.E. Staley Manufacturing Co. Decatur, Ill. 62525	250.00	250.00
11/2/84	Amfac Hawaiian Sugar Planters Assoc. 723 Investment Bldg Washington, DC 20005	250.00	250.00
11/2/84	Rose Bowman 1624 Warm Springs Boise, Idaho 83712	250.00	250.00
11/2/84	Idaho Legislative Campaign Comm Box 445 Boise, Idaho 83701	200.50	200.50
11/13/84	Kootenai County Democratic Central Committee Box 2319 Coeur D'Alene, Idaho 83814	89.00	89.00
LINE 3. Total A2 This Period		▶	\$ Continued

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SCHEDULE A CONTRIBUTIONS

Directions: Before completing this schedule please refer to the instructional manual. If you do not have enough space to report the required information in Section A2, attach another sheet of paper to this report indicating clearly the section and all other required information. A contribution entered in one section of this schedule should never be entered in the other section of this schedule.

SECTION A1: Contributions of Fifty Dollars (\$50.00) or Less

LINE 1 Total Number of Contributors This Period

LINE 2 Total Amount of Contributions This Period

8

SECTION A2: Contributions of More Than Fifty Dollars (\$50.00)

Date	Name and Address of Contributor	Amount This Period	Calendar Year to Date
11/13/84	Idaho AFL-CIO Cope 225 N 16th Boise, Idaho 83702	\$250.00	\$250.00
12/31/84	Patrick Vaughan 4098 Hawthorne Way Boise, Idaho 83703	250.00	250.00
12/31/84	Money Market Savings Interest Account Idaho Bank & Trust Co.	851.25	851.25

LINE 3 Total A2 This Period



4,790.75

87040551733

**SCHEDULE B
EXPENDITURES**

Directions: Before completing this schedule please refer to the instructional manual. If you do not have enough space to report the required information in section B2, attach another sheet of paper to this report indicating clearly the section and all other required information. An expenditure entered in one section of this schedule should never be entered in the other section of this schedule.

SECTION B1: Expenditures of Less Than Twenty-Five Dollars (\$25.00) This Period

LINE 4. Total Number of Expenditures	2
LINE 5. Total Amount of Expenditures	\$ 40

SECTION B2: Expenditures of Twenty-Five Dollars (\$25.00) or More This Period

Date	Name and Address of Recipient	Purpose of Expenditure	Amount of Expenditure
2/24/84	Idaho Bank & Trust Co. P.O. Box 2800 Boise, Idaho 83701	C/D IRS 322.00 State Tax 64.00	386.00
7/16/84	Global Travel BSU Student Union Boise, Idaho 83725	Gov Evans travel to Washington, DC for Rules Committee	840.00
7/16/84	Washington Plaza Hotel Mass & Vermont Ave NW Washington, DC 20005	Gov Evans lodging for Rules Committee meeting	156.00
7/16/84	Idaho State Democratic Party Box 445 Boise, Idaho 83201	Room deposit for Gov Evans in San Francisco Demo convention	200.00
7/16/84	Gov John Evans Statehouse Boise, Idaho 83720	Expenses in Wash. DC Rules Comm meeting	32.00
7/30/84	Don Glebert 5374 N Five Mile Boise, Idaho 83704	Convention travel for Gov Evans	159.75
9/5/84	Governor John Evans Statehouse Boise, Idaho 83720	Convention Expense	623.38
9/5/84	Global Travel BSU Student Union Boise, Idaho 83725	Democratic Gov Assoc meeting	608.00
9/17/84	Western Idaho State Fair 5610 Glenwood Boise, Idaho	Jr. Livestock Sale	124.00
9/17/84	The Saint Paul Hotel Saint Paul, Minnesota	Meeting with V.P. Mondale	75.21
11/2/84	Global Travel BSU Student Union Boise, Idaho 83725	Campaign travel	213.00
11/21/84	Care for Idaho 1004 W Fort Boise, Idaho	Contribution HJR5	50.00

LINE 6. Total B2 This Period ▶ \$ Continued

8704051734

Directions: Before completing this schedule please refer to the instructional manual. If you do not have enough space to report the required information in section B2, attach another sheet of paper to this report indicating clearly the section and all other required information. An expenditure entered in one section of this schedule should never be entered in the other section of this schedule.

LINE 5. Total Amount of Expenditures

Date	Name and Address of Recipient	Purpose of Expenditure	Amount of Expenditure
12/10/84	Red Lion Downtown Boise, Idaho	Coffee room rental Evans committee	40.28
7/18/84	Global Travel BSU Student Union Boise, Idaho 83725	Governor and Mrs. Evans travel to Democratic Convention	720.00

LINE 6: Total R2 This Period

\$ 4,227.62

8704051735

SCHEDULE C SUMMARY PAGE

Directions: Please refer to the instructional material on page 1 of this report. To obtain the appropriate column II figures in Sections A and B add column II of last report to column I of this report.

	COLUMN I THIS PERIOD	COLUMN II CALENDAR YEAR TO DATE
SECTION A: SUMMARY OF CONTRIBUTIONS		
LINE 7. Contributions of \$50.00 or Less (enter amount from line 2)	\$ 309.50	\$ 309.50
LINE 8. Contributions of More Than \$50.00. (enter amount from line 3)	\$ 4,790.75	\$ 4,790.75
LINE 9. Total Contributions (add lines 7 and 8)	\$ 5,100.25	\$ 5,100.25
SECTION B: SUMMARY OF EXPENDITURES		
LINE 10. Expenditures of Less Than \$25.00 (enter amount from line 5)	\$ 40.00	\$ 40.00
LINE 11. Expenditures of \$25.00 or More (enter amount from line 6)	\$ 4,227.62	\$ 4,227.62
LINE 12. Total Expenditures (add lines 10 and 11)	\$ 4,267.62	\$ 4,267.62
SECTION C: CASH BALANCE SUMMARY		
LINE 13. Enter cash balance as of January 1, This Year*	\$ xxxxxxxxxxxxxx	\$ 11,355.62
LINE 14. Enter cash balance at close of last period*	\$ 11,355.62	\$ xxxxxxxxxxxxxx
LINE 15. Total Contributions (enter amount from line 9)	\$ 5,100.25	\$ 5,100.25
LINE 16. Add lines 13, 14 and 15	\$ 16,455.87	\$ 16,455.87
LINE 17. Total Expenditures (enter amount from line 12)	\$ 4,267.62	\$ 4,267.62
LINE 18. Cash balance at close of period (subtract line 17 from line 16)	\$ 12,188.25	\$ 12,188.25
COLUMNS I and II LINE 18 MUST BE THE SAME FIGURE		

*If this is a new candidate's or new political committee's first report, enter on lines 13 and 14 the amount of cash on hand at date of certification. This same figure should be entered on line 13 of all reports filed this calendar year.

BE SURE YOU HAVE SIGNED THIS REPORT

Return This Report to:
Pete T. Cenarrusa
Secretary of State
Statehouse
Boise, Idaho 83720

87040551736

6

JCPenney

QCC#9139

December 6, 1985

Kenneth A. Gross, Esq.
Associate General Counsel
Federal Election Commission
1325 K Street, NW, 7th Fl.
Washington, DC 20463

Re: MUR 2100

Dear Mr. Gross:

I am writing in response to your November 8, 1985 letter to the JCPenney store in Citrus Heights, California which requests information concerning an allegation that JCPenney may have violated the Federal Election Campaign Act. (Assistant General Counsel Lois Lerner agreed to extend our time to respond to your request until December 6th during a telephone conversation on November 26).

Your inquiry is based on information contained in a November 4, 1985 complaint of the Republican National Senatorial Committee against The John Evans for Senate Committee and The Evans Committee. The complaint alleges that the Evans Committee, a state campaign committee organized under Idaho law, unlawfully transferred funds received from a union and several corporations--one of which was JCPenney--to The Evans for Senate Committee, which was organized under the Federal Election Campaign Act.

As the attached affidavit of George M. Stone indicates, JCPenney made a \$1000 corporate political contribution--lawful under Idaho law--to The Evans Committee in August, 1984 (about seven months before the alleged improper transfer was made by The Evans Committee). It was JCPenney's intention that the contribution be used solely in connection with state election activities, and no JCPenney representative at any time agreed to, or was aware of, any subsequent use of the funds, including any transfer to a Federal campaign committee.

It appears that when The Evans Committee was terminated and some of its funds transferred to The John Evans for Senate Committee, the JCPenney contribution was

RECEIVED
OFFICE OF
GENERAL COUNSEL

05 DEC 6 P3:04

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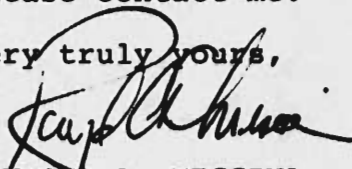
Kenneth A. Gross, Esq.
Page 2

included on the list of the contributions comprising the transferred funds solely for accounting purposes, and perhaps inadvertently. Whatever the reason for the inclusion of this contribution, however, the listing was prepared by The Evans Committee without any notice to JCPenney or the consent of any JCPenney representative.

JCPenney's actions were in complete conformity with state requirements, and with the Federal Election Campaign Act. Accordingly, no action should be taken against JCPenney, and the Commission's inquiry should be closed.

If your office needs additional information in order to complete your review, please contact me.

Very truly yours,



RAYMOND A. MESSINA
Regional Counsel
Attorney for
J. C. Penney Company, Inc.

Enclosure

cc: Patricia Reilly, FEC

87040551738

BEFORE THE
FEDERAL ELECTION COMMISSION

NATIONAL REPUBLICAN
SENATORIAL COMMITTEE,
Petitioner

v.

JOHN EVANS FOR SENATE COMMITTEE,
THE EVANS COMMITTEE,
Respondents

MUR No. 2100

AFFIDAVIT OF GEORGE M. STONE

GEORGE M. STONE, being duly sworn, deposes and says:

1. I am Vice President and Director of Government Relations for J. C. Penney Company, Inc. and am familiar with the matters discussed in this affidavit. My business address is 1156 15th Street, N.W., Suite 1015, Washington, DC 20005.

2. This affidavit is submitted in response to a November 8, 1985 letter of the Commission to JCPenney, informing us that an allegation had been made by the above-named Petitioner that JCPenney "may have violated" certain provisions of the Federal Election Campaign Act. As the following information will demonstrate, there is no basis whatsoever for this allegation. Accordingly, no action should be taken against JCPenney or any of its representatives.

3. The Complaint alleges, in essence, that the Respondents transferred funds from Governor John Evans' Idaho state gubernatorial

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torial committee to a committee established under the Federal Election Campaign Act, and that the Act was violated because some of the transferred funds represented corporate political contributions made to Governor Evans' state campaign committee.

4. Although JCPenney, in August, 1984, made a contribution of corporate funds to Governor Evans' state gubernatorial campaign, that contribution was made for the sole purpose and intention that the funds be used for state election purposes. Any subsequent use of the funds made by the Governor's campaign committee, including any transfer to a committee established under the Federal Election Campaign Act, was made without the knowledge or consent of any JCPenney representative.

5. JCPenney's contribution to Governor Evans' state campaign committee was made on August 17, 1984, nearly seven months before the John Evans for Senate Committee was formed. In accordance with normal Company policy and procedures involving corporate political contributions, the contribution had previously been approved by me, and by our Legal Department which confirmed that it was lawful under Idaho law.

6. A photocopy of JCPenney's check is attached. The check was endorsed and deposited by The Evans Committee (Governor Evans' State gubernatorial campaign committee) to its account in the Idaho Bank & Trust Company, and was paid by JCPenney's bank, Mellon Bank, N.A. on September 6, 1984.

7. On the basis of the above, it is clear that JCPenney and its representatives acted in accordance with all applicable

legal requirements. Since there is no basis for any finding of a possible violation of the Federal Election Campaign Act, the Commission's file on this matter should be closed insofar as it pertains to JCPenney.

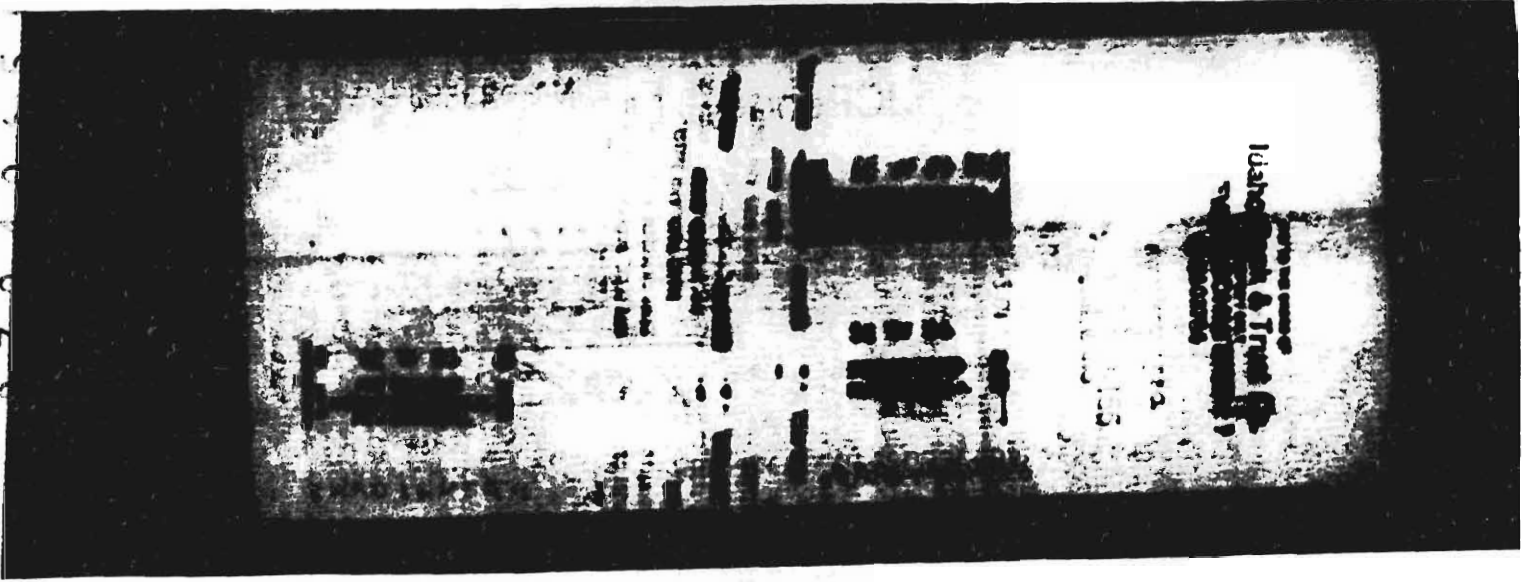
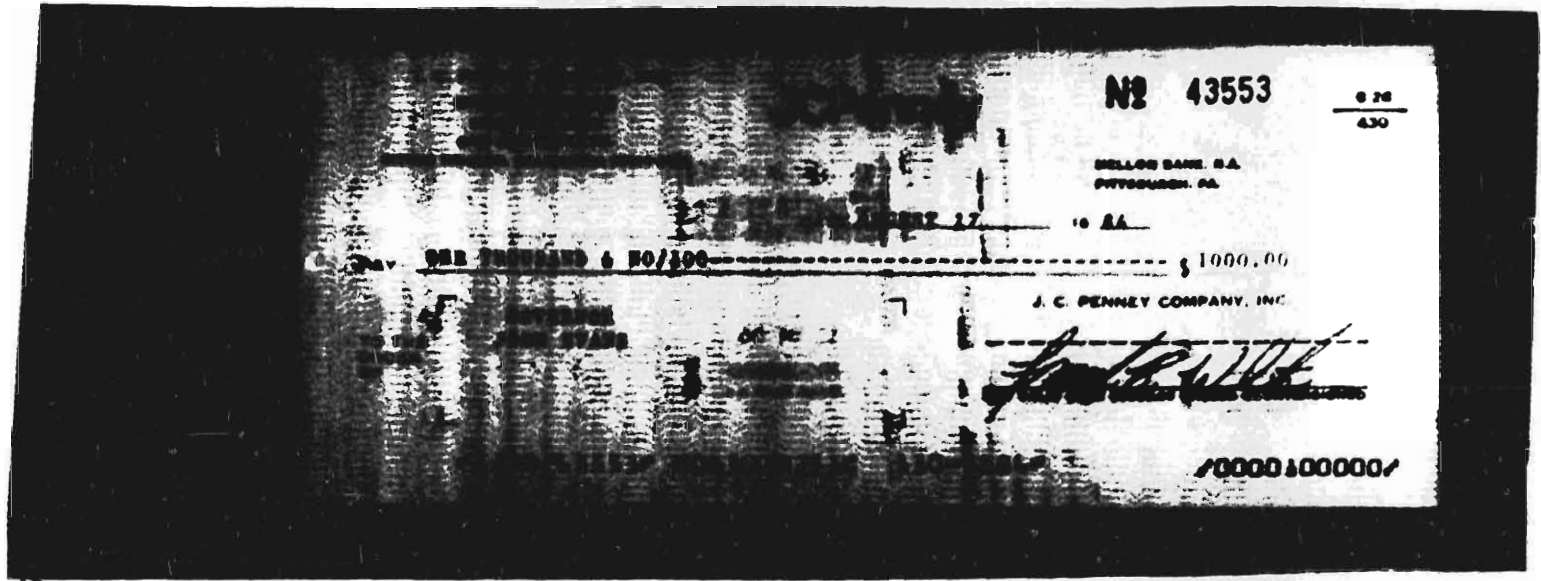

GEORGE M. STONE

Subscribed and sworn to before
me this 6th day of December,
1985.


Nellie D. Thomas
Notary Public

My Commission Expires Dec. 15, 1987

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STATEMENT OF DESIGNATION OF COUNSEL

MUR 2100

NAME OF COUNSEL: Raymond A. Messina

ADDRESS: 1156 15th St., NW

Suite 1015

Washington, DC 20005

TELEPHONE: (202) 862-4827

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.

J. C. PENNEY COMPANY, INC.

December 6, 1985
Date

By 
Signature
GEORGE M. STONE
Vice President & Director
of Government Relations

RESPONDENT'S NAME: J. C. Penney Company, Inc.

ADDRESS: 1301 Avenue of the Americas

New York, NY 10019

HOME PHONE: _____

BUSINESS PHONE: _____

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CCC# 9987

LAW OFFICES

MARTIN, CHAPMAN, PARK & BURKETT

STATEHOUSE CENTER BUILDING
775 N. 8TH STREET • SUITE 200
BOISE, IDAHO 83702

C. BEN MARTIN
JOHN B. CHAPMAN
W. ANTHONY PARK
F. MICHAEL BURKETT, JR.
PATRICIA B. URQUHART
PATRICK D. COSTELLO

86 MAR 17 1986
P.O. BOX 2888
TELEPHONE 343-6485
AREA CODE 208

March 6, 1986

Mr. Charles N. Steele
General Counsel
Federal Elections Commission
Washington, D. C. 20543

Re: National Republican Senatorial Committee v. The
John Evans for Senate Committee and The Evans
Committee MUR 2100

Dear Mr. Steele:

Please advise me of the status of the above-entitled case. My client's response was filed November 27, 1985, and to date, we have received no indication from the Commission as to the disposition of this matter.

Thank you for your assistance.

Very truly yours,

W. Anthony Park
W. Anthony Park

WAP/jsg

cc: John Evans for Senate Committee

86 MAR 17 1986
GENERAL COUNSEL
RECEIVED

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SENSITIVE

FEDERAL ELECTION COMMISSION

999 E Street, N.W.
Washington, D.C. 20463

OFFICE OF THE FEC
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT

55 MAR 25 A 9:34

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION _____

MUR 2100

DATE COMPLAINT RECEIVED

BY OGC November 4, 1985

DATE OF NOTIFICATION TO

RESPONDENT November 8, 1985

STAFF MEMBER Reilly

COMPLAINANT'S NAME: The National Republican Senatorial
Committee

RESPONDENTS' NAMES: The Evans Committee and
Patrick Vaughan, as treasurer
John Evans for Senate Committee and
Hubert Coats, as treasurer
J.C. Penny Co., Inc.
Robert L. Harney
Kaiser Aluminum
Teamsters Joint Counsel #37 Political
Fund

RELEVANT STATUTES: 2 U.S.C. § 434(b)(3)
2 U.S.C. § 441a(f)
2 U.S.C. § 441b(a)
2 U.S.C. § 433(a)
11 C.F.R. § 102.6(a)(1)

INTERNAL REPORTS CHECKED: Disclosure Reports

SUMMARY OF ALLEGATIONS

The Office of the General Counsel received a complaint on November 4, 1985 from the National Republican Senatorial Committee. The complaint alleges a number of violations of the Act arising from the transfer of allegedly impermissible funds from a candidate's state political committee to his federal political committee.

1. Background

Pursuant to Idaho law, Governor John V. Evans authorized a state principal campaign committee ("the Evans Committee") for his 1982 reelection campaign for the governorship of this state.^{1/} Subsequently, on March 15, 1985, Governor Evans filed a Statement of Candidacy with the Secretary of the Senate for the Office of United States Senate. A Statement of Organization for his principal campaign committee ("the Senate Committee"), designating the Idaho Bank and Trust as its depository, was also filed on that date. On March 19, 1985 the Evans Committee filed a termination statement with the Idaho Secretary of State's Office, certifying it had transferred \$11,308.37 to the Senate Committee on March 18, 1985, and had a zero balance. Complaint at Exhibit C. This termination report was then amended two times. In the first amendment the amount of the transfer to the Senate Committee was reported as \$7,350.32; in the second amendment this figure was adjusted to \$7,314.07. Both amendments reported the date of the transfer as March 29, 1985. Complaint at Exhibits D and E.

On July 31, 1985 the Commission received a Statement of Organization and a 1985 Mid Year Report from the Evans Committee. The Evans Committee apparently is affiliated with the Senate Committee as the two committees were both established by the same

^{1/} The Evans Committee qualified as a federal political committee in March, 1985. For the purposes at this report, "the Evans Committee" refers to this entity both as a state committee and a federal political committee.

person. An accompanying letter stated that in March 1985 the Evans Committee had wound up the affairs of the state committee and that the Evans Committee had transferred to the Senate Committee^{2/} permissible funds of \$7,314.07 of the \$11,272.72 it had on hand. The Evans Committee registered with the Commission solely because of this transfer.

2. Allegations in the Complaint

The Complaint makes three allegations regarding the Senate Committee and the Evans Committee. First, the transfer at issue is said to have resulted in violations of 2 U.S.C. §§ 441a(a)(1)(A) and 441b(a). Second, these two committees are said to have attempted to conceal this transfer from the Commission "through a series of apparently false and misleading filings with the FEC..." Complaint at 9. Third, the Committees are said to have violated 2 U.S.C. § 434 by failing to file accurate reports.

Two key assumptions are central to the complaint. First, the complaint assumes that the two bank accounts maintained by the Evans Committee were closed on March 18, 1985 and that these closings prevented any further transactions from these accounts. Second, the complaint assumes that the Senate Committee received

^{2/} Because the exact amount of accrued interest was unknown on the date of the termination, the amount of the transfer has been changed by amendments. See Complaint at 4. Respondents sworn statements and an enclosed bank statement indicate the amount of interest was finally determined to be \$1028.48. Senate Committee Response at Exhibit 2 and at p. 5. Because an amount exceeding the sum of what the Committees considered to be non-permissible funds had already been removed from the account, the amount transferred to the Senate Committee required readjustment. The effect of this adjustment appeared to be that the Committees were adjusting the the amount of the transfer months after this transfer occurred.

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prohibited and excessive contributions from the Evans Committee and that the Senate Committee's reports deliberately conceal that fact. As developed below, Respondents assert that neither assumption is correct.

FACTUAL AND LEGAL ANALYSIS

A. Allegations Relating to the Committees

1. Applicable Law

Pursuant to 11 C.F.R. § 100.5(g)(2)(E), all political committees established by the same person are affiliated. Furthermore, all authorized committees of the same candidate are affiliated. 11 C.F.R. § 100.5(g)(1). Pursuant to 11 C.F.R. 102.6(a)(1) transfers may be made without limitation between such affiliated committees, provided funds transferred are those which are permissible under the Act. The Act prohibits contributions from the general treasuries of corporations and labor unions. 2 U.S.C. § 441b(a). The Act also limits contributions by individuals to \$1000 per person, per election (2 U.S.C. § 441a(a)(1)(A)), and prohibits political committees from knowingly accepting excessive contributions. 2 U.S.C. § 441a(f). Any group of persons receiving contributions or making expenditures aggregating in excess of \$1000 per calendar year constitutes a political committee under the Act. 2 U.S.C. § 431(4). Such political committees must file a statement of organization with the Commission within 10 days of meeting this definition. 2 U.S.C. § 433(a). Upon qualification as a political committee, reports are required to be filed. A committee's initial report must justify all its cash on hand; itemizing all contributions exceeding \$200. 2 U.S.C. § 434(b)(3).

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To determine whether permissible funds are transferred (thus raising the issue of qualification as a political committee), a "last-in, first-out" procedure is used in order to exclude excessive and prohibited funds. See e.g. A.O. 1984-38.

2. Respondents' Explanation of the Transfer

Responding to notification to the complaint, both the Evans Committee and the Senate Committee deny any intent to violate the Act, although recognizing their reports were "confusing in minor respects." Memorandum Response at 14. This confusion is detailed in the following scenario.

Initially, it is clear that the Evans Committee's accounts contained contributions which were not permissible under the Act, but which were proper under Idaho state law. After Governor Evans declared his candidacy for the Senate, the Evans Committee sought to terminate its operations and transfer these funds to the newly formed Senate Committee which had registered with the Commission. The Evans Committee filed a termination statement with the Idaho Secretary of State's Office on March 19, 1985, indicating a zero cash balance following a transfer of \$11,308.97 made to the Senate Committee on the previous day. Response at 3. Instead of physically transferring this sum from the Evans Committee's accounts to an account of the Senate Committee, on March 18, 1985 the treasurer of the Evans committee authorized the bank to change the names of the holders of the two accounts maintained by the Evans committee to "The John Evans for Senate Committee."

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Subsequently, around March 19, 1985, the Idaho Secretary of State's Office contacted the Evans Committee to determine whether any impermissible funds had been transferred to the Senate Committee. Following a discussion with the FEC's Office of Public Information, the Evans Committee reviewed its books using a "last-in, first-out" procedure, and determined that approximately \$3,958.65 of the funds in the account were not permissible funds.^{3/} Accordingly, on March 28, 1985, the Senate Committee

(as holder of the bank signature cards) gave cashiers checks totalling \$3,958.65 to Patrick Vaughan, treasurer of the Evans Committee, to contribute to two non-federal political committees. Respondents have provided copies of the cancelled cashier checks evidencing this transaction. Thus, from March 18, 1985 to March 28, 1985, the Senate Committee's depository account contained at least \$3,958.65 in impermissible funds.

3. Respondents' Reports of The Transfer Transaction

a. The Evans Committee Reports

The initial Evans Committee report noted a cash on hand figure of \$11,272.72. Included in this figure are apparent prohibited and excessive contributions received by the Evans Committee prior to its qualification as a federal political committee. This cash on hand figure was only partially itemized; the report also

^{3/} This review may not have effectively excluded all of the impermissible funds contained in the account. The worksheet contained in the Committee's Response appears to contain two corporate contributions which were not included in this \$3,958.65. These two contributions, totaling \$500, were from the A.E. Staley Manufacturing Company and the Archer Daniels Midland Co. See Senate Committee Response at Exhibit 2 p. 2.

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contained an unitemized memo entry of \$3,650.92. Although the Act requires that the initial report of a committee itemize all contributions exceeding \$200, information obtained in response to the complaint indicates this initial itemization by the Evans Committee was not complete.

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The Evans Committee's Response contains an amendment to the 1985 Mid-Year Report further itemizing cash on hand, and noting an unitemized entry of \$1,172.60. Also included in the response is a worksheet listing the source of all funds composing the Evans Committee cash on hand on its date of qualification as a political committee. Many of the amounts listed on the worksheet, including (\$250) from AMPAC Hawaiian Sugar Planter Association, the corporate contributions noted in footnote 3 and refunds from Mountain Bell do not appear to be itemized on the Evans Committee reports. Furthermore, the reported date of a \$150 contribution by Rose Bowman is inconsistent with the date noted on the worksheet. Therefore, because the Evans Committee worksheets indicate that the Evans Committee failed to fully itemize all contributions exceeding \$200, the Evans Committee appears to have violated 2 U.S.C. § 434(b)(3).

b. The Senate Committee's Report

Although on the date the Evans Committee's accounts were transferred to the Senate Committee these accounts contained \$11,272.72, the initial Mid-Year Report of the Senate Committee reports the transfer-in figure from the Evans Committee as only \$7,314.07. This does not include the receipt of any

impermissible funds although, in fact, such funds were in the Senate Committee's bank accounts for a ten day period. It was only on March 28, 1985, after determining that impermissible funds were in the accounts, that Mr. Coates, treasurer of the Senate Committee, withdrew \$3,958.65, the amount he believed to be impermissible funds. Mr. Coates then authorized the treasurer of the Evans Committee, Mr. Vaughan, to receive two cashier's checks for this total amount. Mr. Vaughan then mailed these checks to two non-federal political committees. Memorandum Response at 5-6. Amendments to the Senate Committee's 1985 Mid-Year Report reflect the same transfer in figure of \$7,314.07 and do not account for the remaining \$3,958.65.

c. The Effect of This Transfer

The confusion surrounding the reporting of the transfer of these funds stems from two factors. First, as previously noted, the Evans Committee did not actually close out its accounts and physically transfer funds to the Senate Committee. Instead, the Evans Committee changed the name of the holder of these accounts to the Senate Committee. Thus, as noted in the complaint, the Evans Committee appeared to be reporting transactions out of a previously closed account when it attempted to account for the transfer-in figure. Second, although this transfer of more than \$1,000 required the Evans Committee to register with the Commission within 10 days of March 18, 1985, the Evans Committee did not do so until July, 1985 when it filed its 1985 Mid-Year Report.

Reading the complaint, responses and amendments in conjunction, there is no doubt that the Senate Committee held impermissible funds in its treasury on March 18, 1985 because of the change in the holder of the bank accounts. Moreover, although the committees attempted to correct this situation by contributing these impermissible funds to non-federal committees, prior to the date of these contributions, the Senate Committee made operating expenditures relating to its start-up costs totaling \$2,230.72. Thus, the Senate Committee apparently received and used impermissible funds in connection with a federal election.

In light of the foregoing, this Office recommends that the Commission find that there is reason to believe that the Evans Committee and its treasurer violated 2 U.S.C. § 433(a) by failing to register with the Commission within 10 days of its qualification as a political committee. Additionally, this Office recommends that the Commission find reason to believe that the Evans Committee and its treasurer violated 2 U.S.C. § 434(b)(3) by failing to fully identify its contributors. Further, because the cited inconsistencies in the committees' reports regarding the transaction between the committees arise from the transfer of prohibited funds, this Office is treating this matter as violation of 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.6(a) rather than a reporting problem. Thus, this Office recommends that the Commission find reason to believe that both the Senate Committee and its treasurer, and the Evans Committee

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and its treasurer, violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.6(a)(i). As discussed below, these funds do not appear to contain excessive contributions, therefore, this office further recommends that the Commission find no reason to believe the Senate Committee violated 2 U.S.C. § 441a(f).

B. Status of Individual Contributors

The Office of the General Counsel further recommends the Commission find no reason to believe that J.C. Penny Co., Inc., Kaiser Aluminum and Teamsters Joint Counsel #37 violated 2 U.S.C. § 441b(a).^{4/} At the time these corporate contributions were made to the Evans Committee they were not made for the purpose of influencing or in connection with a federal election and were legal under state law. Moreover, a contribution made by Robert L. Harney to the Evans Committee was an in-kind contribution. This contribution thus was not part of the monies transferred, and requires the result that there is no reason to believe Mr. Harney violated 2 U.S.C. § 441a(a)(1)(A) or that the Senate Committee and its treasurer violated 2 U.S.C. § 441a(f).

RECOMMENDATIONS

1. Find no reason to believe J.C. Penny Co. Inc., Kaiser Aluminum, and Teamsters Joint Counsel #37 Political Fund violated 2 U.S.C. § 441b(a).

^{4/} The Response from Teamsters Local Union #73 of New Jersey indicates the Evans Committee improperly attributed a contribution made by Teamsters Local #37 located in Portland Oregon to an organization identified as Teamsters Local #37 of New Jersey. Because these funds consisted of general union funds which should have been excluded from the Evans Committee treasury prior to its qualification as a federal committee and should not have been transferred to the Senate Committee, this Office is treating this matter as a violation of 2 U.S.C. § 441b rather than a reporting violation.

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2. Find no reason to believe Robert L. Harney violated 2 U.S.C. § 441a(a)(1)(A).
3. Find no reason to believe the John Evans for Senate Committee and Hubert Coats, as treasurer, violated 2 U.S.C. § 441a(f).
4. Find reason to believe the Evans Committee and Patrick Vaughan, as treasurer, violated 2 U.S.C. §§ 441b(a), 433(a), and 434(b)(3) as well as 11 C.F.R. § 102.6(a)(1).
5. Find reason to believe the John Evans for Senate Committee and Hubert Coats, as treasurer violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.6(a)(1).
6. Approve and send the attached letters.

Charles N. Steele
General Counsel

March 24, 1956
Date

By:

Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

Attachments

1. Response from Evans Committee and Senate Committee
2. Response of Teamsters #73
3. Response of J.C. Penny Inc.
4. Response of Kaiser Aluminum Co.
5. Proposed Letters

Attachment(s) 12,3,4,5
to First General Counsel's Report
have been removed from this
position in Public Record File.
See Index Item(s) 4,5,6,7,12,13.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL
FROM: MARJORIE W. EMMONS/ CHERYL A. FLEMING *CF*
DATE: MARCH 25, 1986
SUBJECT: OBJECTION TO MUR 2100:
FIRST GENERAL COUNSEL'S REPORT
SIGNED MARCH 24, 1986

The above-named document was circulated to the
Commission on Tuesday, March 25, 1986 at 4:00 P.M.

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

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner Harris	_____
Commissioner Josefiak	_____ x _____
Commissioner McDonald	_____
Commissioner McGarry	_____

This matter will be placed on the Executive Session
agenda for Tuesday, April 1, 1986.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
The Evans Committee, et al.) MUR 2100

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of April 1, 1986, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 2100:

1. Find no reason to believe J.C. Penney, Co., Inc. Kaiser Aluminum, and Teamsters Joint Counsel #37 Political Fund violated 2 U.S.C. § 441b(a).
2. Find no reason to believe Robert L. Harney violated 2 U.S.C. § 441a(a)(1)(A).
3. Find no reason to believe the John Evans for Senate Committee and Hubert Coats, as treasurer, violated 2 U.S.C. § 441a(f).
4. Find reason to believe the Evans Committee and Patrick Vaughan, as treasurer, violated 2 U.S.C. §§ 441b(a), 433(a), and 434(b)(3) as well as 11 C.F.R. § 102.6(a)(1).
5. Find reason to believe the John Evans for Senate Committee and Hubert Coats, as treasurer, violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.6(a)(1).

(continued)

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Federal Election Commission
Certification for MUR 2100
April 1, 1986

Page 2

6. Approve and send the letters attached to the General Counsel's report dated March 24, 1986.

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

Attest:

4-2-86

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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//



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 7, 1986

Edward A. Cohen, Esquire
Schneider, Cohen & Solomon
591 Summit Avenue
Jersey City, N.J. 07306

RE: MUR 2100
Teamsters Joint Council 73

Dear Mr. Cohen:

On November 8, 1985, the Commission notified your client of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on April 1, 1986, determined that on the basis of the information in the complaint and information supplied by the respondents, there is no reason to believe that Teamsters Joint Council 73 committed a violation of any statute within its jurisdiction. Additionally, it appears that the contribution in question was erroneously attributed to your client by the reporting Committees.

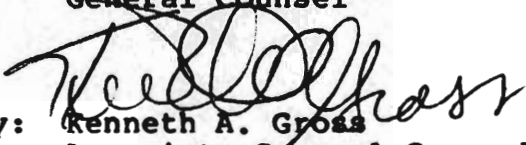
The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

If you have any questions, please direct them to Patty Reilly, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

By: 
Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 7, 1986

Raymond A. Messina, Esquire
1156 15th Street, N.W.
Suite 1015
Washington, D.C. 20005

RE: MUR 2100
J.C. Penney Co., Inc.

Dear Mr. Messina:

On November 8, 1985, the Commission notified your client of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on April 1, 1986, determined that on the basis of the information in the complaint and information provided by you, there is no reason to believe that J.C. Penney Co., Inc. committed a violation of any statute within its jurisdiction.

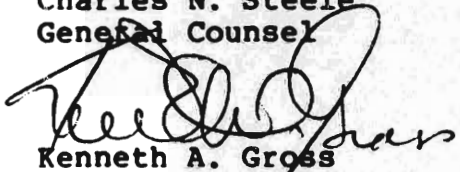
The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

If you have any questions, please direct them to Patty Reilly, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

By: 
Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 7, 1986

Mr. Robert L. Harney
P.O. Box 368
Twin Falls, Idaho 83343

RE: MUR 2100
Robert L. Harney

Dear Mr. Harney:

On November 8, 1985, the Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on April 1, 1986, determined that on the basis of the information in the complaint and information supplied by respondents, there is no reason to believe that you committed a violation of any statute within its jurisdiction.

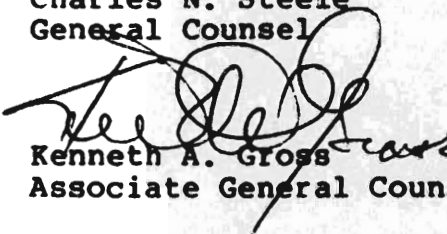
The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

If you have any questions, please direct them to Patty Reilly, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

By: 
Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 7, 1986

Leo Driscoll, Esquire
Winston & Cashatt
1900 Seafirst Financial Center
Spokane, Washington 99201

RE: MUR 2100
Kaiser Aluminum Corporation

Dear Mr. Driscoll:

On November 8, 1985, the Commission notified your client of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on April , 1986, determined that on the basis of the information in the complaint and information provided by you, there is no reason to believe that Kaiser Aluminum Corporation committed a violation of any statute within its jurisdiction.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

If you have any questions, please direct them to Patty Reilly, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

By: 
Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 7, 1986

W. Anthony Park, Esquire
Martin, Chapman Park & Burkett
Statehouse Central Building
775 N 8th Street, Suite 200
Boise, Idaho 83702

RE: MUR 2100
The John Evans for Senate
Committee and Hubert Coats,
as treasurer

Dear Mr. Park:

The Federal Election Commission notified your clients on November 8, 1985, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time.

Upon further review of the allegations contained in the complaint, and information supplied by your clients, the Commission, on April 1, 1986, determined that there is reason to believe that the John Evans for Senate Committee and Hubert Coats, as treasurer, violated 2 U.S.C. § 441b(a), a provision of the Act; as well as 11 C.F.R. § 102.6(a)(1), a provision of the Commission's Regulations. Additionally, on this date, the Commission determined that there is no reason to believe your clients violated 2 U.S.C. § 441a(f). Specifically, it appears the John Evans for Senate Committee improperly accepted a transfer of prohibited corporate funds from the Evans Committee.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent will not be entertained.

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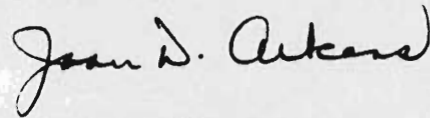
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Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not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

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 your clients wish the matter to be made public.

If you have any questions, please contact Patty Reilly, the attorney assigned to this matter, at (202)376-8200.

Sincerely,



Joan D. Aikens
Chairman

Enclosures
Procedures

87040351765



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 7, 1986

W. Anthony Park, Esquire
Martin, Chapman Park & Burkett
Statehouse Central Building
775 N 8th Street, Suite 200
Boise, Idaho 83702

RE: MUR 2100
The Evans Committee
and Patrick Vaughan,
as treasurer

Dear Mr. Park:

The Federal Election Commission notified your clients on November 8, 1985, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time.

Upon further review of the allegations contained in the complaint, and information supplied by your clients, the Commission, on April 1, 1986, determined that there is reason to believe that the John Evans for Senate Committee and Hubert Coats, as treasurer, violated 2 U.S.C. §§ 441b(a), 433(a), and 434(b)(3), provisions of the Act; as well as 11 C.F.R. § 102.6(a)(1), a provision of the Commission's Regulations. Specifically, it appears your clients improperly transferred prohibited corporate contributions to the John Evans for Senate Committee. Additionally, the Evans Committee failed to register with the Commission upon its qualification as a federal political committee. Additionally, a comparison of the worksheet submitted with the Evans Committee's response and its amended reports reveals the Evans Committee failed to properly itemize all of its contributions.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-

136

probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent will not be entertained.

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

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 your clients wish the matter to be made public.

If you have any questions, please contact Patty Reilly, the attorney assigned to this matter, at (202)376-8200.

Sincerely,

Joan D. Aikens

Joan D. Aikens
Chairman

Enclosures
Procedures

8704051767

C. BEN MARTIN
JOHN S. CHAPMAN
W. ANTHONY PARK
F. MICHAEL BURKETT, JR.
PATRICIA B. URQUHART
PATRICK D. COSTELLO

LAW OFFICES
MARTIN, CHAPMAN, PARK & BURKETT

STATEHOUSE CENTER BUILDING
775 N. 8TH STREET • SUITE 200
BOISE, IDAHO 83702

RECEIVED AT THE FEC
86 APR 21 12:38
ACC#271

J. F. MARTIN (1893 - 1967)
P.O. BOX 2888
TELEPHONE 343-6485
AREA CODE 208

April 17, 1986

Mr. Charles N. Steele, General Counsel
Ms. Patty Reilly, Staff Attorney
Office of General Counsel
Federal Election Commission
Washington, D.C. 20453

Re: National Republican Senatorial Committee v. The John
Evans for Senate Committee and The Evans Committee
MUR 2100

Dear Mr. Steele and Ms. Reilly:

Enclosed please find for filing Respondent's Request for
Conciliation in the above-entitled matter.

My clients continue to adhere to the position outlined in
their original response to the Complaint, which is that both
treasurers used their best efforts to obtain, maintain and submit
the information required by the Federal Election Campaign Act.
They promptly informed the Commission staff of the issues
raised by the transfer from the state campaign committee to
the new Federal Campaign Committee. They have been completely
open with the Commission from the outset regarding the details
of this transaction. They make this offer to enter into pre-
probable cause conciliation out of their continuing desire to
cooperate fully with the Commission, and in the expectation
that a mutually satisfactory resolution of this matter can be
reached. However, Respondents do assert that on this record,
the Commission ought to either exercise its discretion to
take no action on this matter, or agree to a conciliation
agreement without imposition of a civil penalty.

I have advised my clients of the additional information
requested by Ms. Reilly, and they will provide whatever docu-
mentation is necessary to the Commission. The Mountain Bell
Telephone Company refunds received by the Evans Committee on
January 17, 1983, were refunds of deposits required by the
telephone company at the outset of the 1982 gubernatorial
campaign. The honoraria received by the Evans Committee on
November 2, 1984 were given directly to Governor John Evans
for a speech he made, and he in turn donated them to the
Committee. We will provide the Commission with further

Page Two
Mr. Charles N. Steel
Ms. Patty Reilly

documentation on these matters as it becomes available.

Please feel free to contact me if any further information or clarification is required.

Very truly yours,

MARTIN, CHAPMAN, PARK & BURKETT

By


W. Anthony Park
Attorneys for Respondents

WAP/jsg

cc: Robert F. Bauer
Attorney at Law

John Evans for Senate Committee

87040551769

BEFORE THE
FEDERAL ELECTION COMMISSION

REQUEST FOR CONCILIATION

NATIONAL REPUBLICAN
SENATORIAL COMMITTEE,

Petitioner,

v.

JOHN EVANS FOR SENATE
COMMITTEE, THE EVANS
COMMITTEE,

Respondents.

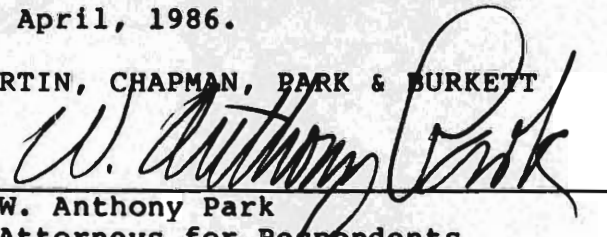
MUR 2100

COME NOW, the Respondents, by and through their attorneys
of record, Martin, Chapman, Park & Burkett, and W. Anthony Park,
and request that the Commission enter into negotiations toward
reaching a conciliation agreement pursuant to 11 CFR §111.18(d).

DATED This 17th day of April, 1986.

MARTIN, CHAPMAN, PARK & BURKETT

By


W. Anthony Park
Attorneys for Respondents

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of
The Evans Committee and
Patrick Vaughan, as treasurer
John Evans for Senate Committee
and Hubert Coates, as treasurer

)
)
)
)
)
)
MAY 3 11:30
MUR 2100

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On April 1, 1986 the Commission found reason to believe the Evans Committee and Patrick Vaughan, as treasurer ("The Evans Committee") violated 2 U.S.C. §§ 441b(a), 433(a) and 434(b)(3), as well as 11 C.F.R. § 102.6(a)(1). Additionally, on that date, the Commission found reason to believe the Evans Committee's affiliated committee, the John Evans for Senate Committee and Hubert Coates, as treasurer, ("The Senate Committee") violated 2 U.S.C. § 441b(a), as well as 11 C.F.R. § 102.6(a)(1). Underlying the Commission's findings were transfers made by the Evans Committee (formally a state committee) to the Senate Committee.

Responding to the Commission's reason to believe findings, the respondents admit making the impermissible transfers in question. Additionally, they have agreed to provide greater documentation of the amounts transferred, and have clarified the sources of other contributions. Both the Senate Committee and the Evans Committee request pre-probable cause conciliation. As developed below, this Office recommends that the Commission grant this request.

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II. LEGAL ANALYSIS

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Pursuant to 11 C.F.R. § 102.6(a)(1) transfers may be made without limitation between affiliated committees, provided funds transferred are those which are permissible under the Act. The Act prohibits contributions from the general treasuries of corporations and labor unions. 2 U.S.C. § 441b(a). Any group of persons receiving contributions or making expenditures aggregating in excess of \$1000 per calendar year constitutes a political committee under the Act. 2 U.S.C. § 431(4). Such political committees must file a statement of organization with the Commission within 10 days of meeting this definition. 2 U.S.C. § 433(a). Upon qualification as a political committee, reports are required to be filed. A committee's initial report must justify all its cash on hand and itemize all contributions exceeding \$200. 2 U.S.C. § 434(b)(3). To determine whether permissible funds are used, a last-in first-out procedure is used to exclude impermissible funds. See e.g. A.O. 1984-38.

In the instant case the Evans Committee transferred (via the change of the name of its bank account to the "John Evans for Senate Committee") impermissible funds to the Senate Committee, thus violating 2 U.S.C. § 441b(a). Additionally, although this March 19, 1985 transfer qualified the Evans Committee as a political committee, the Evans Committee failed to register and report to the Commission as required by 2 U.S.C. §§ 433(a). Finally, the Evans Committee failed to fully identify its contributors as required by 2 U.S.C. § 434(b)(3).

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The Senate Committee accepted transfers from the Evans Committee which contained prohibited funds. Consequently, the Commission found reason to believe the Senate Committee violated 2 U.S.C. § 441b, as well as 11 C.F.R. § 102.6(a)(1).

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IV. RECOMMENDATION

1. Enter into conciliation with the Evans Committee and Patrick Vaughen, as treasurer, prior to a finding of probable cause to believe.
2. Enter into conciliation with the John Evans for Senate Committee and Hubert Coates, as treasurer,

prior to a finding of probable cause to believe.

3. Approve and send the attached letter.

Charles N. Steele
General Counsel

May 8, 1986
Date

By:

Kenneth A. Gross
Associate General Counsel

Attachments:

1. Request for Pre-Probable Cause Conciliation
2. Proposed Letter
3. Proposed Conciliation Agreements (2)

87040351775

87040351776

Attachment(s) 1 and 2
to 5-5-86 G.C. Rpt

have been removed from this
position in Public Record File.

See Index Items 14 and 18

Atch #3 removed per 24 S.C. § 437g(a)(4)(B)(i).



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Red*
DATE: May 8, 1986
SUBJECT: MUR 2100 - General Counsel's Report

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote ☒
Sensitive ☒
Non-Sensitive ☐

24 Hour No Objection ☐
Sensitive ☐
Non-Sensitive ☐

Information ☐
Sensitive ☐
Non-Sensitive ☐

Other ☐

DISTRIBUTION

Compliance ☒
Audit Matters ☐

Litigation ☐
Closed MUR Letters ☐

Status Sheets ☐
Advisory Opinions ☐

Other (see distribution below) ☐

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
The Evans Committee and) MUR 2100
Patrick Vaughan, as treasurer)
John Evans for Senate Committee)
and Hubert Coates, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 13, 1986, the Commission decided by a vote of 6-0 to take the following actions in MUR 2100:

1. Enter into conciliation with the Evans Committee and Patrick Vaughan, as treasurer, prior to a finding of probable cause to believe.
2. Enter into conciliation with the John Evans for Senate Committee and Hubert Coates, as treasurer, prior to a finding of probable cause to believe.
3. Approve and send the letter attached to the General Counsel's Report signed May 8, 1986.

Commissioners Aikens, Elliott, Harris, Josefiak, McDonald and McGarry voted affirmatively for this decision.

Attest:

5-14-86

Date

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

Received in Office of Commission Secretary: Thurs., 5-8-86, 4:30
Circulated on 48 hour tally basis: Fri., 5-9-86, 2:00
Deadline for vote: Tues., 5-13-86, 4:00

87040551778



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 16, 1986

W. Anthony Park, Esquire
Martin, Chapman, Park, and Burkett
775 N. 8th Street
Boise, Idaho 83702

RE: MUR 2100
The Evans Committee and
Patrick Vaughan, as
treasurer
The John Evans for Senate
Committee and Hubert
Coates, as treasurer

Dear Mr. Park:

On April 1, 1986, the Commission found reason to believe that the Evans Committee and Patrick Vaughan, as treasurer, violated 2 U.S.C. §§ 433(a), 434(b)(3) and 441b(a), as well as 11 C.F.R. § 102.6(a)(1). Additionally, on this date the Commission found reason to believe the John Evans for Senate Committee and Hubert Coates, as treasurer, violated 2 U.S.C. § 441b(a), as well as 11 C.F.R. § 102.6(a)(1). At your request, the Commission determined on 5/13, 1986, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

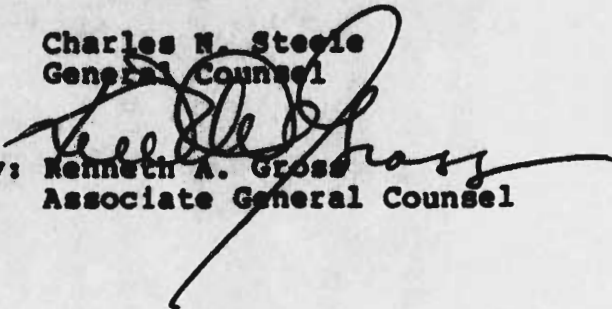
Enclosed are conciliation agreements that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreements, please have them sign the agreements and return them, along with the civil penalties, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually

- 2 -

satisfactory conciliation agreement, please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

By:  Kenneth A. Gross
Associate General Counsel

Enclosures
Conciliation Agreements

87040651780

Attachment(s) _____

to 5-16-86 ltr

have been removed from this
position in Public Record File.

See Index-Items 24.S.C. § 437g(a)(4)(B)(i).

87040351781

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LAW OFFICES

MARTIN, CHAPMAN, PARK & BURKETT

STATEHOUSE CENTER BUILDING
775 N. 8TH STREET • SUITE 200
BOISE, IDAHO 83702

J. F. MARTIN (1893 - 1967)

P.O. BOX 2898
TELEPHONE 343-8485
AREA CODE 208

C. BEN MARTIN
JOHN S. CHAPMAN
W. ANTHONY PARK
F. MICHAEL BURKETT, JR.
PATRICIA B. URQUHART
PATRICK D. COSTELLO

May 9, 1986

Ms. Patti Reilly
Staff Attorney
Office of General Counsel
Federal Election Commission
Washington, D. C. 20453

Re: National Republican Senatorial Committee v.
John Evans for Senate Committee and The Evans
Committee, MUR 2100

Dear Ms. Reilly:

In Tony Park's letter to you of April 17, 1986, he indicated the honoraria you had asked about had been received by Governor John Evans for a speech he made and that he in turn donated them to the committee. As I indicated to you by telephone today, that does not now appear to be the case. As the attached Affidavit of Patrick J. Vaughan indicates, we have since learned that the checks were made directly to The Evans Committee. I have advised The John Evans for Senate Committee of this new information, and of your suggestion that they segregate these funds by donating them to a non-federal committee, such as the State Democratic Party. They are agreeable to that course of action, and will report to the Commission as soon as the disbursement has been made.

As to the information we discussed earlier this week, Rose Bowman made a \$150.00 contribution to The Evans Committee on 12/15/83, as indicated on The Evans Committee FEC Report and on its state financial disclosure report for that period, and not on 2/15/83 as indicated on the work sheet. Each of the "interest" receipts noted on the work sheets were interest payments from Idaho Bank & Trust Company, Boise, Idaho, the Committee's depository bank. The Evans Committee will file the appropriate amended reports to itemize these interest receipts.

Please advise if there is further information we can provide.

Very truly yours,

Patrick B. Costello

PDC/jsg

cc: Patrick J. Vaughan
The Evans Committee
Kathi Rogers

John Evans for Senate Committee

RECEIVED
FEDERAL ELECTION COMMISSION
GENERAL COUNSEL
MAY 16 1986
A8: 56

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Respondents.

**AFFIDAVIT OF PATRICK J.
VAUGHAN**

19

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receipts in question were received as honoraria for the Governor for delivering this speech, but our records did not reflect to whom the checks were made out. In order to clarify this matter, I contacted David C. Carter, Chairman of the U.S. Sweetener Producers Group. Based on information Mr. Carter has since provided to our legal counsel, it now appears these three checks were each made payable directly to the Evans Committee, and sent to the Evans Committee, although they were intended as honoraria for the August 3rd speech.

Further your Affiant sayeth not.


Patrick J. Vaughan

SUBSCRIBED AND SWORN To before me this 9th day of May, 1986.


Notary Public for Idaho
Residing at Boise, Idaho
My Commission Expires: 3/23/87

U.S. Sweetener Producers Group

SUITE 907
1730 M STREET NORTHWEST
WASHINGTON, D.C. 20036

(202) 293-0490

RECEIVED

MAY 21 1984

May 15, 1984

OFFICE OF GOVERNOR

The Honorable John V. Evans
State Capitol
Boise, Idaho 83720

Dear Governor:

The U.S. Sweetener Producers Group is hosting its First Annual International Sweetener Symposium at the Hamilton Hotel in Itasca, Illinois, August 2-4. On behalf of the Group, I extend an invitation to you to address the Symposium at 9:00 a.m. on Friday, August 3.

The U.S.S.P.G. is a newly-formed corporation organized for the purpose of preserving and protecting a viable domestic sweetener industry. It provides a forum for all facets of the domestic sweetener industry to work jointly toward commonly held interests and objectives. Attached for your use and information is a current listing of the Group's members.

Since we presently are formulating our program, I would appreciate your responding to this invitation at your earliest opportunity. The Group would, of course, handle all of your expenses in connection with the appearance as well as providing an honorarium.

We very much hope that your response will be favorable. A photograph and biographical material also would be appreciated.

With all best wishes.

Sincerely,



David C. Carter
Chairman

202-296-4820



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 19, 1986

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: PATTY REILLY

FROM: LEE GARRITY
COMPLIANCE ANALYST
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

SUBJECT: MUR 2100

Please review the attached Request for Additional Information which is to be sent to the John Evans for Senate Committee for the 1986 April Quarterly Report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 4:00 p.m. on Wednesday, May 21, 1986. Thank you.

COMMENTS:

Attachment

87040351786



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Hubert S. Coats, Treasurer
John Evans for Senate Committee
P.O. Box 1002
Boise, ID 82701

Identification Number: C00194472

Reference: April Quarterly Report (1/1/86-3/31/86)

Dear Mr. Coats:

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

-You must provide the occupation and name of employer for each contributor required to be itemized on Schedule A. Please amend your report by supplying the omitted information.

With respect to the occupation and name of employer of the contributor, your committee may demonstrate "best efforts" to obtain the required information. This demonstration should describe your committee's procedures for requesting the information. You may also supply a copy of the solicitation and a statement that all solicitations request the required information. See 11 CFR 104.3(a)(4)(i) and 11 CFR 104.7.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Secretary of the Senate, 232 Hart Senate Office Building, Washington, DC 20510 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

Pat Sheppard
Reports Analyst
Reports Analysis Division

8704051787

BEFORE THE FEDERAL ELECTION COMMISSION
OFFICE OF THE
COMMISSION SECRETARY

SENSITIVE

In the Matter of)
The John Evans for Senate)
Committee and Hubert Coats,)
as treasurer)
The Evans Committee and)
Patrick Vaughan, as)
treasurer)

MUR 2100
26 NOV 7 P4:01

GENERAL COUNSEL'S REPORT

Based on an assessment of information currently available, the Office of the General Counsel is prepared to close the investigation in this matter as to the John Evans for Senate Committee and Hubert Coates, as treasurer, and the Evans Committee and Patrick Vaughan, as treasurer.

7 Nov 1986
Date


Charles N. Steele
General Counsel

87040551788



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *rd*
DATE: November 7, 1986
SUBJECT: MUR 2100 - General Counsel's Report

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote []
Sensitive []
Non-Sensitive []

24 Hour No Objection []
Sensitive []
Non-Sensitive []

Information *xx*
Sensitive *xx*
Non-Sensitive []

Other []

DISTRIBUTION

Compliance *xx*

Audit Matters []

Litigation []

Closed MUR Letters []

Status Sheets []

Advisory Opinions []

Other (see distribution below) []

87040551789



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 2, 1986

W. Anthony Park, Esquire
Martin, Chapman, Park, and Burkett
775 N. 8th Street
Boise, Idaho 83702

RE: MUR 2100
The Evans Committee and
Patrick Vaughan, as
treasurer

Dear Mr. Park:

Based on a complaint filed with the Commission on November 4, 1985, and information supplied by your clients, the Commission determined on April 1, 1986, that there was reason to believe that your clients had violated 2 U.S.C. §§ 441b(a), 433(a), 434(b)(3), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"), as well as 11 C.F.R. § 102.6(a)(1), a provision of the Commission's Regulations, 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 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 of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extensions beyond 20 days.

- 2 -

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety, days to settle this matter through a conciliation agreement.

Should you have any questions, please contact Patty Reilly, the attorney assigned to handle this matter, at (202) 376-8200.

Sincerely,


Charles W. Steele
General Counsel

Enclosure
Brief

87040651791

23

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2100
The Evans Committee and)
Patrick Vaughan, as)
treasurer)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On April 1, 1986, the Commission found reason to believe the Evans Committee and Patrick Vaughan, as treasurer ("the Evans Committee") violated 2 U.S.C. §§ 441b(a), 433(a), 434(b)(3), as well as 11 C.F.R. § 102.6(a)(1). Underlying the Commission's findings were transfers made by the Evans Committee, a former state committee, to the John Evans for Senate Committee ("the Senate Committee"). These transfers occurred in March, 1985, and were accomplished by the Evans Committee changing the name of its bank account from "The Evans Committee" to "The John Evans for Senate Committee." As a result of this transfer, the Evans Committee qualified as a political committee and was required to register with the Commission within 10 days of this qualification. The Evans Committee did not do so until July 31, 1986. Moreover, the Evans Committee's 1985 Mid-Year Report failed to fully itemize its initial cash on hand.^{1/}

^{1/} It was later determined that the Evans Committee failed to fully itemize its interest income.

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At the time of this change of account names, the bank account held approximately \$11,272.^{2/} Subsequently, the Committees determined that this amount contained \$4,574.78 in corporate and union funds.^{3/} Although the Senate Committee attempted to purge the account of the amount of money it believed to be impermissible, prior to this purging, expenditures were made from the account in connection with a federal election.

II. LEGAL ANALYSIS

Pursuant to 11 C.F.R. § 102.6(a)(1) transfers may be made without limitation between affiliated committees whether or not they are political committees under the Act, provided funds transferred are those which are permissible under the Act. Furthermore, these transfers shall count against the reporting thresholds of the Act for determining whether an organization is a political committee. 11 C.F.R. § 102.6(a)(2). The Act prohibits contributions from the general treasuries of corporations and labor unions. 2 U.S.C. § 441b(a). Any group of persons receiving contributions or making expenditures aggregating in excess of \$1000 per calendar year constitutes a political committee under the Act. 2 U.S.C. § 431(4). Such political committees must file a statement of organization with

^{2/} The exact amount could not be determined on that date because the amount of accumulated interest on the principal could not be calculated.

^{3/} This amount was initially thought to be \$3,824.78. It was later determined that certain honoraria, thought to be permissible funds of the candidate, had actually been contributed directly to the Evans Committee by corporations.

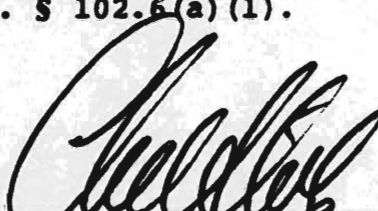
the Commission within 10 days of meeting this definition.
2 U.S.C. § 433(a). Upon qualification as a political committee,
reports are required to be filed. A committee's initial report
must justify all its cash on hand and itemize all contributions
exceeding \$200. 2 U.S.C. § 434(b)(3) and 11 C.F.R. § 104.3(a).
To determine whether permissible funds are used, a last-in first-
out procedure is used to exclude impermissible funds. See e.g.
A.O. 1984-38.

87040551794
The Evans Committee transferred (via the change of the name
of its bank account to the "John Evans for Senate Committee")
impermissible funds to the Senate Committee, thus violating
2 U.S.C. § 441b(a) and 11 C.F.R. § 102.6(a)(1). Additionally,
although this March 19, 1985 transfer qualified the Evans
Committee as a political committee, the Evans Committee failed to
register with the Commission as required by 2 U.S.C. § 433(a).
Finally, the Evans Committee failed to fully identify its initial
cash on hand as required by 2 U.S.C. § 434(b)(3).

III. GENERAL COUNSEL'S RECOMMENDATION

Find probable cause to believe the Evans Committee and
Patrick Vaughan as treasurer, violated 2 U.S.C. 441b(a),
433(a), 434(b)(3), and 11 C.F.R. § 102.6(a)(1).

2 Dec. 1986
Date


Charles N. Steele
General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

December 2, 1986

W. Anthony Park, Esquire
Martin, Chapman, Park, and Burkett
775 N. 8th Street
Boise, Idaho 83702

RE: MUR 2100
The John Evans for
Senate Committee and
Hubert Coates, as
treasurer

Dear Mr. Park:

Based on a complaint filed with the Commission on November 4, 1985, and information supplied by your clients, the Commission determined on April 1, 1986, that there was reason to believe that your clients had violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), as well as 11 C.F.R. § 102.6(a)(1), a provision of the Commission's Regulations, 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 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 of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

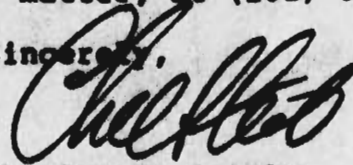
If you are unable to file a responsive brief within 15 days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extensions beyond 20 days.

87040551795

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety, days to settle this matter through a conciliation agreement.

Should you have any questions, please contact Patty Reilly, the attorney assigned to handle this matter, at (202) 376-8200.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief

87040351790

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2100
The John Evans for Senate)
Committee and Hubert Coates)
as treasurer)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On April 1, 1986, the Commission found reason to believe the John Evans for Senate Committee and Hubert Coates, as treasurer, ("the Senate Committee") violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.6(a)(1) by accepting transfers containing impermissible funds from its affiliated committee, the Evans Committee. The Evans Committee made this transfer in March 1985, by changing the name of its bank account from "The Evans Committee" to "The John Evans for Senate Committee." At the time of this transaction, the account held approximately \$11,272.^{1/} Subsequently, it was determined that this account held \$4,574.78 in corporate and union funds.^{2/} Although the Senate Committee attempted to purge these impermissible funds from the account ten days after the transfer, the Senate Committee had already used funds in the account to make expenditures in connection with a federal election.

^{1/} The exact amount in the account could not be determined on that date because the amount of accumulated interest on the principal could not be calculated.

^{2/} The Senate Committee initially believed the amount of impermissible funds was \$3,824.78. It was later determined that certain honoraria, thought to be personal funds of the candidate, had actually been contributed directly to the Evans Committee by corporations.

II. LEGAL ANALYSIS

Pursuant to 11 C.F.R. § 100.5(g)(2)(E), all political committees established by the same person are affiliated. Furthermore, all authorized committees of the same candidate are affiliated. 11 C.F.R. § 100.5(g)(1). Pursuant to 11 C.F.R. 102.6(a)(1) transfers may be made without limitation between such affiliated committees, provided the funds transferred are permissible under the Act. The Act prohibits contributions from the general treasuries of corporations and labor unions. 2 U.S.C. § 441b(a).

In the instant case, the Senate Committee could lawfully accept permissible funds without limitation on amount from its affiliated committee. By accepting transfers from the Evans Committee containing corporate and union funds, however, it appears the Senate Committee violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.6(a)(1).

III. GENERAL COUNSEL'S RECOMMENDATION

Find probable cause to believe the Evans for Senate Committee and Hubert Coats, as treasurer, violated 2 U.S.C. 441b(a) and 11 C.F.R. § 102.6(a)(1).

Date

2 Dec. 1946


Charles N. Steele
General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

SENSITIVE

86 DEC 3 11:35

December 3, 1986

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel *CN*

SUBJECT: MUR #2100

Attached for the Commission's review are briefs stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of these briefs and letters notifying the respondents of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe were mailed on December 2, 1986. Following receipt of the Respondents' reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Briefs
2. Letters to Respondents

87040551799

95

Attachment(s) 1 and 2
to 12-3-86 Memo

have been removed from this
position in Public Record File.

See Index Items 23 and 24

87040551800

87040551801

to the John Evans for Senate Committee, have sought Commission guidance on how to correct the errors which were discovered, and have attempted in good faith to follow that guidance. All of the facts surrounding the transactions at issue were fully reported by the Respondents on both their state and federal campaign financial disclosure reports. There has been no attempt by any of the Respondents to conceal any of the material facts from the Commission or the public.

III.

LEGAL ANALYSIS

Respondents accept the legal analysis contained in the General Counsel's Brief, with the following addition:

It is apparent that Respondents have used their best efforts to obtain, maintain and submit the information required by the Act, and therefore their records and reports should be considered to be in compliance with the Act pursuant to 2 U.S.C. §432(i).

IV.

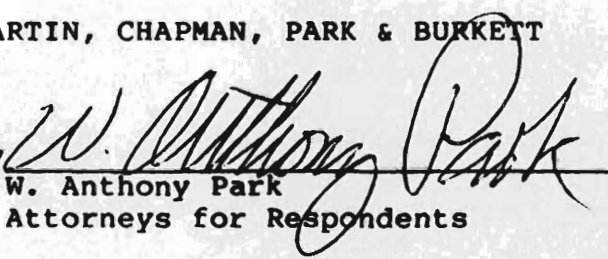
RESPONDENTS' RECOMMENDATION

Respondents respectfully urge the Commission to exercise its discretion to take no action on this matter.

DATED This 16th day of December, 1986.

MARTIN, CHAPMAN, PARK & BURKETT

By


W. Anthony Park
Attorneys for Respondents

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, That on this 16 day of December, 1986, I filed an original and ten copies of RESPONDENTS' BRIEF, with the Secretary of the Commission, Federal Election Commission, Washington, D.C. 20463, and three copies on the Office of the General Counsel, Federal Election Commission, Washington, D.C. 20463, by depositing the same in the United States mail, postage prepaid.

S/
W. Anthony Park

87040551803



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 12, 1987

MEMORANDUM

TO: CHARLES STEELE
GENERAL COUNSEL

ATTENTION: PATTY REILLY

FROM: OSCELYN A. ANDERSON *OS*
COMPLIANCE CLERK
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

SUBJECT: MUR 2100

Please review the attached Request for Additional Information which is to be sent to the John Evans for Senate Committee for the 30 Day Post-General Report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have must be forwarded to RAD in writing by 1:00 p.m. on Wednesday, January 14, 1987.

If comments are not received in writing by the above date and time, the RFAI notice will be sent.

If you have any questions, please contact Oscelyn A. Anderson at 376-2490. Thank you.

COMMENTS:

Attachment

87040551804



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Hubert S. Coats, Treasurer
John Evans for Senate Committee
P.O. Box 1002
Boise, ID 83701

Identification Number: C00194472

Reference: 30 Day Post-General Report (10/16/86-11/24/86)

Dear Mr. Coats:

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

-Schedule A of your report (pertinent portion attached) discloses contributions which appear to exceed the limits set forth in the Act. An individual or a political committee other than a multicandidate committee may make contributions to a candidate for Federal office in excess of \$1,000 per election. Additionally, the Badger Political Action Committee did not meet the requirements for multicandidate status as of the date the contribution(s) was made to your committee. If you have received a contribution which exceeds the limits, the Commission recommends that you refund to the donor the amount in excess of \$1,000. The Commission should be notified in writing if a refund is necessary. In addition, any refund should appear on Line 20 of the Detailed Summary Page and Schedule B of your next report. (2 U.S.C. §§441a(a) and (f))

The term "contribution" includes any gift, subscription, loan, advance or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office.

If the contributions in question were incompletely or incorrectly reported, you may wish to submit documentation for the public record. Please amend your report with the clarifying information.

Although the Commission may take further steps concerning the acceptance of excessive contributions, prompt action by you to refund the excessive amounts will be taken into consideration.

-Column B figures for the Summary and Detailed Summary Pages should equal the sum of the Column B figures of your previous report and the Column A figures of this report. Please amend your report to correct the Column B discrepancies for Line(s) 20(a) and any subsequent report(s) which may be affected by this correction. Note that Column B should reflect the year-to-date totals for calendar year 1986 only.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Secretary of the Senate, 232 Hart Senate Office Building, Washington, DC 20510 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,



Pat Sheppard
Senior Reports Analyst
Reports Analysis Division

87040551806

SCHEDULE A

ITEMIZED RECEIPTS

Page 2 of 21
for Line Number 11C

Full Name of Committee: John Evans for Senate - Out of State

A. Name, Address, Zip	Employer/Occupation	P/O	Date	Receipts
Americans Against Apartheid - PAC Box 85884 Washington, DC 20084			11/05/06	250.00

Total YTD = \$ 250.00

B. Name, Address, Zip	Employer/Occupation	P/O	Date	Receipts
Americans for Good Government PAC 1518 Alabama Avenue Jasper, AL 35501			10/24/06	3500.00

Total YTD = \$ 7,500.00

C. Name, Address, Zip	Employer/Occupation	P/O	Date	Receipts
Americans for a Better Congress - PAC 751 Cleveley Road Highland Park, IL 60035			11/05/06	1500.00

Total YTD = \$ 1,500.00

D. Name, Address, Zip	Employer/Occupation	P/O	Date	Receipts
BRAC'S Responsible Citizen Political League - PAC 3 Research Place Rockville, MD 20850			11/05/06	500.00

Total YTD = \$ 2,500.00

E. Name, Address, Zip	Employer/Occupation	P/O	Date	Receipts
Badger PAC 8255 North 75th Street Milwaukee, WI 53223			10/22/06	2000.00

Total YTD = \$ 2,000.00

F. Name, Address, Zip	Employer/Occupation	P/O	Date	Receipts
Bakery Confectionery and Tobacco Workers - PAC 18451 Connecticut Ave. Kensington, MD 20895			11/05/06	1000.00

Total YTD = \$ 3,500.00

Total This Page \$ 8,750.00

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)
)
John Evans for Senate Committee) MUR 2100
and Hubert Coates, as treasurer;)
The Evans Committee and Patrick)
Vaughan, as treasurer)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

8704051803
This matter arose from a complaint filed on behalf of the National Republican Senatorial Committee. On April 1, 1986, the Commission found reason to believe the John Evans for Senate Committee and Hubert Coates, as treasurer, ("the Senate Committee") violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.6(a)(1) by accepting transfers containing impermissible funds from an affiliated committee, the Evans Committee and Patrick Vaughan, as treasurer, ("the Evans Committee"). The Evans Committee made this transfer in March 1985 by changing the name of its bank account from "The Evans Committee" to "The John Evans for Senate Committee." At the time of this transaction, the account held approximately \$11,272.^{1/} Subsequently, it was determined that this amount included \$4,574.78 in corporate and union funds.^{2/} Although the Senate Committee attempted

^{1/} The exact amount in the account could not be determined on that date because the amount of accumulated interest on the principal had not been calculated.

^{2/} The Senate Committee initially believed the amount of impermissible funds was \$3,824.78. It was later determined that certain honoraria, thought to be personal funds of the candidate, had actually been contributed directly to the Evans Committee by corporations.

to purge these impermissible funds from the account ten days after the transfer, the Senate Committee had already used funds in the account to make expenditures in connection with a federal election.

On April 1, 1986, the Commission also found reason to believe the Evans Committee violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.6(a)(1) in connection with this transfer. Additionally, the Commission determined that there was reason to believe the Evans Committee violated 2 U.S.C. §§ 433(a) and 434(b)(3) by failing to register with the Commission in a timely manner and to report all required information.

Both Committees requested pre-probable cause conciliation. On May 13, 1986, the Commission granted this request.

87040551809

II. LEGAL ANALYSIS

Both Respondents' briefs state that they accept the statement of the case contained in the General Counsel's Brief dated December 2, 1986. Respondents also add that they brought this transfer to the attention of the Commission's staff prior to when the complaint was filed,^{4/} and have requested advice on how to report the transactions in question. Respondents also note they have not attempted to conceal the transactions and fully reported the facts surrounding the transactions on state and federal reports. Therefore, Respondents and this Office agree on all issues of fact and law, but Respondents request that the Commission take no action in this matter. This Office recommends that the Commission find probable cause on the basis of the fact that Respondents used the funds in question in connection with a federal election.

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTIES

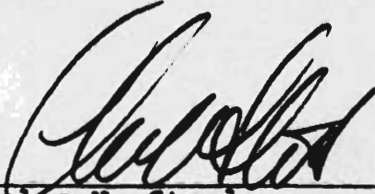
^{4/} According to Respondents' initial response, after the transfer occurred, Respondents became aware of the restrictions on the composition of funds transferred between affiliated committees, and contacted the Commission's Office of Public Information for advice.

87040351811

IV. RECOMMENDATIONS

1. Find probable cause to believe the John Evans for Senate Committee and Hubert Coates, as treasurer, violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.6(a)(1).
2. Find probable cause to believe the Evans Committee and Patrick Vaughan, as treasurer, violated 2 U.S.C. §§ 441b(a), 433(a), and 434(b)(3), and 11 C.F.R. § 102.6(a)(1).
3. Approve the attached conciliation agreements and letter.

3 March 1987
Date



Charles N. Steele
General Counsel

Attachments

1. Conciliation Agreements (2)
2. Proposed Letter

87040551812

Attachment(s) 1 and 2
to 3-3-87 G.C. Rpt.

have been removed from this
position in Public Record File.

See Index Item 31 re: 1

24-S.C. § 437 g (a)(4)(B)(i) re: 2

87040551813



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Cof*
DATE: March 3, 1987
SUBJECT: MUR 2100 - General Counsel's Report

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote ☒ [x]
Sensitive ☒ [x]
Non-Sensitive ☐ []

24 Hour No Objection ☐ []
Sensitive ☐ []
Non-Sensitive ☐ []

Information ☐ []
Sensitive ☐ []
Non-Sensitive ☐ []

Other ☐ []

DISTRIBUTION

Compliance ☒ [x]
Audit Matters ☐ []

Litigation ☐ []
Closed MUR Letters ☐ []

Status Sheets ☐ []
Advisory Opinions ☐ []

Other (see distribution below) ☐ []

87040551814

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
The John Evans for Senate Committee) MUR 2100
and Hubert Coates, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of March 10, 1987, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 2100:

1. Find probable cause to believe the John Evans for Senate Committee and Hubert Coates, as treasurer, violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.6(a)(1).
2. Find probable cause to believe the Evans Committee and Patrick Vaughan, as treasurer, violated 2 U.S.C. §§ 441b(a), 433(a), and 434(b)(3), and 11 C.F.R. § 102.6(a)(1).
3. Approve the conciliation agreements and letter attached to the General Counsel's report dated March 3, 1987.

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

Attest:

March 11, 1987

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 16, 1987

W. Anthony Park, Esquire
Martin, Chapman, Park, and Burkett
775 N. 8th Street
Boise, Idaho 83702

RE: MUR 2100
The John Evans for
Senate Committee and
Hubert Coates, as
treasurer
The Evans Committee and
Patrick Vaughan, as
treasurer

Dear Mr. Park:

On March 10, 1987, the Commission determined that there is probable cause to believe your clients committed violations of provisions of the Federal Election Campaign Act of 1971, as amended, and a provision of the Commission's Regulations.

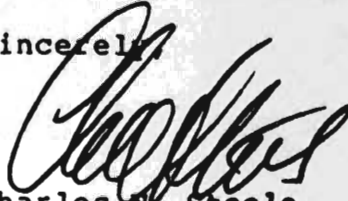
Specifically, the Commission determined that there is probable cause to believe that the John Evans for Senate Committee and Hubert Coates, as treasurer, violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.6(a)(1) in connection with a transfer from the Evans Committee. Additionally, the Commission determined that there is probable cause to believe that the Evans Committee and Patrick Vaughan, as treasurer violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.6(a)(1) in connection with this transfer. The Commission further determined that there is probable cause to believe the Evans Committee and Patrick Vaughan, as treasurer, violated 2 U.S.C. §§ 433(a) and 434(b)(3) by failing to satisfy the Act's registration and reporting requirements.

The Commission has a duty to attempt to correct such violations for a period of thirty to ninety days by informal methods of conference, conciliation and persuasion, and by entering into conciliation agreements. If we are unable to reach agreements during that period, the Commission may institute civil suits in United States District Court and seek payment of civil penalties.

We enclose conciliation agreements that this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed agreements, please sign and return them along with the civil penalties to the Commission within ten days. I will then recommend that the Commission approve the agreement. Please make your check for the civil penalty payable to the Federal Election Commission.

If you have any questions or suggestions for changes in the enclosed conciliation agreements, please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Conciliation Agreements

87040351817

GCH 3003

87 MAR 30 P1:03

LAW OFFICES

MARTIN, CHAPMAN, PARK & BURKETT

C. BEN MARTIN
JOHN S. CHAPMAN
W. ANTHONY PARK
F. MICHAEL BURKETT, JR.
PATRICIA B. URQUHART
PATRICK D. COSTELLO

STATEHOUSE CENTER BUILDING
775 N. 6TH STREET • SUITE 200
BOISE, IDAHO 83702

J. F. MARTIN (1893 - 1967)

P.O. BOX 2898
TELEPHONE 343-6485
AREA CODE 208

March 25, 1987

Ms. Patty Reilly
Staff Attorney
Office of General Counsel
Federal Election Commission
Washington, D.C. 20453

Re: MUR 2100

Dear Ms. Reilly:

Enclosed please find a proposed Conciliation Agreement for each committee in MUR 2100. Also enclosed please find two checks for the civil penalty for each committee.

The Evans Committee will file an amended report identifying the sources of its interest receipts as provided in the agreement within thirty days after the Comissions acceptance of these agreements. Please let me know if anything further needs to be done from our end.

As I stated on the phone, its been a pleasure working with you on this case, and I am glad we were able to bring it to a satisfactory conclusion.

Very truly yours,

MARTIN, CHAPMAN, PARK & BURKETT



Patrick D. Costello

PDC/ajw

Enclosures

cc: Governor John Evans
Mr. Patrick J. Vaughan
Mr. Hubert Coats

87 MAR 30 P2:52

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

87 APR 1 P2:41

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

87 APR 1 P2:40

87040551819

JOHN EVANS FOR SENATE

P. O. BOX 1188
BURLEY, ID 83318

105

3/24 1987

92-358/1241

Pay to
the order of

Federal Election Commission

\$ 350.00

Three hundred fifty and 00/100

Dollars



D.L. EVANS BANK
(208) 678-9078
P.O. BOX 1188
BURLEY, IDAHO 83318

For

Settlement of debt

John G. Evans

⑆124103582⑆ 93 40190 ⑈ 0105

Rocky Mountain Bank Note

Reserve White

JOHN EVANS FOR SENATE

P. O. BOX 1188
BURLEY, ID 83318

106

3/24 1987

92-358/1241

Pay to
the order of

Federal Election Commission

\$ 250.00

Two hundred fifty and 00/100

Dollars



D.L. EVANS BANK
(208) 678-9078
P.O. BOX 1188
BURLEY, IDAHO 83318

For

Settlement of debt

John G. Evans

⑆124103582⑆ 93 40190 ⑈ 0106

Rocky Mountain Bank Note

Reserve White

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Evans Committee and Patrick) MUR 2100
Vaughan, as treasurer)
)
The John Evans for Senate Committee)
and Hubert Coates, as treasurer)

RECEIVED
FEB 11 1987
A 9:52

GENERAL COUNSEL'S REPORT

Attached for Commission approval are proposed revised conciliation agreements submitted by the Evans Committee and Patrick Vaughan, as treasurer ("Evans Committee") and the John Evans for Senate Committee and Hubert Coates, as treasurer ("Senate Committee"). These agreements follow the Commission's determinations of probable cause to believe on March 10, 1987, and approval of proposed agreements.

87040551820

For the reasons
discussed below, this Office recommends that the Commission
accept these agreements.

A. CHANGES PROPOSED BY THE EVANS COMMITTEE

87040551821

- 3 -

87040651822

- 4 -

87040651823

- 5 -

87040651824

B. CHANGES PROPOSED BY THE SENATE COMMITTEE

87040551825

- 7 -

87040551826

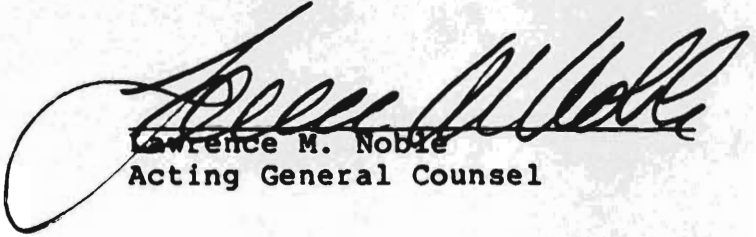
Accordingly, the Office of the General Counsel recommends that the Commission accept the agreement proposed by the Senate Committee and close the file in this matter.

RECOMMENDATIONS

1. Approve the conciliation agreement proposed by the Evans Committee and Patrick Vaughan, as treasurer.
2. Approve the conciliation agreement proposed by the John Evans for Senate Committee and Hubert Coates, as treasurer.
3. Approve the attached letters.
4. Close the file in this matter.

Date

5/27/87


Lawrence M. Noble
Acting General Counsel

Attachments

1. Evans' Committee Counterproposal
2. Senate Committee's Counterproposal
3. Response and Civil Penalty Checks
4. Proposed letters

87040551827

Attachment(s) 1, 3 and 4

to General Counsel's Report

have been removed from this
position in Public Record File.

See Index Item(s) 32+38

87040551828



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Coy*
DATE: May 27, 1987
SUBJECT: MUR 2100 - General Counsel's Report

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote ☒
Sensitive ☒
Non-Sensitive ☐

24 Hour No Objection ☐
Sensitive ☐
Non-Sensitive ☐

Information ☐
Sensitive ☐
Non-Sensitive ☐

Other ☐

DISTRIBUTION

Compliance ☒
Audit Matters ☐

Litigation ☐
Closed MUR Letters ☐

Status Sheets ☐
Advisory Opinions ☐

Other (see distribution
below) ☐

87040351829

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Evans Committee and Patrick)
Vaughan, as treasurer)

MUR 2100

The John Evans for Senate Committee)
and Hubert Coates, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal
Election Commission, do hereby certify that on June 1,
1987, the Commission decided by a vote of 6-0 to take
the following actions in MUR 2100:

1. Approve the conciliation agreement proposed by the Evans Committee and Patrick Vaughan, as treasurer, as recommended in the General Counsel's Report signed May 27, 1987.
2. Approve the conciliation agreement proposed by the John Evans for Senate Committee and Hubert Coates, as treasurer, as recommended in the General Counsel's Report signed May 27, 1987.
3. Approve the letters, as recommended in the General Counsel's Report signed May 27, 1987.
4. Close the file in this matter.

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

Attest:

6/2/87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

35

Received in the Office of Commission Secretary: Thurs., 5-28-87, 9:52
Circulated on 48 hour tally basis: Thurs., 5-28-87, 4:00
Deadline for vote: Mon., 6-01-87, 4:00

jm

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 4, 1987

Edward A. Cohen, Esquire
Schneider, Cohen & Solomon
591 Summit Avenue
Jersey City, N.J. 07306

Re: MUR 2100
Teamsters Joint
Council 73

Dear Mr. Cohen:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
Acting General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 4, 1987

Mr. Robert L. Harney
P.O. Box 368
Twin Falls, Idaho 83343

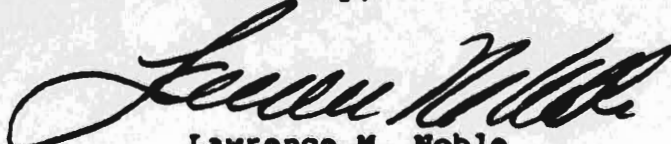
Re: MUR 2100
Robert L. Harney

Dear Mr. Harney:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Lawrence M. Noble
Acting General Counsel

87040551832

36b



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 4, 1987

Raymond A. Messina, Esquire
1156 15th Street, N.W.
Suite 1015
Washington, D.C. 20005

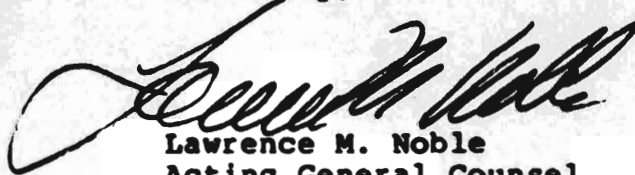
Re: MUR 2100
J.C. Penney Co., Inc.

Dear Mr. Messina:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Lawrence M. Noble
Acting General Counsel

36c



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 4, 1987

Leo Driscoll, Esquire
Winston & Cashatt
1900 Seafirst Financial Center
Spokane, Washington 99201

Re: MUR 2100
Kaiser Aluminum
Corporation

Dear Mr. Driscoll:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Lawrence M. Noble
Acting General Counsel

36d

87040551834



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 4, 1987

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

RE: MUR 2100

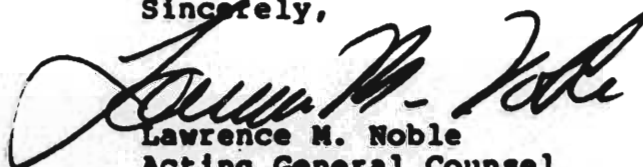
Dear Mr. Baran:

This is in reference to the complaint you filed on behalf of the National Republican Senatorial Committee with the Federal Election Commission on November 4, 1985, concerning possible violations of the Act by the John Evans Committee and Patrick Vaughan, as treasurer ("Evans Committee") and the John Evans for Senate Committee and Hubert Coates, as treasurer ("Senate Committee").

After conducting an investigation in this matter, the Commission found that there was probable cause to believe the Senate Committee violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended, and 11 C.F.R. § 102.6(a)(1), a provision of the Commission's Regulations. Additionally, the Commission found that there was probable cause to believe the Evans Committee violated 2 U.S.C. §§ 441b(a), 433(a), 434(b)(3), and 11 C.F.R. § 102.6(a)(1), also provisions of the Act and Regulations. On June 1, 1987, conciliation agreements signed by the respondents' counsel were accepted by the Commission, thereby concluding the matter. Accordingly, the Commission closed the file in this matter on June 1, 1987. Copies of these agreements are enclosed for your information.

If you have any questions, please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Lawrence M. Noble
Acting General Counsel

Enclosure
Conciliation Agreements



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 4, 1987

Patrick D. Costello, Esquire
Martin, Chapman, Park & Burkett
Statehouse Center Building
775 N. 8th Street
Suite 200
Boise, Idaho 83702

RE: MUR 2100
Evans Committee and
Patrick Vaughan, as
treasurer
John Evans for Senate
Committee and Hubert
Coates, as treasurer

Dear Mr. Costello:

On June 1, 1987, the Federal Election Commission accepted the signed conciliation agreements and civil penalties submitted on your clients' behalf in settlement of violations of the Federal Election Campaign Act of 1971, as amended, and violations of the Commission's Regulations. Accordingly, the file has been closed in this matter. This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
Acting General Counsel

Enclosures
Conciliation Agreements

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
The Evans Committee and) MUR 2100
Patrick Vaughan,)
as treasurer)

CONCILIATION AGREEMENT

87040551837
This matter was initiated by a signed, sworn, and notarized complaint by counsel for the National Republican Senatorial Committee. The Commission found reason to believe that the Evans Committee and Patrick Vaughan, as treasurer, ("Respondents") violated 2 U.S.C. §§ 441b(a), 433(a), and 434(b)(3), as well as 11 C.F.R. § 102.6(a)(1). These violations arose from transfers of impermissible funds made by the Respondents to the John Evans for Senate Committee ("the Senate Committee"). Additionally, Respondents failed to register with the Commission in a timely manner, and failed to identify properly all sources of its cash on hand at the time of its qualification as a political committee. An investigation was conducted.

NOW, THEREFORE, the Commission and Respondents, having duly entered into conciliation pursuant to 2 U.S.C. §437g(a)(A)(i) do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents, and the subject matter of this proceeding.

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

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

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

1. Respondent, the Evans Committee, is a committee affiliated with the John Evans for Senate Committee, but is not a principle campaign committee.
2. The Evans Committee, was organized as a state campaign committee pursuant to Idaho law to support the 1982 re-election campaign of Governor John V. Evans.
3. In March, 1985, Respondents sought to terminate The Evans Committee's state operations and transfer permissible funds to the Senate Committee.
4. Rather than transferring these funds to the Senate Committee, Respondents changed the name of The Evans Committee's bank account to the "John Evans for Senate Committee" and surrendered physical control of this account to the Senate Committee. This account contained both permissible and impermissible funds.
5. Respondents qualified as a federal political committee on or about March 18, 1985. Respondents did not register with the Commission until July 31, 1985.
6. Respondents' initial reports and subsequent amendments did not fully identify the source of interest receipts greater than \$200.00 credited to the bank accounts of The Evans Committee, although the sources were identified on previous state financial disclosure reports. Respondents have agreed to amend these reports to comply with the Act's identification requirements.

V. 1. Pursuant to 2 U.S.C. § 433(a), a political committee shall file a statement of organization within 10 days after becoming a political committee.

2. Upon qualification as a political committee, such committee must justify all cash on hand, and identify all contributions exceeding \$200.00. 2 U.S.C. § 434(b)(3).

3. The Commission's regulations permit transfers without limitation between affiliated committees provided only funds permissible under the Act are transferred. Additionally, any funds transferred count against the transferring committee's reporting threshold for the purpose of determining whether such committee qualifies as a political committee under the Act. 11 C.F.R. § 102.6(a)(1).

4. Pursuant to 2 U.S.C. § 441b(a), a political committee may not accept corporate or labor organization funds in connection with a federal election.

5. Respondents failed to register with the Commission within 10 days of qualification as a political committee in violation of 2 U.S.C. § 434(b)(3).

6. Respondents failed to fully identify the source of interest receipts of more than \$200.00 in violation of 2 U.S.C. § 434(b)(3).

7. Respondents transferred all of the Evans committee's cash on hand (\$11,272.72) to the Senate Committee. Respondents included in this transfer prohibited corporate and labor organization funds totalling \$4,574.78 in violation of 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.6(a)(1). The sources of the funds in question were identified by Respondents on both their state financial disclosure report and in subsequent reports to the Commission.

8. Respondents contend that these violations were not knowing and willful.

VI. 1. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Two Hundred Fifty Dollars (\$250.00), pursuant 2 U.S.C. §437g(a)(5)(A).

2. Respondents will amend their reports on file with the Commission to correctly and fully identify the source of interest receipts greater than \$200.00 to the Evans Committee's initial cash on hand figure of \$11,272.72.

VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a) (1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

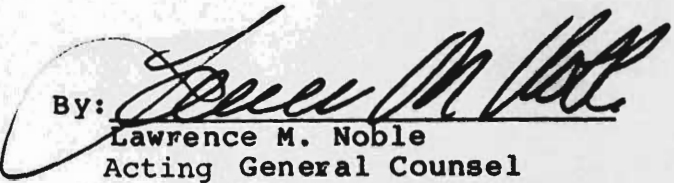
VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

X. This conciliation agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

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FOR THE COMMISSION:

By: 

Lawrence M. Noble
Acting General Counsel

Date

6/3/87

FOR THE RESPONDENTS:

By: 

Patrick D. Costello
Martin, Chapman, Park & Burkett
Attorneys for the Respondents
The Evans Committee and
Patrick Vaughn, Treasurer

March 26, 1987

87040351841

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
The John Evans for Senate) MUR 2100
Committee and Hubert Coates,)
as treasurer)

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by counsel for the National Republican Senatorial Committee. The Commission found reason to believe that the John Evans for Senate Committee ("the Senate Committee") and Hubert Coates, as treasurer, ("Respondents") violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.6(a)(1) by accepting transfers of impermissible funds from an affiliated committee, and an investigation was conducted.

NOW, THEREFORE, the Commission and Respondents, having duly entered into conciliation pursuant to 2 U.S.C. §437g(a)(A)(i) do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents, and the subject matter of this proceeding.

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

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

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

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1. Respondent, John Evans for Senate Committee is the principle campaign committee of Senate candidate Governor John Evans.

2. Respondent, Hubert Coates, is the treasurer of the John Evans for Senate Committee.

3. In March, 1985, the Evans Committee, a state committee affiliated with the Senate Committee, sought to terminate its operations and transfer all its permissible funds to Respondents.

4. Rather than transferring these funds to the Respondents, the Evans Committee changed the name of its bank account to the "John Evans for Senate Committee" and surrendered physical control of the account to Respondents.

5. Upon realizing that this account contained corporate and labor organization funds totaling \$4,574.78, Respondents attempted to remove these impermissible funds by contributing to non-federal committees. Prior to when these contributions were made to non-federal committees, however, Respondents made expenditures in connection with a federal election.

V. 1. Pursuant to 2 U.S.C. 441b(a), political committees are prohibited from accepting corporate or labor organization funds in connection with a federal election.

2. Pursuant to 11 C.F.R. § 102.6(a)(1), affiliated political committees may transfer funds without limitation provided only funds permissible under the Act are transferred.

3. Respondents accepted a transfer of \$11,272.72 from an affiliated committee which contained approximately \$4,574.78

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in prohibited corporate and labor organization funds in violation of 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.6(a)(1).

4. Respondents contend these violations were not knowing and willful.

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Three Hundred Fifty Dollars (\$350.00), pursuant to 2 U.S.C. §437g(a)(5)(A).

VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. §437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

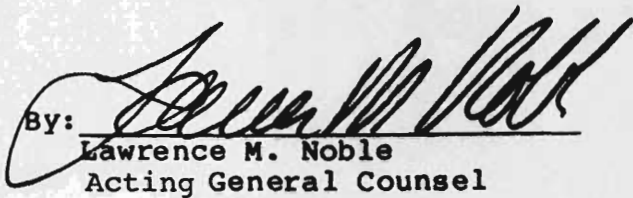
VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

X. This conciliation agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

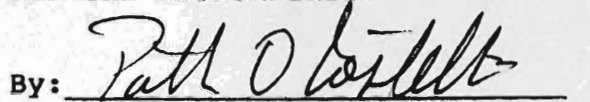
8704051844

FOR THE COMMISSION:

By: 
Lawrence M. Noble
Acting General Counsel

6/3/87
Date

FOR THE RESPONDENTS:

By: 
Patrick D. Costello
Martin, Chapman, Park & Burkett
Attorneys for the Respondents
The Evans Committee and
Hubert Coates, Treasurer

March 26, 1987
Date



FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

THIS IS THE BEGINNING OF MUR # 2100
DATE FILMED 7/24/87 CAMERA NO. 2
CAMERAMAN AS

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