



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF ROL # 2198

Date Filmed 1/9/87 Camera No. --- 2

Cameraman AS

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1) RAD Referral Information

2) Assignment Sheet

3) 12 Day Report and Comment Sheet

4) Routing Slips

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

☐ (1) Classified Information

☐ (6) Personal privacy

☒ (2) Internal rules and practices

☐ (7) Investigatory files

☐ (3) Exempted by other statute

☐ (8) Banking Information

☐ (4) Trade secrets and commercial or financial information

☐ (9) Well Information (geographic or geophysical)

☒ (5) Internal Documents

Signed

Jonathan M. Levin

Date

12/22/86

REC 5-21-77

87040522504

87040522505

Arizona Leadership for America
Search Committee
Thomas F. Karlsen, as treasurer

RAD #86L-3a and
#86L-3b

(M 2198)

1. Open a Matter Under Review.

2. Find reason to believe that the Arizona Leadership for America Search Committee and Thomas F. Karlson, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).
3. Find reason to believe that the DeConcini '88 Committee and Thomas F. Karlson, as treasurer, violated 2 U.S.C. § 441a(f).
4. Approve the General Counsel's Factual and Legal Analyses attached to the report dated June 27, 1986.
5. Close the file.
6. Direct the Office of General Counsel to send the appropriate letters.

Attest:

7-11-86

Marjorie W. Emmons
Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 17, 1986

Thomas F. Karlsen, Treasurer
Arizona Leadership for America Search Committee
1436 North 44th Street
Phoenix, Arizona 85008

RE: MUR 2198
Arizona Leadership for
America Search
Committee
Thomas F. Karlsen, as
treasurer

Dear Mr. Karlsen:

On July 9, 1986, the Federal Election Commission determined that there is reason to believe that the Arizona Leadership for America Search Committee and you, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above-referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The General Counsel's Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

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

The Commission reminds you that a contribution in excess of \$5,000 by a multicandidate committee to a candidate and his authorized committees with respect to a federal election nevertheless appears to be a violation of 2 U.S.C. § 441a(a)(2)(A). You should take immediate steps to insure that this activity does not occur in the future.

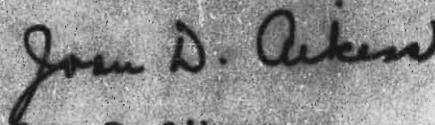
87040322506

permanet

- 2 -

If you have any questions, please contact Jonathan Levin,
the attorney assigned to this matter, at (202) 376-5690.

Sincerely,



Joan D. Aikens
Chairman

Enclosure

General Counsel's Factual and Legal Analysis

87040622507



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 17, 1986

Thomas F. Karlisen, Treasurer
DeConcini '88 Committee
1436 North 44th Street
Phoenix, Arizona 85008

RE: MUR 2198
DeConcini '88 Committee
Thomas F. Karlisen, as
treasurer

Dear Mr. Karlisen:

On July 9, 1986, the Federal Election Commission determined that there is reason to believe that the DeConcini '88 Committee and you, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above-referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The General Counsel's Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

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

The Commission reminds you that the acceptance by a candidate and his authorized political committees of a contribution in excess of \$5,000 from a multicandidate committee with respect to a federal election nevertheless appears to be a violation of 2 U.S.C. § 441a(f). You should take immediate steps to insure that this activity does not occur in the future.

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- 2 -

If you have any questions, please contact Jonathan Levin,
the attorney assigned to this matter, at (202) 376-5690.

Sincerely,



Joan D. Aikens
Chairman

Enclosure

General Counsel's Factual and Legal Analysis

87040522509



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Thomas F. Karlson, Treasurer
DeConcini '88 Committee
1436 North 44th Street
Phoenix, Arizona 85008

RE: MUR 2198
DeConcini '88 Committee
Thomas F. Karlson, as
treasurer

Dear Mr. Karlson:

On July 9, 1986, the Federal Election Commission determined that there is reason to believe that the DeConcini '88 Committee and you, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above-referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The General Counsel's Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

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The Commission reminds you that the acceptance by a candidate and his authorized political committees of a contribution in excess of \$5,000 from a multicandidate committee with respect to a federal election nevertheless appears to be a violation of 2 U.S.C. § 441a(f). You should take immediate steps to insure that this activity does not occur in the future.

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7/16/86

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- 2 -

If you have any questions, please contact Jonathan Levin,
the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Joan D. Aikens
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

27
7/16/86

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Thomas F. Karlson, Treasurer
DeConcini '88 Committee
1436 North 44th Street
Phoenix, Arizona 85008

RE: MUR 2198
DeConcini '88 Committee
Thomas F. Karlson, as
treasurer

Dear Mr. Karlson:

On July 9, 1986, the Federal Election Commission determined that there is reason to believe that the DeConcini '88 Committee and you, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above-referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The General Counsel's Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

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- 2 -

If you have any questions, please contact Jonathan Levin,
the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Joan D. Aikens
Chairman

Enclosure

General Counsel's Factual and Legal Analysis

87040322513



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Thomas F. Karlsen, Treasurer
Arizona Leadership for America Search Committee
1436 North 44th Street
Phoenix, Arizona 85008

RE: MUR 2198
Arizona Leadership for
America Search
Committee
Thomas F. Karlsen, as
treasurer

Dear Mr. Karlsen:

On July 9, 1986, the Federal Election Commission determined that there is reason to believe that the Arizona Leadership for America Search Committee and you, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above-referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The General Counsel's Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

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- 2 -

If you have any questions, please contact Jonathan Levin,
the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

JL
7/16/86

Joan D. Aikens
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

87040622515



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Thomas F. Karlsen, Treasurer
Arizona Leadership for America Search Committee
1436 North 44th Street
Phoenix, Arizona 85008

**RE: MUR 2198
Arizona Leadership for
America Search
Committee
Thomas F. Karlsen, as
treasurer**

Dear Mr. Karlsen:

On July 9, 1986, the Federal Election Commission determined that there is reason to believe that the Arizona Leadership for America Search Committee and you, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above-referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The General Counsel's Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

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The Commission reminds you that a contribution in excess of \$5,000 by a multicandidate committee to a candidate and his authorized committees with respect to a federal election nevertheless appears to be a violation of 2 U.S.C. § 441a(a)(2)(A). You should take immediate steps to insure that this activity does not occur in the future.

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- 2 -

If you have any questions, please contact Jonathan Levin,
the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Joan D. Aikens
Chairman

Enclosure
General Counsel's Factual and Legal Analysis

87040622517



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL
FROM: MARJORIE W. EMMONS/CHERYL A. FLEMING (CF)
DATE: JULY 2, 1986
SUBJECT: OBJECTION TO RAD Ref. 86L-3a/86L-3b:
FIRST GENERAL COUNSEL'S REPORT
SIGNED JUNE 27, 1986

The above-named document was circulated to the
Commission on Monday, June 30, 1986 at 4:00 P.M.

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

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

This matter will be placed on the Executive Session
agenda for Wednesday, July 9, 1986.

87040522518



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL
FROM: MARJORIE W. EMMONS/MARY W. DOVE
DATE: July 2, 1986
SUBJECT: OBJECTION TO RAD Ref. 86L-3a/86L-3b:
FIRST GENERAL COUNSEL'S REPORT
Signed June 27, 1986

The above-named document was circulated to the
Commission on Monday, June 30, 1986 at 4:00 p.m.

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

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

This matter will be placed on the Executive Session
agenda for Wednesday, July 9, 1986.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL
FROM: MARJORIE W. EMMONS/ CHERYL A. FLEMING *CAF*
DATE: JULY 1, 1986
SUBJECT: OBJECTION TO RAD 86L-3a/86L-3b:
FIRST GENERAL COUNSEL'S REPORT
SIGNED JUNE 27, 1986

The above-named document was circulated to the
Commission on Monday, June 30, 1986 at 4:00 P.M.

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

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

This matter will be placed on the Executive Session
agenda for Wednesday, July 9, 1986.

87040522520

FEDERAL ELECTION COMMISSION
999 E STREET, N.W.
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE REC
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT

86 JUN 30 A9:23

SENSITIVE

RAD #86L-3a and 85L-3b
STAFF MEMBER Jonathan Levin

SOURCE OF MUR: INTERNALLY GENERATED

RESPONDENTS' NAMES: Arizona Leadership for America Search
Committee
Thomas F. Karlisen, as treasurer

DeConcini '88 Committee
Thomas F. Karlisen, as treasurer

**RELEVANT STATUTES
AND REGULATIONS:** 2 U.S.C. § 441a(a)(2)(A)
2 U.S.C. § 441a(f)
11 C.F.R. § 102.6(a)

**INTERNAL REPORTS
CHECKED:** Public Records

**FEDERAL AGENCIES
CHECKED:** None

SUMMARY OF ALLEGATIONS

The Reports Analysis Division has referred the Arizona Leadership for America Search Committee ("ALASC") and the DeConcini '88 Committee ("DeConcini '88") to the Office of the General Counsel in connection with a contribution of \$54,089.07 from ALASC to DeConcini '88.

FACTUAL AND LEGAL ANALYSIS

The 1985 Year End Report filed by ALASC disclosed a "transfer" of \$54,089.07 on December 15, 1985, to DeConcini '88. The Year End Report of DeConcini '88 disclosed receipt of this "transfer" on that date.

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ALASC considered its Year End Report to be a termination report because it had paid all of its debts and expended all of its funds. In a letter sent on February 14, 1986, Thomas F. Karlson, the treasurer of both ALASC and DeConcini '88, stated that ALASC's counsel had advised him to return the \$54,089.07 and that the return was made. ALASC's 1986 April Quarterly disclosed the receipt of a return of \$54,089.07 on February 4, 1986. DeConcini '88 has not reported the receipt and return of funds because its Mid-Year Report is not due until July.

In its referral to this Office, RAD disclosed the following background information pertaining to ALASC. ALASC originally registered on January 31, 1983, as the DeConcini for America Search Committee. The name was changed to ALASC in an amended Statement of Organization received on April 18, 1983. Senator DeConcini, in response to a Disavowal Notice regarding activity reported on the 1983 Mid-Year Report of the Dennis DeConcini Re-election Committee (his 1982 principal campaign committee), stated in a letter received on February 6, 1984, that he was not a candidate for federal office and that ALASC had been "established to funnel...contributions and expenditures" to select a potential (and unknown) candidate to run for federal office in 1986 or 1988.

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A letter accompanying the 1986 Year End Report stated that
ALASC

was initially organized to accept political contributions originally intended for the Dennis DeConcini Re-election Committee subsequent to the General Election 1982. Contributors were notified and 'The Committee' functioned as though it were a Principal Campaign Committee for the purposes of the disclosure and contribution limit provisions of the Act.

The treasurer went on to say that the remaining funds were transferred to DeConcini '88 and all contributions to ALASC were to be treated as contributions for the 1988 primary.

ALASC qualified as a multicandidate committee on April 10, 1984. The issue arises whether, in light of the relationship between ALASC, a multicandidate committee, and DeConcini '88, a principal campaign committee, the committees can make unlimited transfers to each other, pursuant to 11 C.F.R. § 102.6(a). In the past, when examining the relationship between a candidate's principal campaign committee ("PCC") and a multicandidate committee with which the candidate has a special relationship, the Commission has found that the contribution limits of 2 U.S.C. § 441a apply to transactions between such committees.

The Commission first faced the issue in MUR 950 (Reagan for President and Citizens for the Republic). In that MUR, the Commission found probable cause to believe that the Reagan for President Committee, a PCC, accepted excessive in-kind contributions from a multicandidate committee with which the

candidate had an active relationship. At the reason to believe stage of its proceedings, the General Counsel's Report presented the Commission with alternative theories of violations. One theory was that the multicandidate committee and the PCC were affiliated and, thus, could make transfers (in that case, in-kind) to one another without limitation. The Commission rejected this approach, and instead imposed the contribution limitations contained in 2 U.S.C. § 441a(a) to the transactions between the committees.

87040622524 The Commission made a similar determination in MUR 1741 (Mondale for President and Committee for the Future of America). In discussing the relationship between a PCC and a multicandidate committee with which the candidate had a special relationship, the General Counsel's Report to the Commission expressly relied upon the analysis used in MUR 950. It analyzed the relationship between the two committees and recommended that the Commission find reason to believe that excessive in-kind contributions had flowed from one committee to the other. The Commission approved the General Counsel's recommendations concerning the excessive contributions.

In MUR 1870 (Congressman Waxman Campaign Committee and the 24th Congressional District of California PAC), the Commission rejected the theory contained in the General Counsel's Report that the candidate's PCC was affiliated with a multicandidate committee with which the candidate had a special relationship. Although the Commission did not state that a PCC and a

multicandidate committee could never be affiliated, the Commission indicated that the more proper analysis was the contribution analysis of MUR 950.^{1/} Upon determining that the multicandidate committee had not performed any services for the PCC, the Commission found no reason to believe that the committees violated 2 U.S.C. §§ 441a(a) and 441a(f) and closed the file.

Despite the letter stating, after the fact, that ALASC was originally formed to function as a principal campaign committee with respect to the 1982 election and despite the statement that all contributions to ALASC were to be treated as contributions for the 1988 primary, it appears that, for most of ALASC's existence, it has functioned as a committee supporting more than one federal candidate. Its Statements of Organization since its founding on January 31, 1983, have indicated as such and it has made contributions to a number of federal candidates; none of these were to Senator DeConcini.

Section 441a(a)(2)(A) of Title 2 states that no multicandidate committee shall make contributions to any candidate and his authorized political committees in excess of \$5,000 with respect to any federal election. Section 441a(f) of

^{1/} In an advisory opinion issued to Congressman Waxman prior to his involvement with the multicandidate committee, the Commission indicated that his involvement would not alter the usual limits on contributions to and by the multicandidate committee, assuming the committee was not affiliated with the candidate's PCC. This opinion, therefore, implies that affiliation between a multicandidate committee and a PCC might be possible.

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Title 2 prohibits the knowing acceptance of contributions in excess of the limits of 2 U.S.C. § 441a. In this matter, ALASC has contributed \$54,089.07, \$49,089.07 in excess of the limit, to Senator DeConcini's principal campaign committee for 1988. Based on the foregoing analysis, the Office of the General Counsel recommends that the Commission open a Matter Under Review and find reason to believe that ALASC violated 2 U.S.C. § 441a(a)(2)(A) and that DeConcini '88 violated 2 U.S.C. § 441a(f).

RECOMMENDATIONS

1. Open a Matter Under Review.
2. Find reason to believe that the Arizona Leadership for America Search Committee and Thomas F. Karlson, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).
3. Find reason to believe that the DeConcini '88 Committee and Thomas F. Karlson, as treasurer, violated 2 U.S.C. § 441a(f).
4. Approve the attached letters and General Counsel's Factual and Legal Analyses.

Charles N. Steele
General Counsel

Date

6/27/86

BY:

Lawrence M. Noble
Deputy General Counsel

Attachments

1. Referrals from RAD
2. Letters and Factual and Legal Analyses

87040522526



MEMORANDUM

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

22 April 1986

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA *JS/*
STAFF DIRECTOR

FROM: JOHN D. GIBSON *JDG*
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: REFERRAL OF THE ARIZONA LEADERSHIP FOR AMERICA
SEARCH COMMITTEE

This is a referral of the Arizona Leadership for America Search Committee. This Committee has made a \$49,089.07 apparent excessive contribution to the DeConcini '88 Committee, which has subsequently been refunded.

For your information, the Arizona Leadership for America Search Committee originally registered with the Commission in January 1983 as the DeConcini for America Search Committee. An amended Statement of Organization was received in April 1983 (in response to a Request for Additional Information), changing its name to the Arizona Leadership for America Search Committee. Senator DeConcini, in response to a Disavowal Notice regarding activity reported on the 1983 Mid-Year Report of the Dennis DeConcini Re-election Committee (his 1982 principal campaign committee), stated in a letter received on February 6, 1984 that he was not a candidate for Federal office. Having clarified his relationship regarding the Dennis DeConcini Re-election Committee, he further noted that the Arizona Leadership for America Search Committee had been "established to funnel... contributions and expenditures" to select a potential (and unknown) candidate to run for Federal office in 1986 or 1988. The Dennis DeConcini Re-election Committee terminated on its 1983 Year End Report.

A companion referral for the DeConcini '88 Committee is also being submitted to your office (see RAD Referral 86L-26b).

If you have any questions regarding this matter, please contact Chris Nuland at 376-2480.

Attachment

Attachment 1 - p. 1 of 23

87040522527

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 22 April 1986

ANALYST: Christopher L. Nuland

I. COMMITTEE: Arizona Leadership for America Search
Committee (C00165407)
Thomas F. Karlson, Treasurer
1436 North 44th Street
Phoenix, AZ 85008

II. RELEVANT STATUTE: 2 U.S.C. §441a(a)(2)(A)
11 CFR 110.2(a)(1)

III. BACKGROUND:

Excessive Contribution Made to a Federal Candidate

The 1985 Year End Termination Report of the Arizona Leadership for America Search Committee ("the Committee") disclosed a \$54,089.07 "transfer" to the DeConcini '88 Committee on December 15, 1985 (Attachment 2). This resulted in an apparent \$49,089.07 excessive contribution made to the DeConcini '88 Committee. A letter accompanying the Termination Report explained that the Committee "was initially organized to accept political contributions originally intended for the Dennis DeConcini Re-election Committee...subsequent to the General Election 1982" and that the Committee "functioned as though it were a Principal Campaign Committee." The letter further indicated that all contributions to the Committee would be treated as contributions toward Senator DeConcini's 1988 primary election (Attachment 3).

A Request for Additional Information ("RFAI") was sent to the Committee on February 19, 1986 which advised that a multicandidate committee is prohibited from making a contribution to a federal candidate in excess of \$5,000 per election. The Committee was asked to notify the DeConcini '88 Committee and request a refund of the amount in excess of \$5,000 (Attachment 4).

1-p. 2 of 23

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ARIZONA LEADERSHIP FOR AMERICA
SEARCH COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

The Committee submitted a response on March 4, 1986 which stated that the DeConcini '88 Committee had returned the full amount of the transfer. The Committee also enclosed a letter dated February 14, 1986, addressed to the Commission, which indicated that the Committee's counsel "suggested that the transfer of funds...may have been inappropriate." Upon advise of counsel, the transfer was returned to the Committee^{1/} (Attachment 5). The Committee's 1986 April Quarterly Report disclosed the refund as being received on February 4, 1986 (Attachment 6).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

^{1/} The Commission has no record of having received the February 14, 1986 letter as a separate communication.

1- p. 3 of 23

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NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
ARIZONA LEADERSHIP FOR AMERICA SEARCH COMMITTEE (FORMERLY DECONCINI FOR AMERICA SEARCH)				NON-PARTY QUALIFIED		ID #C00165407
CONNECTED ORGANIZATION:	BLANK					
1982	REQUEST FOR ADDITIONAL INFORMATION					1 83FEC/268/5380
	STATEMENT OF ORGANIZATION			31JAN83		4 83FEC/265/4959
	STATEMENT OF ORGANIZATION - AMENDMENT			18APR83		2 83FEC/270/4883
	STATEMENT OF ORGANIZATION - AMENDMENT			3MAY83		4 83FEC/271/2516
	REQUEST FOR ADDITIONAL INFORMATION 2ND					2 83FEC/270/4974
	APRIL QUARTERLY	28,722	0	1JAN83 - 31MAR83	21	83FEC/270/4884
	JULY QUARTERLY	11,162	-	1APR83 - 30JUN83	9	83FEC/282/0095
	OCTOBER QUARTERLY	7,210	-	1JUL83 - 30SEP83	8	83FEC/286/1785
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL83 - 30SEP83	3	84FEC/313/4125
	1ST LETTER INFORMATIONAL NOTICE			1JUL83 - 30SEP83	1	84FEC/306/4913
	YEAR-END	26,185	12,279	1OCT83 - 31DEC83	19	84FEC/292/4450
	YEAR-END - AMENDMENT	-	-	1OCT83 - 31DEC83	6	84FEC/313/4128
	REQUEST FOR ADDITIONAL INFORMATION			1OCT83 - 31DEC83	3	84FEC/306/3111
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT83 - 31DEC83	4	84FEC/311/2790
1984	MISCELLANEOUS REPORT			2APR84 FROM FEC	1	84FEC/306/4911
	MISCELLANEOUS NOTICE FROM FEC			16MAY84	1	84FEC/314/2303
	APRIL QUARTERLY	20,161	10,116	1JAN84 - 31MAR84	16	84FEC/311/3223
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN84 - 31MAR84	4	84FEC/325/1545
	REQUEST FOR ADDITIONAL INFORMATION			1JAN84 - 31MAR84	2	84FEC/318/3191
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN84 - 31MAR84	3	84FEC/324/2766
	JULY QUARTERLY	9,254	14,715	1APR84 - 30JUN84	12	84FEC/322/6626
	JULY QUARTERLY - AMENDMENT	-	-	1APR84 - 30JUN84	6	84FEC/328/2975
	1ST LETTER INFORMATIONAL NOTICE			1APR84 - 30JUN84	3	84FEC/327/4230
	OCTOBER QUARTERLY	4,601	20,529	1JUL84 - 30SEP84	14	84FEC/341/1358
	OCTOBER QUARTERLY - AMENDMENT	4,601	20,579	1JUL84 - 30SEP84	16	84FEC/349/2930
	REQUEST FOR ADDITIONAL INFORMATION			1JUL84 - 30SEP84	1	84FEC/347/4804
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL84 - 30SEP84	2	84FEC/349/2233
	POST-GENERAL	3,694	11,299	1OCT84 - 26NOV84	11	85FEC/359/4559
	NOTICE OF FAILURE TO FILE			1OCT84 - 26NOV84	1	84FEC/357/4912
	YEAR-END	1,113	2,650	27NOV84 - 31DEC84	6	85FEC/365/0629
	TOTAL	112,102	0 71,638	0	186	TOTAL PAGES

All reports listed above have been reviewed.

Ending cash-on-hand as of 12/31/84:

\$84,086.74

Outstanding debts and obligations as of 12/31/84:

\$0

87040622531

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-96)

DATE 22APR86
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
ARIZONA LEADERSHIP FOR AMERICA SEARCH COMMITTEE (FORMERLY DECONCINI FOR AMERICA SEARCH)				NON-PARTY QUALIFIED		ID #C00165407
CONNECTED ORGANIZATION: BLANK						
1985	APRIL QUARTERLY	1,941	16,089	1JAN85 - 31MAR85	8	85FEC/370/3295
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN85 - 31MAR85	1	86FEC/396/2656
	REQUEST FOR ADDITIONAL INFORMATION			1JAN85 - 31MAR85	2	85FEC/392/2297
	JULY QUARTERLY	6,329	21,508	1APR85 - 30JUN85	22	85FEC/378/2509
	JULY QUARTERLY - AMENDMENT	-	-	1APR85 - 30JUN85	6	86FEC/396/0531
	REQUEST FOR ADDITIONAL INFORMATION			1APR85 - 30JUN85	2	85FEC/392/2234
	OCTOBER QUARTERLY	1,197	668	1JUL85 - 30SEP85	6	85FEC/389/3605
	REQUEST FOR ADDITIONAL INFORMATION			1OCT85 - 31DEC85	3	86FEC/402/4754
	TERMINATION REPORT	567	54,756	1OCT85 - 31DEC85	7	86FEC/399/3342
	TERMINATION REPORT - AMENDMENT	-	-	1OCT85 - 31DEC85	8	86FEC/404/1292
1986	APRIL QUARTERLY	54,507	4,233	1JAN86 - 31MAR86	10	86FEC/408/4753
	1 ST LETTER INFORMATIONAL NOTICE			1JAN86 - 31MAR86	1	86FEC/410/3482
	TOTAL	64,441	97,254		76	TOTAL PAGES

All reports listed above have been reviewed.

Ending cash-on-hand as of 3/31/86: \$50,274.18

Outstanding debts and obligations owed as of 3/31/86: \$0

1-p. 5 of 23

1985 Year End Termination Report

ATTACHMENT 2

CAMPAIGN FINANCE SYSTEM

Run Date: 01-21-1986

Itemized Disbursements

Page 1 of 1

(111) AZ. LEADERSHIP FOR AM. CON

Sub/Line 0 00

Any information copied from such Reports and 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 ADDRESS/PURPOSE OF DISBURSEMENT/DATE OF DISB.-AMOUNT/ELECTION

for the period 10-01-85 thru 12-31-85

TYPE: C

DECONCORDI *NO COMMITTEE

111-0047-C

12-15-85

\$4,000.07

Primary

1436 N. 44TH STREET

PHOENIX, AZ. 85008

TRANSFER-SEE LETTER ATTACHED

Year to date: \$54,000.07

Page Total

\$54,000.07

Report Total

\$54,000.07

1 vendors printed

8,7,0,4,0,5,2,2,5,3,2

1- p. 6 of 23

January 22, 1986

Federal Election Commission
1325 K Street North West
Washington, DC 20463

Re: Arizona Leadership for America Search Committee
FEC #C00165407
January 31, 1985 Year-End Report
Termination Report

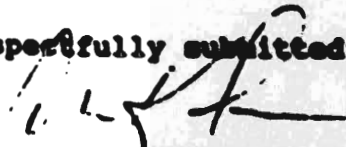
Gentlemen:

The attached January 31, 1985 is the final report for the Arizona Leadership for America Search Committee ("The Committee"). "The Committee" was initially organized to accept political contributions originally intended for the Dennis DeConcini Re-election Committee (FEC #C00102715, Terminated 1983) subsequent to the General Election 1982. Contributors were notified and "The Committee" functioned as though it were a Principal Campaign Committee for the purposes of the disclosure and contribution limit provisions of the Act.

"The Committee" will no longer receive any contributions or make any disbursements and has no outstanding debts or obligations. Remaining funds were transferred to the DeConcini '88 Committee (FEC #C00195990). All contributions to "The Committee" will be treated as contributions toward the Primary Election 1988 for contribution limitations of the Act.

We respectfully request termination status for "The Committee" effective December 31, 1985.

Respectfully submitted,


Thomas F. Karlson
Treasurer
Arizona Leadership for America Search Committee

1- p. 7 of 23



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

1985

Thomas F. Karlson, Treasurer
Arizona Leadership for America
Search Committee
1436 North 44th Street
Phoenix, AZ 85008

Identification Number: C00165407

Reference: Year End Termination Report (10/1/85-12/31/85)

Dear Mr. Karlson:

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 B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Act precludes a multicandidate committee from making a contribution to a candidate for Federal office in excess of \$5,000 per election. (2 U.S.C. §441a(a)) If you have made an excessive contribution, the Commission recommends that you notify the recipient and request a refund of the amount in excess of \$5,000. Please inform the Commission immediately in writing and provide a photocopy of your refund request sent to the recipient. In addition, any refund should appear on a supporting Schedule A for Line 16 of your next report.

If the contribution(s) in question was incorrectly reported and/or you have additional information, you may wish to submit documentation for the public record.

Although the Commission may take further legal steps concerning the excessive contribution(s), your prompt action in obtaining a refund of the excessive amount will be taken into consideration.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need

1- p. 8 of 23

87040522534

assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,



Christopher L. Nuland
Reports Analyst
Reports Analysis Division

87040622535

1- p. 9 of 23

KARLSON & CHRISTENSEN, P.C.

CERTIFIED PUBLIC ACCOUNTANTS
1430 NORTH 40TH STREET
PHOENIX, ARIZONA 85009

(602) 251-0270

RECEIVED L. THE FEC

MAR 4 AM: 58

ATTACHMENT 5

Page 1 of 2

THOMAS F. KARLSON, C.P.A.
DON W. CHRISTENSEN, C.P.A.

RECEIVED OFFICE
OF THE ATTORNEY GENERAL
PHOENIX, ARIZONA
JAN 28 1986

February 26, 1986

Mr. Christopher L. Roland
Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, DC 20463

Re: Arizona Leadership for America Search Committee
FEC # C00163407
Year-End Termination Report (10/1-12/31/85)
Your letter dated February 19, 1986

Dear Mr. Roland:

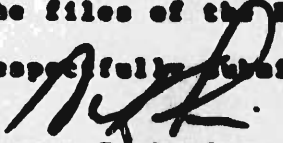
On February 14, 1986 I corresponded with the Federal Election Commission regarding the transfer of funds to the DeConcini '88 Committee (copy enclosed).

Subsequent to that date (February 14, 1986) the DeConcini '88 Committee has returned the transfer (\$34,089.07) back to the Arizona Leadership for America Search Committee. I'm on the Treasurer for both Committees and therefore, executed the transfer myself.

The Arizona Leadership for America Search Committee will remain active and report the above transfer on its March 31, 1986 report. The DeConcini '88 Committee will reflect said transfer on its Mid-Year report for June 30, 1986.

Please accept this letter as an additional amendment to the Year-End report of Arizona Leadership for America Search Committee and the DeConcini '88 Committee. An additional copy is enclosed for the files of the DeConcini '88 Committee.

Respectfully Submitted,


Thomas F. Karlson
enc.

1-p. 10 of 23

KARLEN & CHRISTENSEN, P.C.

CERTIFIED PUBLIC ACCOUNTANTS

1436 NORTH 40TH STREET
PHOENIX, ARIZONA 85006

(602) 231-9279

THOMAS F. KARLEN, C.P.A.
DON M. CHRISTENSEN, C.P.A.RECEIVED OFFICE
5100 E. UNIVERSITY DRIVE
TAMPA, FL 33611
(813) 886-1100

February 14, 1986

Federal Election Commission
1325 K Street NW
Washington, DC 20463Re: Arizona Leadership for America Search Committee (FEC #C00165407)
Year End Report-December 31, 1985

Gentlemen:

On January 23, 1986 the above Committee filed its year-end report due January 31, 1986. Said report requested termination status for the Committee as all debts had been paid and all funds expended.

Subsequent to filing of the report the Committee's counsel reviewed the report and suggested that the transfer of funds from the Committee in 1985 to the DeConcini '88 Committee (FEC #C00195990) may have been inappropriate. In accordance with counsel's advice the DeConcini '88 Committee has returned the transfer of funds in the amount of \$54,089.07 back to the Arizona Leadership for America Search Committee.

We hereby request the Federal Election Commission not grant termination status to the Arizona Leadership for America Search Committee and that quarterly reports will subsequently be filed beginning with the March 11, 1986 filing period. Said report will reflect the return of the transfer of funds (with sufficient explanation) and the DeConcini '88 Committee with reflect the disbursement of said funds to the Arizona Leadership for America Search Committee (also with sufficient explanation).

Please accept this letter as an amendment to the year end reports of Arizona Leadership for America Search Committee (FEC #C00165407) and the DeConcini '88 Committee (FEC #C00195990). Two copies are enclosed of this letter for both Committee's files.

Respectfully submitted

Thomas F. Karlen, Treasurer
Arizona Leadership for America Search Committee
DeConcini '88 Committee

1 - p. 11 of 23

1986 April Quarterly Report

ATTACHMENT 6

CAMPAIGN FINANCE SYSTEM

Run Date: 04-05-1986

From: Scott's

Page 1 of 1

(111) AZ. LEADERSHIP FOR AM. CON.

Line 8 11c-STATE POLITICAL COMMITTEES

Any information copied from such Reports and 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-ADDRESS/DATE OF EACH RECEIPT-AMOUNT OF RECEIPT/AGGREGATE YEAR TO DATE

For the period 01-01-86 thru 03-31-86 All Committees

TYPE: C

RECONCILING 86 COMMITTEE

ONE LETTERS ATTACHED

02-01-86 24,009.07 Primary

1435 N. 44TH STREET

PHOENIX AZ

111-0001-C

OTHER POLITICAL 111.

Year to date: 224,009.07

Page Total 224,009.07

Report Total 224,009.07

1 Contributors printed

8 3 3 8 7 3 4 0 9 2 2 2 5 3 8

1- p. 12 of 23



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

22 April 1986

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA *15/*
STAFF DIRECTOR

FROM: JOHN D. GIBSON *OK*
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: REFERRAL OF DECONCINI '88 COMMITTEE

This is a referral of the DeConcini '88 Committee. This Committee has accepted and refunded an apparent excessive contribution from a multicandidate political committee, the Arizona Leadership for America Search Committee.

For your information, the Arizona Leadership for America Search Committee originally registered with the Commission in January 1983 as the DeConcini for America Search Committee. An amended Statement of Organization was received in April 1983 (in response to a Request for Additional Information), changing its name to the Arizona Leadership for America Search Committee. Senator DeConcini, in response to a Disavowal Notice sent to him regarding activity reported on the 1983 Mid-Year Report of the Dennis DeConcini Re-election Committee (his 1982 principal campaign committee), stated in a letter received on February 6, 1984 that he was not a candidate for Federal office. Having clarified his relationship regarding the Dennis DeConcini Re-election Committee, he further noted that the Arizona Leadership for America Search Committee had been "established to funnel... contributions and expenditures" to select a potential (and unknown) candidate to run for Federal office in 1986 or 1988. The Dennis DeConcini Re-election Committee terminated on its 1983 Year End Report.

A companion referral for the Arizona Leadership for America Search Committee is also being submitted to your office (see RAD Referral 86L-26a).

If you have any questions regarding this matter, please contact Pat Sheppard at 376-2480.

1 - p. 13 of 23

Attachment

87040622539

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 22 April 1986

ANALYST: Pat Sheppard

I. COMMITTEE: DeConcini '88 Committee
(C00195990)
Thomas Karlsen, Treasurer
1436 North 44th Street
Phoenix, AZ 85008

II. RELEVANT STATUTE: 2 U.S.C. §441a(f)

III. BACKGROUND:

Receipt of Excessive Contribution

The 1985 Year End Report of the DeConcini '88 Committee ("the Committee") disclosed the receipt of a contribution totalling \$54,089.07 designated for the primary election from the Arizona Leadership for America Search Committee (a multicandidate political committee) on December 15, 1985 (Attachment 2). This resulted in an apparent excessive contribution totalling \$49,089.07.

A Request for Additional Information ("RFAI") citing the excessive amount was sent to the Committee on March 4, 1986 (Attachment 3). The RFAI advised the Committee that the Act precluded a candidate for Federal office from receiving contributions from a multicandidate committee in excess of \$5,000 per election. The Committee was asked to refund the amount in excess of \$5,000. The Committee responded on March 18, 1986 stating that it had refunded the entire contribution to the Arizona Leadership for America Search Committee; however, it did not disclose the date of the refund or a copy of the refund check (Attachment 4). The response also included copies of letters from the Arizona Leadership for America Search Committee to the Commission stating a refund had been received. The Arizona Leadership for America Search Committee's 1986 April Quarterly Report disclosed the receipt of a \$54,089.07 refund from the Committee on February 4, 1986 (Attachment 5).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

1- p. 14 of 23

87040522540

FEDERAL ELECTION COMMISSION
1985-1986
CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

DATE 27MAR86

PAGE 1

CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/	PARTY	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
			PRIMARY	GENERAL	PRIMARY	GENERAL			
DECONCINI, DENNIS	SENATE	DEMOCRATIC PARTY			ARIZONA		1988 ELECTION	ID# 86AZ00027	
1. STATEMENT OF CANDIDATE							26JUN85	2	85SEN/004/2914
1985 STATEMENT OF CANDIDATE									
2. CANDIDATE REPORTS OF RECEIPTS & EXPENDITURES									
3. PRINCIPAL CAMPAIGN COMMITTEE									
DECONCINI '88 COMMITTEE							ID# C00195990 SENATE		
1985 STATEMENT OF ORGANIZATION							17JUN85	3	85SEN/004/2220
MID-YEAR REPORT			1,000		0		21JUN85 - 30JUN85	5	85SEN/004/3128
1 ST LETTER INFORMATIONAL NOTICE							1JAN85 - 30JUN85	1	85FEC/389/0578
YEAR-END			194,524		26,360		1JUL85 - 31DEC85	42	86SEN/001/3618
YEAR-END - AMENDMENT			-		-		1JUL85 - 31DEC85	7	86SEN/006/3406
REQUEST FOR ADDITIONAL INFORMATION							1JUL85 - 31DEC85	3	86FEC/404/1048
TOTAL			195,524	0	26,360	0		61	TOTAL PAGES
4. AUTHORIZED COMMITTEES									
4B. TRANSFERS IN FROM JOINT FUNDRAISING COMMITTEES									

All report have been reviewed
Cash on hand as of 12/31/85 - \$169,163
Debts as of 12/31/85 - \$4,200

8 7 0 4 0 5 2 2 5 4 1

1 - p. 15 of 23

ATTACHMENT # 1
Page 1 of 1

1985 YEAR END REPORT

ATTACHMENT # 2
page 1 of 2

CORPORATE FINANCE SYSTEM

Run Dates: 01-27-1986

Itemized Receipts

Page 1 of 1

Sub/Line 0 11c, SUMMARY PAGE

(CDS) DISCLOSURE TO COMMITTEE

Any information copied from such Reports and 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 collect contributions from such committee.

NAME-ADDRESS/TYPE CONTRIBUTION/DATE OF RECEIPT-AMOUNT/ELECTION

For the period 07-01-85 thru 12-31-85

POL. ACTION COM.

Over \$500 YTD

TYPE: P

ALMA FOR

AMONG. TRAIL LEADERS

11-14-85

1,000.00

Primary

1400 3RD STREET, NW.

WASHINGTON DC 20007-

202-6384-P

POL. ACTION COM.

Year to date: \$1,000.00

ARIZONA LEADER, ARIZONA

CHURCH COM

SEE LETTER ATTACHED

12-15-85

24,000.07

Primary

1126 NORTH 44TH STREET

PHOENIX

AZ 85009-

202-6384-P

POL. ACTION COM.

Year to date: \$24,000.07

P89

AUTO DEALER & SERVICE

105-12 BULLOGE AVENUE

ARIZONA

OF 11430-

202-6384-P

FREE TRUCK FEE

11-05-85

1,000.00

Primary

POL. ACTION COM.

Year to date: \$2,000.00

CONTRACT LETTER (BET COM

ONE S. 24TH ST

PHOENIX

AZ 85016-

202-6384-P

OFF: POL. COM

09-10-85

1,000.00

Primary

POL. ACTION COM.

Year to date: \$1,000.00

Page Total

\$27,000.07

Report Total

\$27,000.07

4 Contributors printed

1 - p. 16 of 23

January 22, 1986

Federal Election Commission
1325 K Street North West
Washington, DC 20463

Re: Arizona Leadership for America Search Committee
FEC #C00163487
January 31, 1985 Year-End Report
Termination Report

Gentlemen:

The attached January 31, 1985 is the final report for the Arizona Leadership for America Search Committee ('The Committee'). 'The Committee' was initially organized to accept political contributions originally intended for the Dennis DeConcini Re-election Committee (FEC #C00102715, Terminated 1983) subsequent to the General Election 1982. Contributors were notified and 'The Committee' functioned as though it were a Principal Campaign Committee for the purposes of the disclosure and contribution limit provisions of the Act.

'The Committee' will no longer receive any contributions or make any disbursements and has no outstanding debts or obligations. Remaining funds were transferred to the DeConcini '88 Committee (FEC #C00195990). All contributions to 'The Committee' will be treated as contributions toward the Primary Election 1988 for contribution limitations of the Act.

We respectfully request termination status for 'The Committee' effective December 31, 1985.

Respectfully submitted,

Thomas F. Karlson
Treasurer
Arizona Leadership for America Search Committee

1 - p. 17 of 23



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

MAR 4 1986

Thomas Karlsen, Treasurer
DeConcini '88 Committee
1436 North 44th Street
Phoenix, AZ 85008

Identification Number: C00195990

Reference: Year End Report (7/1/85-12/31/85)

Dear Mr. Karlsen:

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. A multicandidate committee may not make a contribution to a candidate for Federal office in excess of \$5,000 per election. If you have received an excessive contribution, the Commission recommends that you refund to the donor the amount in excess of \$5,000 per election. The Commission should be notified in writing if a refund is necessary. In addition, any refund should appear on Line 20(c) of the Detailed Summary Page and Schedule B of your next report. (2 U.S.C. §441a(a) and (f))

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 legal steps concerning the acceptance of excessive contributions, prompt action by you to refund the excessive amounts will be taken into consideration.

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,

1 - p. 18 of 23

87040522544

please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2486.

Sincerely,



Pat Sheppard
Reports Analyst
Reports Analysis Division

87040622545

1- p. 19 of 23

RECEIVED
SECRETARY OF THE SENATE

ALLEN & CHRISTENSEN, P.C.

CERTIFIED PUBLIC ACCOUNTANTS

1436 NORTH 44TH STREET
PHOENIX, ARIZONA 85006

(602) 251-0278

64 MAR 13 12:30
ATTACHMENT # 4
Page 1 of 3

THOMAS F. HARLSON, C.P.A.
DON W. CHRISTENSEN, C.P.A.

SHARON OFFICE
5150 E. UNIVERSITY DRIVE
TEMPE, AZ 85281
(602) 968-2100

March 16, 1986

Federal Election Commission
Reports Analysis Division
Washington, DC 20463

Att: Pat Sheppard

Re: DeCensini '86 Committee Year-end Report (7/1/85-12/31/85)

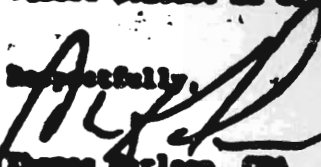
Gentlemen:

Please find enclosed various correspondence with the Commission regarding the Arizona Leadership for American Search Committee and your letter of March 4, 1986 copy enclosed.

I am the Treasurer for both committees and have affected a return of the transfer in question. Said transfer will be reflected on the next report Q1-4-Year (1/30/86) of the DeCensini '86 Committee.

Please contact me directly should additional information be required.

Respectfully,


Thomas Harlson, CPA
Treasurer
DeCensini '86 Committee

THS.

1 - p. 20 of 23

THOMAS F. HARTSON, P.C.
GENERAL PUBLIC ACCOUNTANTS
1325 E STREET NW
WASHINGTON, ARIZONA 85006
(602) 251-9379

NOT DELIVERED
ATTACHMENT # 4
Page 2 of 3

THOMAS F. HARTSON, C.P.A.
DON E. CHRISTENSEN, C.P.A.

CHARTER OFFICE
2000 E. UNIVERSITY DRIVE
TAMPA, FL 33601
(813) 249-8888

February 14, 1986

Federal Election Commission
1325 E Street NW
Washington, DC 20463

Re: Arizona Leadership for America Search Committee (FEC #C00165407)
Year End Report-December 31, 1985

Gentlemen:

On January 22, 1986 the above Committee filed its year-end report due January 31, 1986. Said report requested termination status for the Committee as all debts had been paid and all funds expended.

Subsequent to filing of the report the Committee's counsel reviewed the report and suggested that the transfer of funds from the Committee in 1985 to the DeConcini '88 Committee (FEC #C00193936) may have been inappropriate. In accordance with counsel's advice the DeConcini '88 Committee has returned the transfer of funds in the amount of \$54,000.07 back to the Arizona Leadership for America Search Committee.

We hereby request the Federal Election Commission not grant termination status to the Arizona Leadership for America Search Committee and that quarterly reports will subsequently be filed beginning with the March 31, 1986 filing period. Said report will reflect the return of the transfer of funds (with sufficient explanation) and the DeConcini '88 Committee with reflect the disbursement of said funds to the Arizona Leadership for America Search Committee (also with sufficient explanation).

Please accept this letter as an amendment to the year end reports of: Arizona Leadership for America Search Committee (FEC #C00165407) and the DeConcini '88 Committee (FEC #C00193936). Two copies are enclosed of this letter for both Committee's files.

Respectfully,


Thomas F. Hartson, Secretary
Arizona Leadership for America Search Committee
DeConcini '88 Committee

1 - p. 21 of 23

RINEN & CHRISTENSEN, P.A.

CERTIFIED PUBLIC ACCOUNTANTS

1430 NORTH 44TH STREET
PHOENIX, ARIZONA 85006

(602) 231-0273

ACHMENT # 4
Page 3 of 3

THOMAS F. KARLSEN CPA
DON M. CHRISTENSEN CPA

CHANDLER OFFICE
2100 E. UNIVERSITY DRIVE
CHANDLER, AZ 85226
(602) 955-5100

February 26, 1986

Mr. Christopher L. Huland
Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, DC 20463

Re: Arizona Leadership for America Search Committee
FEC # C00165407
Year-End Termination Report (10/1-12/31/85)
Your Letter Dated February 19, 1986

Dear Mr. Huland:

On February 14, 1986 I corresponded with the Federal Election Commission regarding the transfer of funds to the DeConcini '88 Committee (copy enclosed).

Subsequent to that date (February 14, 1986) the DeConcini '88 Committee has returned the transfer (\$54,089.67) back to the Arizona Leadership for America Search Committee. I'm on the Treasurer for both Committees and therefore, executed the transfer myself.

The Arizona Leadership for America Search Committee will remain active and report the above transfer on its March 31, 1986 report. The DeConcini '88 Committee will reflect said transfer on its Mid-Year report for June 30, 1986.

Please accept this letter as an additional amendment to the Year-End report of Arizona Leadership for America Search Committee and the DeConcini '88 Committee. An additional copy is enclosed for the files of the DeConcini '88 Committee.

Respectfully Submitted,


Thomas F. Karlson
enc.

1 - p. 22 of 23

8704968250683411

1986 April Quarterly Report

ATTACHMENT 5

CAMPAIGN FINANCE SYSTEM

Run Date: 04-05-1986

Standard Receipts

(1979) AZ. LEADERSHIP FOR AM. CON.

Page 1 of 1

Line 2 THE OTHER POLITICAL COMMITTEES

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

NAME-ADDRESS/DATE OF EACH RECEIPT-AMOUNT OF RECEIPT/AGGREGATE YEAR TO DATE
For the period 01-01-86 thru 03-31-86 All Contributions

TYPE: C

RECEIVING *NO COMMITTEE

ONE LETTERS ATTACHED

02-04-86 \$4,009.07 Primary

3436 N. 44TH STREET

PHOENIX AZ

019-8801-C

OTHER POLITICAL CON.

Year to date: \$34,009.07

Page Total 034,009.07

Report Total 034,009.07

1 Contributors printed

938703403722549

1-p. 23 of 23



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Thomas F. Karlisen, Treasurer
Arizona Leadership for America Search Committee
1436 North 44th Street
Phoenix, Arizona 85008

RE: MUR

Arizona Leadership for
America Search
Committee

Thomas F. Karlisen, as
treasurer

Dear Mr. Karlisen:

On , 1986, the Federal Election Commission determined that there is reason to believe that the Arizona Leadership for America Search Committee and you, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within fifteen days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

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 the 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

Attachment 2 - p. 1 of 14

87040322550

Letter to Thomas F. Karlsen, Treasurer
Page 2

pursued. The Office of the 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 will not be entertained after briefs on probable cause have been mailed to the respondent.

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

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.

The investigation now being conducted will be 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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jonathan Levin, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Joan D. Aikens
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

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87040522551

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. _____

STAFF MEMBER(S) & TEL. NO.
Jonathan Levin (202) 376-5690

RESPONDENT: Arizona Leadership for America Search Committee
Thomas F. Karlsen, as treasurer

SUMMARY OF ALLEGATIONS

This matter involves an apparent contribution of \$54,089.07 by the Arizona Leadership for America Search Committee ("ALASC") to the DeConcini '88 Committee ("DeConcini '88").

FACTUAL BASIS AND LEGAL ANALYSIS

The 1985 Year End Report filed by ALASC disclosed a "transfer" of \$54,089.07 on December 15, 1985, to DeConcini '88. The Year End Report of DeConcini '88 disclosed receipt of this "transfer" on that date.

ALASC considered its Year End Report to be a termination report because it had paid all of its debts and expended all of its funds. In a letter sent on February 14, 1986, Thomas F. Karlsen, the treasurer of both ALASC and DeConcini '88, stated that ALASC's counsel had advised him to return the \$54,089.07 and that the return was made. ALASC's 1986 April Quarterly disclosed the receipt of a return of \$54,089.07 on February 4, 1986. DeConcini '88 has not reported the receipt and return of

2 - p. 3 of 14

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the funds because its Mid-Year Report is not due until July.

In its referral to this Office, the Commission's Reports Analysis Division disclosed the following background information pertaining to ALASC. ALASC originally registered on January 31, 1983, as the DeConcini for America Search Committee. The name was changed to ALASC in an amended Statement of Organization received on April 18, 1983. Senator DeConcini, in response to a Disavowal Notice regarding activity reported on the 1983 Mid-Year Report of the Dennis DeConcini Re-election Committee (his 1982 principal campaign committee), stated in a letter received on February 6, 1984, that he was not a candidate for federal office and that ALASC had been "established to funnel...contributions and expenditures" to select a potential (and unknown) candidate to run for federal office in 1986 or 1988.

A letter accompanying the 1986 Year End Report stated that
ALASC

was initially organized to accept political contributions originally intended for the Dennis DeConcini Re-election Committee subsequent to the General Election 1982. Contributors were notified and 'The Committee' functioned as though it were a Principal Campaign Committee for the purposes of the disclosure and contribution limit provisions of the Act.

The treasurer went on to say that the remaining funds were transferred to DeConcini '88 and all contributions to ALASC were to be treated as contributions for the 1988 primary.

2 - p. 4 of 14

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ALASC qualified as a multicandidate committee on April 10, 1984. The issue arises whether, in light of the relationship between ALASC, a multicandidate committee, and DeConcini '88, a principal campaign committee, the committees can make unlimited transfers to each other, pursuant to 11 C.F.R. § 102.6(a). In the past, when examining the relationship between a candidate's principal campaign committee ("PCC") and a multicandidate committee with which the candidate has a special relationship, the Commission has found that the contribution limits of 2 U.S.C. § 441a apply to transactions between such committees.

The Commission first faced the issue in MUR 950 (Reagan for President and Citizens for the Republic). In that MUR, the Commission found probable cause to believe that the Reagan for President Committee, a PCC, accepted excessive in-kind contributions from a multicandidate committee with which the candidate had an active relationship. At the reason to believe stage of its proceedings, the General Counsel's Report presented the Commission with alternative theories of violations. One theory was that the multicandidate committee and the PCC were affiliated and, thus, could make transfers (in that case, in-kind) to one another without limitation. The Commission rejected this approach, and instead imposed the contribution limitations contained in 2 U.S.C. § 441a(a) to the transactions between the committees.

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The Commission made a similar determination in MUR 1741 (Mondale for President and Committee for the Future of America). In discussing the relationship between a PCC and a multicandidate committee with which the candidate had a special relationship, the General Counsel's Report to the Commission expressly relied upon the analysis used in MUR 950. It analyzed the relationship between the two committees and recommended that the Commission find reason to believe that excessive in-kind contributions had flowed from one committee to the other. The Commission approved the General Counsel's recommendations concerning the excessive contributions.

In MUR 1870 (Congressman Waxman Campaign Committee and the 24th Congressional District of California PAC), the Commission rejected the theory contained in the General Counsel's Report that the candidate's PCC was affiliated with a multicandidate committee with which the candidate had a special relationship. Although the Commission did not state that a PCC and a multicandidate committee could never be affiliated, the Commission indicated that the more proper analysis was the contribution analysis of MUR 950.^{1/} Upon determining that the

^{1/} In an advisory opinion issued to Congressman Waxman prior to his involvement with the multicandidate committee, the Commission indicated that his involvement would not alter the usual limits on contributions to and by the multicandidate committee, assuming the committee was not affiliated with the candidate's PCC. This opinion, therefore, implies that affiliation between a multicandidate committee and a PCC might be possible.

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multicandidate committee had not performed any services for the PCC, the Commission found no reason to believe that the committees violated 2 U.S.C. §§ 441a(a) and 441a(f) and closed the file.

Despite the letter stating, after the fact, that ALASC was originally formed to function as a principal campaign committee with respect to the 1982 election and despite the statement that all contributions to ALASC were to be treated as contributions for the 1988 primary, it appears that, for most of ALASC's existence, it has functioned as a committee supporting more than one federal candidate. Its Statements of Organization since its founding on January 31, 1983, have indicated as such and it has made contributions to a number of federal candidates; none of these were to Senator DeConcini.

Section 441a(a)(2)(A) of Title 2 states that no multicandidate committee shall make contributions to any candidate and his authorized political committees in excess of \$5,000 with respect to any federal election. In this matter, ALASC has contributed \$54,089.07, \$49,089.07 in excess of the limit, to Senator DeConcini's principal campaign committee for 1988. Based on the foregoing analysis, the Office of the General Counsel recommends that the Commission find reason to believe that ALASC violated 2 U.S.C. § 441a(a)(2)(A).

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97040622556



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Thomas F. Karlson, Treasurer
DeConcini '88 Committee
1436 North 44th Street
Phoenix, Arizona 85008

RE: MUR
DeConcini '88 Committee
Thomas F. Karlson, as
treasurer

Dear Mr. Karlson:

On , 1986, the Federal Election Commission determined that there is reason to believe that the DeConcini '88 Committee and you, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within fifteen days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

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 the 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 the 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.

2 - p. 8 of 14

87040622557

Letter to Thomas F. Karlsen, Treasurer
Page 2

Further, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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

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.

The investigation now being conducted will be 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 investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jonathan Levin, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Joan D. Aikens
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

2 - p. 9 of 14

87040522558

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. _____

STAFF MEMBER(S) & TEL. NO.
Jonathan Levin (202) 376-5690

RESPONDENT: DeConcini '88 Committee
Thomas F. Karlsen, as treasurer

SUMMARY OF ALLEGATIONS

This matter involves the receipt by the DeConcini '88 Committee ("DeConcini '88") of an apparent contribution of \$54,089.07 from the Arizona Leadership for America Search Committee ("ALASC").

FACTUAL BASIS AND LEGAL ANALYSIS

The 1985 Year End Report filed by ALASC disclosed a "transfer" of \$54,089.07 on December 15, 1985, to DeConcini '88. The Year End Report of DeConcini '88 disclosed receipt of this "transfer" on that date.

ALASC considered its Year End Report to be a termination report because it had paid all of its debts and expended all of its funds. In a letter sent on February 14, 1986, Thomas F. Karlsen, the treasurer of both ALASC and DeConcini '88, stated that ALASC's counsel had advised him to return the \$54,089.07 and that the return was made. ALASC's 1986 April Quarterly disclosed the receipt of a return of \$54,089.07 on February 4, 1986. DeConcini '88 has not reported the receipt and return of

2 - p. 10 of 14

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the funds because its Mid-Year Report is not due until July.

In its referral to this Office, the Commission's Reports Analysis Division disclosed the following background information pertaining to ALASC. ALASC originally registered on January 31, 1983, as the DeConcini for America Search Committee. The name was changed to ALASC in an amended Statement of Organization received on April 18, 1983. Senator DeConcini, in response to a Disavowal Notice regarding activity reported on the 1983 Mid-Year Report of the Dennis DeConcini Re-election Committee (his 1982 principal campaign committee), stated in a letter received on February 6, 1984, that he was not a candidate for federal office and that ALASC had been "established to funnel...contributions and expenditures" to select a potential (and unknown) candidate to run for federal office in 1986 or 1988.

A letter accompanying the 1986 Year End Report stated that ALASC

was initially organized to accept political contributions originally intended for the Dennis DeConcini Re-election Committee subsequent to the General Election 1982. Contributors were notified and 'The Committee' functioned as though it were a Principal Campaign Committee for the purposes of the disclosure and contribution limit provisions of the Act.

The treasurer went on to say that the remaining funds were transferred to DeConcini '88 and all contributions to ALASC were to be treated as contributions for the 1988 primary.

2 - p. 11 of 14

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ALASC qualified as a multicandidate committee on April 10, 1984. The issue arises whether, in light of the relationship between ALASC, a multicandidate committee, and DeConcini '88, a principal campaign committee, the committees can make unlimited transfers to each other, pursuant to 11 C.F.R. § 102.6(a).

In the past, when examining the relationship between a candidate's principal campaign committee ("PCC") and a multicandidate committee with which the candidate has a special relationship, the Commission has found the contribution limits of 2 U.S.C. § 441a apply to transactions between such committees.

The Commission first faced the issue in MUR 950 (Reagan for President and Citizens for the Republic). In that MUR, the Commission found probable cause to believe that the Reagan for President Committee, a PCC, accepted excessive in-kind contributions from a multicandidate committee with which the candidate had an active relationship. At the reason to believe stage of its proceedings, the General Counsel's Report presented the Commission with alternative theories of violations. One theory was that the multicandidate committee and the PCC were affiliated and, thus, could make transfers (in that case, in-kind) to one another without limitation. The Commission rejected this approach, and instead imposed the contribution limitations contained in 2 U.S.C. § 441a(a) to the transactions between the committees.

The Commission made a similar determination in MUR 1741 (Mondale for President and Committee for the Future of America).

2 - p. 12 of 14

87040522561

In discussing the relationship between a PCC and a multicandidate committee with which the candidate had a special relationship, the General Counsel's Report to the Commission expressly relied upon the analysis used in MUR 950. It analyzed the relationship between the two committees and recommended that the Commission find reason to believe that excessive in-kind contributions had flowed from one committee to the other. The Commission approved the General Counsel's recommendations concerning the excessive contributions.

87040522562
In MUR 1870 (Congressman Waxman Campaign Committee and the 24th Congressional District of California PAC), the Commission rejected the theory contained in the General Counsel's Report that the candidate's PCC was affiliated with a multicandidate committee with which the candidate had a special relationship. Although the Commission did not state that a PCC and a multicandidate committee could never be affiliated, the Commission indicated that the more proper analysis was the contribution analysis of MUR 950.^{1/} Upon determining that the multicandidate committee had not performed any services for the PCC, the Commission found no reason to believe that the committees violated 2 U.S.C. §§ 441a(a) and 441a(f) and closed the file.

^{1/} In an advisory opinion issued to Congressman Waxman prior to his involvement with the multicandidate committee, the Commission indicated that his involvement would not alter the usual limits on contributions to and by the multicandidate committee, assuming the committee was not affiliated with the candidate's PCC. This opinion, therefore, implies that affiliation between a multicandidate committee and a PCC might be possible.

Despite the letter stating, after the fact, that ALASC was originally formed to function as a principal campaign committee with respect to the 1982 election and despite the statement that all contributions to ALASC were to be treated as contributions for the 1988 primary, it appears that, for most of ALASC's existence, it has functioned as a committee supporting more than one federal candidate. Its Statements of Organization since its founding on January 31, 1983, have indicated as such and it has made contributions to a number of federal candidates; none of these were to Senator DeConcini.

Section 441a(a)(2)(A) of Title 2 states that no multicandidate committee shall make contributions to any candidate and his authorized political committees in excess of \$5,000 with respect to any federal election. Section 441a(f) of Title 2 prohibits the knowing acceptance of contributions in excess of the limits of 2 U.S.C. § 441a. In this matter, DeConcini '88 has accepted a \$54,089.07 contribution from ALASC, \$49,089.07 in excess of the limit. Based on the foregoing analysis, the Office of the General Counsel recommends that the Commission find reason to believe that DeConcini '88 violated 2 U.S.C. § 441a(f).



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *red*
DATE: June 30, 1986
SUBJECT: RAD Referral 86L-3a/86L-3b- First G.C.'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) []

87040522564



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

22 April 1986

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: REFERRAL OF THE ARIZONA LEADERSHIP FOR AMERICA
SEARCH COMMITTEE

This is a referral of the Arizona Leadership for America Search Committee. This Committee has made a \$49,089.07 apparent excessive contribution to the DeConcini '88 Committee, which has subsequently been refunded.

For your information, the Arizona Leadership for America Search Committee originally registered with the Commission in January 1983 as the DeConcini for America Search Committee. An amended Statement of Organization was received in April 1983 (in response to a Request for Additional Information), changing its name to the Arizona Leadership for America Search Committee. Senator DeConcini, in response to a Disavowal Notice regarding activity reported on the 1983 Mid-Year Report of the Dennis DeConcini Re-election Committee (his 1982 principal campaign committee), stated in a letter received on February 6, 1984 that he was not a candidate for Federal office. Having clarified his relationship regarding the Dennis DeConcini Re-election Committee, he further noted that the Arizona Leadership for America Search Committee had been "established to funnel... contributions and expenditures" to select a potential (and unknown) candidate to run for Federal office in 1986 or 1988. The Dennis DeConcini Re-election Committee terminated on its 1983 Year End Report.

A companion referral for the DeConcini '88 Committee is also being submitted to your office (see RAD Referral 86L-26h).
86L-96

If you have any questions regarding this matter, please contact Chris Nuland at 376-2480.

Attachment

R 7 0 4 0 5 2 2 5 6 5

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 22 April 1986

ANALYST: Christopher L. Nuland

I. COMMITTEE: Arizona Leadership for America Search
Committee (C00165407)
Thomas F. Karlsen, Treasurer
1436 North 44th Street
Phoenix, AZ 85008

II. RELEVANT STATUTE: 2 U.S.C. §441a(a)(2)(A)
11 CFR 110.2(a)(1)

III. BACKGROUND:

Excessive Contribution Made to a Federal Candidate

The 1985 Year End Termination Report of the Arizona Leadership for America Search Committee ("the Committee") disclosed a \$54,089.07 "transfer" to the DeConcini '88 Committee on December 15, 1985 (Attachment 2). This resulted in an apparent \$49,089.07 excessive contribution made to the DeConcini '88 Committee. A letter accompanying the Termination Report explained that the Committee "was initially organized to accept political contributions originally intended for the Dennis DeConcini Re-election Committee...subsequent to the General Election 1982" and that the Committee "functioned as though it were a Principal Campaign Committee." The letter further indicated that all contributions to the Committee would be treated as contributions toward Senator DeConcini's 1988 primary election (Attachment 3).

A Request for Additional Information ("RFAI") was sent to the Committee on February 19, 1986 which advised that a multicandidate committee is prohibited from making a contribution to a federal candidate in excess of \$5,000 per election. The Committee was asked to notify the DeConcini '88 Committee and request a refund of the amount in excess of \$5,000 (Attachment 4).

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ARIZONA LEADERSHIP FOR AMERICA
SEARCH COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

The Committee submitted a response on March 4, 1986 which stated that the DeConcini '88 Committee had returned the full amount of the transfer. The Committee also enclosed a letter dated February 14, 1986, addressed to the Commission, which indicated that the Committee's counsel "suggested that the transfer of funds...may have been inappropriate." Upon advise of counsel, the transfer was returned to the Committee^{1/} (Attachment 5). The Committee's 1986 April Quarterly Report disclosed the refund as being received on February 4, 1986 (Attachment 6).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

^{1/} The Commission has no record of having received the February 14, 1986 letter as a separate communication.

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
ARIZONA LEADERSHIP FOR AMERICA SEARCH COMMITTEE (FORMERLY DECONCINI FOR AMERICA SEARCH)	CONNECTED ORGANIZATION: BLANK			NON-PARTY QUALIFIED	ID #C00165407	
1983	REQUEST FOR ADDITIONAL INFORMATION					1 83FEC/268/5380
	STATEMENT OF ORGANIZATION			31JAN83	4	83FEC/265/4959
	STATEMENT OF ORGANIZATION - AMENDMENT			18APR83	2	83FEC/270/4883
	STATEMENT OF ORGANIZATION - AMENDMENT			3MAY83	4	83FEC/271/2516
	REQUEST FOR ADDITIONAL INFORMATION 2ND				2	83FEC/270/4974
	APRIL QUARTERLY	28,722	0	1JAN83 - 31MAR83	21	83FEC/270/4984
	JULY QUARTERLY	11,162	-	1APR83 - 30JUN83	9	83FEC/282/0895
	OCTOBER QUARTERLY	7,210	-	1JUL83 - 30SEP83	8	83FEC/286/1705
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL83 - 30SEP83	3	84FEC/313/4125
	1ST LETTER INFORMATIONAL NOTICE	-	-	1JUL83 - 30SEP83	1	84FEC/306/4913
	YEAR-END	26,185	12,279	1OCT83 - 31DEC83	19	84FEC/297/4450
	YEAR-END - AMENDMENT	-	-	1OCT83 - 31DEC83	6	84FEC/313/4128
	REQUEST FOR ADDITIONAL INFORMATION			1OCT83 - 31DEC83	3	84FEC/306/3111
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT83 - 31DEC83	4	84FEC/311/2790
1984	MISCELLANEOUS REPORT			2APR84 FROM FEC	1	84FEC/306/4911
	MISCELLANEOUS NOTICE FROM FEC			16MAY84	1	84FEC/314/2303
	APRIL QUARTERLY	20,161	10,116	1JAN84 - 31MAR84	16	84FEC/311/3223
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN84 - 31MAR84	4	84FEC/325/1545
	REQUEST FOR ADDITIONAL INFORMATION			1JAN84 - 31MAR84	2	84FEC/318/3191
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN84 - 31MAR84	3	84FEC/324/2766
	JULY QUARTERLY	9,254	14,715	1APR84 - 30JUN84	12	84FEC/322/0026
	JULY QUARTERLY - AMENDMENT	-	-	1APR84 - 30JUN84	6	84FEC/328/2975
	1ST LETTER INFORMATIONAL NOTICE	-	-	1APR84 - 30JUN84	3	84FEC/327/4230
	OCTOBER QUARTERLY	4,601	20,579	1JUL84 - 30SEP84	14	84FEC/341/1358
	OCTOBER QUARTERLY - AMENDMENT	4,601	20,579	1JUL84 - 30SEP84	16	84FEC/349/2930
	REQUEST FOR ADDITIONAL INFORMATION			1JUL84 - 30SEP84	1	84FEC/347/4804
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL84 - 30SEP84	2	84FEC/349/2233
	POST-GENERAL	3,694	11,299	1OCT84 - 26NOV84	11	85FEC/359/4559
	NOTICE OF FAILURE TO FILE			1OCT84 - 26NOV84	1	84FEC/357/4912
	YEAR-END	1,118	2,650	27NOV84 - 31DEC84	6	85FEC/365/0629
	TOTAL	112,102	0 71,630	0	186	TOTAL PAGES

All reports listed above have been reviewed.

Ending cash-on-hand as of 12/31/84: \$84,086.74

Outstanding debts and obligations as of 12/31/84: \$0

8 7 0 4 0 5 2 2 5 6 9

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-86)

DATE 22APR86
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
ARIZONA LEADERSHIP FOR AMERICA SEARCH COMMITTEE (FORMERLY DECONCINI FOR AMERICA SEARCH)				NON-PARTY QUALIFIED		ID #C00165407
CONNECTED ORGANIZATION: BLANK						
1985	APRIL QUARTERLY	1,841	16,089	1JAN85 -31MAR85	8	85FEC/370/3295
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN85 -31MAR85	1	86FEC/396/2656
	REQUEST FOR ADDITIONAL INFORMATION	6,329	21,508	1JAN85 -31MAR85	2	85FEC/392/2287
	JULY QUARTERLY	-	-	1APR85 -30JUN85	22	85FEC/378/2509
	JULY QUARTERLY - AMENDMENT	-	-	1APR85 -30JUN85	6	86FEC/396/0531
	REQUEST FOR ADDITIONAL INFORMATION	1,197	668	1APR85 -30JUN85	2	85FEC/392/2284
	OCTOBER QUARTERLY	567	54,756	1JUL85 -30SEP85	6	85FEC/389/3605
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1OCT85 -31DEC85	3	86FEC/402/4754
	TERMINATION REPORT	-	-	1OCT85 -31DEC85	7	86FEC/399/3342
	TERMINATION REPORT - AMENDMENT	54,507	4,233	1OCT85 -31DEC85	8	86FEC/404/1292
1986	APRIL QUARTERLY			1JAN86 -31MAR86	10	86FEC/408/4753
	1'ST LETTER INFORMATIONAL NOTICE			1JAN86 -31MAR86	1	86FEC/410/3482
TOTAL		64,441	97,254	0	76	TOTAL PAGES

All reports listed above have been reviewed.

Ending cash-on-hand as of 3/31/86: \$50,274.18

Outstanding debts and obligations owed as of 3/31/86: \$0

1985 Year End Termination Report

ATTACHMENT 2

CAMPAIGN FINANCE SYSTEM

Run Date: 01-21-1986

Standard Statements

Page 1 of 1

(111) AZ. LEADERSHIP FOR AM. CON

Chk/Lines 20

Any information copied from such Reports and 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 ADDRESS/PURPOSE OF DISBURSEMENT/DATE OF DISB. AMOUNT/ELECTION

For the period 12-01-85 thru 12-31-85

TYPE: C

DECONCINI *80 COMMITTEE

111-C067-C

12-15-85

54,009.07

Primary

1436 N. 44TH STREET

PHOENIX, AZ. 85008

TRANSFER-SEE LETTER ATTACHED

Year to date: 554,709.07

Page Total

554,709.07

Report Total

554,709.07

1 vendors printed

87040622570

January 22, 1986

Federal Election Commission
1325 K Street North West
Washington, DC 20463

Re: Arizona Leadership for America Search Committee
FEC #C00165407
January 31, 1985 Year-End Report
Termination Report

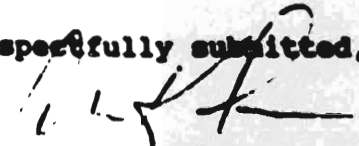
4 Gentlemen:

4 The attached January 31, 1985 is the final report for the Arizona
4 Leadership for America Search Committee ('The Committee'). 'The Committee'
3 was initially organized to accept political contributions originally
3 intended for the Dennis DeCencini Re-election Committee (FEC #C00103715,
2 Terminated 1983) subsequent to the General Election 1982. Contributors
2 were notified and 'The Committee' functioned as though it were a Principal
1 Campaign Committee for the purposes of the disclosure and contribution
1 limit provisions of the Act.

1 'The Committee' will no longer receive any contributions or make any
1 disbursements and has no outstanding debts or obligations. Remaining
1 funds were transferred to the DeCencini '88 Committee (FEC #C00195990).
1 All contributions to 'The Committee' will be treated as contributions
1 toward the Primary Election 1988 for contribution limitations of the Act.

1 We respectfully request termination status for 'The Committee' effective
1 December 31, 1985.

Respectfully submitted,


Thomas F. Karlson
Treasurer
Arizona Leadership for America Search Committee



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

NOV 19 1986

**Thomas F. Karlsen, Treasurer
Arizona Leadership for America
Search Committee
1436 North 44th Street
Phoenix, AZ 85008**

Identification Number: C00165407

Reference: Year End Termination Report (10/1/85-12/31/85)

Dear Mr. Karlsen:

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 B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Act precludes a multicandidate committee from making a contribution to a candidate for Federal office in excess of \$5,000 per election. (2 U.S.C. §441a(a)) If you have made an excessive contribution, the Commission recommends that you notify the recipient and request a refund of the amount in excess of \$5,000. Please inform the Commission immediately in writing and provide a photocopy of your refund request sent to the recipient. In addition, any refund should appear on a supporting Schedule A for Line 16 of your next report.

If the contribution(s) in question was incorrectly reported and/or you have additional information, you may wish to submit documentation for the public record.

Although the Commission may take further legal steps concerning the excessive contribution(s), your prompt action in obtaining a refund of the excessive amount will be taken into consideration.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need

87040522572

assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,



Christopher L. Nuland
Reports Analyst
Reports Analysis Division

87040322573

KARLSON & CHRISTENSEN, P.C.

CERTIFIED PUBLIC ACCOUNTANTS

1400 NORTH 40TH STREET

PHOENIX, ARIZONA 85018

(602) 251-0070

RECEIVED AT THE FEC

FEB 14 1986

ATTACHMENT 5

Page 1 of 2

THOMAS F. KARLSON, C.P.A.
DON W. CHRISTENSEN, C.P.A.

RECEIVED OFFICE
OF THE FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543
FEB 14 1986

February 26, 1986

Mr. Christopher L. Noland
Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, DC 20463

Re: Arizona Leadership for America Search Committee
FEC # C00163407
Year-End Termination Report (10/1-12/31/85)
Your Letter Dated February 19, 1986

Dear Mr. Noland:

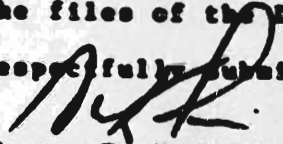
On February 14, 1986 I corresponded with the Federal Election Commission regarding the transfer of funds to the DeConcini '88 Committee (copy enclosed).

Subsequent to that date (February 14, 1986) the DeConcini '88 Committee has returned the transfer (\$54,089.87) back to the Arizona Leadership for America Search Committee. I'm on the Treasurer for both Committees and therefore, executed the transfer myself.

The Arizona Leadership for America Search Committee will remain active and report the above transfer on its March 31, 1986 report. The DeConcini '88 Committee will reflect said transfer on its Mid-Year report for June 30, 1986.

Please accept this letter as an additional amendment to the Year-End report of Arizona Leadership for America Search Committee and the DeConcini '88 Committee. An additional copy is enclosed for the files of the DeConcini '88 Committee.

Respectfully Submitted,


Thomas F. Karlson
enc.

86034041292

KARLSEN & CHRISTENSEN, P.C.

CERTIFIED PUBLIC ACCOUNTANTS

1436 NORTH 46TH STREET
PHOENIX, ARIZONA 85006

(602) 231-9175

THOMAS F. KARLSEN, C.P.A.
DON M. CHRISTENSEN, C.P.A.SEARCH OFFICE
5100 S. UNIVERSITY DRIVE
TUCSON, AZ 85706
(602) 262-1100

February 14, 1986

Federal Election Commission
1325 K Street NW
Washington, DC 20463Re: Arizona Leadership for America Search Committee (FEC #C00165407)
Year End Report-December 31, 1985

Gentlemen:

On January 22, 1986 the above Committee filed its year-end report due January 31, 1986. Said report requested termination status for the Committee as all debts had been paid and all funds expended.

Subsequent to filing of the report the Committee's counsel reviewed the report and suggested that the transfer of funds from the Committee in 1985 to the DeConcini '88 Committee (FEC #C00195990) may have been inappropriate. In accordance with counsel's advice the DeConcini '88 Committee has returned the transfer of funds in the amount of \$54,089.07 back to the Arizona Leadership for America Search Committee.

We hereby request the Federal Election Commission not grant termination status to the Arizona Leadership for America Search Committee and that quarterly reports will subsequently be filed beginning with the March 31, 1986 filing period. Said report will reflect the return of the transfer of funds (with sufficient explanation) and the DeConcini '88 Committee with reflect the disbursement of said funds to the Arizona Leadership for America Search Committee (also with sufficient explanation).

Please accept this letter as an amendment to the year end reports of Arizona Leadership for America Search Committee (FEC #C00165407) and the DeConcini '88 Committee (FEC #C00195990). Two copies are enclosed of this letter for both Committee's files.

Respectfully submitted

Thomas F. Karlson, Treasurer
Arizona Leadership for America Search Committee
DeConcini '88 Committee

1986 April Quarterly Report

ATTACHMENT 6

CAMPAIGN FINANCE SYSTEM

Run Date: 04-08-1986

Itemized Receipts

Page 1 of 1

Line 8 11c-OTHER POLITICAL COMMITTEES

(111) AZ. LEADERSHIP FOR AM. CON.

Any information copied from such Reports and 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-ADDRESS/DATE OF EACH RECEIPT-AMOUNT OF RECEIPT/IMMEDIATE YEAR TO DATE
For the period 01-01-86 thru 03-31-86

All Occupations

TYPE: C

DECONCINI '86 COMMITTEE

ONE LETTERS ATTACHED

02-04-86 54,009.07 Primary

1436 N. 44TH STREET

PHOENIX AZ

111-0001-C

OTHER POLITICAL CON.

Year to date: 554,009.07

Page Total 554,009.07

Report Total 554,009.07

1 Contributors printed

07040522576
33231001753



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

22 April 1986

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: REFERRAL OF DECONCINI '88 COMMITTEE

This is a referral of the DeConcini '88 Committee. This Committee has accepted and refunded an apparent excessive contribution from a multicandidate political committee, the Arizona Leadership for America Search Committee.

For your information, the Arizona Leadership for America Search Committee originally registered with the Commission in January 1983 as the DeConcini for America Search Committee. An amended Statement of Organization was received in April 1983 (in response to a Request for Additional Information), changing its name to the Arizona Leadership for America Search Committee. Senator DeConcini, in response to a Disavowal Notice sent to him regarding activity reported on the 1983 Mid-Year Report of the Dennis DeConcini Re-election Committee (his 1982 principal campaign committee), stated in a letter received on February 6, 1984 that he was not a candidate for Federal office. Having clarified his relationship regarding the Dennis DeConcini Re-election Committee, he further noted that the Arizona Leadership for America Search Committee had been "established to funnel... contributions and expenditures" to select a potential (and unknown) candidate to run for Federal office in 1986 or 1988. The Dennis DeConcini Re-election Committee terminated on its 1983 Year End Report.

A companion referral for the Arizona Leadership for America Search Committee is also being submitted to your office (see RAD Referral 86L-26a).

86L-3a

If you have any questions regarding this matter, please contact Pat Sheppard at 376-2480.

Attachment

87040522577

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 22 April 1985

ANALYST: Pat Sheppard

I. COMMITTEE: DeConcini '88 Committee
(C00195990)
Thomas Karlsen, Treasurer
1436 North 44th Street
Phoenix, AZ 85008

II. RELEVANT STATUTE: 2 U.S.C. §441a(f)

III. BACKGROUND:

Receipt of Excessive Contribution

The 1985 Year End Report of the DeConcini '88 Committee ("the Committee") disclosed the receipt of a contribution totalling \$54,089.07 designated for the primary election from the Arizona Leadership for America Search Committee (a multicandidate political committee) on December 15, 1985 (Attachment 2). This resulted in an apparent excessive contribution totalling \$49,089.07.

A Request for Additional Information ("RFAI") citing the excessive amount was sent to the Committee on March 4, 1986 (Attachment 3). The RFAI advised the Committee that the Act precluded a candidate for Federal office from receiving contributions from a multicandidate committee in excess of \$5,000 per election. The Committee was asked to refund the amount in excess of \$5,000. The Committee responded on March 18, 1986 stating that it had refunded the entire contribution to the Arizona Leadership for America Search Committee; however, it did not disclose the date of the refund or a copy of the refund check (Attachment 4). The response also included copies of letters from the Arizona Leadership for America Search Committee to the Commission stating a refund had been received. The Arizona Leadership for America Search Committee's 1986 April Quarterly Report disclosed the receipt of a \$54,089.07 refund from the Committee on February 4, 1986 (Attachment 5).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

87040622578

357

1982

FEDERAL ELECTION COMMISSION

DATE 27MAR86

1985-1986

CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

PAGE 1

CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/	PARTY	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES TYPE OF FILER	MICROFILM LOCATION
			PRIMARY	GENERAL	PRIMARY	GENERAL			
DECONCINI, DENNIS	SENATE	DEMOCRATIC PARTY			ARIZONA		1988 ELECTION	ID# 86AZ00027	
1. STATEMENT OF CANDIDATE							26JUN85	2 85SEN/004/2914	
1985 STATEMENT OF CANDIDATE									
2. CANDIDATE REPORTS OF RECEIPTS & EXPENDITURES									
3. PRINCIPAL CAMPAIGN COMMITTEE									
DECONCINI '88 COMMITTEE							ID# C00195990 SENATE		
1985 STATEMENT OF ORGANIZATION							17JUN85	3 85SEN/004/2220	
MID-YEAR REPORT			1,000		0		21JUN85 - 30JUN85	5 85SEN/004/3128	
1 ST LETTER INFORMATIONAL NOTICE							1JAN85 - 30JUN85	1 85FEC/389/0578	
YEAR-END			194,524		26,360		1JUL85 - 31DEC85	42 86SEN/001/3618	
YEAR-END - AMENDMENT			-		-		1JUL85 - 31DEC85	7 86SEN/006/3406	
REQUEST FOR ADDITIONAL INFORMATION							1JUL85 - 31DEC85	3 86FEC/404/1048	
TOTAL			195,524	0	26,360	0		61 TOTAL PAGES	
4. AUTHORIZED COMMITTEES									
4B. TRANSFERS IN FROM JOINT FUNDRAISING COMMITTEES									

All report have been reviewed
 Cash on hand as of 12/31/85 - \$169,163
 Debts as of 12/31/85 - \$4,280

8 7 0 4 0 4 2 2 5 7 9

1985 YEAR END REPORT

ATTACHMENT # 2
Page 1 of 2

CANDIDATE FINANCE SYSTEM

Run Dates: 01-27-1986

Itemized Receipts

Page 1 of 1

Run/Line # 110, SUMMARY PAGE

(300) DISBURSEMENT COMMITTEE

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

DATE-RECEIVED/TO CONTRIBUTIONS/DATE OF RECEIPT-AMOUNT/ELECTION

For the period 07-01-85 thru 12-31-85

POL. ACTION COM.

Over \$200 YTD

TYPE: P

ALMA PAC

ASSOC. THIAL LAWYERS

11-14-85 1,000.00 Primary

1000 3RD STREET, SE.

WASHINGTON DC 20007-

202-6824-9

POL. ACTION COM.

Year to date: \$1,000.00

ARIZONA LEADER. AMERICA

SEARCH COM

SEE LETTER ATTACHED

12-15-85 24,000.07 Primary

1426 NORTH 44TH STREET

PHOENIX

AZ 85018-

202-6824-9

POL. ACTION COM.

Year to date: \$24,000.07

P89

AUTO DEALERS & DRIVERS

FREE TRADE PAC

11-05-85 1,000.00 Primary

100-12 BULLDOGE AVENUE

ARIZONA

85 11435-

202-6824-9

POL. ACTION COM.

Year to date: \$2,000.00

SOUTHWEST LETTER COPY COM

ATT: MR. BO WEND

09-10-85 1,000.00 Primary

6025 S. 24TH ST

PHOENIX

AZ 85014-

202-6824-9

POL. ACTION COM.

Year to date: \$1,000.00

Page Total 257,000.07

Report Total 257,000.07

4 Contributors printed

87040230593

January 22, 1986

Federal Election Commission
1325 K Street North West
Washington, DC 20463

Re: Arizona Leadership for America Search Committee
FEC #C00165407
January 31, 1985 Year-End Report
Termination Report

Gentlemen:

The attached January 31, 1985 is the final report for the Arizona Leadership for America Search Committee ('The Committee'). 'The Committee' was initially organized to accept political contributions originally intended for the Dennis DeConcini Re-election Committee (FEC #C00102715, Terminated 1983) subsequent to the General Election 1982. Contributors were notified and 'The Committee' functioned as though it were a Principal Campaign Committee for the purposes of the disclosure and contribution limit provisions of the Act.

'The Committee' will no longer receive any contributions or make any disbursements and has no outstanding debts or obligations. Remaining funds were transferred to the DeConcini '88 Committee (FEC #C00198990). All contributions to 'The Committee' will be treated as contributions toward the Primary Election 1988 for contribution limitations of the Act.

We respectfully request termination status for 'The Committee' effective December 31, 1985.

Respectfully submitted,

Thomas F. Karlson
Treasurer
Arizona Leadership for America Search Committee



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

MAR 4 1986

Thomas Karlsen, Treasurer
DeConcini '88 Committee
1436 North 44th Street
Phoenix, AZ 85008

Identification Number: C00195990

Reference: Year End Report (7/1/85-12/31/85)

Dear Mr. Karlsen:

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. A multicandidate committee may not make a contribution to a candidate for Federal office in excess of \$5,000 per election. If you have received an excessive contribution, the Commission recommends that you refund to the donor the amount in excess of \$5,000 per election. The Commission should be notified in writing if a refund is necessary. In addition, any refund should appear on Line 20(c) of the Detailed Summary Page and Schedule B of your next report. (2 U.S.C. §441a(a) and (f))

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 legal steps concerning the acceptance of excessive contributions, prompt action by you to refund the excessive amounts will be taken into consideration.

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,

87040622592

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

87040322583

RECEIVED
SECRETARY OF THE SENATE
MAR 20 PM 2:44
HAND DELIVERED

WILSON & CHRISTENSEN, P.C.
CERTIFIED PUBLIC ACCOUNTANTS
1436 NORTH 46TH STREET
PHOENIX, ARIZONA 85008
(602) 231-0275

6 MAR 18 P2:30
ATTACHMENT # 4
Page 1 of 3

THOMAS F. KARLSON, C.P.A.
DON M. CHRISTENSEN, C.P.A.

SEARCH OFFICE
9150 E. UNIVERSITY DRIVE
TAMPA, FL 33621
(813) 880-3151

March 16, 1986

Federal Election Commission
Reports Analysis Division
Washington, DC 20463

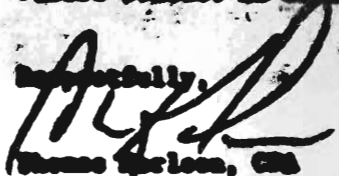
Att: Pat Sheppard
Re: DeCensini '86 Committee Year-end Report (7/1/85-12/31/85)

Gentlemen:

Please find enclosed various correspondence with the Commission regarding the Arizona Leadership for America Search Committee and your letter of March 4, 1986 copy enclosed.

I am the Treasurer for both committees and have effected a return of the transfer in question. Said transfer will be reflected on the next report (Mid-Year 6/30/86) of the National '86 Committee.

Please contact us directly should additional information be required.

Respectfully,

Thomas Karlson, CPA
Treasurer
DeCensini '86 Committee

END.

8704086020003706

K. ROSEN & CHRISTENSEN, P.C.
SECURITY FUND ADVISORS
1331 NORTH 40TH STREET
PHOENIX, ARIZONA 85006
(602) 251-0370

HAND DELIVERED
STAMPED

ATTACHMENT # 4
Page 2 of 3

THOMAS F. ROSEN, C.P.A.
DON E. CHRISTENSEN, C.P.A.

STANDARD OFFICE
1000 E. UNIVERSITY AVENUE
PHOENIX, AZ 85026
(602) 251-0370

February 14, 1986

Federal Election Commission
1325 E Street NW
Washington, DC 20463

Re: Arizona Leadership for America Search Committee (FEC #C00165407)
Year End Report-December 31, 1985

Gentlemen:

On January 30, 1986 the above Committee filed its year-end report due January 31, 1986. Said report requested termination status for the Committee as all debts had been paid and all funds expended.

Subsequent to filing of the report the Committee's counsel reviewed the report and suggested that the transfer of funds from the Committee in 1985 to the BiConcinal '88 Committee (FEC #C00185999) may have been inappropriate. In accordance with counsel's advice the BiConcinal '88 Committee has returned the transfer of funds in the amount of \$54,000.07 back to the Arizona Leadership for America Search Committee.

We hereby request the Federal Election Commission not grant termination status to the Arizona Leadership for America Search Committee and that quarterly reports will subsequently be filed beginning with the March 31, 1986 filing period. This report will reflect the return of the transfer of funds (with sufficient explanation) and the BiConcinal '88 Committee with respect to the disbursement of said funds to the Arizona Leadership for America Search Committee (also with sufficient explanation).

Please accept this letter as an amendment to the year end reports of Arizona Leadership for America Search Committee (FEC #C00165407) and the BiConcinal '88 Committee (FEC #C00185999). Two copies are enclosed of this letter for both Committee's files.

Respectfully submitted,

Thomas F. Rosen, President
Arizona Leadership for America Search Committee
Between '88 Committee

THOMAS F. KARLSON, C.P.A.
DAVID M. CHRISTENSEN, C.P.A.

SEARCH OFFICE
2100 S. UNIVERSITY DRIVE
TAMPA, FL 33601
(813) 940-5100

February 26, 1986

Mr. Christopher L. Noland
Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, DC 20463

Re: Arizona Leadership for America Search Committee
PEC # C00165407
Year-End Termination Report (10/1-12/31/85)
Your Letter Dated February 19, 1986

Dear Mr. Noland:

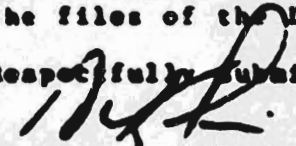
On February 14, 1986 I corresponded with the Federal Election Commission regarding the transfer of funds to the DeConcini '88 Committee (copy enclosed).

Subsequent to that date (February 14, 1986) the DeConcini '88 Committee has returned the transfer (\$54,089.07) back to the Arizona Leadership for America Search Committee. I'm on the Treasurer for both Committees and therefore, executed the transfer myself.

The Arizona Leadership for America Search Committee will remain active and report the above transfer on its March 31, 1986 report. The DeConcini '88 Committee will reflect said transfer on its Mid-Year report for June 30, 1986.

Please accept this letter as an additional amendment to the Year-End report of Arizona Leadership for America Search Committee and the DeConcini '88 Committee. An additional copy is enclosed for the files of the DeConcini '88 Committee.

Respectfully Submitted,


Thomas F. Karlson
enc.

1986 April Quarterly Report

ATTACHMENT 5

CAMPAIGN FINANCE SYSTEM

Run Date: 04-08-1986

Standard Receipts

Page 1 of 1

(111) AZ. LEADERSHIP FOR AM. CON.

Line 8 11c-OTHER POLITICAL COMMITTEES

Any information copied from such Reports and 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-ADDRESS/DATE OF EACH RECEIPT-AMOUNT OF RECEIPT/AGGREGATE YEAR TO DATE

For the period 01-01-86 thru 03-31-86

All Occupations

TYPE: C

DECONCINI '86 COMMITTEE

SEE LETTERS ATTACHED

02-04-86 \$4,009.07 Primary

1436 N. 44TH STREET

PHOENIX

AZ

111-0001-C

OTHER POLITICAL CON.

Year to date: \$24,009.07

Page Total \$24,009.07

1 Contributors printed

Report Total \$24,009.07

2387040322587



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 2198

Date Filmed 1/9/67 Camera No. --- 2

Cameraman A.S.

87040522588