



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2663

DATE FILMED 9/28/89 CAMERA NO. 3

CAMERAMAN AS

3 3 0 4 0 7 6 4 5 3 5

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 11 August 1987

ANALYST: Mike Tangney

I. COMMITTEE: Friends of Dronenburg PAC
(C00204461)
David Hawkins, Treasurer
1629 Columbia Street
San Diego, CA 92101

II. RELEVANT STATUTE: 2 U.S.C. §441a(a)(1)(A)
11 CFR 110.1(a)(1)
11 CFR 102.5(a)(1)(i) and (2)

III. BACKGROUND:

Excessive Contributions Made to Federal Candidate Committees and Financing Political Activity in Connection With a Federal Election From a Non-Federal Committee

The Friends of Dronenburg PAC ("the PAC") made two (2) excessive contributions to federal candidate committees totalling \$8,000 during calendar year 1986. In addition, the PAC received \$1,000 from Friends of Dronenburg Non-Federal Committee ("the Non-Federal Committee") and the Non-Federal Committee made contributions of \$1,000 each to two (2) federal candidate committees during calendar year 1986.

The 1986 Year End Report submitted by the PAC disclosed a contribution to a federal candidate committee of \$5,000 on October 1, 1986 (Attachment 2). This contribution was not designated; however, in accordance with 11 CFR 110.1(a)(2)(i) and (ii), the Reports Analysis Division has attributed the contribution to the primary election. On April 22, 1987, a Request for Additional Information ("RFAI") was sent to the PAC referencing the 1986 Year End Report (Attachment 3). The RFAI advised that the Act precludes a multicandidate committee from making a contribution to a federal candidate in excess of \$5,000 per election and recommended that the PAC contact the recipient and request a refund of the amount in excess of \$5,000.

FRIENDS OF DRONENBURG PAC
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

Cory M. Homnick, a representative of the PAC, telephoned the Reports Analysis Division ("RAD") analyst on April 29, 1987 to seek clarification concerning the RFAI sent on April 22, 1987. He was informed by the analyst that the RFAI should have stated that the Act precludes a political committee, other than a multicandidate committee, from making a contribution to a candidate for federal office in excess of \$1,000 per election, not \$5,000 per election (Attachment 4).

On May 4, 1987, an amendment to the 1986 Year End Report was received at the Commission which disclosed that a contribution of \$5,000, on October 10, 1986, which was originally reported as a contribution to a state candidate was actually a contribution to a federal candidate committee. In addition, the amendment disclosed that the Non-Federal Committee made two contributions of \$1,000 each on March 17, 1986 and December 31, 1986 to two (2) federal candidate committees (Attachment 5).

On May 20, 1987, an RFAI was sent to the PAC referencing the 1986 July Quarterly Report which requested that the PAC provide a Schedule A to support the entry of \$1,000 on Line 12 of the Detailed Summary Page (Attachment 6).

On May 27, 1987, RFAIs were sent to the PAC referencing the 1986 October Quarterly Report, the 1986 Year End Report and the amended 1986 Year End Report (Attachments 7 and 8).*/ The RFAIs informed the PAC that the Act precludes a political committee, other than a multicandidate committee, from making a contribution to a candidate for federal office in excess of \$1,000 per election. The RFAIs recommended that the PAC contact the recipients and request refunds of the amounts in excess of \$1,000.

The RFAI for the 1986 Year End and amended Year End Reports also informed the PAC that making contributions to a federal candidate committee from a non-federal committee is prohibited by 11 CFR 102.5(a)(1)(i). The RFAI requested that the full amount of the contribution be refunded by the PAC to the federal candidate committees or that the PAC transfer a sum equal to that which was contributed to the federal candidate committees to the Non-Federal Committee. In addition, the RFAI requested that the PAC provide a Schedule A to support the entry of \$5,000 reported on Line 16 of the Detailed Summary Page.

*/ The 1986 October Quarterly Report listed an additional \$5,000 contribution to the same state candidate which the PAC later disclosed as a federal candidate.

FRIENDS OF DRONENBURG PAC
REPORTS ANALYSIS OGC REFERRAL
PAGE 3

An amendment to the 1986 July Quarterly Report was received at the Commission on May 28, 1987 which revealed that the \$1,000 transfer reported by the PAC on Line 12 of the Detailed Summary Page was a transfer from the Non-Federal Committee received May 9, 1986 (Attachment 9).

On June 12, 1987, Mr. Alan Wiley, a PAC representative, called the RAD analyst to inquire as to whether the PAC is a multicandidate committee (Attachment 10). The analyst explained the criteria to become a multicandidate committee and stated that because the PAC had not contributed to five (5) federal candidates, it was not yet a multicandidate committee.

On June 17, 1987, an RFAI was sent to the PAC referencing the 1986 Amended July Quarterly Report (Attachment 11). The RFAI advised the PAC that if the transfer was from an account maintained for non-federal activity that such a transfer is prohibited by 11 CFR 102.5(a)(1)(i) and the full amount should be returned to the non-federal account.

On June 18, 1987, a Second Notice was sent to the PAC for failure to respond to the RFAs of May 27, 1987, which referenced the 1986 October Quarterly Report, the 1986 Year End Report and the amended 1986 Year End Report (Attachment 12).

On June 22, 1987, Mr. Wiley called the RAD analyst to discuss what action to take regarding the excessive contributions (Attachment 13). The analyst advised Mr. Wiley to send letters to the candidate committees requesting refunds of the excessive amounts and to send a copy of the letters to the Commission.

On June 29, 1987, the PAC submitted an amendment to the Commission for the 1986 July Quarterly Report, 1986 October Quarterly Report and 1986 Year End Report which disclosed that: 1) the PAC transferred \$2,000 to the Non-Federal Committee on June 22, 1987 for the contributions of \$1,000 each made to the two federal candidate committees; 2) the PAC transferred \$1,000 to the Non-Federal Committee on June 22, 1987, for the funds originally transferred to the PAC from the Non-Federal Committee; 3) the PAC received a contribution refund of \$4,000 on June 15, 1987 from one federal candidate committee and is expecting a refund from the remaining federal candidate committee; and 4) the PAC disclosed that the \$5,000 reported on Line 16 represented a voided check (Attachment 14).

FRIENDS OF DRONENBURG PAC
REPORTS ANALYSIS OGC REFERRAL
PAGE 4

On July 1, 1987, an RFAI was sent to the PAC referencing the 1986 Amended Year End Report (Attachment 15). The RFAI advised the PAC that a cancelled check should be itemized on Schedule B for Line 21 as a negative entry. An amendment to the 1986 Year End Report was received at the Commission on July 13, 1987 which disclosed that the voided check was for the apparent excessive contribution reported on the 1986 October Quarterly Report (Attachment 16).

As of this date, no further response has been received by the Commission.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

89040764539

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FEDERAL ELECTION COMMISSION
1985-1986
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 7AUG87

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
				TYPE OF FILER		
FRIENDS OF DRONENBURG PAC				ID #C00204461	NON-PARTY NON-QUALIFIED	
CONNECTED ORGANIZATION: NONE						
1986 STATEMENT OF ORGANIZATION				31MAR86	2	86FEC/406/3810
JULY QUARTERLY		9,024	0	1APR86 -30JUN86	7	86FEC/421/4618
JULY QUARTERLY - AMENDMENT		-	-	1APR86 -30JUN86	5	87FEC/468/3945
REQUEST FOR ADDITIONAL INFORMATION				1APR86 -30JUN86	1	87FEC/467/5484
REQUEST FOR ADDITIONAL INFORMATION				1APR86 -30JUN86	3	87FEC/469/3998
OCTOBER QUARTERLY		2,220	5,015	1JUL86 -30SEP86	9	87FEC/454/0636
OCTOBER QUARTERLY - AMENDMENT		-	-	1JUL86 -30SEP86	7	87FEC/471/4432
NOTICE OF FAILURE TO FILE				1JUL86 -30SEP86	1	87FEC/453/0280
REQUEST FOR ADDITIONAL INFORMATION				1JUL86 -30SEP86	2	87FEC/468/3798
REQUEST FOR ADDITIONAL INFORMATION 2ND				1JUL86 -30SEP86	11	87FEC/469/4493
NOTICE OF FAILURE TO FILE				1OCT86 -24NOV86	1	87FEC/453/0281
YEAR-END		9,098	10,300	1OCT86 -31DEC86	8	87FEC/458/2413
YEAR-END - AMENDMENT		-	-	1OCT86 -31DEC86	8	87FEC/466/4876
YEAR-END - AMENDMENT		-	-	1OCT86 -31DEC86	1	87FEC/471/4514
YEAR-END - AMENDMENT		4,098	5,300	1OCT86 -31DEC86	5	87FEC/473/4964
REQUEST FOR ADDITIONAL INFORMATION				1OCT86 -31DEC86	3	87FEC/466/1632
REQUEST FOR ADDITIONAL INFORMATION				1OCT86 -31DEC86	7	87FEC/468/3788
REQUEST FOR ADDITIONAL INFORMATION				1OCT86 -31DEC86	1	87FEC/473/1948
REQUEST FOR ADDITIONAL INFORMATION 2ND				1OCT86 -31DEC86	1	87FEC/469/4504
REQUEST FOR ADDITIONAL INFORMATION 2ND				1OCT86 -31DEC86	1	87FEC/469/4505
REQUEST FOR ADDITIONAL INFORMATION				1OCT86 -31DEC86	1	87FEC/471/5069
1987 MID-YEAR REPORT		4,395	7,000	1JAN87 -30JUN87	7	87FEC/481/2340
TOTAL		19,737 *	0		92	TOTAL PAGES

All 1985-1986 reports have been reviewed.
Ending Cash on Hand as of 12/31/86: \$5,028
Debts Owed TO the Committee as of 12/31/86: \$0
Debts Owed BY the Committee as of 12/31/86: \$0

*These figures include the 1987 Mid Year Report.

Attachment 2

SCHEDULE B

ITEMIZED DISBURSEMENTS

1986 Year End Report

The amounts contributed
for each category of the
Detailed Summary Page

Page 1 of 1

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

NAME OF COMMITTEE OR FUND

FRIENDS OF TREASURER PAC

C00204661

A. Full Name, Mailing Address and ZIP Code HON. ROBERT W. NAYLOR STATE CAPITOL ROOM 5136 SACRAMENTO, CALIFORNIA 95814	Purpose of Disbursement CONTRIBUTION FOR STATE ASSEMBLY Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 10/10/86	Amount of Each Disbursement This Period \$,000.00
B. Full Name, Mailing Address and ZIP Code MICHAEL D. ANTONOVICH 109 E. HARVARD, SUITE 300 GLENDALE, CALIFORNIA 91203	Purpose of Disbursement CONTRIBUTION Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 10/1/86	Amount of Each Disbursement This Period \$,000.00
C. Full Name, Mailing Address and ZIP Code COMMITTEE TO RE-ELECT DUNCAN SENATOR POST OFFICE BOX 1036 CORONADO, CALIFORNIA 92118	Purpose of Disbursement CONTRIBUTION Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 10/10/86	Amount of Each Disbursement This Period 100.00
D. Full Name, Mailing Address and ZIP Code FRIENDS OF BILL LOWERY 832 FIFTH AVENUE SAN DIEGO, CALIFORNIA 92101	Purpose of Disbursement CONTRIBUTION Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 10/10/86	Amount of Each Disbursement This Period 100.00
E. Full Name, Mailing Address and ZIP Code CANTOS FOR ASSEMBLY POST OFFICE BOX 86199 SAN DIEGO, CALIFORNIA 92138	Purpose of Disbursement CONTRIBUTION Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 10/10/86	Amount of Each Disbursement This Period 100.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (all pages this has number only)

10,300.00

4114



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20541

Attachment 3
(Page 1 of 2)

RQ-2

APR 22 1987

David Hawkins, Treasurer
Friends of Dronenburg PAC
1629 Columbia Street
San Diego, CA 92101

Identification Number: C00204461

Reference: Year End Report (10/1/86-12/31/86)

Dear Mr. Hawkins:

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

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

Sincerely,



Mike Tangney
Reports Analyst
Reports Analysis Division

800490764540
2726313

TELECON

ANALYST: Mike Tangney

CONVERSATION WITH: Cory M. Homnick

COMMITTEE: Friends Of Dronenburg PAC (C00204461

DATE: April 29, 1987

SUBJECT(S): RFAI sent to the committee

Mr. Homnick called to seek clarification concerning the RFAI sent to the committee on April 22, 1987. I advised him that since the committee is not a multi candidate committee the letter should have stated that the committee could contribute no more than \$1,000 per election to a federal candidate.

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HARRIS & SCOTT
ACCOUNTANCY CORPORATION

CERTIFIED
PUBLIC
ACCOUNTANTS

David A. Harriss, C.P.A.
P. Laurence Scott, Jr., C.P.A.
Daryl B. Gotsch, C.P.A.
Dorothy G. Cramer, C.P.A.

Frank B. Harris, C.P.A. (Retired)



Attachment 5
(Page 1 of 4)

MEMBER OF THE INSTITUTE OF
CERTIFIED PUBLIC ACCOUNTANTS
OF THE STATE OF CALIFORNIA

RECEIVED AT THE FEC
2775 VAN DE WALLE RD. #2014
SAN DIEGO, CA 92108
619-481-7775 • 654-6776
JUL 14 1987
San Diego, CA 92101-3577
619-236-6531

April 29, 1987

Mr. Mike Tangney
Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

RE: Friends of Dronenburg - PAC
Identification Number: C00204461

Dear Mr. Tangney:

This letter is in response to your notice dated April 22, 1987, of which a copy is enclosed herein.

As per our telephone conversation of April 29, even though the letter is in response to a contribution to a Federal candidate in excess of \$5,000, the letter should actually be in response to a contribution on behalf of a Federal candidate for over \$1,000 by a non multicandidate committee. If my assumption is correct, I wish to enclose the following statement of facts:

- 1) Due to a clerical error, contributions to two (2) different Federal Election Candidates were inadvertently paid from the Funds of Friends of Dronenburg, Identification Number 78-1133, a California State Candidate-Controlled Committee. These contributions were reported on the California Form 490 for the period in which the contributions were made. The pertinent portion of this form is enclosed for your review.
- 2) The contribution to the Honorable Robert W. Naylor was incorrectly listed as a contribution for State Assembly. The contribution should be listed as a contribution for the United States Senate.

The following is a schedule of contributions to Federal Election Candidates including the above changes:

87040764543
87034654875

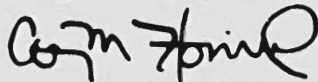
Mr. Mike Tangney
Federal Election Commission

April 29, 1987
Page II

<u>Recipient</u>	<u>Contribution Date</u>	<u>Amount</u>
1. Honneyu Election Committee	March 17, 1986	\$1,000.00
2. Wally Merger for Congress	December 31, 1986	1,000.00
3. Hon. Robert W. Naylor	October 10, 1986	5,000.00
4. Michael D. Antonovich	October 1, 1986	5,000.00
5. Friends of Bill Lowery	October 10, 1986	100.00
6. Committee to Re-Elect Duncan Hunter	October 10, 1986	100.00

In view of the above statement of facts, it is respectfully submitted that the committee made a prudent attempt to comply with the regulations as set forth in the Act as regards to a multicandidate committee and that the aforementioned contributions be allowed to remain as originally filed.

Very truly yours,



Cory M. Homnick

CMH:alb
Enclosures

HS

SCHEDULE E

Attachment 5 (Page 3 of 4)

**PAYMENTS AND CONTRIBUTIONS (OTHER THAN LOANS) MADE
(CONTINUATION SHEET)
FORM 420, 430 OR 490**

(Amounts May Be Rounded To Whole Dollars)

DATE OF COMMITTEE
FRIENDS OF DRONENBURG

STATEMENT COVERS PERIOD
FROM 2u/19/86 TO 12/31
ID NUMBER OF COMMITTEE
78-1133

CODES FOR CLASSIFYING EXPENDITURES

One of the following codes is used to describe the expenditure, no written description is needed. (Note exceptions on the back of this schedule for codes "C", "I" and "T".) Refer to the back of this schedule for detailed explanations of each category.

- "C" - CONTRIBUTIONS TO OTHER CANDIDATES OR COMMITTEES
- "I" - INDEPENDENT EXPENDITURES
- "L" - LITERATURE
- "B" - BROADCAST ADVERTISING
- "N" - NEWSPAPER AND PERIODICAL ADVERTISING
- "O" - OUTSIDE ADVERTISING

- "S" - SURVEYS, SIGNATURE GATHERING, DOOR-TO-DOOR SOLICITATIONS
- "F" - FUNDRAISING EVENTS
- "G" - GENERAL OPERATIONS AND OVERHEAD
- "T" - TRAVEL ACCOMMODATIONS AND MEALS
- "P" - PROFESSIONAL MANAGEMENT AND CONSULTING SERVICES

If one of the above codes does not accurately or fully describe the expenditure, leave the "Code" column blank; provide a written description in the "Description of Payment" column.

NAME AND ADDRESS OF PAYEE, CREDITOR OR RECIPIENT OF CONTRIBUTION IN COMMITTEE, ALSO ENTER ID NUMBER OR NAME AND ADDRESS OF TREASURER	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
Linda Sheridan 3622 Villa Terrace San Diego, California 92123	G		657.
Linda Sheridan 3622 Villa Terrace San Diego, California 92123	G		1,190.
Lawkins & Scott 3629 Columbia Street San Diego, California 92101	G		555.
Copy Shoppe 333 A Street, Suite 504 San Diego, California 92101	G		129.
Cafe Del Coyote 301 North El Camino Real San Clemente, California 92672	F		143.1
Linda Sheridan 3622 Villa Terrace San Diego, California 92123	G		106.9
Billy Hager for Congress Post Office Box 423 La Jolla City, California 92032	C		1,000.00
Flery Exclusive Florists 100 5th Avenue San Diego, California 92101	F		107.38
SUBTOTAL			3,890.45

If more space is needed, check box at left and attach additional Schedules E

SCHEDULE E**PAYMENTS AND CONTRIBUTIONS (OTHER THAN LOANS) MADE
(CONTINUATION SHEET)
FORM 420, 430 OR 490**

(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD	
FROM	THROUGH
1-1-86	9-17-
ID NUMBER OF COMMITTEE	
78-1133	

NAME OF CANDIDATE OR COMMITTEE
Friends of Dronenburg

CODES FOR CLASSIFYING EXPENDITURES

One of the following codes is used to describe the expenditure, no written description is needed. (Note exceptions on the b of this schedule for codes "C", "I" and "T".) Refer to the back of this schedule for detailed explanations of each category.

- | | |
|--|--|
| <p>"C" — CONTRIBUTIONS TO OTHER CANDIDATES OR COMMITTEES
 "I" — INDEPENDENT EXPENDITURES
 "L" — LITERATURE
 "B" — BROADCAST ADVERTISING
 "N" — NEWSPAPER AND PERIODICAL ADVERTISING
 "O" — OUTSIDE ADVERTISING</p> | <p>"S" — SURVEYS, SIGNATURE GATHERING, DOOR-TO-DOOR SOLICITATIONS
 "F" — FUNDRAISING EVENTS
 "G" — GENERAL OPERATIONS AND OVERHEAD
 "T" — TRAVEL ACCOMMODATIONS AND MEALS
 "P" — PROFESSIONAL MANAGEMENT AND CONSULTING SERVICES</p> |
|--|--|

One of the above codes does not accurately or fully describe the expenditure, leave the "Code" column blank, provide a written description in the "Description of Payment" column.

NAME AND ADDRESS OF PAYEE, CREDITOR OR RECIPIENT OF CONTRIBUTION IF COMMITTEE ALSO ENTER ID NUMBER OR NAME AND ADDRESS OF TREASURER	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
Ernest J. Dronenburg 5001 Ligia Place El Cajon, CA 92020	C T		1,018.0 343.0
Linda Sheridan 3622 Villa Terrace San Diego, CA 92123	G		513.0
Votes Unlimited 60 State Road Farndale, N.Y. 12734	F		175.0
Embassy Suites Great American Parkway Santa Clara, CA	T		298.0
Safeway Stores Santa Clara, CA	T		328.0
Santa Clara Marriott Santa Clara, CA	T		596.0
Konneyu Election Committee P.O. Box 303 Saratoga, CA 95071 ID# C00200709	C		1,000.0
Charles Hansen Photo P.O. Box 7302 San Diego, CA 92107		Campaign Photos	429.0
SUBTOTAL			4,700.0

If more space is needed, check box at left and attach additional Schedules E



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

EQ-2

MAY 20 1987

David Hawkins, Treasurer
Friends of Dronenburg PAC
1629 Columbia Street
San Diego, CA 92101

Identification Number: C00204461

Reference: July Quarterly Report (4/1/86-6/30/86)

Dear Mr. Hawkins:

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:

-Please provide a Schedule A to support the entry on Line 12 of the Detailed Summary Page. All transfers from affiliates received by your committee must be itemized on Schedule A, regardless of the amount. 2
U.S.C. §434(b)(3)(D).

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

Sincerely,

A handwritten signature in dark ink, appearing to read "Mike Tangney".

Mike Tangney
Reports Analyst
Reports Analysis Division

87034675431
92040765549



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

NO-2

MAY 27 1987

David Hawkins, Treasurer
Friends of Dronenburg PAC
1629 Columbia Street
San Diego, CA 92101

Identification Number: C00204461

Reference: October Quarterly Report (7/1/86-9/30/86)

Dear Mr. Hawkins:

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 established by the Act. The Act precludes a political committee, other than a multicandidate committee, from making a contribution to a candidate for Federal office in excess of \$1,000 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 \$1,000. 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.

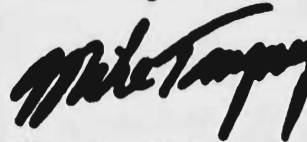
Although the Commission may take further legal steps concerning the excessive contribution(s), your prompt action in obtaining a refund of the excessive amount will be taken into consideration.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission

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97034683798

within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,



Mike Tangney
Reports Analyst
Reports Analysis Division

87734683799

1986 October Quarterly Report

Any information reported from such Reports and Exhibits may not be sold or used by any person for the purpose of soliciting contributions or purchases, other than using the name and address of any donor or contributor to solicit contributions from such donor or contributor.

NAME OF COMMITTEE (in Full)

FRIENDS OF DRENNENBURG PAC

C03204461

Attachment 7
(Page 3 of 3)

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Disbursement
Mon. Robert W. Maylor State Capitol Room 5136 Sacramento, California 95814	Contribution for State Assembly Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	9/3/86	5,000
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Disbursement
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify)		
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Disbursement
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify)		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Disbursement
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify)		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Disbursement
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify)		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Disbursement
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify)		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Disbursement
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify)		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Disbursement
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify)		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Disbursement
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify)		

37040769552

37040769552



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20461

82-2

MAY 27 1987

David Hawkins, Treasurer
Friends of Dronenburg PAC
1629 Columbia Street
San Diego, CA 92101

Identification Number: C00204461

Reference: Year End and Amended Year End Report (10/1/86-
12/31/86 - dated 4/29/87)

Dear Mr. Hawkins:

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 established by the Act. The Act precludes a political committee, other than a multicandidate committee, from making a contribution to a candidate for Federal office in excess of \$1,000 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 \$1,000. 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.

-Please provide a Schedule A to support the entry of \$5,000 reported on Line 16 of the Detailed Summary Page. All refunds received from Federal candidates and committees must be itemized on Schedule A, regardless of the amount of the refund. 2 U.S.C. §434(b).

-Your amended Year End Report dated April 29, 1987 states that contributions were made to federal candidates by the Friends of Dronenburg non-federal

3703463739

committee (pertinent portion attached). Please be advised that such a contribution is prohibited by 11 CFR 102.5(a)(1)(i) and the full amount of the contribution should be refunded to your non-federal committee. As an alternative your federal committee may transfer a sum equal to that which was contributed to the candidate committees to your non-federal committee. Please inform the Commission immediately in writing and provide a photo copy of the checks from the candidate committees or a photocopy of the check for the transfer-out from your federal committee to your non-federal committee. In addition, if a transfer-out is made from your federal committee to your non-federal committee it should be disclosed on a supporting Schedule B for Line 27 of your next report.

Although the Commission may take further legal action regarding the activities conducted by your non-federal committee, your prompt action in obtaining a refund or transferring out to the non-federal committee a sum equal to that which was contributed to the candidate committees 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 assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,



Mike Tangney
Reports Analyst
Reports Analysis Division

37734673737

GENERAL D

ITEMIZED DISBURSEMENTS

1986 Year End Report

The amount allocated
to each category of the
Detailed Summary Page

Don List Number

Any information derived from such Reports and Disbursements 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 OF COMMITTEE OR FUND

FRIENDS OF TREKINBURG PAC

C02204651

A. Full Name, Mailing Address and ZIP Code SON, ROBERT W. SAYLOR SENATE CAPITOL ROOM 5136 SACRAMENTO, CALIFORNIA 95814	Purpose of Disbursement CONTRIBUTION FOR STATE ASSEMBLY Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 10/10/86	Amount of Each Disbursement This Period 5,000.00
B. Full Name, Mailing Address and ZIP Code MICHAEL S. ANTONOVICH 109 E. HARVARD, SUITE 200 GLINDALE, CALIFORNIA 91205	Purpose of Disbursement CONTRIBUTION Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 10/1/86	Amount of Each Disbursement This Period 5,000.00
C. Full Name, Mailing Address and ZIP Code COMMITTEE TO RE-ELECT DUNCAN BUTLER POST OFFICE BOX 1036 CORONADO, CALIFORNIA 92118	Purpose of Disbursement CONTRIBUTION Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 10/10/86	Amount of Each Disbursement This Period 100.00
D. Full Name, Mailing Address and ZIP Code FRIENDS OF BILL LOWERY 832 FIFTH AVENUE SAN DIEGO, CALIFORNIA 92101	Purpose of Disbursement CONTRIBUTION Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 10/10/86	Amount of Each Disbursement This Period 100.00
E. Full Name, Mailing Address and ZIP Code CANTOS FOR ASSEMBLY POST OFFICE BOX 86199 SAN DIEGO, CALIFORNIA 92138	Purpose of Disbursement CONTRIBUTION Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 10/10/86	Amount of Each Disbursement This Period 100.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (page 3 of 3)

TOTAL This Period (last page this line number only)

10,300.00

37034603419

HARRIS & SCOTT
ACCOUNTING CORPORATION

CHARTERED
FISCAL
AGENTS

David A. Hastings, C.P.A.
F. Lawrence Scott, Jr., C.P.A.
Daryl B. Colwell, C.P.A.
Dorcas G. Carter, C.P.A.
Frank R. Harris, C.P.A. (Retired)



MEMBER
OF THE AMERICAN INSTITUTE OF
CERTIFIED PUBLIC ACCOUNTANTS
OF THE STATE OF CALIFORNIA
CHARTERED PUBLIC ACCOUNTANTS

☐ 2775 Via de la Valle, 20,
San Diego, California 92114
619-481-7775 • 619-494-0900

☒ 1629 Columbia Street
San Diego, CA 92101, 257,
619-235-6831

May 26, 1987

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

RE: July Quarterly Report
(April 1, 1986 - June 30, 1986)

Identification Number: C00204461

Dear Sir or Madam:

Pursuant to your correspondence dated May 20, 1987, enclosed is an amended Form 3X, Schedule A, prepared on behalf of Friends of Dronenburg PAC, ID# C00204461.

The schedule has been amended to include the entry on Line 12 of the Detailed Summary Page as originally filed.

Very truly yours,

Cory M. Homnick
Assistant Treasurer
Friends of Dronenburg PAC

CMH:alb
Enclosures

7 MAY 28 PM 5:55

23

1986 July Quarterly Report

This document should be
kept separate from the
other financial reportsPage 2 of 2
F.Y. 1986

Information supplied from each Report and Statement may not be sold or used by any person for the purpose of soliciting contributions or for commercial gain, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE in Full

FRIENDS OF BROWNSBURG PAC

C0020441

A. Full Name, Mailing Address and ZIP Code JAMES B. COLES 2951 BESSMER STREET SAN DIEGO, CA 92106 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer COLES CONSTRUCTION Occupation DEVELOPER/CONTRACTOR Aggregate Year-to-Date > \$250.00	Date (month, day, year) 6/5/86	Amount of Each Receipt this Period 250.00
B. Full Name, Mailing Address and ZIP Code PAUL F. SCHRIED P.O. BOX 1349 SOLANA BEACH, CA 92075 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer BRITTON CAPITAL CORP SOLANA BEACH, CA 92075 Occupation RESIDENT Aggregate Year-to-Date > \$250.00	Date (month, day, year) 5/28/86	Amount of Each Receipt this Period 250.00
C. Full Name, Mailing Address and ZIP Code GEORGE CUVALA 6575 SERRANO PLACE SAN DIEGO, CA 92115 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation RETIRED Aggregate Year-to-Date > \$250.00	Date (month, day, year) 6/4/86	Amount of Each Receipt this Period 250.00
D. Full Name, Mailing Address and ZIP Code DAVID L. MALCOLM 4065 BERNADA DUNES BONITA, CA 92002 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer SUN COAST FINANCIAL Occupation PRESIDENT Aggregate Year-to-Date > \$250.00	Date (month, day, year) 5/30/86	Amount of Each Receipt this Period 250.00
E. Full Name, Mailing Address and ZIP Code RUSS RICHARD 4776 MT. HELIX DRIVE LA MESA, CA 92041 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer PACIFIC SCENE, INC. SAN DIEGO, CA 92110 Occupation MANAGER Aggregate Year-to-Date > \$250.00	Date (month, day, year) 6/10/86	Amount of Each Receipt this Period 250.00
F. Full Name, Mailing Address and ZIP Code STEVEN L. DAVIS 3838 CAMINO DEL RIO NO. SAN DIEGO, CA 92108 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer PHASE ONE DEVELOPMENT, INC. Occupation DEVELOPER Aggregate Year-to-Date > \$500.00	Date (month, day, year) 6/3/86	Amount of Each Receipt this Period 500.00
G. Full Name, Mailing Address and ZIP Code FRIENDS OF BROWNSBURG 1629 COLUMBIA STREET SAN DIEGO, CALIFORNIA 92101 ID# 78-1133 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year) 5/9/86	Amount of Each Receipt this Period 1,000.00
TOTAL of Receipts This Page (specify):			2,750.00
TOTAL This Period (list page this line number only):			7,000.00

TELECON

ANALYST: Mike Tangney

CONVERSATION WITH: Alan Wiley

COMMITTEE: Friends of Dronenburg PAC

DATE: June 12, 1987

SUBJECT(S): Multi Candidate status

Mr. Wiley called and informed me that he was working on matters concerning the committee. He wanted to know whether the committee was now a multi candidate committee. I informed him of the requirements that a committee must meet to become a multi candidate committee and that because the committee has not contributed to 5 federal candidates it is not a multi candidate committee.

3 7 0 4 0 7 6 5 5 8



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20461

EO-2

JAN 17 1987

David Hawkins, Treasurer
Friends of Dronenburg PAC
1629 Columbia Street
San Diego, CA 92101

Identification Number: C00204461

Reference: Amended July Quarterly Report (4/1/86-6/30/86 - dated
5/26/87)

Dear Mr. Hawkins:

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 discloses a receipt of \$1,000 from the Friends of Dronenburg (pertinent portion attached). Please clarify whether this transfer is from an account maintained by your committee for non-Federal activity. If so, be advised that such transfer is prohibited by 11 CFR 102.5(a)(1)(i) and the full amount of the transfer should be returned to the non-Federal account. Please inform the Commission immediately in writing and provide a photocopy of your check for the transfer-out. In addition, the transfer-out should be disclosed on a supporting Schedule B for Line 27 of your next report.

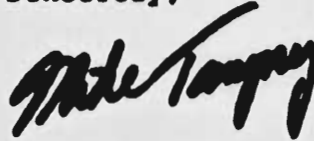
If, however, this transaction represents an "internal transfer" of funds from one Federal account to another, and the source(s) of such funds has been identified in previous reports of receipts and disbursements, please note that such transfers should not be itemized as doing so inflates total receipts and cash on hand. If this is the case, please amend your report accordingly.

Although the Commission may take further legal action regarding the acceptance of funds from a non-Federal account, your prompt transfer-out of the funds in question, or clarification of the transaction, will be taken into consideration.

37734693998
20040704559

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

Sincerely,



Mike Tangney
Reports Analyst
Reports Analysis Division

3 2 0 4 0 7 6 4 5 6 0

8 7 7 3 4 6 9 3 9 9 7



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20541

BQ-3

June 18, 1987

David Hawkins, Treasurer
Friends of Dronenburg PAC
1629 Columbia Street
San Diego, CA 92101

Identification Number: C00204461

Reference: October Quarterly (7/1/86-9/30/86), Year End
(10/1/86-12/31/86) and Amended Year End (10/1/86-
12/31/86 - dated 4/29/87) Reports

Dear Mr. Hawkins:

This letter is to inform you that as of June 17, 1987, the Commission has not received your response to our requests for additional information dated May 27, 1987. Those notices requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). Copies of our original requests are enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Mike Tangney on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,

A handwritten signature in cursive script, reading "John D. Gibson".
John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosures

37734674473
80040764561

TELECON

ANALYST: Mike Tangney

CONVERSATION WITH: Alan Wiley

COMMITTEE: Friends of Dronenburg PAC

DATE: June 22, 1987

SUBJECT(S): Contribution refund

Mr. Wiley wanted to know what the best course of action would be concerning the excessive contributions the committee made. I advised him to send letters to the federal candidate committees requesting a refund and to send a copy of the letters to the FEC.

37040764562

HAWKINS & SCOTT
ACCOUNTANCY CORPORATION

CERTIFIED
PUBLIC
ACCOUNTANTS

David A. Hawkins, C.P.A.
F. Laurence Scott, Jr., C.P.A.
Daryl B. Golemb, C.P.A.
Dennis G. Cronin, C.P.A.

Frank R. Harris, C.P.A. (Retired)



MEMBERS
■ AMERICAN INSTITUTE OF
CERTIFIED PUBLIC ACCOUNTANTS
■ CALIFORNIA SOCIETY OF
CERTIFIED PUBLIC ACCOUNTANTS

RECEIVED AT THE FEC

2775 Via de la Valle/202
Del Mar, California 92014

87 JUN 29 11:44

1629 Columbia Street
San Diego, CA 92101-2572
619/235-6531

Attachment 14
(Page 1 of 6)

June 25, 1987

Mr. Michael Tangney
Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

RE: Friends of Dronenberg
Identification Number: L00204461

Dear Mr. Tangney:

This letter is in response to your notice dated June 18, 1987, of which a copy is enclosed herein.

Inasmuch as your letters have questioned several issues, I wish to submit the following information:

1. Per your letter dated June 17, 1987, you question if a prohibited transfer from a non-Federal activity account to the PAC account has occurred. We opened the PAC account with a \$1,000 transfer from the state account. We have reimbursed the state account for \$1,000 and will list the transfer on the report due July 31, 1987. Please see Exhibit A, a copy of the check and deposit slip.
2. Per your letter of May 27, 1987, you ask for detail on the line 16 (Refunds) entry of \$5,000. This is not a refund. A check was written for a political contribution and then voided. This should not have been shown as a disbursement or "Refund."
3. Your letter of May 27, 1987, alerted us to the fact that due to a clerical error two checks for contributions to Federal candidates had been written from a non-Federal account. We have reimbursed the state account for the amount of the checks (\$2,000) from the PAC account, and will list the transfer on the July 31, 1987 report. See Exhibit A, a copy of the checks and deposit slip.
4. Your letter dated April 22, 1987, pointed out that because we are not a multicandidate committee, we had twice overcontributed to Federal candidates. We have written both candidates explaining the

Mr. Michael Tangney
Federal Election Commission

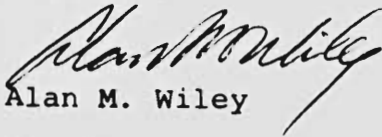
June 25, 1987
Page II

situation and requesting a refund (see Exhibit B). We have received and deposited a \$4,000 refund from "Antonovich for U.S. Senate" (see Exhibits C and D). We are expecting a check from the Robert W. Naylor campaign. When we receive the funds we will forward to you a copy of the check and deposit slip.

This should put us in compliance with the issues discussed in your letters. Thank you for your help in our phone conversations. It has greatly aided my progress in clearing these matters.

If you have any questions, please give me a call.

Sincerely,


Alan M. Wiley

AW:alb
Enclosures

3 0 0 4 0 7 6 4 5 4

HS

NOTICE: This document is a copy of a document filed with the court. It is not a legal document and should not be used for legal purposes. The original document is the only authoritative source of information.

Attachment 14
(Page 3 of 6)

DEPOSIT SLIP

DATE: 6/22/87

AMOUNT: 3000.00

TOTAL DEPOSIT: 3000.00

NATIONAL BANK OF CALIFORNIA

COIN	CURRENCY	AMOUNT
10-397	1000.00	
10-397	1000.00	
10-397	1000.00	
TOTAL		3000.00

FRIENDS OF DRONENBURG PAC

FRIENDS OF DRONENBURG PAC
1629 COLUMBIA ST. 619-235-6531
SAN DIEGO, CA 92101

No. 1011

June 22 1987

PAY TO THE ORDER OF Friends of Dronenberg

One thousand and ^{xx}/₁₀₀

\$ 1,000.00 DOLLARS

NATIONAL BANK OF CALIFORNIA
1400 California St. San Diego, CA 92101

FOR Reim for Fed candidate Heager

Susan L. Adams

⑆00101⑆ ⑆122238970⑆ 020132405⑆

FRIENDS OF DRONENBURG PAC
1629 COLUMBIA ST. 619-235-6531
SAN DIEGO, CA 92101

No. 1009

June 22 1987

PAY TO THE ORDER OF Friends of Dronenberg

One thousand & ^{xx}/₁₀₀

\$ 1,000.00 DOLLARS

NATIONAL BANK OF CALIFORNIA
1400 California St. San Diego, CA 92101

FOR Reimburse for amount to open account

Susan L. Adams

⑆001009⑆ ⑆122238970⑆ 020132405⑆

FRIENDS OF DRONENBURG PAC
1629 COLUMBIA ST. 619-235-6531
SAN DIEGO, CA 92101

No. 1010

June 22 1987

PAY TO THE ORDER OF Friends of Dronenberg

One thousand and ^{xx}/₁₀₀

\$ 1,000.00 DOLLARS

NATIONAL BANK OF CALIFORNIA
1400 California St. San Diego, CA 92101

FOR Reim for cash to Fed Candidate Kennedy

Susan L. Adams

⑆001010⑆ ⑆122238970⑆ 020132405⑆

Exhibit A

HAWKINS & SCOTT
ACCOUNTANCY CORPORATION

CERTIFIED
PUBLIC
ACCOUNTANTS

David A. Hawkins, C.P.A.
F. Laurence Scott, Jr., C.P.A.
Daryl B. Golemb, C.P.A.
Dennis G. Cronin, C.P.A.

Frank R. Harris, C.P.A. (Retired)



MEMBERS
• AMERICAN INSTITUTE OF
CERTIFIED PUBLIC ACCOUNTANTS
• CALIFORNIA SOCIETY OF
CERTIFIED PUBLIC ACCOUNTANTS

Attachment 14

(Page 4 of 6)

☐ 2775 Via de la Valle, 202
Del Mar, California 92014
619 481-7775 · 455-6996

☒ 1629 Columbia Street
San Diego, CA 92101-2572
619 235-6531

June 25, 1987

Mr. Charles Bell
Treasurer for Robert Naylor Campaign
1030 15th Street
Suite 250
Sacramento, California 95814

RE: Campaign Contribution

Dear Mr. Bell:

As a result of a preliminary review by the Federal Election Commission, Friends of Dronenberg PAC has been required to make certain adjustments. A contribution of \$5,000.00 was made on October 10, 1986, to the campaign for Robert Naylor. At that time we were not a multicandidate committee and were, therefore, limited to a maximum of \$1,000.00 per candidate. In order that we may comply with this rule, we ask that \$4,000.00 be returned to the Friends of Dronenberg PAC.

Your prompt attention to this matter is appreciated. If I can be of further service, please give me a call.

Sincerely,

Alan M. Wiley

AMW:alb

Exhibit B



Board of Supervisors County of Los Angeles

Attachment 14
(Page 5 of 6)

MICHAEL D. ANTONOVICH
SUPERVISOR FIFTH DISTRICT

June 16, 1987

Mr. Cory M. Homnick
Friends of Dronenburg PAC
Hawkins & Scott
1629 Columbia Street
San Diego, CA 92101-2572

Dear Mr. Homnick:

Enclosed is our check #6105 in the amount of \$4000.00 which is a refund from you contribution of \$5000.00. This refund is necessary as your PAC had not become a multi candidate committee at the time you issued your check.

Thank you for your help and cooperation.

Sincerely,

Lolli Benton

LOLLI BENTON
Antonovich for Senate
116 N. Maryland, Ste 205
Glendale, CA 91205
818 240-1988

RECEIVED

JUN 17 1987

Ass'd.....

Exhibit C

PLEASE BE SURE THAT ALL ITEMS ARE PROPERLY
ENDORSED. LIST EACH CHECK SEPARATELY.

CURRENCY		DOLLARS	CENTS
COIN			
CHECKS			
1			
2	90-1865	4000	00
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
28			
TOTAL		4000	00

**PLEASE ENTER THE TOTAL AMOUNT OF DEPOSIT
ON THE OTHER SIDE OF THIS TICKET**

	X	100
	X	50
	X	20
	X	10
	X	5
	X	2
	X	1
TOTAL		\$

№006105 № 121222186571: 010... 222338 №



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

EO-2

JUL 1 1987

David Hawkins, Treasurer
Friends of Dronenburg PAC
1629 Columbia Street
San Diego, CA 92101

Identification Number: C00204461

Reference: Amended Year End Report (10/1/86-12/31/86, dated
6/25/87)

Dear Mr. Hawkins:

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:

-Your amended report states that the sum of \$5,000 which was reported on Line 16 of the Detailed Summary Page was not a refund but represents a voided check. A cancelled check should be itemized on Schedule B for Line 21 as a negative entry. Please amend your report accordingly or provide additional clarification concerning this matter.

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

Sincerely,

A handwritten signature in dark ink, appearing to read "Mike Tangney".

Mike Tangney
Reports Analyst
Reports Analysis Division

3 3 0 4 0 7 6 4 5 6 9
3 7 0 3 4 7 1 5 0 5 2

HARRIS & SCOTT
COMMUNICATIONS CORPORATION

General
Adm.
Attention

David A. Mason, I. PA
P. Lawrence Scott, II, I. PA
Daryl B. Galt, I. PA
Dorothy G. Galt, I. PA
Frank B. Martin, I. PA, Director

HS

THE HARRIS & SCOTT COMPANY
1000 17th Street, N.W.
Washington, D.C. 20036

RECEIVED BY THE FEC
U.S. Election Commission
20540-7775 055-0775
07 JUL 1987
07:28:43

Attachment 16
(Page 1 of 4)

July 7, 1987

Mr. Michael Tangney
Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

RE: Friends of Dronenberg PAC
Identification Number: C00204461

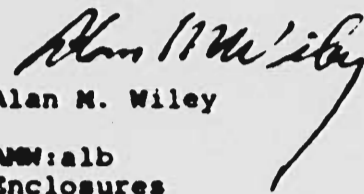
Dear Mr. Tangney:

As per your letter dated July 1, 1987 (copy enclosed), we have amended the year end report (October 1, 1986 - December 31, 1986, dated June 25, 1987) to reflect the voided check as a negative disbursement. We are filing the corrected return through you so that this matter may be resolved as easily as possible. Please find the return attached.

In the past there has been confusion as to what point we become a multi-candidate committee. Could you send us a statement clarifying our current status? Your efforts are appreciated.

If you have any questions or find any other matters which require our attention, please feel free to call me.

Sincerely,


Alan M. Wiley
AMW:alb
Enclosures

3773474951
3904076570

RECEIVED BY THE REC
Attachment 16
(Page 2 of 4)
87 JUL 13 08:46

377317:4955

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

For further information contact:

Federal Election Commission
500 E Street NW
Washington, DC 20460
Tel: 202-693-5400
Fax: 202-693-5400

Key

NOTE: Submission of this statement or recording information may subject the person making this report to the penalties of 7 U.S.C. 6022b.

All previous versions of FIC FORMS 1 and FIC FORM 2a are obsolete and should no longer be used.

SECTION 32-130

FRIENDS OF DRECHENBERG INC

Fiscal Year Ending 12/31/86

From 10/01/86 To 12/31/86

I. RECEIPTS

11. CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than Political Committees

Name Entry Unitemized \$ 694.00

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTIONS (other than loans) (Add 11(a), 11(b) and 11(c))

12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES

13. ALL LOANS RECEIVED

14. LOAN REPAYMENTS RECEIVED

15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)

16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES
AND OTHER POLITICAL COMMITTEES

17. OTHER RECEIPTS (Dividends, Interest, etc.)

18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)

II. DISBURSEMENTS

19. OPERATING EXPENDITURES

20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES

21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND
OTHER POLITICAL COMMITTEES

22. INDEPENDENT EXPENDITURES (Use Schedule E)

23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES
(2 U.S.C. § 441 (d)) (Use Schedule F)

24. LOAN REPAYMENTS MADE

25. LOANS MADE

26. REFUNDS OF CONTRIBUTIONS TO

(a) Individuals/Persons Other Than Political Committees

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))

27. OTHER DISBURSEMENTS

28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)

III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES

29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)

30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)

31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)

32. TOTAL OPERATING EXPENDITURES from Line 19

33. OFFSETS TO OPERATING EXPENDITURES from Line 15

34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)

30040764572

374955

SCHEDULE B

ITEMIZED DISBURSEMENTS

1986 Year End Report (dated 7/13/87)

The reports submitted for each category of the Detailed Summary Page

PAGE 1 OF 1
FOR LINE NUMBER 11

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 comment or purposes, other than using the name and address of any political committee to solicit contributions from such committees.

NAME OF COMMITTEE (in Full)

Attachment 16
(Page 4 of 4)

FRIENDS OF DRENNENBURG PAC

C90294461

A. Full Name, Mailing Address and ZIP Code HON, ROBERT W. MAYLOR STATE CAPITOL ROOM 5136 SACRAMENTO, CALIFORNIA 95814	Purpose of Disbursement CONTRIBUTION FOR STATE ASSEMBLY Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 10/10/86	Amount of Each Disbursement This Period \$,000.00
B. Full Name, Mailing Address and ZIP Code MICHAEL D. ANTONOVICH 109 E. HARVARD, SUITE 200 GLENDALE, CALIFORNIA 91205	Purpose of Disbursement CONTRIBUTION Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 10/1/86	Amount of Each Disbursement This Period \$,000.00
C. Full Name, Mailing Address and ZIP Code COMMITTEE TO RE-ELECT DUNCAN HUNTER POST OFFICE BOX 1036 CORONADO, CALIFORNIA 92118	Purpose of Disbursement CONTRIBUTION Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 10/10/86	Amount of Each Disbursement This Period 100.00
D. Full Name, Mailing Address and ZIP Code FRIENDS OF BILL LOWERY 832 FIFTH AVENUE SAN DIEGO, CALIFORNIA 92101	Purpose of Disbursement CONTRIBUTION Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 10/10/86	Amount of Each Disbursement This Period 100.00
E. Full Name, Mailing Address and ZIP Code CANTOS FOR ASSEMBLY POST OFFICE BOX 86199 SAN DIEGO, CALIFORNIA 92138	Purpose of Disbursement CONTRIBUTION Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 10/10/86	Amount of Each Disbursement This Period 100.00
F. Full Name, Mailing Address and ZIP Code HON, ROBERT W. MAYLOR STATE CAPITAL, ROOM 5136 SACRAMENTO, CALIFORNIA 95814	Purpose of Disbursement VOID CONTRIBUTION CHECK FROM BUDGET MULTICOMMUNITY Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 09/03/86	Amount of Each Disbursement This Period (5,000.00)
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (last one)

TOTAL This Period (on page this line number only)

5,000.00

3709070570



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

March 11, 1988

MEMORANDUM

TO : LAWRENCE M. NOBLE
GENERAL COUNSEL

ATTENTION: DEBORAH CURRY

THROUGH : JOHN C. SURINA
STAFF DIRECTOR

FROM : JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR

SUBJECT : UPDATE TO RAD REFERRAL #87L-37
FRIENDS OF DRONENBURG PAC

This update is to provide additional information concerning the referral of Friends of Dronenberg PAC ("the PAC").

The 1987 Mid-Year and Year End Reports disclose contribution refunds received of \$4,000 each for excessive contributions the PAC made to two federal candidate committees (Attachments 2 and 3). However, the 1987 Year End Report discloses that the PAC made one \$4,000 contribution and two \$2,000 contributions to the same federal candidate committees subsequent to the receipt of the refunds (Attachment 4).

The PAC does not appear to have attained multicandidate status because it has not made contributions to five federal candidate committees from its federal account. The PAC has, however, reimbursed its non-federal account for contributions that the non-federal account made to two federal candidate committees (Attachment 5).

If you have any questions, please contact Mike Tangney at 376-2480.

FEDERAL ELECTION COMMISSION
1987-1988

DATE 11MAR88

COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
				TYPE OF FILER		
FRIENDS OF DRONENBURG PAC						ID #C00204461 NON-PARTY NON-QUALIFIED
CONNECTED ORGANIZATION:	NONE					
1987 MID-YEAR REPORT		4,395	7,000	1JAN87 -30JUN87	7	87FEC/481/2340
YEAR-END		9,241	8,015	1JUL87 -31DEC87	8	88FEC/500/4581
TOTAL		13,636	0 15,015	0	15	TOTAL PAGES

None of the reports have been reviewed.
 Ending cash-on-hand as of 12/31/87: \$3,650
 Outstanding debts owed to the Committee: \$0
 Outstanding debts owed by the Committee: \$0

3 9 0 4 0 7 6 4 5 7 5

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedules
for each category of the
Detailed Summary PagePAGE 16
FOR LINE NUMBER 16

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 OF COMMITTEE (in Full)

FRIENDS OF DRONENBURG PAC

A. Full Name, Mailing Address and ZIP Code

Antonovich For Senate
116 N. Maryland, Suite 205
Glendale, CA 91205

Name of Employer

Refund of excess
Contribution made before we
were a multi-candidate com.
OccupationDate (month,
day, year)Amount of Each
Receipt this PeriodReceipt For ☐ Primary ☐ General
☐ Other (specify)

N/A

6/15/87

4,000.00

Aggregate Year-to-Date > \$

4,000.00

B. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this PeriodReceipt For ☐ Primary ☐ General
☐ Other (specify)

Occupation

Aggregate Year-to-Date > \$

C. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this PeriodReceipt For ☐ Primary ☐ General
☐ Other (specify)

Occupation

Aggregate Year-to-Date > \$

D. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this PeriodReceipt For ☐ Primary ☐ General
☐ Other (specify)

Occupation

Aggregate Year-to-Date > \$

E. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this PeriodReceipt For ☐ Primary ☐ General
☐ Other (specify)

Occupation

Aggregate Year-to-Date > \$

F. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this PeriodReceipt For ☐ Primary ☐ General
☐ Other (specify)

Occupation

Aggregate Year-to-Date > \$

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this PeriodReceipt For ☐ Primary ☐ General
☐ Other (specify)

Occupation

Aggregate Year-to-Date > \$

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

4,000.00

3204070312300

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s)
for each category of the
Detailed Summary PagePAGE 04
1 1 2
FOR LINE NUMBER
16

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 OF COMMITTEE (in Full)

Friends of Bronenburg PAC

A. Full Name, Mailing Address and ZIP Code
Honorable Robert W. Naylor
State Capital, Room 5136
Sacramento, CA 95814Name of Employer
Refund of Excess Contri-
bution made prior to becoming
~~multi candidate committee~~
Occupation
Not ApplicableDate (month,
day, year)
8/24/87Amount of Each
Receipt this Period

4,000.00

Receipt For ☐ Primary ☐ General
☐ Other (specify)

Aggregate Year-to-Date > \$

B. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this PeriodReceipt For ☐ Primary ☐ General
☐ Other (specify)

Occupation

Aggregate Year-to-Date > \$

C. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this PeriodReceipt For ☐ Primary ☐ General
☐ Other (specify)

Occupation

Aggregate Year-to-Date > \$

D. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this PeriodReceipt For ☐ Primary ☐ General
☐ Other (specify)

Occupation

Aggregate Year-to-Date > \$

E. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this PeriodReceipt For ☐ Primary ☐ General
☐ Other (specify)

Occupation

Aggregate Year-to-Date > \$

F. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this PeriodReceipt For ☐ Primary ☐ General
☐ Other (specify)

Occupation

Aggregate Year-to-Date > \$

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this PeriodReceipt For ☐ Primary ☐ General
☐ Other (specify)

Occupation

Aggregate Year-to-Date > \$

SUBTOTAL of Receipts This Page (options)

4,000.00

TOTAL This Period (list page(s) line number only)

4,000.00

3209076-577

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedules for each category of the Detailed Summary Page

PAGE 1 OF 1
FOR LINE NUMBER 22

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 OF COMMITTEE (in Full)

Friends of Dronenburg PAC

A Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Honorable Robert W. Naylor State Capitol, Room 5136 Sacramento, CA 95814	Contribution for State Assembly Disbursement for ☐ Primary ☐ General ☐ Other (specify)	9/2/87	4,000.00
B Full Name, Mailing Address and ZIP Code Antonovich For Senate 116 N. Maryland, Suite 205 Glendale, CA 91205	Purpose of Disbursement Contribution Disbursement for ☐ Primary ☐ General ☐ Other (specify)	10/1/87	2,000.00
C Full Name, Mailing Address and ZIP Code Antonovich For Senate 116 N. Maryland, Suite 205 Glendale, CA 91205	Purpose of Disbursement Contribution Disbursement for ☐ Primary ☐ General ☐ Other (specify)	12/22/87	2,000.00
D Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL (Total for this Page, optional)			8,000.00
TOTAL (Total for this Page, optional)			8,000.00

37040764578

SCHEDULE D

ITEMIZED DISBURSEMENTS

Use separate schedules for each category of the Detailed Summary Page

PAGE 1 OF 1
FOR LINE NUMBER 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 OF COMMITTEE (in Full)

FRIENDS OF DRONENBURG PAC

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Friends of Dronenburg 1629 Columbia Street San Diego, CA 92101	Transfer of funds to <u>Controlled Committee</u> Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	2/3/87	4,000.00
Friends of Dronenburg 1629 Columbia Street San Diego, CA 92101	Reimburse Controlld Committee for money used to open account Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	6/22/87	1,000.00
Friends of Dronenburg 1629 Columbia Street San Diego, CA 92101	Reimburse Controlld Committee for Konseyu Contribution Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	6/22/87	1,000.00
Friends of Dronenburg 1629 Columbia Street San Diego, CA 92101	Reimburse Controlld Committee for Berger Contribution Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	6/22/87	1,000.00
	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)		
	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)		
	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)		
	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)		
	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)		
	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)		

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

7,000.00

37734812343

FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
88 MAR 28 AM 10:31

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD 87L-37

STAFF MEMBER: Deborah Curry

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

RESPONDENTS: Friends of Dronenberg PAC (Federal Account) and David Hawkins, as treasurer; Friends of Dronenberg (Non-Federal Account) and David Hawkins, as treasurer

RELEVANT STATUTE: 2 U.S.C. § 441a(a)(1)(A); 2 U.S.C. § 441b; and 11 C.F.R. §§ 102.5(a) and 110.1(a)(2)(i) & (ii)

I. BACKGROUND

This matter was generated by the Reports Analysis Division ("RAD") after a review of the disclosure reports of Friends of Dronenberg PAC (hereinafter "Federal Account"). The RAD review revealed that the Federal Account had made two possible excessive contributions totalling \$8,000 to two federal candidate committees in violation of 2 U.S.C. § 441a(a)(1)(A). Additionally, the RAD review revealed that the Federal Account received \$1,000 from Friends of Dronenberg Non-Federal Committee (hereinafter "Non-Federal Account") and the Non-Federal Account had also made contributions of \$1,000 each to two federal candidate committees in possible violation of 11 C.F.R. § 102.5 and 2 U.S.C. § 441b. Based on recent Commission discussions, in MUR 2536, RAD 87L-37 had been revised.

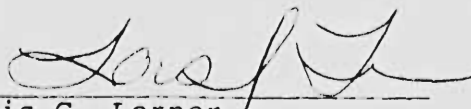
However, in a memorandum dated March 11, 1988, RAD updated RAD Referral 87L-37. The RAD update revealed that Friends of Dronenberg PAC made additional contributions to the same federal candidate committees subsequent to the receipt of refunds from

these committees. This additional information necessitates a review of committee reports, an analysis of violations under the new Commission regulations at section 110.1 as well as revised interrogatories and request for documents. A report with appropriate recommendations will be circulated to the Commission upon completion of this review.

Lawerence M. Noble
General Consel

3/25/88
Date

By:


Lois G. Lerner
Associate General Counsel

3 7 0 4 0 7 0 4 5 3 1

88 JUL -6 PM 1:44

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Friends of Dronenberg PAC)
(Federal/Non-Federal Accounts))
and David Hawkins, as treasurer)

RAD 87L-37

SENSITIVE

EXECUTIVE SESSION
JUL 26 1988

GENERAL COUNSEL'S REPORT

I. BACKGROUND

This matter was generated by the Reports Analysis Division ("RAD") after a review of the disclosure reports of Friends of Dronenberg PAC (hereinafter "Federal Account"). The RAD review revealed that the Federal Account had made two apparent excessive contributions totalling \$8,000 to two federal candidate committees in violation of 2 U.S.C. § 441a(a)(1)(A).

Additionally, the RAD review revealed that the Federal Account received \$1,000 from Friends of Dronenberg Non-Federal Committee (hereinafter "Non-Federal Account") and the Non-Federal Account had also made contributions of \$1,000 each to two federal candidate committees in possible violation of 11 C.F.R. § 102.5(a) and 2 U.S.C. § 441b.

A subsequent RAD Update on March 11, 1988, provided additional information concerning the referral of the Federal Account. (Attachment 2, pages 40-45). The RAD Update indicated that the Federal Account made three additional apparent excessive contributions to the same federal candidate committees.

It appears from the RAD referral and the RAD Update that in making repeated contributions to these federal candidate

100-40700-32

committees, the Federal Account may have been trying to make the maximum contribution (\$5,000) permissible under the Act for multicandidate committees. It also appears, however, that the Federal Account erred in its belief that it had achieved multicandidate status. Therefore, the Federal Account's reliance on this mistaken assumption may have been the reason behind the excessive contributions that caused this matter to be referred.

II. FACTUAL AND LEGAL ANALYSIS

A. FACTS

1. Contributions by the Federal Account

Initial RAD Referral

The 1986 Year End Report submitted by the Federal Account disclosed a \$5,000 contribution to Michael D. Antonovich, a federal candidate, on October 1, 1986. (Attachment 1, page 7). This contribution was not designated by the contributor. 1/ RAD attributed the contribution to the primary election. This attribution, however, appears to have been erroneous. 2/ On April 22, 1987, a Request for Additional Information ("RFAI") was sent to the Federal Account referencing the 1986 Year End Report. (Attachment 1, page 8).

Although the Federal Account had not attained multicandidate status, the RFAI mistakenly advised that the Act precludes a

1/ Reports on file at the Commission indicate that Antonovich for Senate Committee designated this contribution to the primary.

2/ The accuracy of this attribution by RAD is discussed further in the analysis section of this report.

multicandidate committee from making a contribution to a federal candidate in excess of \$5,000 per election and recommended that the Federal Account contact the recipient and request a refund of the amount in excess of \$5,000.

On April 29, 1987, a representative of the Federal Account telephoned the RAD Analyst. He was informed by the RAD Analyst that the RFAI should have stated that the Act precludes a political committee, other than a multicandidate committee, from making a contribution to a candidate for federal office in excess of \$1,000 per election, not \$5,000 per election. (Attachment 1, page 10).

On May 4, 1987, an amendment to the 1986 Year End Report was received at the Commission which disclosed that a \$5,000 contribution, made on October 10, 1986, and originally reported as a contribution to a state candidate, was actually a contribution to Robert W. Naylor a federal candidate. (Attachment 1, page 11). Again, this contribution was not designated by the contributor. 3/ It appears that RAD may have attributed this contribution to the general election. 4/ However, Mr. Naylor lost the primary election and was not, therefore, a candidate in the general election.

On May 27, 1987, RFAIs were sent to the Federal Account referencing the 1986 Year End Report and the amended 1986 Year

3/ Reports on file at the Commission indicate that Bob Naylor for U.S. Senate Committee designated this contribution to the primary.

4/ The accuracy of this apparent attribution by RAD is discussed further in the analysis section of this report.

20040764584

End Report. (Attachments 1, pages 19-20). The RFAIs informed the Federal Account that the Act precludes a political committee, other than a multicandidate committee, from making a contribution to a candidate for federal office in excess of \$1,000 per election. The RFAIs recommended that the Federal Account contact the recipients and request refunds of the amounts in excess of \$1,000.

On June 12, 1987, another Federal Account representative called the RAD Analyst to inquire as to whether the Federal Account was a multicandidate committee. (Attachment 1, page 24). The RAD Analyst explained the criteria to become a multicandidate committee and stated that because the Federal Account had not contributed to five (5) federal candidates, it was not yet a multicandidate committee.

On June 18, 1987, a Second Notice was sent to the Federal Account for failure to respond to the RFAIs on May 27, 1987, which referenced the 1986 October Quarterly Report, the 1986 Year End Report and the amended 1986 Year End Report. (Attachment 1, page 27).

On June 22, 1987, the Federal Account representative called the RAD Analyst to discuss what action to take regarding the excessive contributions. (Attachment 1, page 28). The RAD Analyst advised him to send letters to the candidate committees requesting refunds of the excessive amounts and to send copies of the letters to the Commission.

On June 29, 1987, the Federal Account submitted an additional amendment to the Commission for the 1986 Year End Report which disclosed that the Federal Account had received a contribution refund of \$4,000 on June 15, 1987, from Antonovich for U.S. Senate. The Federal Account also indicated that it was expecting a \$4,000 refund from the Robert Naylor campaign. (Attachment 1, pages 29-34). 5/

RAD Update

On March 11, 1988, RAD updated its referral to provide additional information concerning the Federal Account. (Attachment 2, pages 40-45). According to RAD, the 1987 Year End Report discloses an additional \$4,000 contribution to Bob Naylor for U.S. Senate Committee on September 2, 1987 and two additional \$2,000 contributions to the Antonovich for Senate Committee on October 1, 1987 and December 22, 1987. (Attachment 2, pages 40 and 44). The Federal Account made contributions totalling \$4,000 each to the same federal candidate committees, subsequent to the receipt of refunds in these amounts from the candidate committees. The Naylor contribution 6/ and the Antonovich contribution 7/ were not designated by the Federal Account on its

5/ The 1987 Year End Report discloses that the Federal Account received a contribution refund of \$4,000 on August 24, 1987, from Bob Naylor for U.S. Senate.

6/ Reports on file at the Commission indicate that the \$4,000 Naylor contribution was undesignated by the Bob Naylor for U.S. Senate Committee.

7/ Reports on file at the Commission indicate that the first \$2,000 Antonovich contribution was designated for the primary election by the Antonovich for Senate Committee. The final \$2,000 Antonovich contribution, however, does not appear on reports filed by the Antonovich for Senate Committee.

reports. According to the RAD Update, it does not appear that the Federal Account had yet attained multicandidate status at the time this second round of contributions were made because the Federal Account had not made contributions to five federal candidate committees.

2. Contributions by the Non-Federal Account

The Federal Account's amendment to the 1986 Year End Report, on May 4, 1987, also disclosed that the Non-Federal Account made two contributions of \$1,000 each on March 17, 1986 and December 31, 1986 to two (2) federal candidate committees (Wally Herger for Congress and Konneye Election Committee). (Attachment 1, pages 11-14).

The RFAI for the 1986 Year End and amended Year End Reports informed the Federal Account that making contributions to a federal candidate committee from a non-federal committee is prohibited by 11 C.F.R. § 102.5(a)(1)(i). (Attachment 1, pages 19-20). The RFAI requested that the full amount of the contribution be refunded to the Non-Federal Account by the federal candidate committees, or that the Federal Account transfer a sum equal to that which was contributed to the federal candidate committees to the Non-Federal Account. (Attachment 1, pages 19-20).

On June 29, 1987, the Federal Account submitted the additional amendment to the Commission for the 1986 Year End Report which disclosed that the Federal Account transferred

\$2,000 to the Non-Federal Account on June 22, 1987, for the contributions of \$1,000 each made to the two federal candidate committees. (Attachment 1, pages 29-34). 8/

3. Transfers from the Non-Federal Account

On May 20, 1987, an RFAI was sent to the Federal Account referencing the 1986 July Quarterly Report and requesting that the Federal Account provide a Schedule A to support the entry of \$1,000 on Line 12 of the Detailed Summary Page. (Attachment 1, page 15).

An amendment to the 1986 July Quarterly Report was received at the Commission on May 28, 1987, which revealed that the \$1,000 transfer reported by the Federal Account on Line 12 of the Detailed Summary Page was a transfer from the Non-Federal Account received May 9, 1986. (Attachment 1, pages 22-23).

On June 17, 1987, an RFAI was sent to the Federal Account referencing the 1986 amended July Quarterly Report. (Attachment 1, pages 25-26). The RFAI advised the Federal Account that if the transfer was from an account maintained for non-federal activity that such a transfer is prohibited by 11 C.F.R. § 102.5(a)(1)(i) and the full amount should be returned to the non-federal account.

An additional amendment to the 1986 July Quarterly Report filed by the Federal Account on June 29, 1987, indicates that the Federal Account transferred \$1,000 back to the Non-Federal

8/ This disbursement is disclosed by the Federal Account on the 1987 Mid Year Report.

Account on June 22, 1987 for the funds originally transferred to the Federal Account from the Non-Federal Account. 9/ (Attachment 1, pages 29-34).

B. ANALYSIS

1. Contributions Under 2 U.S.C. § 441a(a)(1)(A)

a) RAD Referral

The RAD review revealed possible excessive contributions totalling at least \$8,000 to two federal candidate committees during calendar year 1986. The primary issue here is whether the Federal Account exceeded the contribution limits under the Act. Additional issues raised by the RAD referral are the accuracy of the attribution of both the Antonovich contribution (primary) and the Naylor contribution (general).

The Law

The Act precludes a political committee, other than a multicandidate committee, from making a contribution to a candidate for federal office in excess of \$1,000 per election. 2 U.S.C. § 441a(a)(1)(A). However, under the Act, multicandidate committees may make contributions to a federal candidate that do not exceed \$5,000 per election. 2 U.S.C. § 441a(a)(2)(A). The criteria for multicandidate committee status are six months registration with the Commission, contributions from more than fifty persons and contributions to five or more candidates for federal office. 2 U.S.C. § 441a(a)(4).

9/ This disbursement is disclosed by the Federal Account on the 1987 Mid-Year Report.

11 C.F.R. § 110.1(a)(2)(i) makes it clear that contributions designated in writing by a contributor for a particular election are attributable to the limit set for that election. 10/ The regulation further states that a contribution made after a primary election and designated for the primary shall be made only to the extent of the net primary debts outstanding. 11/ However, in the case of a contribution not designated in writing for a particular election, the contribution will be attributable to the primary election if made on or before the primary date and to the general election if made after the primary election date. 11 C.F.R. § 110.1(a)(2)(ii).

Application of Law

In the instant matter, the Federal Account was not a multicandidate committee at the time the contributions in question were made since the Federal Account had not made contributions to five or more candidates for federal office. Therefore, the Federal Account was limited to a \$1,000 contribution per election per federal candidate committee. Consequently, the Federal Account's contribution to Robert W. Naylor (\$5,000)

10/ Please note that the former 11 C.F.R. § 110.1 was in effect at the time the transactions in question arose. Amended 11 C.F.R. § 110.1 became effective on April 8, 1987.

11/ Unlike the Commission's present regulations at 11 C.F.R. § 110.1, former 11 C.F.R. § 110.1 did not define the meaning of net debts outstanding. However, in Advisory Opinion 1984-32, the Commission defined the term net debts outstanding as "the difference between the total of the committee's debts and obligations incurred with respect to the primary election and the total of the committee's cash on hand available to pay those debts and obligations at the time [the] contribution is made."

and Antonovich for Senate (\$5,000) appears to have exceeded the contribution limits by at least \$4,000. However, further analysis of these undesignated contributions is needed to determine whether the full amount of the contribution (\$5,000) should have been refunded.

The Federal Account made a \$5,000 contribution to Antonovich on October 1, 1986. The contribution was undesignated on the report of the Federal Account. The Federal Account also made a \$5,000 contribution to the Naylor campaign on October 10, 1986. Again, this contribution was not designated on the report of the Federal Account. The California primary was June 3, 1986. Therefore, the undesignated contributions were made after the June 3, 1986, California primary. In accordance with 11 C.F.R. § 110.1(a)(2)(ii) these contributions would have been attributable to the general election since they were made after the primary election. However, since Antonovich lost the primary and was not a candidate for the general election, RAD attributed this contribution to the primary election. 12/ According to Commission records, Mr. Naylor also lost the primary and was not a candidate for the general election. Nevertheless, it appears that RAD attributed the Naylor contribution to the general election.

RAD's attribution of the Antonovich contribution to the primary election is contrary to the presumptions of 11 C.F.R.

12/ Records at the Commission indicate that Antonovich for Senate Committee may have had primary debts outstanding at the time the contribution was made. This apparently was the basis for RAD's attribution of the contribution to the primary.

§ 110.1(a). The Antonovich contribution was undesignated and made after the primary election. According to 11 C.F.R. § 110.1(a)(2)(ii), the contribution is attributable to the general election. Because Antonovich was not a candidate in the general election, this contribution made after the primary could not be attributed to the general election. Pursuant to 11 C.F.R. § 110.1(a) absent evidence of a written designation from the Federal Account to the Antonovich for Senate Committee for this contribution, the Federal Account's contribution to Antonovich can not be treated as a primary election contribution, primary net debts notwithstanding. ^{13/} Thus, the entire \$5,000 should have been refunded.

With regard to the Naylor contribution, it appears at first blush that this undesignated contribution was attributable to the general election since it was made by the Federal Account after the primary. See 11 C.F.R. § 110.1(a)(2)(ii). However, like Mr. Antonovich, Mr. Naylor was not a candidate in the general election, therefore, the entire \$5,000 made after the primary should have been refunded.

b) RAD Update

With respect to the possible additional excessive contributions included in the RAD Update, the Federal Account may

^{13/} Antonovich's designation of the \$5,000 contribution received by the Committee on 10-3-86 is not controlling on this issue. It is the intent of the contributor, as evidenced by the written designation, which controls the designation. This is true notwithstanding the confusion caused by the language in former 11 C.F.R. § 102.9(e) which implied that recipient candidates could designate contributions to specific elections as they chose to.

have made additional excessive contributions totalling \$8,000 during calendar year 1987. Again, the issue is whether the Federal Account exceeded the contribution limits under the Act.

The Law

The present regulation at 11 C.F.R. §§ 110.1(b)(1) & (2)(i) makes it clear that contributions designated in writing by a contributor for a particular election are attributable to the limit set for that election. Contributions are considered designated in writing if made by check, money order, or other negotiable instrument that indicates for which election the contribution is made, or the contribution is accompanied by a writing signed by the contributor, that clearly indicates the particular election. 11 C.F.R. §§ 110.1(b)(4)(i) and (ii). Contributions may be redesignated in accordance with 11 C.F.R. § 110.1(b)(5). See also 11 C.F.R. § 110.1(b)(4)(iii). Contributions designated for a particular election but made after that election shall be made to the extent that the contribution does not exceed net debts outstanding. 11 C.F.R. § 110.1(b)(3)(i). 14/ See also 11 C.F.R. § 110.1(b)(3)(iii). A contribution not designated in writing for a particular election

14/ In the present regulations, the Commission has codified its prior view of the meaning of net debts outstanding. Additionally, the present regulation includes in the calculation of net debts outstanding: the estimated cost of raising funds to liquidate debts and the estimated cost of terminating the committee if the candidate is not a candidate for the next election. 11 C.F.R. § 110.1(b)(3)(ii). The amount of the net debts outstanding is adjusted as additional funds are received and expenditures are made. 11 C.F.R. § 110.1(b)(3)(iii).

is attributed to the next election for the Federal office after the contribution is made. 11 C.F.R. § 110.1(b)(2)(ii).

Application of Law

Here, the Federal Account was not a multicandidate committee at the time these additional contributions were made since the Federal Account had yet to contribute to five or more Federal candidates. Therefore, the Federal Account was limited to \$1,000 per election per federal candidate committee with regard to these additional contributions of \$4,000 each as well. Consequently, the Federal Account appears to have exceeded the contribution limits of the Act by at least \$3,000.

The Naylor contribution (\$4,000) and the Antonovich contributions (2-\$2,000) were not designated by the Federal Account on its reports. Both the 1986 primary and general election dates had already passed at the time the contributions in question were made. Consequently, under the present regulation these contributions, if undesignated, are attributable to the next Senate election which in this case would be the 1988 California primary on June 7, 1988. However, there is no evidence that Mr. Naylor and Mr. Antonovich are candidates in 1988. Therefore, the Naylor contribution (\$4,000) and the Antonovich contribution (2-\$2,000) should be refunded.

The Office of the General Counsel notes that the available evidence indicates that the contributions in question (RAD Referral and RAD Update) were not designated by the Federal Account. Nevertheless, if the Federal Account submits evidence of a written designation at the time these contributions were made and the recipient federal candidate committees' had primary net debts outstanding, the Federal Account could make a \$1,000 contribution back to the 1986 primary. The Office of the General Counsel submits for Commission approval interrogatories and request for production of documents to the Federal Account so that a determination of whether these contributions were designated in writing can be made. The Office of the General Counsel recommends, therefore, that the Commission find reason to believe the Federal Account and David Hawkins, as treasurer, violated 2 U.S.C. § 441a(a)(1)(A). 15/

According to the record in this matter, the RAD review revealed that the Non-Federal Account had made contributions of \$1,000 each to two federal candidates during calendar year 1986. Additionally, the RAD review also revealed that the Non-Federal Account made a transfer of \$1,000 to the Federal Account on May 9, 1986. These transactions raise the issue of whether a

violation occurred when the Non-Federal Account made expenditures and transferred funds to the Federal Account for political activity in connection with a federal election.

11 C.F.R. § 102.5 prescribes certain requirements for organizations that intend to finance both federal and non-federal activity. Pursuant to 11 C.F.R. § 102.5(a)(1)(i), when an organization elects to establish a separate federal account that is treated as a separate federal political committee, only funds subject to the prohibitions and limitations of the Act may be deposited into the federal account and all disbursements, contributions, expenditures and transfers by such committee in connection with federal elections must be made by the Federal Account. Furthermore, no transfers may be made to such federal account from any other account maintained by such organization for the purpose of financing activity in connection with non-federal elections. 11 C.F.R. § 102.5(a)(1)(i). Pursuant to 11 C.F.R. § 102.5(a)(2), all contributions deposited in such federal accounts must be designated for the federal account, any solicitations for contributions to the federal account must expressly state that the contributions will be used in connection with a federal election, and contributors must be informed that all contributions are subject to the prohibitions and limitations of the Act.

The Federal Account has admitted that contributions were made by the Non-Federal Account to federal candidate committees. In addition, the Federal Account also admits that it received a \$1,000 transfer from the Non-Federal Account. Therefore, it

appears that these two transactions constitute violations of 11 C.F.R. § 102.5(a). Consequently, the Office of the General Counsel recommends that the Commission find reason to believe the Federal/Non-Federal Accounts and David Hawkins, as treasurer, violated 11 C.F.R. § 102.5(a).

**3. Contributions From Banks, Corporations and Labor Unions
Under 2 U.S.C. § 441b**

Another issue raised by this referral is whether the expenditures to federal candidate committees by the Non-Federal Account and a transfer from the Non-Federal Account to Federal Account contained funds prohibited under the Act. Pursuant to 2 U.S.C. § 441b contributions or expenditures by national banks, corporations and labor unions in connection with federal elections are prohibited.

Under California law, state political committees may receive contributions of an unlimited amount from banks, corporations and labor unions. Therefore, the expenditures and transfer of funds made by the Non-Federal Account may have been made with funds that contain contributions prohibited by 2 U.S.C. § 441b. The Office of the General Counsel submits for Commission approval interrogatories and request for production of documents on this issue so that the question of whether there were, in fact, prohibited funds in the account at the time of the transfers and expenditures can be resolved.

The Office of the General Counsel recommends that the Commission find reason to believe the Federal/Non-Federal Accounts and David Hawkins, as treasurer, violated 2 U.S.C. § 441b.

III. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe Friends of Dronenberg PAC (Federal Account) and David Hawkins, as treasurer, violated 2 U.S.C. § 441a(a)(1)(A).
3. Find reason to believe Friends of Dronenberg PAC (Federal/Non-Federal Accounts) and David Hawkins, as treasurer, violated 11 C.F.R. § 102.5(a).
4. Find reason to believe Friends of Dronenberg PAC (Federal/Non-Federal Accounts) and David Hawkins, as treasurer, violated 2 U.S.C. § 441b.
5. Approve the attached letter and General Counsel's factual and legal analysis.
6. Approve attached interrogatories and request for production of documents.

Lawrence M. Noble
General Counsel

44070993
Date

7/5/88

By:

Lois G. Lerner
Associate General Counsel

Attachments

1. Referral material
2. Referral Update
3. Proposed letter, Interrogatories and Request for Production of Documents to Respondent
4. Factual and Legal Analysis

Staff Person: Deborah Curry



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS / KAREN E. TRACH *MT*
COMMISSION SECRETARY

DATE: JULY 11, 1988

SUBJECT: OBJECTIONS TO: RAD Ref. 87L-37 - General Counsel's
Report
Signed July 5, 1988

The above-captioned document was circulated to the
Commission on THURSDAY, JULY 7, 1988, at 11:00 A.M..

Objection(s) have been received from the Commissioner(s)
as indicated by the name(s) checked below:

Commissioner Aikens	<u>X</u>
Commissioner Elliott	<u>X</u>
Commissioner Josefiak	<u> </u>
Commissioner McDonald	<u> </u>
Commissioner McGarry	<u> </u>
Commissioner Thomas	<u> </u>

This matter will be placed on the meeting agenda
for JULY 26, 1988.

Please notify us who will represent your Division before the
Commission on this matter.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Friends of Dronenberg PAC) RAD 87L-37
(Federal/Non-Federal Accounts))
and David Hawkins, as treasurer)

(MUR)
2663

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of July 26, 1988, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions with respect to the above-captioned matter:

1. Open a Matter Under Review.
2. Find reason to believe Friends of Dronenberg PAC (Federal Account) and David Hawkins, as treasurer, violated 2 U.S.C. § 441a(a)(1)(A) with respect to the Five Thousand Dollar contribution to Michael Antonovich on October 1, 1986, and the Five Thousand Dollar contribution to Robert W. Naylor on October 10, 1986.
3. Find reason to believe Friends of Dronenberg PAC (Federal/Non-Federal Accounts) and David Hawkins, as treasurer, violated 11 C.F.R. § 102.5(a).

(continued)

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Federal Election Commission
Certification for RAD 88L-37
July 26, 1988

Page 2

4. Find reason to believe Friends of Dronenberg PAC (Federal/Non-Federal Accounts) and David Hawkins, as treasurer, violated 2 U.S.C. § 441b.
5. Direct the Office of General Counsel to draft an appropriate letter and factual and legal analysis and circulate them for Commission approval.
6. Direct the Office of General Counsel to draft modified interrogatories and request for production of documents and circulate them for Commission approval.

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

Attest:

7-29-88

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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BEFORE THE FEDERAL ELECTION COMMISSION 24 APR 11:26

In the Matter of)
)
Friends of Dronenberg PAC) MUR 2663
(Federal/Non-Federal Accounts))
and David Hawkins, as treasurer)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On July 26, 1988, the Commission opened a MUR in Friends of Dronenberg PAC (Federal/Non-Federal Accounts) and David Hawkins, as treasurer. On July 26, 1988, the Commission found reason to believe Friends of Dronenberg PAC (Federal Account) and David Hawkins, as treasurer, violated 2 U.S.C. § 441a(a)(1)(A) with respect to the Five Thousand Dollar contribution to Michael Antonovich on October 1, 1986, and the Five Thousand Dollar contribution to Robert W. Naylor on October 10, 1986. The Commission also found reason to believe Friends of Dronenberg PAC (Federal/Non-Federal Accounts) and David Hawkins, as treasurer, violated 11 C.F.R. § 102.5(a) and 2 U.S.C. § 441b. At that time, the Commission directed that the Office of the General Counsel draft modified interrogatories and request for production of documents and circulate them for Commission approval. The Commission also directed the Office of the General Counsel to draft an appropriate letter and factual and legal analysis and circulate them for Commission approval. Attached to this report are the revised documents requested by the Commission to be

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circulated for approval. Attachment 1. Therefore, the Office of General Counsel recommends approval of these revised documents.

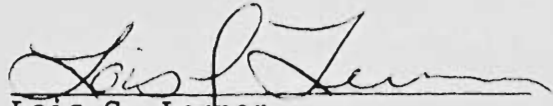
II. RECOMMENDATIONS

1. Approve and send the attached documents consisting of letter, factual and legal analysis, interrogatories and request for production of documents, as revised to Respondents.

Lawrence M. Noble
General Counsel

8/23/88
Date

By:


Lois G. Lerner
Associate General Counsel

Attachments

1. Letter, Factual and Legal Analysis, Interrogatories and Request for Production of Documents

Staff Member: Deborah Curry



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: *[Signature]* MARJORIE W. EMMONS
COMMISSION SECRETARY

DATE: AUGUST 25, 1988

SUBJECT: MUR 2663 General Counsel's Report
Signed August 23, 1988

The above-captioned document was circulated to the
Commission on WEDNESDAY, AUGUST 24, 1988 4:00.

Objection(s) have been received from the Commissioner(s)
as indicated by the name(s) checked below:

Commissioner Aikens	_____
Commissioner Elliott	<u> X </u>
Commissioner Josefiak	_____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Thomas	_____

This matter will be placed on the meeting agenda
for AUGUST 30, 1988.

Please notify us who will represent your Division before the
Commission on this matter.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Friends of Dronenberg PAC) MUR 2663
(Federal/Non-Federal Accounts))
and David Hawkins, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of August 30, 1988, do hereby certify that the Commission decided by a vote of 6-0 to approve and send the documents consisting of letter, factual and legal analysis, interrogatories and request for production of documents, as revised, to Respondents as recommended in the General Counsel's August 23, 1988 report in the above-captioned matter.

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

Attest:

8/31/88

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

33040764605



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 7, 1988

David Hawkins, Treasurer
Friends of Dronenberg PAC
1629 Columbia Street
San Diego, CA 92101

RE: MUR 2663
Friends of Dronenberg
PAC (Federal/Non Federal
Accounts) and David
Hawkins, as treasurer

Dear Mr. Hawkins:

On July 26, 1988, the Federal Election Commission found that there is reason to believe Friends of Dronenberg PAC (Federal/Non-Federal Accounts) and you, as treasurer, violated 11 C.F.R. § 102.5(a) of Commission regulations and 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Commission also found reason to believe Friends of Dronenberg PAC (Federal Account) and you, as treasurer, violated 2 U.S.C. § 441a(a)(1)(A). The 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 the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office, along with answers to the enclosed questions and request for production of documents, within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the Friends of Dronenberg PAC (Federal/Non-Federal Accounts) 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. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

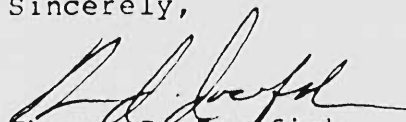
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 authorizing such counsel to receive any notifications and other communications from the Commission.

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the 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 Deborah Curry, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Thomas J. Josefiak
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Interrogatories and Request for Production of Documents

RECEIVED
FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION COMMISSION

DGC
475

88 SEP 26 AM 11:54 **STATEMENT OF DESIGNATION OF COUNSEL** 88 SEP 26 AM 10:14

MUR 2663

NAME OF COUNSEL: Cory M. Homnick

ADDRESS: 1629 Columbia Street
San Diego, California 92101

TELEPHONE: (619) 235-6531

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

9-30-88
Date

David A. Hawkins
Signature

RESPONDENT'S NAME: David A. Hawkins

ADDRESS: 1629 Columbia Street
San Diego, CA 92101

HOME PHONE: _____

BUSINESS PHONE: (619)235-6531

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HAWKINS & SCOTT
ACCOUNTANCY CORPORATION

David A. Hawkins, C.P.A.
F. Laurence Scott, Jr., C.P.A.
Dennis G. Cronin, C.P.A.
Alan M. Wiley, C.P.A.

Frank R. Harris, C.P.A. (1924-1987)



MEMBERS
■ AMERICAN INSTITUTE OF
CERTIFIED PUBLIC ACCOUNTANTS
■ CALIFORNIA SOCIETY OF
CERTIFIED PUBLIC ACCOUNTANTS

2775 Via de la Valle 202
Del Mar, California 92014
619-481-7775 - 455-6996

1629 Columbia Street
San Diego, CA 92101-2572
619-235-6531

OGC #630

88 OCT 11 PM 4:32

CERTIFIED MAIL

October 3, 1988

Deborah Curry
Office of General Counsel
Federal Election Commission
Washington, DC 20463

Reference: Friends of Dronenburg
Mur: 2663

Dear Ms. Curry:

This letter is to serve as a request for extension of time in which to respond to your request for interrogatories and production of documents for the aforementioned campaign committee. After our discussion of October 3, 1988, it is clear that additional time is necessary to compile sources of funds constituting balances in the accounts as requested in your interrogatory. We hereby request an extension of time until October 15, 1988.

Your cooperation is most appreciated.

Sincerely,

Cory M. Honnick
Certified Public Accountant
Under Designation of Counsel

CMH:sla

88 OCT 11 PM 3:00

FEDERAL ELECTION COMMISSION



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 13, 1988

Cory M. Homnick
1629 Columbia Street
San Diego, California 92101

RE: MUR 2663
Friends of Dronenberg
PAC (Federal/Non-Federal
Accounts) and David
Hawkins, as treasurer

Dear Mr. Homnick:

This is in response to your letter dated October 3, 1988, which we received on October 11, 1988, requesting an extension until October 15, 1988, to respond to the Commission's notification of reason to believe. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on October 15, 1988.

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

Sincerely,

Lawrence M. Noble
General Counsel

Lois G. Lerner

By: Lois G. Lerner
Associate General Counsel

33340764610

HAWKINS & SCOTT
ACCOUNTANCY CORPORATION

David A. Hawkins, C.P.A.
F. Laurence Scott, Jr., C.P.A.
Dennis G. Cronin, C.P.A.
Alan M. Wiley, C.P.A.

Frank R. Harris, C.P.A. (1924-1987)



MEMBERS
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FEDERAL ELECTION COMMISSION
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88 OCT 20 PM 2:44

2775 Via de la Valle 202
Del Mar, California 92014
619-481-7775-455-6996

1629 Columbia Street
San Diego, CA 92101-2572
619/235-6531

066# 706

October 14, 1988

Thomas J. Josefiak
Chairman
Federal Election Commission
Washington, D. C. 20463

Re: Friends of Dronenburg PAC
Identification Number: C00204461
MUR 2663

Dear Mr. Josefiak:

Enclosed pursuant to your request dated September 7, 1988, is our response to your Request for Production of Documents.

It is our understanding through correspondence received by our office from Mike Tangney, a Reports Analyst at the Federal Election Commission, that our prompt action to remedy potential violations of the Federal Election Campaign Act will be taken into consideration in your investigation. As evidence of this prompt action, I hereby enclose the following statements of fact:

1) In October, 1986, the Friends of Dronenburg Federal Account made two (2) contributions of \$5,000.00 each to the committees of Robert W. Naylor and Michael B. Antonovich, respectively. Immediately upon learning from the Federal Election Commission that the Committee had not yet attained multicandidate committee status, we sent requests for refunds to the donee committees. I enclose for your files copies of refund requests and checks received in the above matter.

2) In March, 1986, and December, 1986, the Friends of Dronenburg Federal Account inadvertently made two (2) contributions of \$1,000.00 each to the Federal Committees of Wally Herger and the Konneyu Election Committee. Immediately upon being notified of a potential violation, the Friends of Dronenburg Federal Committee reimbursed the non-Federal Committee for these aforementioned two (2) contributions. I enclose copies of reimbursement checks dated June 22, 1987 as evidence.

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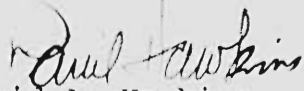
Thomas J. Josefiak
Chairman
Federal Election Commission

October 14, 1988
Page 2 of 2

3) On May 9, 1986, the non-Federal account of Friends of Dronenburg transferred \$1,000.00 to open the Federal account. Immediately after being informed of a potential violation, the Federal account reimbursed the non-Federal account this \$1,000.00. I enclose check #1009 dated June 22, 1987 as evidence.

In view of the above statements of facts and the enclosed interrogatories, I am certain you will see that Friends of Dronenburg and I, as treasurer, exercised appropriate business care and prudence in these matters and that no further action should be taken against the Friends of Dronenburg Federal and non-Federal accounts.

Sincerely,


David A. Hawkins
Treasurer
Friends of Dronenburg

DAH:CMH/gsm
Enclosures

cc: Ernest J. Dronenburg

HS

FRIENDS OF DRONENBERG PAC

1. YES

2.	DATE	AMOUNT
	03/09/86	\$1,000.00
	03/12/86	\$1,000.00
	11/13/86	\$1,000.00

3.	DATE	ACCOUNT BALANCE
	3/19/86	\$32,146.29
	3/12/86	\$30,549.83
	11/13/86	\$65,700.19

4.	SOURCES OF FUNDS CONSTITUTING THE NOVEMBER 13, 1986	BALANCE.
	CONTRIBUTOR	AMOUNT DATE
	LAWRENCE M. CUSHMAN	\$200.00 10/21/86
	CHARLES G. BAKALY, JR.	\$250.00 10/02/86
	COAST DISTRIBUTING CO.	\$250.00 10/31/86
	GEO THERMAL RESOURCES ASSN. PAC.	\$2,500.00 10/30/86
	CALIFORNIA FARM BUREAU FEDERATION	\$2,500.00 10/30/86
	CREDIT MANAGERS ASSOCIATION	\$250.00 10/13/86
	P.S. I LOVE YOU REALTY	\$125.00 10/23/86
	STERENBUSH GROUP	\$125.00 10/20/86
	PACIFIC MERCHANT SHIPPING ASSOCIATION	\$1,000.00 10/31/86
	DEWITT W. KRUEGER & ASSOCIATES	\$50.00 11/04/86
	ROHR INDUSTRIES, INC.	\$250.00 11/04/86
	PAUL SCHEIBE	\$100.00 11/05/86
	AYLA - PAC	\$200.00 10/28/86
	MISSION VALLEY PIPE & SUPPLY	\$100.00 11/04/86
	CALIF. RETAILERS GOOD GOV'T. COUNCIL	\$500.00 11/03/86
	SDG&E CITIZENS FOR GOOD GOV'T.	\$250.00 11/03/86
	JOHN S. ROBBINS	\$100.00 10/29/86
	PRESSLEY PETERBILT	\$150.00 10/24/86
	ROD BLAIR	\$500.00 10/21/86
	SNIDER LEASING CORP.	\$1,000.00 10/20/86
	FLORIN ROAD NISSAN	\$1,000.00 10/20/86
	PACIFIC MUTUAL	\$2,000.00 10/16/86
	WATSON LAND COMPANY	\$300.00 10/15/86
	ASSOC. SALES TAX CONSULTANTS	\$110.00 10/22/86
	GREAT WESTERN SHOWS, INC.	\$25.00 10/29/86
	SANTA FE SOUTHERN PACIFIC CORP.	\$250.00 10/24/86
	MUNICIPAL DUCK COMPANY, INC.	\$100.00 10/27/86
	UNIVERSITY FORD/PLYMOUTH	\$200.00 10/29/86
	ORCO BLOCK CO., INC.	\$500.00 10/28/86
	SPA CENTERS, INC.	\$200.00 10/30/86
	CARTER HAWLEY HALE	\$1,000.00 10/24/86
	THE GIFFORD - HILL CO.	\$500.00 10/22/86
	LONGS DRUG STORES	\$300.00 10/14/86

4.

SOURCES OF FUNDS CONSTITUTING THE NOVEMBER 13, 1986	BALANCE.
CONTRIBUTOR	AMOUNT DATE
THE FIELDSTONE CO.	\$500.00 09/16/86
STANDARD PACIFIC CORP.	\$400.00 09/18/86
A-M COMPANY	\$200.00 09/18/86
KEITH ENGINEERING, INC.	\$500.00 09/11/86
J.M. PETERS COMPANY, INC.	\$750.00 09/17/86
THE LINCOLN CLUB OF ORANGE COUNTY	\$2,000.00 10/14/86
THE FIELDSTONE COMPANY	\$125.00 10/15/86
PG&E EMPLOYEES GOOD GOV'T FUND	\$1,000.00 10/17/86
NORTHROP CORPORATION	\$250.00 10/10/86
PACIFIC LIGHTING CORP.	\$2,000.00 09/24/86
ATLANTIC RICHFIELD COMPANY	\$2,000.00 09/08/86
OCCIDENTAL PETROLEUM CORP.	\$500.00 10/10/86
FIRST INTERSTATE BANK	\$500.00 09/26/86
LITTON INDUSTRIES	\$1,000.00 10/08/86
NATIONAL MEDICAL ENTERPRISES, INC.	\$500.00 10/10/86
WELLS FARGO BANK	\$375.00 10/10/86
MICROPRO	\$200.00 10/08/86
THRIFTY CORP.	\$500.00 10/08/86
O'MELVENY AND MYERS PAC.	\$500.00 10/08/86
HOWARD P. MARGULEAS	\$500.00 10/08/86
FRIENDS OF MIKE ANTONOVICH	\$5,000.00 10/03/86
HUGHES AIRCRAFT COMPANY	\$1,000.00 10/09/86
GISSON DUNN & CRUTCHER	\$500.00 10/07/86
WALT DISNEY PRODUCTIONS	\$1,000.00 10/03/86
ADVANCED MICRO DEVICES	\$200.00 09/25/86
TOSCO CORPORATION	\$1,000.00 10/02/86
BIXBY RANCH COMPANY	\$250.00 09/22/86
CALIF. AUTOMATIC VENDORS PAC.	\$500.00 10/02/86
BOB WONDRIES FORD	\$250.00 10/07/86
CALIF. ASSOC. OF EQUIPMENT LESSORS	\$250.00 10/03/86
RAY N. MCCLAVE, D.D.S., INC.	\$50.00 10/06/86
BAKER, ANGEL, MORRIS & HRUBY	\$250.00 09/24/86
TOPA CAPITAL CORP.	\$500.00 10/06/86
FRANKLIN C. LATCHAM	\$250.00 10/01/86
BLOCK CO., INC.	\$250.00 09/24/86
CITIPAC	\$1,500.00 08/21/86
S.D. FEDERATION OF REPUB. WOMEN	\$25.00 09/26/86
GENERAL TELEPHONE EMPLOYEES	\$1,000.00 09/22/86
MDCI CORP.	\$500.00 09/16/86
DIGITAL RESEARCH	\$400.00 09/18/86
WATT PAC	\$500.00 09/18/86
SUPERIOR STAMP & COIN	\$250.00 09/19/86
CAPITAL INDUSTRIES	\$500.00 09/18/86
METRO	\$250.00 09/26/86
EVANS TELEPHONE COMPANY	\$250.00 09/25/86
VICRO MFG. CORP.	\$250.00 09/25/86
URBAN DEVCO INC.	\$500.00 09/26/86
MAX ROUSE & SONS, INC.	\$500.00 09/26/86
PG&E EMPLOYEES	\$500.00 09/23/86
GREAT WESTERN SHOWS INC.	\$25.00 09/29/86
TEXACO POLITICAL INVOLVEMENT	\$500.00 09/17/86
SYNTEX COMMITTEE	\$200.00 08/28/86
H. WITMER DECORATIVES	\$100.00 09/25/86
GRANITE CONSTRUCTION	\$1,000.00 08/08/86

4.

SOURCES OF FUNDS CONSTITUTING THE NOVEMBER 13, 1986 BALANCE.

CONTRIBUTOR	AMOUNT	DATE
INTEL CORPORATION	\$200.00	09/08/86
FENWICK, DAVIS & WEST	\$200.00	09/10/86
THE SOUTHLAND CORPORATION	\$1,007.11	06/26/86
PARAMOUNT PICTURES	\$1,000.00	07/18/86
COOPERSVISION, INC.	\$1,000.00	08/21/86
STATE CAL TAX REFUND	\$101.25	08/13/86
CA. GRAIN & FEED ASSOC.	\$400.00	07/01/86
AT&T WEST PAC.	\$150.00	06/03/86
SHELL GOOD GOV. FUND.	\$1,000.00	07/02/86
PACIFIC TELESIS GROUP	\$1,500.00	06/05/86
INTEGRATED SIGN	\$100.00	06/02/86
PETTER OIL COMPANY	\$250.00	06/03/86
MILLER BREWING CO.	\$250.00	05/21/86
JOSEPH DOLPHIN	\$1,250.00	06/09/86
GREAT AMERICAN 1ST SAVINGS	\$250.00	06/06/86
SAN DIEGO GAS & ELECTRIC	\$500.00	06/03/86
EYE PHYSICIANS MEDICAL CENTER	\$250.00	06/03/86
WALDEN FINANCIAL	\$250.00	06/04/86
CONTINENTAL ASSOCIATES	\$625.00	06/04/86
HOME CAPITAL CORP.	\$375.00	06/04/86
INVESTORS LEASING CORP.	\$125.00	06/04/86
C.O.G.G.	\$1,250.00	06/04/86
PACIFIC FALLISADES REPUBLICAN	\$25.00	04/10/86
LIQUIDATION OF INVESTMENT	\$50,000.00	06/02/86
TOTAL	\$113,243.36	

SOURCES OF FUNDS CONSTITUTING THE MARCH 12 & 19, 1986 BALANCE.

CONTRIBUTOR	AMOUNT	DATE
THE CLOROX COMPANY	\$500.00	01/22/86
CHARLES S. SHUKEN	\$100.00	02/04/86
FRANKLIN & PATRICIA LATCHAM	\$250.00	02/06/86
J. & LILA DICKSON	\$150.00	02/11/85
HOUSEHOLD FINANCE INTER.	\$250.00	02/04/86
MR. W.K. MORRIS/CHEVRON CORP.	\$500.00	02/04/86
SAMUEL STEIN	\$250.00	02/18/86
SANTA MONICA REPB. WOMEN'S CLUB	\$25.00	02/13/86
CITIZENS UTILITIES CO. #70	\$250.00	02/10/86
BANK OF AMERICA	\$500.00	01/29/86
HILBERT K. CHU C.P.A.	\$30.00	01/04/86
JOHN G. FRANKOT, JR.	\$100.00	12/30/85
DON THAYER, INC.	\$100.00	01/08/86
GREAT AMERICAN SAVINGS	\$250.00	11/26/85
JAMES S. GRAHAM	\$7,000.00	12/31/85
STANWOOD C. JOHNSON	\$3,000.00	12/31/85
OUTDOOR ADVERTISING ASSN.	\$200.00	12/31/85
STATE & LOCAL CITIZENSHIP RESPONSIB	\$750.00	12/31/85
PRESSEY PETERBILT	\$100.00	12/31/85
SAN DIEGO GAS & ELECTRIC	\$1,000.00	12/31/85
WYMAN, BAUTZER, ROTHMAN, KUCHEL & SIL	\$500.00	12/31/85

SOURCES OF FUNDS CONSTITUTING THE MARCH 12 & 19, 1986 BALANCE
CONTRIBUTOR AMOUNT DATE

CUBIC CORPORATION	\$100.00	12/26/85
C.A. DUNN	\$100.00	12/26/85
ATLANTIC RICHFIELD CO.	\$2,500.00	12/26/85
NCR CORPORATION	\$500.00	12/31/85
EVANS TELEPHONE COMPANY	\$250.00	12/26/85
W.E. LANGSTON	\$250.00	12/26/85
SAM DEVITT	\$100.00	12/26/85
KEN OLIPHANT	\$250.00	12/26/85
DANIEL RYAN	\$500.00	12/26/85
FLVOR CORPORATION	\$500.00	12/26/85
LAW OFFICES JOHN THOMAS MONTAG	\$150.00	12/26/85
DARYL C. IDLER, JR.	\$150.00	12/26/85
PEPPER OIL CO., INC.	\$150.00	12/26/85
IDEAL PLUMBING & HEATING	\$100.00	12/26/85
ERNEST J. DRONENBURG, SR.	\$200.00	12/26/85
ERNEST S. TUCKER, III	\$150.00	12/26/85
KIM FLETCHER	\$200.00	12/26/85
HAWKINS FAMILY TRUST	\$150.00	12/26/85
JACOBS DEVELOPMENT CO.	\$250.00	12/11/85
FREDERICK A. GAGE	\$250.00	12/11/85
MCMAHON DEVELOPMENT	\$500.00	12/11/85
MAGNOLIA ENTERPRISES	\$250.00	12/11/85
WILLIAM BUCK JOHNS	\$250.00	12/11/85
ART AGAJANIAN	\$250.00	12/11/85
DOY HENLEY	\$250.00	12/11/85
JOHN KONWISER	\$150.00	12/11/85
E. TYLER MILLER, JR.	\$250.00	12/11/85
MICHAEL P. ALESSIO	\$150.00	12/11/85
CHARLES S. SHUKEN	\$100.00	12/11/85
ELEANOR R. STORRS	\$100.00	12/11/85
SUNCOAST FINANCIAL CORP.	\$1,000.00	12/11/85
T.W. HOERN, III	\$150.00	12/11/85
ANVIL CORPORATION	\$250.00	12/11/85
DIXIELINE LUMBER CO.	\$250.00	12/11/85
THE BERGHEER COMPANY	\$100.00	12/11/85
C.J. SEGERSTROM & SONS	\$250.00	12/11/85
ROBERT F. BEAVER	\$250.00	12/11/85
ORED BLOCK CO., INC.	\$500.00	12/11/85
MAY CO.	\$500.00	12/11/85
HARRIETTE F. WITMER	\$250.00	12/11/85
KEN WILLIG	\$150.00	12/11/85
FITZPATRICK & ASSOCIATES	\$500.00	12/11/85
JAMES R. SPIEVAK	\$150.00	12/11/85
ROHR INDUSTRIES, INC.	\$150.00	12/11/85
THE SIGNAL COMPANIES, INC.	\$300.00	12/11/85
WILLIAM A. HINRICHS, M.D., INC.	\$100.00	12/11/85
KAISER STEEL CORP.	\$750.00	11/29/85
WILLIAM D. HEIMBACH	\$500.00	11/29/85
J. JAMES WOODYARD	\$500.00	11/29/85
PACIFIC TELESIS GROUP	\$1,500.00	11/29/85
ROBERT M. ARAN, ATTY.	\$500.00	11/29/85

TOTAL \$33,455.00

5. NONE



Form 490
1984

CONSOLIDATED CAMPAIGN STATEMENT (Government Code Sections 84200-84217)

For use by candidates/officeholders and their controlled committees.

(Type or Print in Ink)

Statement covers period from 1-1-85 through 6-30-85

A OFFICIAL USE ONLY

DATE OF ELECTION (MO., DAY, YR.) (if applicable):

TOTAL PAGES:
8

I CANDIDATE/OFFICEHOLDER INCLUDED IN THIS CONSOLIDATED REPORT

NAME OF CANDIDATE: ERNEST J DRONENBURG				OFFICE SOUGHT OR HELD (INCLUDE LOCATION AND DISTRICT NUMBER IF APPLICABLE) BOARD OF EQUALIZATION			
RESIDENTIAL ADDRESS:	NO. AND STREET	CITY	STATE	ZIP CODE	AREA CODE	PHONE NUMBER	
	5001 LIGIA PLACE	EL CAJON	CA	92020	(619)	442-4702	
BUSINESS ADDRESS:	NO. AND STREET	CITY	STATE	ZIP CODE	AREA CODE	PHONE NUMBER	
	110 WEST C STREET	SAN DIEGO	CA	92101	(619)	237-7884	

II CONTROLLED COMMITTEES* INCLUDED IN THIS CONSOLIDATED REPORT

NAME OF COMMITTEE: FRIENDS OF DRONENBURG						I.D. NUMBER 78-1133	
ADDRESS OF COMMITTEE:	NO. AND STREET	CITY	STATE	ZIP CODE	AREA CODE	PHONE NUMBER	
	1629 COLUMBIA STREET	SAN DIEGO	CA	92101	(619)	235-6531	

NAME OF TREASURER: DAVID A HAWKINS							
PERMANENT ADDRESS OF TREASURER:	NO. AND STREET	CITY	STATE	ZIP CODE	AREA CODE	PHONE NUMBER	
	1629 COLUMBIA STREET	SAN DIEGO	CA	92101	(619)	235-6531	

NAME OF COMMITTEE:						I.D. NUMBER	
ADDRESS OF COMMITTEE:	NO. AND STREET	CITY	STATE	ZIP CODE	AREA CODE	PHONE NUMBER	

NAME OF TREASURER							
PERMANENT ADDRESS OF TREASURER:	NO. AND STREET	CITY	STATE	ZIP CODE	AREA CODE	PHONE NUMBER	

Attach additional information on appropriately labeled continuation sheets.

III CANDIDATE/OFFICEHOLDER ONLY: LIST ANY OTHER COMMITTEES NOT INCLUDED IN THE CONSOLIDATED STATEMENT WHICH ARE CONTROLLED BY YOU OR ARE PRIMARILY FORMED TO RECEIVE CONTRIBUTIONS OR MAKE EXPENDITURES ON BEHALF OF YOUR CANDIDACY.

COMMITTEE NAME AND I.D. NUMBER	COMMITTEE ADDRESS	TREASURER	Controlled Committee?	
			YES	NO

Attach additional information on appropriately labeled continuation sheets.

* (A controlled committee is one which is controlled directly or indirectly by a candidate or which acts jointly with a candidate or controlled committee connection with the making of expenditures. A candidate controls a committee if the candidate, the candidate's agent, or any other committee he or she controls, has significant influence on the actions or decisions of the committee.)

VERIFICATION

I declare under penalty of perjury that to the best of my knowledge this statement and its schedules are true, correct and complete and that I have used all reasonable diligence in their preparation.

Executed on 7-30-85 at San Diego, California by _____
(DATE) (CITY AND STATE) (SIGNATURE OF TREASURER(S))

Executed on _____ at _____ by _____
(DATE) (CITY AND STATE) (SIGNATURE OF TREASURER(S))

I declare under penalty of perjury that to the best of my knowledge this statement and its schedules are true, correct and complete and that treasurer(s) of this committee(s) has used all reasonable diligence in the preparation of this statement and its schedules.

Executed on 7-30-85 at San Diego, California by _____
(DATE) (CITY AND STATE) (SIGNATURE OF CANDIDATE OR OFFICEHOLDER)

For information required to be provided to you pursuant to the Information Practices Act of 1977, see "Information Manual on Campaign Disclosure Provisions of the Political Reform Act," Part X.

IV ALLOCATION OF CONTRIBUTIONS AND EXPENDITURES MADE TO OR ON BEHALF OF OTHER CANDIDATES, OFFICEHOLDERS AND MEASURES (Allocate expenditures from Schedules E & F made to or on behalf of another candidate, officeholder or measure. Amounts may be rounded off to whole dollars.)

OFFICIAL USE ONLY	DATE	NAME OF CANDIDATE OR OFFICEHOLDER AND OFFICE OR MEASURE AND BALLOT NUMBER OR LETTER	CHECK ONE		AMOUNT	CUMULATIVE TO DATE
			Support	Oppose		
		Ernest J. Dronenburg, Member			10,846.37	10,846.37
		Board of Equalization,				
		Third District				

Attach additional information on appropriately labeled continuation sheets.

**INSTRUCTIONS FOR PREPARING COVER PAGE
CONSOLIDATED CAMPAIGN STATEMENT
FORM 490**

PERIOD COVERED BY STATEMENT:

The period covered begins the day after the closing date of the last campaign statement filed. If a previous statement has not been filed, the period begins on January 1 of the current calendar year. The period ends on the closing date for the current statement. The closing date is specified in the "Information Manual on Campaign Disclosure."

DATE OF ELECTION:

If this statement is filed in connection with an election held on a date other than June 5 or November 6, enter the date of the election.

PART I:

Provide the candidate's or officeholder's full name, residential address, business address and telephone numbers, and the office sought or held.

PART II:

Identify the controlled committees included in the consolidated report and the treasurers of the committees. Use the same information that appears on the committees' Statements of Organization filed with the Secretary of State. Do not use abbreviations. A permanent business or residential address must be provided for the treasurers. The identification numbers must be included. (If not yet received from the Secretary of State's office, that fact must be noted.)

PART III:

The candidate or office holder must list all additional committees not included in this consolidated report which are controlled by the candidate or officeholder or are primarily formed to receive contributions or make expenditures on the candidate's behalf and whether or not they are controlled committees.

VERIFICATION:

The statement must be signed by each committee treasurer included in the consolidated report and by the candidate or officeholder who controls the committee. The treasurer and candidate or officeholder must review the information contained in the statement before signing the verification.

ALLOCATION OF CONTRIBUTIONS AND EXPENDITURES MADE TO OR ON BEHALF OF OTHER CANDIDATES, OFFICEHOLDERS AND MEASURES:

List all contributions (including loans) and independent expenditures itemized on Schedules E and F to support or oppose officeholders, candidates and ballot measures (other than those controlling this committee or for which this committee is primarily formed). Indicate the date of the expenditure, the office sought or held (or the measure's number or letter and the jurisdiction), the amount of the expenditure and the cumulative amount to date. The "Cumulative to Date" column should include the total of expenditures for or against each candidate or measure since January 1 of the current calendar year. (See "Information Manual on Campaign Disclosure" for discussion and examples of "cumulation".)

CAMPAIGN DISCLOSURE STATEMENT SUMMARY PAGE
FORM 420, 430 OR 490

(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD

FROM THROUGH

1-1-85 6-30-85

NAME OF CANDIDATE OR COMMITTEE

Friends of Dronenburg

I.D. NUMBER (IF COMMITTEE)

78-1133

	COLUMN A Cumulative total from previous period *	COLUMN B Total this period from attached schedules	COLUMN C Cumulative to date (Columns A + B)
CONTRIBUTIONS RECEIVED			
1. Monetary contributions	\$.00	\$ 100.00 SCHEDULE A, LINE 1	\$ 100.00
2. Loans	1,550.00	SCHEDULE B, LINE 1	1,550.00
3. Subtotal	\$1,550.00 LINES 1 + 2	\$ 100.00 LINES 1 + 2	\$ 1,650.00 LINES 1 + 2
4. Non-monetary contributions	.00	1,180.00 SCHEDULE C, LINE 1	1,180.00
5. Pledges	.00	SCHEDULE D, LINE 1	
6. TOTAL CONTRIBUTIONS	\$1,550.00 LINES 3 + 4 + 5	\$ 1,280.00 LINES 3 + 4 + 5	\$ 2,830.00 LINES 3 + 4 + 5 (SHOULD EQUAL LINE 6, COLUMNS A + B)
EXPENDITURES MADE			
7. Payments	\$.00	\$ 10,846.37 SCHEDULE E, LINE 1	\$10,846.37
8. Accrued expenses (unpaid bills)	.00	SCHEDULE F, LINE 1	
9. TOTAL EXPENDITURES	\$.00 LINES 7 + 8	\$ 10,846.37 LINES 7 + 8	\$10,846.37 LINES 7 + 8 (SHOULD EQUAL LINE 9, COLUMNS A + B)

*If this is the first report filed for the calendar year, Column A should be blank except for unpaid loans, bills and pledges.

STATEMENT OF CHANGES IN FINANCIAL CONDITION

10. Cash on hand at the beginning of this period. (Line 14 of previous statement)	\$ 65,150.00
11. Cash receipts this period (Line 3, Column B above)	100.00
12. Miscellaneous adjustments to cash (Schedule G, Line 7)	1,948.56
13. Cash payments this period (Line 7, Column B above)	10,846.37
14. Cash on hand at closing date (Lines 10+11+12-13 above) *	56,352.19
15. Outstanding debts (Line 2 + Line 8 of Column C above)	
16. Ending surplus (if Line 14 is greater than Line 15, subtract Line 15 from Line 14)	\$ 56,352.19
17. Ending deficit (if Line 15 is greater than Line 14, subtract Line 14 from Line 15)	\$ ()

*Ending cash on hand should not be a negative amount.

SUMMARY FOR CANDIDATES IN BOTH A JUNE AND NOVEMBER ELECTION (See Instructions on Reverse)

	1/1 thru 6/30	7/1 to date
18. CONTRIBUTIONS RECEIVED:		
19. EXPENDITURES MADE:		

SCHEDULE A
MONETARY CONTRIBUTIONS RECEIVED
FORM 420, 430 OR 490

(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD	
FROM	THROUGH
1-1-85	6-30-85
I.D. NUMBER (IF COMMITTEE)	
78-1133	

NAME OF CANDIDATE OR COMMITTEE:

Friends of Dronenburg

DATE REC'D	FULL NAME AND ADDRESS OF CONTRIBUTOR (IF COMMITTEE, ALSO ENTER I.D. NUMBER OR TREASURER'S NAME AND ADDRESS)	OCCUPATION	EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	AMOUNT	
				RECEIVED	CUMULATIVE TO DATE
2-22-85	MDCI Corporation P.O. Box 54001, T.A. Los Angeles, CA 90054-0001			100.00	100.00
SUBTOTAL				100.00	

☐

If more space is needed, check box at left
and attach additional Schedules A.

SUMMARY

1. AMOUNT RECEIVED - CONTRIBUTIONS OF \$100 OR MORE (Include all Schedule A subtotals)	\$	100.00
2. AMOUNT RECEIVED - CONTRIBUTIONS OF LESS THAN \$100 (Not itemized)		
3. TOTAL MONETARY CONTRIBUTIONS THIS PERIOD (Line 1 + Line 2) Enter here and on Line 1 Column B of Summary Page		\$ 100.00

SCHEDULE C
NON-MONETARY CONTRIBUTIONS RECEIVED
FORM 420, 430 OR 490

(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
FROM THROUGH

1-1-85 6-30-85

I.D. NUMBER (IF COMMITTEE)

78-1133

NAME OF CANDIDATE OR COMMITTEE:

Friends of Dronenburg

DATE REC'D	FULL NAME AND ADDRESS OF CONTRIBUTOR (IF COMMITTEE, ALSO ENTER I.D. NUMBER OR TREASURER'S NAME AND ADDRESS)	OCCUPATION	EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	DESCRIPTION OF GOODS OR SERVICES	FAIR MARKET VALUE RECEIVED	CUMU- LATIVE AMOUNT
1-1-85	Hawkins & Harris			Secretarial	40.00	40.00
6-30-85	1629 Columbia Street San Diego, CA 92101			Accounting	540.00	540.00
1-18-85	Ross Enterprises			Consulting		
2-17-85	2605 Camino Del Rio So. San Diego, CA 92108			Services	600.00	600.00
SUBTOTALS					1,180.00	



If more space is needed, check box at left
and attach additional Schedules C.

SUMMARY

1. NON-MONETARY CONTRIBUTIONS OF \$100 OR MORE THIS PERIOD.	\$	1,180.00
2. NON-MONETARY CONTRIBUTIONS UNDER \$100 THIS PERIOD (Not itemized).		
3. TOTAL NON-MONETARY CONTRIBUTIONS THIS PERIOD (Line 1 + 2) Enter here and on Line 4, Column B of Summary Page		\$1,180.00

SCHEDULE E
PAYMENTS AND CONTRIBUTIONS MADE

FORM 420, 430 OR 490

(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD	
FROM	THROUGH
1-1-85	6-30-85
I.D. NUMBER (IF COMMITTEE)	
78-1133	

NAME OF CANDIDATE OR COMMITTEE:

Friends of Dronenburg

CODES FOR CLASSIFYING EXPENDITURES

If one of the following codes is used to describe the expenditure, no written description is needed. (Note exceptions on the back of this schedule for codes "C", "I" and "T".) Refer to the back of this schedule and the *Information Manual on Campaign Disclosure* for detailed explanations and examples of each category.

- | | |
|---|--|
| "C" - CONTRIBUTIONS TO OTHER CANDIDATES OR COMMITTEES | "S" - SURVEYS, SIGNATURE GATHERING, DOOR-TO-DOOR SOLICITATIONS |
| "I" - INDEPENDENT EXPENDITURES | "F" - FUNDRAISING EVENTS |
| "L" - LITERATURE | "G" - GENERAL OPERATIONS AND OVERHEAD |
| "B" - BROADCAST ADVERTISING | "T" - TRAVEL, ACCOMMODATIONS AND MEALS |
| "N" - NEWSPAPER AND PERIODICAL ADVERTISING | "P" - PROFESSIONAL MANAGEMENT AND CONSULTING SERVICES |
| "O" - OUTSIDE ADVERTISING | |

If one of the above codes does not accurately or fully describe the expenditure, leave the "Code" column blank and provide a written description in the "Description of Payment" column.

IMPORTANT: Do not itemize the payment of accrued expenses on Schedule E. Report only the lump sum of these payments on Line 3 of the Summary section, below.

NAME AND ADDRESS OF PAYEE, CREDITOR OR RECIPIENT OF CONTRIBUTION (IF COMMITTEE, ALSO ENTER I.D. NUMBER OR NAME AND ADDRESS OF TREASURER)	CODE OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
Red Lion Motor Inn 2001 Point West Way Sacramento, CA 95815		Hospitality Room and Coffee Service	537.08 300.00
Business Boosters 414 W. Cedar Street San Diego, CA 92138		Campaign Buttons	361.00
Sacramento Volume Services 1100 14th Street Sacramento, CA 95814		Coffee Service	211.75
Maryann Minaesian Hodgson 19752 MacArthur Boulevard Irvine, CA 92715	P		3,000.00
Stanwood C. Johnson 3430 Camino Del Rio North, Suite 300 San Diego, CA 92108		Reimburse Convention Volunteer Expenses	726.36
☒ If more space is needed, check box and attach additional Schedules E.			SUBTOTAL 5,136.19

IMPORTANT: Contributions and expenditures on behalf of other candidates or committees must also be entered in the allocation section at the front of the campaign statement.

SUMMARY

1. Payments of \$100 or more made this period (Include all Schedule E Subtotals)	9,964.76
2. Payments under \$100 this period (not itemized)	881.61
3. Total Accrued Expenses paid this period (Schedule F, Line 4)	.00
4. Total Payments this period (Line 1 + 2 + 3) Enter here and on Line 7, Column B of Summary Page	10,846.37

SCHEDULE E
PAYMENTS AND CONTRIBUTIONS MADE
(CONTINUATION SHEET)
FORM 420, 430 OR 490)

(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD	
FROM	THROUGH
1-1-85	6-30-85
I.D. NUMBER (IF COMMITTEE)	
78-1133	

NAME OF CANDIDATE OR COMMITTEE:
 Friends of Dronenburg

CODES FOR CLASSIFYING EXPENDITURES

If one of the following codes is used to describe the expenditure, no written description is needed. (Note exceptions on the back of this schedule for codes "C", "I" and "T".) Refer to the back of Schedule E and the *Information Manual on Campaign Disclosure* for detailed explanations and examples of each category.

"C" - CONTRIBUTIONS TO OTHER CANDIDATES OR COMMITTEES	"S" - SURVEYS, SIGNATURE GATHERING, DOOR-TO-DOOR SOLICITATIONS
"I" - INDEPENDENT EXPENDITURES	"F" - FUNDRAISING EVENTS
"L" - LITERATURE	"G" - GENERAL OPERATIONS AND OVERHEAD
"B" - BROADCAST ADVERTISING	"T" - TRAVEL, ACCOMMODATIONS AND MEALS
"N" - NEWSPAPER AND PERIODICAL ADVERTISING	"P" - PROFESSIONAL MANAGEMENT AND CONSULTING SERVICES
"O" - OUTSIDE ADVERTISING	

If one of the above codes does not accurately or fully describe the expenditure, leave the "Code" column blank and provide a written description in the "Description of Payment" column.

NAME AND ADDRESS OF PAYEE, CREDITOR OR RECIPIENT OF CONTRIBUTION (IF COMMITTEE, ALSO ENTER I.D. NUMBER OR NAME AND ADDRESS OF TREASURER)	CODE OR DESCRIPTION OF PAYMENT	AMOUNT PAID
Express Press 501 W. 'B' Street San Diego, CA 92101	Printing	258.88
Franchise Tax Board Sacramento, CA 95817	Form 100 12-31-84 Form 100ES 12-31-85	104.76 184.76
Internal Revenue Service Fresno, CA 93888	Form 1120POL 12-31-84	812.23
Fred Lyte 800 Wilshire Boulevard Los Angeles, CA 90017	Loan	2,000.00
U.S. Postmaster San Diego, CA 92101	Postage	100.00
E. J. Dronenburg - Reimburse 5001 Ligia Place El Cajon, CA 92101	Photos Convention Travel	71.27 549.18 374.00
Center City Printing 1031 14th Street San Diego, CA 92101	Printing	373.49
SUBTOTAL		4,828.57

☐ If more space is needed, check box and attach additional Schedules E.

SCHEDULE G
MISCELLANEOUS ADJUSTMENTS TO CASH POSITION
FORM 420, 430 OR 490

(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD	
FROM	THROUGH
1-1-85	6-30-85

NAME OF CANDIDATE OR COMMITTEE:

Friends of Dronenburg

I.D. NUMBER (IF COMMITTEE)

78-1133

DATE	DESCRIPTION OF ADJUSTMENT (IF THE ADJUSTMENT INVOLVES A COMMITTEE, OTHER THAN THE FILER, ENTER THE COMMITTEE'S NAME AND ADDRESS. ALSO ENTER THE COMMITTEE'S I.D. NUMBER OR THE TREASURER'S NAME AND ADDRESS)	AMOUNT OF	
		INCREASE TO CASH	DECREASE TO CASH
Various	Interest income - Checking account	323.56	
5-4-85	Interest income - Investment account	1,625.00	
SUBTOTAL		(a) 1,948.56	(b)

☐ If more space is needed, check box at left and attach additional Schedules G

SUMMARY

1.	INCREASES TO CASH OF \$100 OR MORE THIS PERIOD (Column (a))	\$ 1,948.56
2.	INCREASES TO CASH OF LESS THAN \$100 THIS PERIOD (Not itemized)	
3.	TOTAL INCREASES TO CASH THIS PERIOD (Line 1 + Line 2)	1,948.56
4.	DECREASES TO CASH OF \$100 OR MORE THIS PERIOD (Column (b))	
5.	DECREASES TO CASH OF LESS THAN \$100 THIS PERIOD (Not itemized)	
6.	TOTAL DECREASES TO CASH THIS PERIOD (Line 4 + Line 5)	
7.	TOTAL MISCELLANEOUS ADJUSTMENTS TO CASH THIS PERIOD (Line 3 minus Line 6) Enter here and on Line 12 of Summary Page	\$1,948.56 (May be negative figure)



Form 490
1981

CONSOLIDATED CAMPAIGN STATEMENT

(Government Code Section 84200-84217)

For use by candidates/officeholders and their controlled committees.

(Type or Print in Ink)

Statement covers period from 7-1-85 through 12-31-85

A OFFICIAL USE ONLY

DATE OF ELECTION (MO., DAY, YR.): (IF APPLICABLE)

TOTAL PAGES:

I CANDIDATE/OFFICEHOLDER INCLUDED IN THIS CONSOLIDATED REPORT (If applicable)

NAME OF CANDIDATE:

Ernest J. Dronenburg

OFFICE SOUGHT OR HELD (INCLUDE LOCATION AND DISTRICT NUMBER IF APPLICABLE)
Board of Equalization

RESIDENTIAL ADDRESS: NO. AND STREET	CITY	STATE	ZIP CODE	AREA CODE	PHONE NUMBER
5001 Ligia Place	El Cajon	CA	92020	(619)	442-4702
BUSINESS ADDRESS: NO. AND STREET	CITY	STATE	ZIP CODE	AREA CODE	PHONE NUMBER
110 West C Street	San Diego	CA	92101	(619)	237-7884

II CONTROLLED COMMITTEES* INCLUDED IN THIS CONSOLIDATED REPORT

NAME OF COMMITTEE:

Friends of Dronenburg

I.D. NUMBER

78-1133

ADDRESS OF COMMITTEE: NO. AND STREET	CITY	STATE	ZIP CODE	AREA CODE	PHONE NUMBER
1629 Columbia Street	San Diego	CA	92101	(619)	235-6531

NAME OF TREASURER:

David A. Hawkins

PERMANENT ADDRESS OF TREASURER: NO. AND STREET	CITY	STATE	ZIP CODE	AREA CODE	PHONE NUMBER
1629 Columbia Street	San Diego	CA	92101	(619)	235-6531

NAME OF COMMITTEE:

I.D. NUMBER

ADDRESS OF COMMITTEE: NO. AND STREET	CITY	STATE	ZIP CODE	AREA CODE	PHONE NUMBER
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NAME OF TREASURER:

PERMANENT ADDRESS OF TREASURER: NO. AND STREET	CITY	STATE	ZIP CODE	AREA CODE	PHONE NUMBER
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Attach additional information on appropriately labeled continuation sheets.

III CANDIDATE/OFFICEHOLDER ONLY: IF YOU HAVE KNOWLEDGE OF ANY OTHER COMMITTEES NOT INCLUDED IN THIS CONSOLIDATED STATEMENT WHICH HAVE RECEIVED CONTRIBUTIONS OR MADE EXPENDITURES ON BEHALF OF YOUR CANDIDACY, IDENTIFY THEM IN THIS SECTION.

COMMITTEE NAME AND I.D. NUMBER	COMMITTEE ADDRESS	TREASURER	CONTROLLED COMMITTEE**	
			YES	NO

Attach additional information on appropriately labeled continuation sheets.

*A controlled committee is one which is controlled directly or indirectly by a candidate or which acts jointly with a candidate or controlled committee in connection with the making of expenditures. A candidate controls a committee, if he, his agent or any other committee he controls, has significant influence on the actions or decisions of the committee.

VERIFICATION

I declare under penalty of perjury that to the best of my knowledge this statement and its schedules are true, correct and complete and that I have used all reasonable diligence in their preparation.

Executed on 1/30/86 at San Diego, California by _____
(DATE) (CITY AND STATE) (SIGNATURE OF TREASURER(S))

Executed on _____ at _____ by _____
(DATE) (CITY AND STATE) (SIGNATURE OF TREASURER(S))

I declare under penalty of perjury that to the best of my knowledge this statement and its schedules are true, correct and complete and the treasurer(s) of this committee(s) has used all reasonable diligence in the preparation of this statement and its schedules.

Executed on 1/30/86 at San Diego, California by _____
(DATE) (CITY AND STATE) (SIGNATURE OF CANDIDATE OR OFFICEHOLDER)

For information required to be provided to you pursuant to the Information Practices Act of 1977, see "Information Manual on Campaign Disclosure Provisions of the Political Reform Act," Part X.

CAMPAIGN DISCLOSURE STATEMENT SUMMARY PAGE
FORM 420, 430 OR 490

(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD	
FROM	THROUGH
7-1-85	12-31-85

NAME OF CANDIDATE OR COMMITTEE
 Friends of Dronenburg

I.D. NUMBER (IF COMMITTEE)
 78-1133

	COLUMN A Cumulative total from previous period*	COLUMN B Total this period from attached schedules	COLUMN C Cumulative to date (Columns A + B)
CONTRIBUTIONS RECEIVED			
1. Monetary contributions	\$ 100.00	\$ 41,696.00	\$ 41,796.00
2. Loans	1,550.00	SCHEDULE A, LINE 1 10,000.00	11,550.00
3. Subtotal	\$ 1,650.00 LINES 1 - 2	SCHEDULE B, LINE 1 \$ 51,696.00 LINES 1 - 2	\$ 53,346.00 LINES 1 - 2
4. Non-monetary contributions	1,180.00	2,214.50 SCHEDULE C, LINE 1	3,394.50
5. Pledges		SCHEDULE D, LINE 7	
6. TOTAL CONTRIBUTIONS	\$ 2,830.00 LINES 3 + 4 + 5	\$ 53,910.50 LINES 1 - 4 + 5	\$ 56,740.50 LINES 3 + 4 + 5 (SHOULD EQUAL COLUMNS A + B)
EXPENDITURES MADE			
7. Payments	\$ 10,846.37	\$ 7,496.83	\$ 18,343.20
8. Accrued expenses (unpaid bills)	.00	1,828.84 SCHEDULE F, LINE 1	1,828.84
9. TOTAL EXPENDITURES	\$ 10,846.37 LINES 7 + 8	\$ 9,325.67 LINES 7 + 8	\$ 20,172.04 LINES 7 + 8 (SHOULD EQUAL COLUMNS A + B)

STATEMENT OF CHANGES IN FINANCIAL CONDITION

10. Cash on hand at the beginning of this period	\$ 56,352.19
11. Cash receipts this period (Line 3, Column B above)	51,696.00
12. Miscellaneous adjustments to cash (Schedule G, Line 7)	2,147.74
13. Cash payments this period (Line 7, Column B above)	7,496.83
14. Cash on hand at closing date (Lines 10+11+12-13 above)	102,699.10
15. Outstanding debts (Line 2 + Line 8 of Column C above)	13,378.84
16. Ending surplus (if Line 14 is greater than Line 15, subtract Line 15 from Line 14)	\$ 89,320.26
17. Ending deficit (if Line 15 is greater than Line 14, subtract Line 14 from Line 15)	\$ ()

*If this is the first report filed for the calendar year, Column A should be blank except for unpaid loans, bills and pledges.

SUMMARY OF JUNE AND NOVEMBER ELECTIONS (See Instructions on Reverse)

	1/1 thru 6/30	7/1 to date
18. CONTRIBUTIONS RECEIVED:		
19. EXPENDITURES MADE:		

SCHEDULE A

MONETARY CONTRIBUTIONS RECEIVED FORM 420, 430 OR 490

(Amounts May Be Rounded To Whole Dollars)

				STATEMENT COVERS PERIOD	
				FROM	THROUGH
				7-1-85	12-31-85
NAME OF CANDIDATE OR COMMITTEE:				I.D. NUMBER (IF COMMITTEE)	
Friends of Dronenburg				78-1133	
DATE REC'D	FULL NAME AND ADDRESS OF CONTRIBUTOR (IF COMMITTEE, ENTER I.D. NUMBER OR TREASURER'S NAME AND ADDRESS)	OCCUPATION	EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	AMOUNT	
				RECEIVED	CUMULATIVE TO DATE
7-10-85	P.S. I Love You Realty 2825 E. Tahquitz McCallum, Suite C Palm Springs, CA 92262			500.00	500.00
7-26-85	MDCI Corporation P.O. Box 54001, T.A. Los Angeles, CA 90054-0001			100.00	200.00
10-17-85	Julius A. Leetham 111 North Hill Street Los Angeles, CA 90012	Superior Court Judge	County of Los Angeles	100.00	100.00
10-17-85	Northrop Corporation 1840 Century Park East Los Angeles, CA 90067-2199			500.00	500.00
10-17-85	Occidental Petroleum Corp. 10889 Wilshire Boulevard Los Angeles, CA 90024			500.00	500.00
				SUBTOTAL	1,700.00



If more space is needed, check box at left
and attach additional Schedules A.

SUMMARY

- | | |
|--|--------------|
| 1. AMOUNT RECEIVED, \$100 OR MORE (Include all Schedule A subtotals) | \$ 40,600.00 |
| 2. AMOUNT RECEIVED LESS THAN \$100 (Not itemized) | 1,096.00 |
| 3. TOTAL MONETARY CONTRIBUTIONS THIS PERIOD
(Line 1 + Line 2) Enter here and on Line 1 Column B of Summary Page | \$41,696.00 |

SCHEDULE A

MONETARY CONTRIBUTIONS RECEIVED (CONTINUATION SHEET) FORM 420, 430 OR 490

(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
FROM 7-1-85 THROUGH 12-31-85

NAME OF CANDIDATE OR COMMITTEE:

Friends of Dronenburg

I.D. NUMBER (IF COMMITTEE)
78-1133

DATE REC'D	FULL NAME AND ADDRESS OF CONTRIBUTOR (IF COMMITTEE, ENTER I.D. NUMBER OR TREASURER'S NAME AND ADDRESS)	OCCUPATION	EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	AMOUNT	
				RECEIVED	CUMULATIVE TO DATE
10-17-85	Litton Industries 360 N. Crescent Drive Beverly Hills, CA 90210			1,000.00	1,000.00
10-17-85	Richard L. Noble 523 W. 6th Street Los Angeles, CA 90014	Attorney	Noble, Campbell & Uhler	250.00	250.00
10-17-85	Margaret Martin Brock 2220 Avenue of the Stars Los Angeles, CA 90067	Philanthropist		250.00	250.00
10-17-85	Virco Mfg. Corp. P.O. Box 44846, Hancock Station Los Angeles, CA 90044			250.00	250.00
10-17-85	Robert F. Beaver 1235 Margarita Drive Fullerton, CA 92633	President	Willard Brent Co., Inc.	100.00	100.00
10-17-85	Watt Pac., Inc. 2716 Ocean Park Boulevard Santa Monica, CA 90405			500.00	500.00
10-17-85	Superior Stamp & Coin Co./NC 9301 Wilshire Boulevard Beverly Hills, CA 90210			250.00	250.00
10-17-85	Certified Grocers Political Action Committee I.D. #801745			250.00	250.00
10-30-85	Gen. Tel. Gov't. Club P.O. Box 862 Santa Monica, CA 90406			500.00	500.00

SUBTOTAL 3,350.00

☒ If more space is needed, check box at left
and attach additional Schedules A.

SCHEDULE A

MONETARY CONTRIBUTIONS RECEIVED (CONTINUATION SHEET) FORM 420, 430 OR 490

(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
FROM 7-1-85 THROUGH 12-31-85

NAME OF CANDIDATE OR COMMITTEE:
Friends of Dronenburg

I.D. NUMBER (IF COMMITTEE)
78-1133

9
2
6
4
0
7
6
4
0
7
0
3

DATE REC'D	FULL NAME AND ADDRESS OF CONTRIBUTOR (IF COMMITTEE, ENTER I.D. NUMBER OR TREASURER'S NAME AND ADDRESS)	OCCUPATION	EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	AMOUNT	
				RECEIVED	CUMULATIVE TO DATE
10-17-85	Longs Drug Stores 141 North Civic Drive Walnut Creek, CA 94596			100.00	100.00
10-17-85	Security Pacific Corp. 333 South Hope St., Ste W28-22 Los Angeles, CA 90071			500.00	500.00
10-17-85	State and Local Citizenship Responsibility Group of the Employees of So. Cal. Edison Co. I.D. #74-2227			500.00	500.00
10-17-85	Watson Land Company 22010 So. Wilmington Ave. Carson, CA 90745			500.00	500.00
10-17-85	Thrifty Corporation 3424 Wilshire Boulevard Los Angeles, CA 90010			500.00	500.00
10-17-85	Carter Hawley Hale Stores, Inc. 550 S. Flower Street Los Angeles, CA 90071			500.00	500.00
10-17-85	Martin Gould 1245 So. Grand Avenue Pasadena, CA 91105	Retired		250.00	250.00
10-17-85	Oltmans Construction Co. 10005 Mission Mill Road Whittier, CA 90608-0985			750.00	750.00
10-17-85	Hughes Aircraft Company P.O. Box 1042, C2/B111 El Segundo, CA 90245			500.00	500.00
10-17-85	Charles G. Bakaly, Jr. 400 So. Hope St., 15th Floor Los Angeles, CA 90071-2899	Attorney	O'Melveny & Myers Los Angeles, CA	250.00	250.00
10-17-85	Dominic F. Birgen 10249 Fifth Avenue Inglewood, CA 90303	Tax Manager	Rockwell International	250.00	250.00

☒ If more space is needed, check box at left
and attach additional Schedules A.

SUBTOTAL 4,600.00

SCHEDULE A

**MONETARY CONTRIBUTIONS RECEIVED
(CONTINUATION SHEET)
FORM 420, 430 OR 490**

(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD	
FROM	THROUGH
7-1-85	12-31-85

NAME OF CANDIDATE OR COMMITTEE:

Friends of Dronenburg

I.D. NUMBER (IF COMMITTEE)

78-1133

DATE REC'D	FULL NAME AND ADDRESS OF CONTRIBUTOR (IF COMMITTEE, ENTER I.D. NUMBER OR TREASURER'S NAME AND ADDRESS)	OCCUPATION	EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	AMOUNT	
				RECEIVED	CUMULATIVE TO DATE
10-30-85	Joseph A. Vinatieri, Atty. 13215 E. Penn St., Ste 510 Whittier, CA 90602	Attorney		250.00	250.00
10-30-85	The Holden Group 11365 W. Olympic Blvd. Los Angeles, CA 90064			250.00	250.00
10-30-85	Pacific Lighting 810 S. Flower Street Los Angeles, CA 90017			1,000.00	1,000.00
10-30-85	Tosco Corporation P.O. Box 2860 Bakersfield, CA 93303			2,000.00	2,000.00
11-29-85	4 Day Tire Stores 17622 Armstrong Avenue Irvine, CA 92714			250.00	250.00
11-29-85	Dorothy B. Stillwell 1429 Santiago Drive Newport Beach, CA 92660	Housewife		500.00	500.00
11-29-85	Bieber Lighting Corp. 626 Isis Avenue Inglewood, CA 90301			100.00	100.00
11-29-85	Carl M. Buck Bldg. Co. 8242 W. 3rd St., Ste 300 Los Angeles, CA 90048			250.00	250.00
11-29-85	E. B. Buster 1841 Beverly Glen Drive Santa Ana, CA 92705	Chairman, CEO	Cherry Textron	100.00	100.00
11-29-85	U.S. Safe Deposit Co. 2081 San Joaquin Hills Rd. Newport Beach, CA 92660			250.00	250.00
11-29-85	Robert B. Ferguson 840 Newport Center Dr. #600 Newport Beach, CA 92660	Self-employed	Ferguson-Independent	250.00	250.00
SUBTOTAL				5,200.00	

☒ If more space is needed, check box at left
and attach additional Schedules A.

SCHEDULE A
MONETARY CONTRIBUTIONS RECEIVED
(CONTINUATION SHEET)
FORM 420, 430 OR 490

(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD	
FROM	THROUGH
7-1-85	12-31-85

NAME OF CANDIDATE OR COMMITTEE:

Friends of Dronenburg

I.D. NUMBER (IF COMMITTEE)

78-1133

DATE REC'D	FULL NAME AND ADDRESS OF CONTRIBUTOR (IF COMMITTEE, ENTER I.D. NUMBER OR TREASURER'S NAME AND ADDRESS)	OCCUPATION	EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	AMOUNT	
				RECEIVED	CUMULATIVE TO DATE
11-29-85	Robert M. Aran, Atty. 8730 Wilshire Boulevard Beverly Hills, CA 90211	Attorney		500.00	500.00
11-29-85	Pacific Telesis Group 140 New Montgomery Street San Francisco, CA 94105			1,500.00	1,500.00
11-29-85	J. James Woodyard 14348 Riverside Drive Sherman Oaks, CA 91403	Business - Real Estate		500.00	500.00
11-29-85	William D. Heimbach 900 Wilshire Blvd., Ste 820 Los Angeles, CA 90017	Attorney		500.00	500.00
11-29-85	Kaiser Steel Corporation Box 5050 Fontana, CA			750.00	750.00
12-11-85	William A. Hinrichs, M.D., Inc. Physician 7127 Babilonia Street La Costa, CA 92008			100.00	100.00
12-11-85	The Signal Companies, Inc. 11255 North Torrey Pines Rd. La Jolla, CA 92037-1059			300.00	300.00
12-11-85	Rohr Industries, Inc. Chula Vista, CA 92012			150.00	150.00
12-11-85	James R. Spievak 4063 Via Del Conquistador San Diego, CA 92117	Attorney		150.00	150.00
12-11-85	Fitzpatrick & Associates 11030 Santa Monica Blvd. Los Angeles, CA 90025			500.00	500.00
12-11-85	Ken Willig 8430 Whale Watch Way La Jolla, CA 92037	President	Celluland, Inc. 7200 Parkway Drive La Mesa, CA 92041	150.00	150.00

☒ If more space is needed, check box at left
and attach additional Schedules A.

SUBTOTAL 5,100.00

SCHEDULE A

MONETARY CONTRIBUTIONS RECEIVED (CONTINUATION SHEET) FORM 420, 430 OR 490

(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
FROM 7-1-85 THROUGH 12-31-85

NAME OF CANDIDATE OR COMMITTEE:

Friends of Dronenburg

I.D. NUMBER (IF COMMITTEE)
78-1133

DATE REC'D	FULL NAME AND ADDRESS OF CONTRIBUTOR (IF COMMITTEE, ENTER I.D. NUMBER OR TREASURER'S NAME AND ADDRESS)	OCCUPATION	EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	AMOUNT	
				RECEIVED	CUMULATIVE TO DATE
12-11-85	Harriette F. Witmer P.O. Box 17599 Corona Del Mar, CA 92713	Chairman, CEO	Deepwater, Inc.	250.00	250.00
12-11-85	May Co. Los Angeles, CA 90014			500.00	500.00
12-11-85	Orco Block Co., Inc. P.O. Box E Stanton, CA 90680			500.00	500.00
12-11-85	Robert F. Beaver 1235 Margarita Drive Fullerton, CA 92633	Executive	Willard-Brent Co., Inc.	250.00	350.00
12-11-85	C.J. Segerstrom & Sons 3315 Fairview Road Costa Mesa, CA 92626			250.00	250.00
12-11-85	The Bergheer Company 840 Newport Center Drive Newport Beach, CA 92660			100.00	100.00
12-11-85	Dixieline Lumber Co. 3250 Sports Arena Boulevard San Diego, CA 92138			250.00	250.00
12-11-85	Anvil Corporation P.O. Box 19505 Irvine, CA 92713			250.00	250.00
12-11-85	T.W. Hoehn III 5566 Paseo Del Norte Carlsbad, CA 92008	Executive	Hoehn Motors, Inc. Carlsbad, CA	150.00	150.00
12-11-85	Suncoast Financial Corp. 625 3rd Avenue Chula Vista, CA 92010			1,000.00	1,000.00

SUBTOTAL 3,500.00

X

If more space is needed, check box at left
and attach additional Schedules A.

SCHEDULE A

MONETARY CONTRIBUTIONS RECEIVED
(CONTINUATION SHEET)
FORM 420, 430 OR 490

(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD
 FROM 7-1-85 THROUGH 12-31-85

NAME OF CANDIDATE OR COMMITTEE:
 Friends of Dronenburg

I.D. NUMBER (IF COMMITTEE)
 78-1133

DATE REC'D	FULL NAME AND ADDRESS OF CONTRIBUTOR (IF COMMITTEE, ENTER I.D. NUMBER OR TREASURER'S NAME AND ADDRESS)	OCCUPATION	EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	AMOUNT	
				RECEIVED	CUMULATIVE TO DATE
12-11-85	Eleanor R. Storrs 801 Tolito Avenue Coronado, CA	Retired		100.00	100.00
12-11-85	Charles S. Shuken 1340 E. 6th Street Los Angeles, CA 90021	President	MDCI Corporation P.O. Box 54001, T.A. Los Angeles, CA	100.00	100.00
12-11-85	Michael P. Alessio 3737 Fourth Avenue San Diego, CA 92103	President	Capitol Limousine Svc.	150.00	150.00
12-11-85	E. Tyler Miller, Jr. P.O. Box 1134 Rancho Santa Fe, CA 92067	Real Estate Developer	Collins Development	250.00	250.00
12-11-85	John Konwiser 1907 Bayadere Terrace Corona Del Mar, CA 92625	Builder/ Developer	Konwiser Corporation	150.00	150.00
12-11-85	Doy Henley 1409 E. St. Gertrude Place Santa Ana, CA 92705	President	Aeromil Eng. Co.	250.00	250.00
12-11-85	Art Agajanian 3822 Campus Drive Newport Beach, CA 92660			250.00	250.00
12-11-85	William Buck Johns 2600 Mesa Drive Santa Ana, CA 92707	Developer		250.00	250.00
12-11-85	Magnolia Enterprises P.O. Box 8707 Newport Beach, CA 92660			250.00	250.00
12-11-85	McMahon Development 2020 E. First Street Santa Ana, CA 92705			500.00	500.00
SUBTOTAL				2,250.00	

X

If more space is needed, check box at left
 and attach additional Schedules A.

SCHEDULE A

**MONETARY CONTRIBUTIONS RECEIVED
(CONTINUATION SHEET)
FORM 420, 430 OR 490**

(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD	
FROM	THROUGH
7-1-85	12-31-85

NAME OF CANDIDATE OR COMMITTEE:
Friends of Dronenburg

I.D. NUMBER (IF COMMITTEE)
78-1133

DATE REC'D	FULL NAME AND ADDRESS OF CONTRIBUTOR (IF COMMITTEE, ENTER I.D. NUMBER OR TREASURER'S NAME AND ADDRESS)	OCCUPATION	EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	AMOUNT	
				RECEIVED	CUMULATIVE TO DATE
12-11-85	Frederick A. Gage 903 So. Lake St., Ste 101 Burbank CA 91502	Business Developer	Gage Communications	250.00	250.00
12-11-85	Jacobs Development Co. 6820 Indiana Avenue Riverside, CA 92506			250.00	250.00
12-26-85	David A. Hawkins Hawkins Family Trust P.O. Box 8181 Rancho Santa Fe, CA 92067	CPA		150.00	150.00
12-26-85	Kim Fletcher P.O. Box 2070 San Diego, CA 92112	Executive		200.00	200.00
12-26-85	Ernest S. Tucker, III 4156 Coutts Street San Diego, CA 92103	Doctor	Scripps Clinic	150.00	150.00
12-26-85	Ernest J. Dronenburg, Sr. 1221 Yerba Verde Drive El Cajon, CA 92020	Retired		200.00	200.00
12-26-85	Ideal Plumbing & Heating 5138 Waring Road San Diego, CA 92120			100.00	100.00

☒ If more space is needed, check box at left
and attach additional Schedules A.

SUBTOTAL 1,300.00

SCHEDULE A
MONETARY CONTRIBUTIONS RECEIVED
(CONTINUATION SHEET)
FORM 420, 430 OR 490

(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD	
FROM	THROUGH
7-1-85	12-31-85

NAME OF CANDIDATE OR COMMITTEE:

Friends of Dronenburg

I.D. NUMBER (IF COMMITTEE)

78-1133

DATE REC'D	FULL NAME AND ADDRESS OF CONTRIBUTOR (IF COMMITTEE, ENTER I.D. NUMBER OR TREASURER'S NAME AND ADDRESS)	OCCUPATION	EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	AMOUNT	
				RECEIVED	CUMULATIVE TO DATE
12-26-85	Pepper Oil Co., Inc. 2300 Tidelands Avenue National City, CA 92050			150.00	150.00
12-26-85	Daryl C. Idler, Jr. 4979 New Ranch Road El Cajon, CA 92020	Attorney		150.00	150.00
12-26-85	Law Offices John Thomas Montag 110 West C Street San Diego, CA 92101	Attorney	Fluor Corporation 3333 Michaelson Drive Irvine, CA 92730	150.00	150.00
12-26-85	Fluor Corporation Irvine, CA 92730			500.00	500.00
12-26-85	Daniel Ryan 11222 Chalon Road Los Angeles, CA 90049	Retired		500.00	500.00
12-26-85	Ken Oliphant Box 1989 Placentia, CA 92670			250.00	250.00
12-26-85	Sam Devitt 17601 E. 17th Street Tustin, CA 92680			100.00	100.00

SUBTOTAL 1,800.00



If more space is needed, check box at left
and attach additional Schedules A.

SCHEDULE A

**MONETARY CONTRIBUTIONS RECEIVED
(CONTINUATION SHEET)
FORM 420, 430 OR 490**

(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD	
FROM	THROUGH
7-1-85	12-31-85

NAME OF CANDIDATE OR COMMITTEE:

Friends of Dronenburg

I.D. NUMBER (IF COMMITTEE)
78-1133

DATE REC'D	FULL NAME AND ADDRESS OF CONTRIBUTOR (IF COMMITTEE, ENTER I.D. NUMBER OR TREASURER'S NAME AND ADDRESS)	OCCUPATION	EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	AMOUNT	
				RECEIVED	CUMULATIVE TO DATE
12-26-85	W. E. Langston 18 Oak Crest Lane Newport Beach, CA 92660	General Contractor	Snider/Snider Langston, Inc.	250.00	250.00
12-26-85	Evans Telephone Company P.O. Box 518 Patterson, CA 95363			250.00	250.00
12-31-85	NCR Corporation Dayton, Ohio 45479			500.00	500.00
12-26-85	Atlantic Richfield Co. P.O. Box 711512 Los Angeles, CA 90071			2,500.00	2,500.00
12-26-85	C.A. Dunn P.O. Box 2056 Rancho Santa Fe, CA 92067	Executive		100.00	100.00
12-26-85	Cubic Corporation P.O. Box 80787 San Diego, CA 92138			100.00	100.00
12-31-85	Wyman, Bautzer, Rothman, Kuchel & Silbert Los Angeles, CA 90067			500.00	500.00
12-31-85	San Diego Gas & Electric 101 Ash Street San Diego, CA 92101			1,000.00	1,000.00
12-31-85	Pressley Peterbilt P.O. Box 26320 San Diego, CA 92126			100.00	100.00
12-31-85	State & Local Citizenship Responsibility Group ID #74-2227			750.00	1,250.00
12-31-85	Outdoor Advertising Assn. I.D. #79-1426			200.00	200.00

☐ If more space is needed, check box at left
and attach additional Schedules A.

SUBTOTAL 6,250.00

SCHEDULE B
LOANS
FORM 420, 430 OR 490

(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD	
FROM	THROUGH
7-1-85	12-31-85

NAME OF CANDIDATE OR COMMITTEE:

Friends of Dronenburg

I.D. NUMBER (IF COMMITTEE)

78-1133

PART 1 - LOANS RECEIVED

DATE REC'D	FULL NAME AND ADDRESS OF LENDER AND ANY GUARANTORS OR COSIGNERS (IF COMMITTEE, ENTER I.D. NUMBER OR TREASURER'S NAME AND ADDRESS)	OCCUPATION	EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	INT. RATE	AMOUNT OF LOAN	CUMULATIVE TO DATE
12-31-85	Stanwood C. Johnson 4752 Hawley Blvd., No. 3 San Diego, CA 92116	Attorney		10%	3,000.00	3,000.00
12-31-85	James S. Graham 4601 Katy Court La Mesa, CA 92041	Attorney		10%	7,000.00	7,000.00
☐ If more space is needed, check box at left and attach additional Schedules B, Part 1.					SUBTOTAL	10,000.00

PART 2 - LOANS REPAYED, FORGIVEN, OR PAID BY A THIRD PARTY:

DATE	FULL NAME AND ADDRESS OF THE LENDER	(a) AMOUNT REPAYED	ENTER THIS DATA ON SCHEDULE A ALSO		UNPAID BALANCE
			(b) AMOUNT FORGIVEN OR PAID BY THIRD PARTY	THIRD PARTY NAME AND ADDRESS	
☐ If more space is needed, check box at left and attach additional Schedules B, Part 2.		(a)	(b)		
SUBTOTAL					

SUMMARY

1. LOANS OF \$100 OR MORE THIS PERIOD (Part 1)	\$ 10,000.00
2. LOANS UNDER \$100 THIS PERIOD (Not itemized)	
3. TOTAL LOANS RECEIVED (Line 1 + 2)	10,000.00
4. LOANS OF \$100 OR MORE REPAYED THIS PERIOD (Part 2, Column a)	
5. LOANS OF \$100 OR MORE THIS PERIOD FORGIVEN OR PAID BY THIRD PARTY (Part 2, Column b)	
6. LOANS UNDER \$100 REPAYED, FORGIVEN, OR PAID BY A THIRD PARTY THIS PERIOD (Not itemized)	
7. TOTAL LOANS REPAYED, FORGIVEN OR PAID BY A THIRD PARTY THIS PERIOD (Line 4 + 5 + 6)	.00
8. NET CHANGE THIS PERIOD	
(Subtract Line 7 from Line 3) Enter the difference here and on Line 2, Column B of Summary Page	
	\$10,000.00

(May be negative figure)

SCHEDULE C
NON-MONETARY CONTRIBUTIONS RECEIVED
FORM 420, 430 OR 490

(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD	
FROM	THROUGH
7-1-85	12-31-85

NAME OF CANDIDATE OR COMMITTEE:

Friends of Dronenburg

I.D. NUMBER (IF COMMITTEE)

78-1133

DATE REC'D	FULL NAME AND ADDRESS OF CONTRIBUTOR (IF COMMITTEE, ENTER I.D. NUMBER OR TREASURER'S NAME AND ADDRESS)	OCCUPATION	EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	DESCRIPTION OF GOODS OR SERVICES	FAIR MARKET VALUE RECEIVED	CUMULATIVE AMOUNT
9-7-85	David A. Hawkins 1629 Columbia Street San Diego, CA 92101	CPA		Convention supplies	101.00	101.00
7-1-85	Hawkins & Scott 1629 Columbia Street San Diego, CA 92101			Secretarial Accounting	40.00 540.00	80.00 1,080.00
11-15-85	Fred Lyte 800 Wilshire Boulevard Los Angeles, CA 90017	Executive	Lyte & Co.	Cocktail Reception & Related Supplies	1,533.50	1,533.50
SUBTOTALS						

☐

If more space is needed, check box at left and attach additional Schedules C.

SUMMARY

- | | |
|--|-------------|
| 1. NON-MONETARY CONTRIBUTIONS OF \$100 OR MORE THIS PERIOD. | \$ 2,214.50 |
| 2. NON-MONETARY CONTRIBUTIONS UNDER \$100 THIS PERIOD (Not itemized). | |
| 3. TOTAL NON-MONETARY CONTRIBUTIONS THIS PERIOD
(Line 1 + 2) Enter here and on Line 4, Column B of Summary Page | \$2,214.50 |

SCHEDULE E
PAYMENTS AND CONTRIBUTIONS MADE

FORM 420, 430 OR 490

(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD	
FROM	THROUGH
7-1-85	12-31-85

NAME OF CANDIDATE OR COMMITTEE:

Friends of Dronenburg

I.D. NUMBER (IF COMMITTEE)

78-1133

NAME AND ADDRESS OF PAYEE, CREDITOR, OR RECIPIENT OF CONTRIBUTION (IF COMMITTEE, ENTER I.D. NUMBER OR TREASURER'S NAME AND ADDRESS)	IF CONTRI- BUTION CHECK HERE	DESCRIPTION OF EXPENDITURE	AMOUNT PAID
California Republic Party		Pre-registration Form	110.00
Stu Cooper 3074 Admiral Avenue San Diego, CA 92123		Music for pep rally - Deposit Balance	300.00 250.00
The Copy Shoppe 233 A Street, Suite 504 San Diego, CA 92101		Copies Copies Copies Printing	118.14 155.57 197.50 106.49
Sharon Kelly 1020 N Street Sacramento, CA 95808		Christmas Party Expenses	236.00
Linda Sheridan 3622 Villa Terrace San Diego, CA 92116		Fundraising expenses	500.00
Center City Printing 1031 14th Street San Diego, CA 92101		Envelopes, letters Letterhead	474.47 376.51
Town & Country Hotel 500 Hotel Circle North San Diego, CA 92108		Lodging - Deposit Lodging - Convention Coffee - Convention	130.00 520.79 559.52
Hawkins & Scott 1629 Columbia Street San Diego, CA 92101		Postage for TACS letter Postage Postage	193.45 162.18 106.92
☒ If more space is needed, check box at left and attach additional Schedules E.			SUBTOTAL 4,497.54

SUMMARY

1. PAYMENTS OF \$100 OR MORE MADE THIS PERIOD (Include all Schedule E subtotals)	\$ 7,196.46
2. PAYMENTS UNDER \$100 THIS PERIOD (Not itemized)	300.37
3. TOTAL ACCRUED EXPENSES PAID THIS PERIOD (Schedule F, Line 4)	.00
4. TOTAL PAYMENTS THIS PERIOD (Lines 1 + 2 + 3) Enter total here and on Line 7, Column B of Summary Page.	\$ 7,496.83

SCHEDULE E
PAYMENTS AND CONTRIBUTIONS MADE
(CONTINUATION SHEET)
FORM 420, 430 OR 490)

(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD	
FROM	THROUGH
7-1-85	12-31-85
I.D. NUMBER (IF COMMITTEE)	
78-1133	

NAME OF CANDIDATE OR COMMITTEE:

Friends of Dronenburg

NAME AND ADDRESS OF PAYEE, CREDITOR, OR RECIPIENT OF CONTRIBUTION (IF COMMITTEE, ENTER I.D. NUMBER OR TREASURER'S NAME AND ADDRESS)	IF CONTRI- BUTION. CHECK HERE	DESCRIPTION OF EXPENDITURE	AMOUNT PAID
Doug Boyd 4424 Maple Drive Oceanside, CA 92056		Convention Supply Reimbursed Convention Supply Reimbursed	202.20 231.17
Eric Miethke 2618 Shad Court Sacramento, CA 95826		Fundraising expenses	227.90
Linda & Roger Chase 5056 Narragansett San Diego, CA 92107		Fundraising expenses	100.00
U.S. Postmaster San Diego, CA 92101		Fundraising expenses	440.00
Stage One Labels 7056 Convoy Court San Diego, CA 92111		Convention labels	257.24
Maryann Minaesian Hodgson 19752 MacArthur Boulevard Irvine, CA 92715		Reimburse for fundraising expenses	716.23 114.18
Murry Associates 4501 Mission Bay Drive San Diego, CA 92109		Convention expenses	410.00
☐ If more space is needed, check box at left and attach additional Schedules E.			SUBTOTALS 2,698.92

SCHEDULE F
ACCRUED EXPENSES
(UNPAID BILLS)

FORM 420, 430 OR 490

(Amounts May Be Rounded To Whole Dollars)

STATEMENT COVERS PERIOD	
FROM	THROUGH
7-1-85	12-31-85

NAME OF CANDIDATE OR COMMITTEE:

I.D. NUMBER (IF COMMITTEE)

Friends of Dronenburg

78-1133

NAME AND ADDRESS OF PAYEE, CREDITOR, OR RECIPIENT OF CONTRIBUTION (IF COMMITTEE, ENTER I.D. NUMBER OR TREASURER'S NAME AND ADDRESS)	IF CONTRI- BUTION, CHECK HERE	DESCRIPTION OF EXPENDITURE	AMOUNT ACCRUED
Center City Printing 1031 14th Street San Diego, CA 92101		Printing Services	217.77
At Your Service P.O. Box 90513 San Diego, CA 92109-0860		Fundraising expenses	606.07
Maryann Minaesian Hodgson P.O. Box 19223 Sacramento, CA 95819		Fundraising expenses	1,005.00
☐ If more space is needed, check box at left and attach additional Schedules F.			SUBTOTAL 1,828.84

SUMMARY

1. ACCRUED EXPENSES OF \$100 OR MORE THIS PERIOD	\$ 1,828.84
2. ACCRUED EXPENSES OF UNDER \$100 THIS PERIOD (Not itemized)	.00
3. TOTAL ACCRUED EXPENSES INCURRED THIS PERIOD (Line 1 + 2)	1,828.84
4. ACCRUED EXPENSES PAID THIS PERIOD (Not itemized) Enter here and on Line 3, Schedule E	.00
5. NET CHANGE THIS PERIOD (Subtract Line 4 from Line 3) Enter difference here and on Line 8, Column B of Summary Page	\$ 1,828.84

(May be negative figure)

SCHEDULE G
MISCELLANEOUS ADJUSTMENTS TO CASH POSITION
FORM 420, 430 OR 490

(Amounts May Be Rounded To Whole Dollars)

		STATEMENT COVERS PERIOD	
		FROM	THROUGH
		7-1-85	12-31-85
NAME OF CANDIDATE OR COMMITTEE: Friends of Dronenburg		I.D. NUMBER (IF COMMITTEE) 78-1133	
DATE	DESCRIPTION OF ADJUSTMENT (IF THE ADJUSTMENT INVOLVES A COMMITTEE, OTHER THAN THE FILER, ENTER THE I.D. NUMBER OR THE TREASURER'S NAME AND ADDRESS)	AMOUNT OF	
		INCREASE TO CASH	DECREASE TO CASH
8-23-85	Red Lion Motor Inn refund for overpayment	188.21	
Various	Interest - Checking account	319.09	
11-29-85	Interest - Investment account	1,625.00	
SUBTOTAL		2,132.30	

☐ If more space is needed, check box at left and attach additional Schedules G

SUMMARY

1. INCREASES TO CASH OF \$100 OR MORE (Include all subtotals (a)).	\$ 2,132.30	
2. INCREASES TO CASH OF LESS THAN \$100 (Not itemized).	15.44	
3. TOTAL INCREASES TO CASH (Line 1 + Line 2).		
4. DECREASES TO CASH OF \$100 OR MORE (Include all subtotals (b)).	2,147.74	
5. DECREASES TO CASH OF LESS THAN \$100 (Not itemized)		
6. TOTAL DECREASES TO CASH (Line 4 + Line 5)		
7. TOTAL MISCELLANEOUS ADJUSTMENTS TO CASH (Line 3 minus Line 6) Enter here and on Line 12 of Summary Page		\$ 2,147.74

(May be negative figure)

HAWKINS & SCOTT
ACCOUNTANCY CORPORATION

CERTIFIED
PUBLIC
ACCOUNTANTS

David A. Hawkins, C.P.A.
F. Laurence Scott, Jr., C.P.A.
Daryl B. Golemb, C.P.A.
Dennis G. Cronin, C.P.A.
Frank R. Harris, C.P.A. (Retired)



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Del Mar, California 92014
619/481-7775 - 455-6996

☐ 1629 Columbia Street
San Diego, CA 92101-2572
619/235-6531

June 25, 1987

Mr. Charles Bell
Treasurer for Robert Naylor Campaign
1030 15th Street
Suite 250
Sacramento, California 95814

RE: Campaign Contribution

Dear Mr. Bell:

As a result of a preliminary review by the Federal Election Commission, Friends of Dronenberg PAC has been required to make certain adjustments. A contribution of \$5,000.00 was made on October 10, 1986, to the campaign for Robert Naylor. At that time we were not a multicandidate committee and were, therefore, limited to a maximum of \$1,000.00 per candidate. In order that we may comply with this rule, we ask that \$4,000.00 be returned to the Friends of Dronenberg PAC.

Your prompt attention to this matter is appreciated. If I can be of further service, please give me a call.

Sincerely,

Alan M. Wiley

AMW:alb

Exhibit B



Board of Supervisors County of Los Angeles

MICHAEL D. ANTONOVICH
SUPERVISOR FIFTH DISTRICT

June 16, 1987

Mr. Cory M. Homnick
Friends of Dronenburg PAC
Hawkins & Scott
1629 Columbia Street
San Diego, CA 92101-2572

Dear Mr. Homnick:

Enclosed is our check #6105 in the amount of \$4000.00 which is a refund from you contribution of \$5000.00. This refund is necessary as your PAC had not become a multi candidate committee at the time you issued your check.

Thank you for your help and cooperation.

Sincerely,

Lolli Benton

LOLLI BENTON
Antonovich for Senate
116 N. Maryland, Ste 205
Glendale, CA 91205
818 240-1988

RECEIVED

JUN 17 1987

Ans'd.....

Exhibit C

PLEASE BE SURE THAT ALL ITEMS ARE PROPERLY
ENDORSED LIST EACH CHECK SEPARATELY

CURRENCY	DOLLARS	CENTS
COIN		
CHECKS		
90-1865	4000	00
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		
TOTAL	4000	00

PLEASE ENTER THE TOTAL AMOUNT OF DEPOSIT
ON THE OTHER SIDE OF THIS TICKET

	X	100	
	X	50	
	X	20	
	X	10	
	X	5	
	X	2	
	X	1	
TOTAL	\$		

ANTONOVICH FOR U.S. SENATE

109 E. HARVARD, STE. 200 818-500-1100
GLENDALE, CA 91205

6105

PAY
TO THE
ORDER OF

Friends of Cronenburg
or thousand and so.

June 15 1987

90-1865-1222

\$ 4000.50

DOLLARS

**Valley National Bank**

GLENDAL MAIN
420 N. Brand Blvd., Glendale, CA 91203-2309

FOR

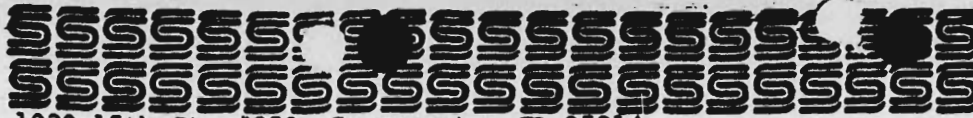
Refund

Lilli Benton

Issa Sekovich

11 006 105 11 1: 1 2 2 2 1 8 6 5 7 1: 0 1 0 2 2 2 3 3 8 11

Bob Naylor For U.S. Senate Committee



N° T-152

1030 15th St, #250, Sacramento, CA 95814

Aug. 24 1987 $\frac{91.4}{1210}$

PAY TO THE
ORDER OF Friends of Dronenburg PAC

\$ 4000.00

THE SUM 4000 DOLLARS

DOLLARS

SECURITY PACIFIC NATIONAL BANK
The Senator Office #0787
1123 L St., Sacramento, CA 95814

Charles H. Be

⑆121000044⑆

787-018016

RECEIVED
AUG 27 1987
AMERICAN

3 3 0 4 0 7 6 4 6 4 0

37040764547

HAWKINS & SCOTT
ACCOUNTANCY CORPORATION

David A. Hawkins, C.P.A.
F. Laurence Scott, Jr., C.P.A.
Dennis G. Cronin, C.P.A.

Frank R. Harris, C.P.A. (1924-1987)



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2775 Via de la Valle 202
Del Mar, California 92014
619/481-7775-485-6996

* 1629 Columbia Street
San Diego, CA 92101-2572
619/235-6531

FAX 619/696-5397

December 21, 1988

Ms. Deborah Curry
Federal Election Commission
Washington, DC 20463

Re: Friends of Dronenburg PAC
Identification Number: C00204461
MUR 2663

Dear Ms. Curry:

In response to our telephone conference of last week, enclosed is a revised response to your Request for Production of Documents.

It is our understanding through correspondence received by our office from Mike Tangney, a Reports Analyst at the Federal Election Commission, that our prompt action to remedy potential violations of the Federal Election Campaign Act will be taken into consideration in your investigation. As evidence of this prompt action, I hereby enclosed the following statements of fact:

1) In October, 1986, the Friends of Dronenburg Federal Account made two (2) contributions of \$5,000.00 each to the committees of Robert W. Naylor and Michael B. Antonovich, respectively. Immediately upon learning from the Federal Election Commission that the Committee had not yet attained multicandidate committee status, we sent requests for refunds to the donee committees. I enclosed for your files copies of refund requests and checks received in the above matter.

2) On March 9, 1986 and November 13, 1986, the Friends of Dronenburg non-federal account inadvertently made two (2) contributions of \$1,000.00 each to the Federal committee of Wally Herger. On March 12, 1986, the Friends of Dronenburg non-Federal account inadvertently made a contribution of \$1,000.00 to the Federal Konneyu Election Committee. Immediately upon being notified of a potential violation, the Friends of Dronenburg Federal account reimbursed the non-Federal account for one (1) of the Herger contributions and the Konneyu contribution. To my knowledge, the other Herger contribution has yet to be reimbursed. I enclosed copies of reimbursement checks dated June 22, 1987 as evidence.

88 DEC 27 AM 9:36

FEDERAL ELECTION COMMISSION

DEC 27 1988

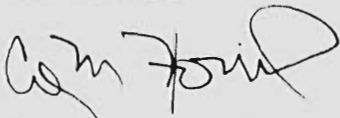
Page 2

Ms. Deborah Curry
Federal Election Commission
December 21, 1988

3) On May 9, 1986, the non-Federal account of Friends of Dronenburg transferred \$1,000.00 to open the Federal account. Immediately after being informed of a potential violation, the Federal account reimbursed the non-Federal account this \$1,000.00. I enclosed check #1009 dated June 22, 1987 as evidence.

In view of the above statements of facts and the enclosed interrogatories, I am certain you will see that Friends of Dronenburg exercised appropriate business care and prudence in these matters and that no further action should be taken against the Friends of Dronenburg Federal and non-Federal accounts.

Sincerely,



Cory M. Homnick
Certified Public Accountant

CMH:sla
Enclosures

cc: Ernest J. Dronenburg

HS

FRIENDS OF DRONENBURG PAC

1. YES

2.	DATE	AMOUNT
	-----	-----
	03/09/86	\$ 1,000.00
	03/12/86	1,000.00
	11/13/86	1,000.00

3.	DATE	ACCOUNT BALANCE
	-----	-----
	03/09/86	\$32,146.29
	03/12/86	30,549.83
	11/13/86	65,700.19

4. SOURCES OF FUNDS CONSTITUTING THE NOVEMBER 13, 1986 BALANCE.

	CONTRIBUTOR	AMOUNT	DEPOSIT DATE
	-----	-----	-----
	LAWRENCE M. CUSHMAN	\$ 200.00	11/11/86
	CHARLES G. BAKALY, JR.	250.00	11/11/86
C	COAST DISTRIBUTING CO.	250.00	11/11/86
L	GEOTHERMAL RESOURCES ASSN. PAC	2,500.00	11/11/86
L	CALIFORNIA FARM BUREAU FEDERATION	2,500.00	11/11/86
L	CREDIT MANAGERS ASSOCIATION	250.00	11/11/86
C	P.S. I LOVE YOU REALTY	125.00	11/11/86
C	STERENBUSH GROUP	125.00	11/11/86
L	PACIFIC MERCHANT SHIPPING ASSOCIATION	1,000.00	11/11/86
C	DEWITT W. KRUEGER & ASSOCIATES	50.00	11/11/86
C	ROHR INDUSTRIES, INC.	250.00	11/11/86
	PAUL SCHEIBE	100.00	11/11/86
L	AYLA - PAC	200.00	11/11/86
C	MISSION VALLEY PIPE & SUPPLY	100.00	11/11/86
L	CALIFORNIA RETAILERS GOOD GOV'T COUNCIL	500.00	11/11/86
L	SDG&E CITIZENS FOR GOOD GOV'T	250.00	11/11/86
	JOHN S. ROBBINS	100.00	11/11/86
C	PRESSLEY PETERBILT	150.00	11/11/86
	ROD BLAIR	500.00	11/11/86
C	SNIDER LEASING CORP.	1,000.00	11/11/86
C	FLORIN ROAD NISSAN	1,000.00	11/11/86
C	PACIFIC MUTUAL	2,000.00	11/11/86
C	WATSON LAND COMPANY	300.00	11/11/86
C	ASSOC. SALES TAX CONSULTANTS	110.00	11/11/86
C	GREAT WESTERN SHOWS, INC.	25.00	11/11/86
C	SANTA FE SOUTHERN PACIFIC CORP.	250.00	11/11/86
C	MUNICIPAL DUCK COMPANY, INC.	100.00	11/11/86
C	UNIVERSITY FORD/PLYMOUTH	200.00	11/11/86
C	ORCO BLOCK CO., INC.	500.00	11/11/86
C	SPA CENTERS, INC.	200.00	11/11/86
C	CARTER HAWLEY HALE	1,000.00	11/11/86
C	THE GIFFORD - HILL CO.	500.00	11/11/86

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FRIENDS OF DRONENBURG PAC

4. SOURCES OF FUNDS CONSTITUTING THE NOVEMBER 13, 1986 BALANCE
(CONTINUED).

	CONTRIBUTOR	AMOUNT	DEPOSIT DATE
C	LONGS DRUG STORES	\$ 300.00	10/20/86
C	THE FIELDSTONE CO	500.00	10/20/86
C	STANDARD PACIFIC CORP.	400.00	10/20/86
C	A-M COMPANY	200.00	10/20/86
C	KEITH ENGINEERING, INC.	500.00	10/20/86
C	J.M. PETERS COMPANY, INC.	750.00	10/20/86
L	THE LINCOLN CLUB OF ORANGE COUNTY	2,000.00	10/20/86
C	THE FIELDSTONE COMPANY	125.00	10/20/86
L	PG&E EMPLOYEES GOOD GOV'T FUND	1,000.00	10/20/86
C	NORTHROP CORPORATION	250.00	10/20/86
C	PACIFIC LIGHTING CORP.	2,000.00	10/20/86
C	ATLANTIC RICHFIELD COMPANY	2,000.00	10/20/86
C	OCCIDENTAL PETROLEUM CORP.	500.00	10/20/86
N	FIRST INTERSTATE BANK	500.00	10/20/86
C	LITTON INDUSTRIES	1,000.00	10/20/86
C	NATIONAL MEDICAL ENTERPRISES, INC.	500.00	10/20/86
N	WELLS FARGO BANK	375.00	10/20/86
C	MICROPRO	200.00	10/20/86
C	THRIFTY CORP.	500.00	10/20/86
L	O'MELVENY AND MYERS PAC	500.00	10/20/86
	HOWARD P. MARGULEAS	500.00	10/20/86
C	FRIENDS OF MIKE ANTONOVICH	5,000.00	10/10/86
C	HUGHES AIRCRAFT COMPANY	1,000.00	10/10/86
C	GISSON DUNN & CRUTCHER	500.00	10/10/86
C	WALT DISNEY PRODUCTIONS	1,000.00	10/10/86
C	ADVANCED MICRO DEVICES	200.00	10/10/86
C	TOSCO CORPORATION	1,000.00	10/10/86
C	BIXBY RANCH COMPANY	250.00	10/10/86
L	CALIF. AUTOMATIC VENDORS PAC	500.00	10/10/86
C	BOB WONDRIES FORD	250.00	10/10/86
L	CALIF. ASSOC. OF EQUIPMENT LESSORS	250.00	10/10/86
C	RAY N. MCCLAVE, D.D.S., INC.	50.00	10/10/86
C	BAKER, ANGEL, MORRIS & HRUBY	250.00	10/10/86
C	TOPA CAPITAL CORP.	500.00	10/10/86
	FRANKLIN C. LATCHAM	250.00	10/10/86
C	BLOCK CO., INC.	250.00	9/30/86
L	CITPAC	1,500.00	9/30/86
L	S.D. FEDERATION OF REPUBLICAN WOMEN	25.00	9/30/86
L	GENERAL TELEPHONE EMPLOYEES	1,000.00	9/30/86
C	MDCI CORP.	500.00	9/30/86
C	DIGITAL RESEARCH	400.00	9/30/86
L	WATT PAC	500.00	9/30/86
C	SUPERIOR STAMP & COIN	250.00	9/30/86
C	CAPITAL INDUSTRIES	500.00	9/30/86
C	METRO	250.00	9/30/86

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FRIENDS OF DRONENBURG PAC

4. SOURCES OF FUNDS CONSTITUTING THE NOVEMBER 13, 1986 BALANCE
(CONTINUED).

	CONTRIBUTOR	AMOUNT	DEPOSIT DATE
C	EVANS TELEPHONE COMPANY	250.00	9/30/86
C	VICRO MFG. CORP.	\$ 250.00	9/30/86
C	URBAN DEVCO INC.	500.00	9/30/86
C	MAX ROUSE & SONS, INC.	500.00	9/30/86
L	PG&E EMPLOYEES	500.00	9/30/86
C	GREAT WESTERN SHOWS INC.	25.00	9/30/86
L	TEXACO POLITICAL INVOLVEMENT	500.00	9/30/86
L	SYNTEX COMMITTEE	200.00	9/30/86
C	H. WITMER DECORATIVES	100.00	9/30/86
C	GRANITE CONSTRUCTION	1,000.00	9/19/86
C	INTEL CORPORATION	200.00	9/19/86
C	FENWICK, DAVIS & WEST	200.00	9/19/86
C	THE SOUTHLAND CORPORATION	1,007.11	9/19/86
C	PARAMOUNT PICTURES	1,000.00	9/4/86
C	COOPERVISION, INC.	1,000.00	9/3/86
	STATE CAL TAX REFUND	101.25	9/3/86
L	CA. GRAIN & FEED ASSOC.	400.00	8/13/86
L	AT&T WEST PAC.	150.00	7/23/86
L	SHELL GOOD GOV. FUND	1,000.00	7/23/86
C	PACIFIC TELESIS GROUP	1,500.00	6/19/86
C	INTEGRATED SIGN	100.00	6/19/86
C	PETTER OIL COMPANY	250.00	6/19/86
C	MILLER BREWING CO.	250.00	6/19/86
	JOSEPH DOLPHIN	1,250.00	6/19/86
N	GREAT AMERICAN 1ST SAVINGS	250.00	6/19/86
C	SAN DIEGO GAS & ELECTRIC	500.00	6/5/86
C	EYE PHYSICIANS MEDICAL CENTER	250.00	6/5/86
C	WALDEN FINANCIAL	250.00	6/5/86
C	CONTINENTAL ASSOCIATES	625.00	6/5/86
C	HOME CAPITAL CORP.	375.00	6/5/86
C	INVESTORS LEASING CORP.	125.00	6/5/86
C	C.O.G.G.	1,250.00	6/5/86
C	PACIFIC PALLISADES REPUBLICAN	25.00	6/5/86
	LIQUIDATION OF INVESTMENT	50,000.00	6/5/86
	TOTAL	\$113,243.36	

SOURCES OF FUNDS CONSTITUTING THE MARCH 9 & 12, 1986 BALANCE.

	CONTRIBUTOR	AMOUNT	DEPOSIT DATE
C	THE CLOROX COMPANY	\$ 500.00	2/18/86
	CHARLES S. SHUKEN	100.00	2/18/86

SOURCES OF FUNDS CONSTITUTING THE MARCH 9 & 12, 1986 BALANCE
(CONTINUED).

	CONTRIBUTOR	AMOUNT	DEPOSIT DATE
	FRANKLIN & PATRICIA LATCHAM	250.00	2/18/86
	J. & LILA DICKSON	\$ 150.00	2/18/86
C	HOUSEHOLD FINANCE INTER.	250.00	2/18/86
C	MR. W.K. MORRIS/CHEVRON CORP.	500.00	2/18/86
	SAMUEL STEIN	250.00	2/18/86
L	SANTA MONICA REPUB. WOMEN'S CLUB	25.00	2/18/86
L	CITIZENS UTILITIES CO. #70	250.00	2/18/86
N	BANK OF AMERICA	500.00	2/1/86
	HILBERT K. CHU C.P.A.	30.00	2/1/86
	JOHN G. FRANKOT, JR.	100.00	1/10/86
C	DON THAYER, INC.	100.00	1/10/86
N	GREAT AMERICAN SAVINGS	250.00	1/10/86
	JAMES S. GRAHAM (LOAN RECEIVED)	7,000.00	12/31/85
	STANWOOD C. JOHNSON (LOAN RECEIVED)	3,000.00	12/31/85
L	OUTDOOR ADVERTISING ASSN	200.00	12/31/85
L	STATE & LOCAL CITIZENSHIP RESPONSIBILITY	750.00	12/31/85
C	PRESSEY PETERBILT	100.00	12/31/85
C	SAN DIEGO GAS & ELECTRIC	1,000.00	12/31/85
C	WYMAN, BAUTZER, ROTHMAN, KUCHEL & SIL	500.00	12/31/85
C	NCR CORPORATION	500.00	12/31/85
C	CUBIC CORPORATION	100.00	12/26/85
	C.A. DUNN	100.00	12/26/85
C	ATLANTIC RICHFIELD CO.	2,500.00	12/26/85
C	EVANS TELEPHONE COMPANY	250.00	12/26/85
	W.E. LANGSTON	250.00	12/26/85
	SAM DEVITT	100.00	12/26/85
	KEN OLIPHANT	250.00	12/26/85
	DANIEL RYAN	500.00	12/26/85
C	FLUOR CORPORATION	500.00	12/26/85
	LAW OFFICES JOHN THOMAS MONTAG	150.00	12/26/85
	DARYL C. IDLER, JR.	150.00	12/26/85
C	PEPPER OIL CO., INC.	150.00	12/26/85
C	IDEAL PLUMBING & HEATING	100.00	12/26/85
	ERNEST J. DRONENBURG, SR.	200.00	12/26/85
	ERNEST S. TUCKER, III	150.00	12/26/85
	KIM FLETCHER	200.00	12/26/85
	HAWKINS FAMILY TRUST	150.00	12/26/85
C	JACOBS DEVELOPMENT CO.	250.00	12/11/85
	FREDERICK A. GAGE	250.00	12/11/85
C	MCMAHON DEVELOPMENT	500.00	12/11/85
C	MAGNOLIA ENTERPRISES	250.00	12/11/85
	WILLIAM BUCK JOHNS	250.00	12/11/85
	ART AGAJANIAN	250.00	12/11/85
	DOY HENLEY	250.00	12/11/85

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FRIENDS OF DRONENBURG PAC

4. SOURCES OF FUNDS CONSTITUTING THE MARCH 9 & 12, 1986 BALANCE
(CONTINUED).

	CONTRIBUTOR	AMOUNT	DEPOSIT DATE
	JOHN KONWISER	150.00	12/11/85
	E. TYLER MILLER, JR.	250.00	12/11/85
	MICHAEL P. ALESSIO	150.00	12/11/85
	CHARLES S. SHUKEN	\$ 100.00	12/11/85
	ELEANOR R. STORRS	100.00	12/11/85
C	SUNCOAST FINANCIAL CORP.	1,000.00	12/11/85
	T.W. HOEHN, III	150.00	12/11/85
C	ANVIL CORPORATION	250.00	12/11/85
C	DIXIELINE LUMBER CO.	250.00	12/11/85
C	THE BERGHEER COMPANY	100.00	12/11/85
C	C. J. SEGERSTROM & SONS	250.00	12/11/85
	ROBERT F. BEAVER	250.00	12/11/85
C	ORCO BLOCK CO., INC.	500.00	12/11/85
	MAY CO.	500.00	12/11/85
	HARRIETTE F. WITMER	250.00	12/11/85
	KEN WILLIG	150.00	12/11/85
	FITZPATRICK & ASSOCIATES	500.00	12/11/85
	JAMES R. SPIEVAK	150.00	12/11/85
C	ROHR INDUSTRIES, INC.	150.00	12/11/85
C	THE SIGNAL COMPANIES, INC.	300.00	12/11/85
C	WILLIAM A. HINRICHS, M.D., INC.	100.00	12/11/85
C	KAISER STEEL CORP.	750.00	12/11/85
	WILLIAM D. HEIMBACH	500.00	12/11/85
	J. JAMES WOODYARD	500.00	11/27/85
C	PACIFIC TELESIS GROUP	1,500.00	11/27/85
	ROBERT M. ARAN, ATTY.	500.00	11/27/85
	TOTAL	\$ 33,455.00	

5. SEE CODES USED IN INTERROGATORY NO. 4.

C - CORPORATION

L - LABOR ORGANIZATION

N - NATIONAL BANK

BEFORE THE FEDERAL ELECTION COMMISSION

88 DEC 30 PM 1:59

In the Matter of)
) MUR 2663
Friends of Dronenberg PAC)
(Federal/Non-Federal Accounts) and)
David Hawkins, as treasurer)

COMPREHENSIVE INVESTIGATIVE REPORT # 1

On July 26, 1988, the Commission found reason to believe Friends of Dronenberg PAC (Federal Account) and David Hawkins, as treasurer, violated 2 U.S.C. § 441a(a)(1)(A) with respect to a five thousand dollar contribution to Michael Antonovich on October 1, 1986, and a five thousand dollar contribution to Robert W. Naylor on October 10, 1986. The Commission also found reason to believe Friends of Dronenberg PAC (Federal/Non-Federal Accounts) and David Hawkins, as treasurer, violated 11 C.F.R. § 102.5(a) and 2 U.S.C. § 441b. On August 31, 1988, the Commission approved the sending of interrogatories and a request for production of documents to the Federal/Non-Federal Accounts. The Federal/Non-Federal Accounts requested and were granted an extension of time until October 15, 1988, in which to answer the interrogatories and produce the documents. On October 20, 1988, the Office of the General Counsel received answers to the interrogatories as well as documents.

According to the record, Friends of Dronenberg Non-Federal Account made several expenditures in connection with federal elections. Specifically, Friends of Dronenberg PAC Non-Federal Account made two (\$1,000) contributions to two federal candidate

committees (Wally Herger for Congress Committee and Konneyu Election Committee). Additionally, on May 9, 1986, Friends of Dronenberg PAC Non-Federal Account transferred \$1,000 to Friends of Dronenberg PAC's Federal Account.

The response of the Federal/Non-Federal Accounts is inadequate for determining whether the expenditures or transfer in question contained prohibited funds. First, it is unclear from the submission how Respondents arrived at the balances on the dates of the transactions in question, and they mistakenly used the wrong dates in their analysis. Furthermore, Respondents have indicated that an additional federal expenditure was made by the Non-Federal Account.

Follow-up telephone conversations by this Office with Respondents have clarified the matter. Respondents are now in the process of developing information for submission that will assist us in analyzing whether prohibited funds were in the account at the time the transactions in question were made. Respondents have indicated that this additional information will be submitted by January 2, 1988. Upon receipt and review of this information this Office will submit a report with appropriate recommendations.

Lawrence M. Noble
General Counsel

12-30-88
Date

By:

Lois G. Lerner
Associate General Counsel

Staff Person: Deborah Curry

Frank R. Harris, CPA (1924-1987)



MEMBERS

- AMERICAN INSTITUTE OF CERTIFIED PUBLIC ACCOUNTANTS
- CALIFORNIA SOCIETY OF CERTIFIED PUBLIC ACCOUNTANTS

2775 Via de la Valer 202
Del Mar, California 92014
619-481-7775 • 455-6996

* 1629 Columbia Street
San Diego, CA 92101-2572
619/235-6531

89 JAN 17 PM 12:02

FEDERAL ELECTRIC COMMISSION

January 11, 1989

Ms. Deborah Curry
Federal Election Commission
Washington, DC 20463

Re: Friends of Dronenburg PAC
Identification Number: C00204461
MUR 2663

Dear Ms. Curry:

In response to our telephone conference yesterday, enclosed is a revised response to your Request for Production of Documents.

If you have additional questions, please give me a call.

Sincerely,

Susan

Susan L. Adrian
Office Manager

sla
Enclosure

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FRIENDS OF DRONENBURG PAC

1. YES

2.	DATE	AMOUNT
	-----	-----
	03/09/86	\$ 1,000.00
	03/12/86	1,000.00
	05/09/86	1,000.00
	11/13/86	1,000.00

3.	DATE	ACCOUNT BALANCE
	-----	-----
	03/09/86	\$32,146.29
	03/12/86	30,549.83
	05/09/86	20,882.84
	11/13/86	65,700.19

4. SOURCES OF FUNDS CONSTITUTING THE NOVEMBER 13, 1986 BALANCE.

	CONTRIBUTOR	AMOUNT	DEPOSIT DATE
	-----	-----	-----
	LAWRENCE M. CUSHMAN	\$ 200.00	11/11/86
	CHARLES G. BAKALY, JR.	250.00	11/11/86
C	COAST DISTRIBUTING CO.	250.00	11/11/86
L	GEOTHERMAL RESOURCES ASSN. PAC	2,500.00	11/11/86
L	CALIFORNIA FARM BUREAU FEDERATION	2,500.00	11/11/86
L	CREDIT MANAGERS ASSOCIATION	250.00	11/11/86
C	P.S. I LOVE YOU REALTY	125.00	11/11/86
C	STERENBUSH GROUP	125.00	11/11/86
L	PACIFIC MERCHANT SHIPPING ASSOCIATION	1,000.00	11/11/86
C	DEWITT W. KRUEGER & ASSOCIATES	50.00	11/11/86
C	ROHR INDUSTRIES, INC.	250.00	11/11/86
	PAUL SCHEIBE	100.00	11/11/86
L	AYLA - PAC	200.00	11/11/86
C	MISSION VALLEY PIPE & SUPPLY	100.00	11/11/86
L	CALIFORNIA RETAILERS GOOD GOV'T COUNCIL	500.00	11/11/86
L	SDG&E CITIZENS FOR GOOD GOV'T	250.00	11/11/86
	JOHN S. ROBBINS	100.00	11/11/86
C	PRESSLEY PETERBILT	150.00	11/11/86
	ROD BLAIR	500.00	11/11/86
C	SNIDER LEASING CORP.	1,000.00	11/11/86
C	FLORIN ROAD NISSAN	1,000.00	11/11/86
C	PACIFIC MUTUAL	2,000.00	11/11/86
C	WATSON LAND COMPANY	300.00	11/11/86
C	ASSOC. SALES TAX CONSULTANTS	110.00	11/11/86
C	GREAT WESTERN SHOWS, INC.	25.00	11/11/86
C	SANTA FE SOUTHERN PACIFIC CORP.	250.00	11/11/86
C	MUNICIPAL DUCK COMPANY, INC.	100.00	11/11/86
C	UNIVERSITY FORD/PLYMOUTH	200.00	11/11/86
C	ORCO BLOCK CO., INC.	500.00	11/11/86

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FRIENDS OF DRONENBURG PAC

4. SOURCES OF FUNDS CONSTITUTING THE NOVEMBER 13, 1986 BALANCE
(CONTINUED).

	CONTRIBUTOR	AMOUNT	DEPOSIT DATE
C	SPA CENTERS, INC.	200.00	11/11/86
C	CARTER HAWLEY HALE	1,000.00	11/11/86
C	THE GIFFORD - HILL CO.	500.00	11/11/86
C	LONGS DRUG STORES	\$ 300.00	10/20/86
C	THE FIELDSTONE CO	500.00	10/20/86
C	STANDARD PACIFIC CORP.	400.00	10/20/86
C	A-M COMPANY	200.00	10/20/86
C	KEITH ENGINEERING, INC.	500.00	10/20/86
C	J.M. PETERS COMPANY, INC.	750.00	10/20/86
L	THE LINCOLN CLUB OF ORANGE COUNTY	2,000.00	10/20/86
C	THE FIELDSTONE COMPANY	125.00	10/20/86
L	PG&E EMPLOYEES GOOD GOV'T FUND	1,000.00	10/20/86
C	NORTHROP CORPORATION	250.00	10/20/86
C	PACIFIC LIGHTING CORP.	2,000.00	10/20/86
C	ATLANTIC RICHFIELD COMPANY	2,000.00	10/20/86
C	OCCIDENTAL PETROLEUM CORP.	500.00	10/20/86
N	FIRST INTERSTATE BANK	500.00	10/20/86
C	LITTON INDUSTRIES	1,000.00	10/20/86
C	NATIONAL MEDICAL ENTERPRISES, INC.	500.00	10/20/86
N	WELLS FARGO BANK	375.00	10/20/86
C	MICROPRO	200.00	10/20/86
C	THRIFTY CORP.	500.00	10/20/86
L	O'MELVENY AND MYERS PAC	500.00	10/20/86
	HOWARD P. MARGULEAS	500.00	10/20/86
C	FRIENDS OF MIKE ANTONOVICH	5,000.00	10/10/86
C	HUGHES AIRCRAFT COMPANY	1,000.00	10/10/86
C	GISSON DUNN & CRUTCHER	500.00	10/10/86
C	WALT DISNEY PRODUCTIONS	1,000.00	10/10/86
C	ADVANCED MICRO DEVICES	200.00	10/10/86
C	TOSCO CORPORATION	1,000.00	10/10/86
C	BIXBY RANCH COMPANY	250.00	10/10/86
L	CALIF. AUTOMATIC VENDORS PAC	500.00	10/10/86
C	BOB WONDRIES FORD	250.00	10/10/86
L	CALIF. ASSOC. OF EQUIPMENT LESSORS	250.00	10/10/86
C	RAY N. MCCLAVE, D.D.S., INC.	50.00	10/10/86
C	BAKER, ANGEL, MORRIS & HRUBY	250.00	10/10/86
C	TOPA CAPITAL CORP.	500.00	10/10/86
	FRANKLIN C. LATCHAM	250.00	10/10/86
C	BLOCK CO., INC.	250.00	9/30/86
L	CITPAC	1,500.00	9/30/86
L	S.D. FEDERATION OF REPUBLICAN WOMEN	25.00	9/30/86
L	GENERAL TELEPHONE EMPLOYEES	1,000.00	9/30/86
C	MDCI CORP.	500.00	9/30/86
C	DIGITAL RESEARCH	400.00	9/30/86
L	WATT PAC	500.00	9/30/86

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FRIENDS OF DRONENBURG PAC

4. SOURCES OF FUNDS CONSTITUTING THE NOVEMBER 13, 1986 BALANCE
(CONTINUED).

	CONTRIBUTOR	AMOUNT	DEPOSIT DATE
C	SUPERIOR STAMP & COIN	250.00	9/30/86
C	CAPITAL INDUSTRIES	500.00	9/30/86
C	METRO	250.00	9/30/86
C	EVANS TELEPHONE COMPANY	250.00	9/30/86
C	VICRO MFG. CORP.	\$ 250.00	9/30/86
C	URBAN DEVCO INC.	500.00	9/30/86
C	MAX ROUSE & SONS, INC.	500.00	9/30/86
L	PG&E EMPLOYEES	500.00	9/30/86
C	GREAT WESTERN SHOWS INC.	25.00	9/30/86
L	TEXACO POLITICAL INVOLVEMENT	500.00	9/30/86
L	SYNTEX COMMITTEE	200.00	9/30/86
C	H. WITMER DECORATIVES	100.00	9/30/86
C	GRANITE CONSTRUCTION	1,000.00	9/19/86
C	INTEL CORPORATION	200.00	9/19/86
C	FENWICK, DAVIS & WEST	200.00	9/19/86
C	THE SOUTHLAND CORPORATION	1,007.11	9/19/86
C	PARAMOUNT PICTURES	1,000.00	9/4/86
C	COOPERVISION, INC.	1,000.00	9/3/86
	STATE CAL TAX REFUND	101.25	9/3/86
L	CA. GRAIN & FEED ASSOC.	400.00	8/13/86
L	AT&T WEST PAC.	150.00	7/23/86
L	SHELL GOOD GOV. FUND	1,000.00	7/23/86
C	PACIFIC TELESIS GROUP	1,500.00	6/19/86
C	INTEGRATED SIGN	100.00	6/19/86
C	PETTER OIL COMPANY	250.00	6/19/86
C	MILLER BREWING CO.	250.00	6/19/86
	JOSEPH DOLPHIN	1,250.00	6/19/86
N	GREAT AMERICAN 1ST SAVINGS	250.00	6/19/86
C	SAN DIEGO GAS & ELECTRIC	500.00	6/5/86
C	EYE PHYSICIANS MEDICAL CENTER	250.00	6/5/86
C	WALDEN FINANCIAL	250.00	6/5/86
C	CONTINENTAL ASSOCIATES	625.00	6/5/86
C	HOME CAPITAL CORP.	375.00	6/5/86
C	INVESTORS LEASING CORP.	125.00	6/5/86
C	C.O.G.G.	1,250.00	6/5/86
C	PACIFIC PALLISADES REPUBLICAN	25.00	6/5/86
	LIQUIDATION OF INVESTMENT	50,000.00	6/5/86
	TOTAL	\$113,243.36	

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FRIENDS OF DRONENBURG PAC

4. SOURCES OF FUNDS CONSTITUTING THE MAY 9, 1986 BALANCE.

	CONTRIBUTOR	AMOUNT	DEPOSIT DATE
C	BROOKES & BROKES	\$ 300.00	5/9/86
C	AMFAC	500.00	5/9/86
C	WORLD AIRWAYS, INC.	150.00	5/9/86
	SEAFIRST BANK (INTEREST ON BONDS)	1,625.00	5/9/86
	COUNTY OF SAN DIEGO (REFUND)	52.25	4/11/86
C	FRANK DEVORE CONSULTING, INC.	100.00	4/11/86
L	SHELL GOOD GOVT. FUND	1,000.00	4/11/86
	LOUIS BRUTOCAD	100.00	4/11/86
N	SECURITY PACIFIC CORPORATION	500.00	3/18/86
N	CROCKER NATIONAL CORPORATION	250.00	3/18/86
C	FRANK DEVORE CONSULTING, INC.	100.00	3/18/86
L	ALLIANCE OF MOTION PICTURE & TELEVISION PRODUCERS	250.00	3/18/86
L	TRW STATE GOOD GOVT. FUND	250.00	3/18/86
L	LONG BEACH REPUBLICAN WOMEN	25.00	3/18/86
	H. GABRIEL	25.00	3/18/86
	AFTON MILLER	100.00	3/18/86
	TOTAL \$	5,327.25	

SOURCES OF FUNDS CONSTITUTING THE MARCH 9 & 12, 1986 BALANCE.

	CONTRIBUTOR	AMOUNT	DEPOSIT DATE
C	THE CLOROX COMPANY	\$ 500.00	2/18/86
	CHARLES S. SHUKEN	100.00	2/18/86
	FRANKLIN & PATRICIA LATCHAM	250.00	2/18/86
	J. & LILA DICKSON	\$ 150.00	2/18/86
C	HOUSEHOLD FINANCE INTER.	250.00	2/18/86
C	MR. W.K. MORRIS/CHEVRON CORP.	500.00	2/18/86
	SAMUEL STEIN	250.00	2/18/86
L	SANTA MONICA REPUB. WOMEN'S CLUB	25.00	2/18/86
L	CITIZENS UTILITIES CO. #70	250.00	2/18/86
N	BANK OF AMERICA	500.00	2/1/86
	HILBERT K. CHU C.P.A.	30.00	2/1/86
	JOHN G. FRANKOT, JR.	100.00	1/10/86
C	DON THAYER, INC.	100.00	1/10/86
N	GREAT AMERICAN SAVINGS	250.00	1/10/86
	JAMES S. GRAHAM (LOAN RECEIVED)	7,000.00	12/31/85
	STANWOOD C. JOHNSON (LOAN RECEIVED)	3,000.00	12/31/85
L	OUTDOOR ADVERTISING ASSN	200.00	12/31/85
L	STATE & LOCAL CITIZENSHIP RESPONSIBILITY	750.00	12/31/85

4. SOURCES OF FUNDS CONSTITUTING THE MARCH 9 & 12, 1986 BALANCE
(CONTINUED).

	CONTRIBUTOR	AMOUNT	DEPOSIT DATE
C	PRESSEY PETERBILT	100.00	12/31/85
C	SAN DIEGO GAS & ELECTRIC	1,000.00	12/31/85
C	WYMAN, BAUTZER, ROTHMAN, KUCHEL & SIL	500.00	12/31/85
C	NCR CORPORATION	500.00	12/31/85
C	CUBIC CORPORATION	100.00	12/26/85
	C.A. DUNN	100.00	12/26/85
C	ATLANTIC RICHFIELD CO.	2,500.00	12/26/85
C	EVANS TELEPHONE COMPANY	250.00	12/26/85
	W.E. LANGSTON	250.00	12/26/85
	SAM DEVITT	100.00	12/26/85
	KEN OLIPHANT	250.00	12/26/85
	DANIEL RYAN	500.00	12/26/85
C	FLUOR CORPORATION	500.00	12/26/85
	LAW OFFICES JOHN THOMAS MONTAG	150.00	12/26/85
	DARYL C. IDLER, JR.	150.00	12/26/85
C	PEPPER OIL CO., INC.	150.00	12/26/85
C	IDEAL PLUMBING & HEATING	100.00	12/26/85
	ERNEST J. DRONENBURG, SR.	200.00	12/26/85
	ERNEST S. TUCKER, III	150.00	12/26/85
	KIM FLETCHER	200.00	12/26/85
	HAWKINS FAMILY TRUST	150.00	12/26/85
C	JACOBS DEVELOPMENT CO.	250.00	12/11/85
	FREDERICK A. GAGE	250.00	12/11/85
C	MCMAHON DEVELOPMENT	500.00	12/11/85
C	MAGNOLIA ENTERPRISES	250.00	12/11/85
	WILLIAM BUCK JOHNS	250.00	12/11/85
	ART AGAJANIAN	250.00	12/11/85
	DOY HENLEY	250.00	12/11/85
	JOHN KONWISER	150.00	12/11/85
	E. TYLER MILLER, JR.	250.00	12/11/85
	MICHAEL P. ALESSIO	150.00	12/11/85
	CHARLES S. SHUKEN	\$ 100.00	12/11/85
	ELEANOR R. STORRS	100.00	12/11/85
C	SUNCOAST FINANCIAL CORP.	1,000.00	12/11/85
	T.W. HOEHN, III	150.00	12/11/85
C	ANVIL CORPORATION	250.00	12/11/85
C	DIXIELINE LUMBER CO.	250.00	12/11/85
C	THE BERGHEER COMPANY	100.00	12/11/85
C	C. J. SEGERSTROM & SONS	250.00	12/11/85
	ROBERT F. BEAVER	250.00	12/11/85
C	ORCO BLOCK CO., INC.	500.00	12/11/85
	MAY CO.	500.00	12/11/85
	HARRIETTE F. WITMER	250.00	12/11/85
	KEN WILLIG	150.00	12/11/85

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PAGE 6

FRIENDS OF DRONENBURG PAC

4. SOURCES OF FUNDS CONSTITUTING THE MAY 9, 1986 BALANCE (CONTINUED).

	CONTRIBUTOR	AMOUNT	DEPOSIT DATE
	-----	-----	-----
	FITZPATRICK & ASSOCIATES	500.00	12/11/85
	JAMES R. SPIEVAK	150.00	12/11/85
C	ROHR INDUSTRIES, INC.	150.00	12/11/85
C	THE SIGNAL COMPANIES, INC.	300.00	12/11/85
C	WILLIAM A. HINRICHS, M.D., INC.	100.00	12/11/85
C	KAISER STEEL CORP.	750.00	12/11/85
	WILLIAM D. HEIMBACH	500.00	12/11/85
	J. JAMES WOODYARD	500.00	11/27/85
C	PACIFIC TELESIS GROUP	1,500.00	11/27/85
	ROBERT M. ARAN, ATTY.	500.00	11/27/85

	TOTAL	\$ 33,455.00	

5. SEE CODES USED IN INTERROGATORY NO. 4.

C - CORPORATION

L - LABOR ORGANIZATION

N - NATIONAL BANK

3004076455

HAWKINS & SCOTT
ACCOUNTANCY CORPORATION

David A. Hawkins, C.P.A.
F. Laurence Scott, Jr., C.P.A.
Dennis G. Cronin, C.P.A.
Alan M. Wiley, C.P.A.

Frank R. Harris, C.P.A. (1924-1987)



MEMBERS
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■ CALIFORNIA SOCIETY OF
CERTIFIED PUBLIC ACCOUNTANTS

0604 1734

☐ 2775 Via de la Valle 202
Del Mar, California 92014
619 481-7775 - 455-6996

☒ 1629 Columbia Street
San Diego, CA 92101-2572
619 235-6531

January 28, 1989

Ms. Deborah Curry
Federal Election Commission
Washington, DC 20463

Re: Friends of Dronenburg PAC
Identification Number C00204461
MUR2663

Dear Ms. Curry:

Many thanks for your time yesterday afternoon regarding the
apparent violations.

Request is hereby made for pre-probable cause conciliation. Your
efforts in effecting this request is most appreciated.

Very truly yours,

David A. Hawkins
Treasurer
Friends of Dronenburg PAC

89FEB-3 AM 10:41

FEDERAL ELECTION COMMISSION
MAIL ROOM

COPIES 3 11:3:26

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FRIENDS OF DRONENBURG PAC

1. YES

2.	DATE	AMOUNT
	03/09/86	\$ 1,000.00
	03/12/86	1,000.00
	05/09/86	1,000.00
	11/13/86	1,000.00

3.	DATE	ACCOUNT BALANCE
	03/09/86 (end of 3/9/86)	\$32,146.29
	03/12/86 (end of 3/12/86)	30,549.83
	05/09/86 (end of 5/8/86)	20,882.84
	11/13/86 (end of 11/12/86)	65,700.19

4. SOURCES OF FUNDS CONSTITUTING THE NOVEMBER 13, 1986 BALANCE.

	CONTRIBUTOR	AMOUNT	DEPOSIT DATE
	LAWRENCE M. CUSHMAN	\$ 200.00	11/11/86
	CHARLES G. BAKALY, JR.	250.00	11/11/86
C	COAST DISTRIBUTING CO.	250.00	11/11/86
L	GEO THERMAL RESOURCES ASSN. PAC	2,500.00	11/11/86
L	CALIFORNIA FARM BUREAU FEDERATION	2,500.00	11/11/86
L	CREDIT MANAGERS ASSOCIATION	250.00	11/11/86
C	P.S. I LOVE YOU REALTY	125.00	11/11/86
C	STERENBUSH GROUP	125.00	11/11/86
L	PACIFIC MERCHANT SHIPPING ASSOCIATION	1,000.00	11/11/86
C	DEWITT W. KRUEGER & ASSOCIATES	50.00	11/11/86
C	ROHR INDUSTRIES, INC.	250.00	11/11/86
	PAUL SCHEIBE	100.00	11/11/86
L	AYLA - PAC	200.00	11/11/86
C	MISSION VALLEY PIPE & SUPPLY	100.00	11/11/86
L	CALIFORNIA RETAILERS GOOD GOV'T COUNCIL	500.00	11/11/86
L	SDG&E CITIZENS FOR GOOD GOV'T	250.00	11/11/86
	JOHN S. ROBBINS	100.00	11/11/86
C	PRESSLEY PETERBILT	150.00	11/11/86
	ROD BLAIR	500.00	11/11/86
C	SNIDER LEASING CORP.	1,000.00	11/11/86
C	FLORIN ROAD NISSAN	1,000.00	11/11/86
C	PACIFIC MUTUAL	2,000.00	11/11/86
C	WATSON LAND COMPANY	300.00	11/11/86
C	ASSOC. SALES TAX CONSULTANTS	110.00	11/11/86
C	GREAT WESTERN SHOWS, INC.	25.00	11/11/86
C	SANTA FE SOUTHERN PACIFIC CORP.	250.00	11/11/86
C	MUNICIPAL DUCK COMPANY, INC.	100.00	11/11/86
C	UNIVERSITY FORD/PLYMOUTH	200.00	11/11/86
C	ORCO BLOCK CO., INC.	500.00	11/11/86

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FRIENDS OF DRONENBURG PAC

4. SOURCES OF FUNDS CONSTITUTING THE NOVEMBER 13, 1986 BALANCE
(CONTINUED).

	CONTRIBUTOR	AMOUNT	DEPOSIT DATE
C	SPA CENTERS, INC.	200.00	11/11/86
C	CARTER HAWLEY HALE	1,000.00	11/11/86
C	THE GIFFORD - HILL CO.	500.00	11/11/86
C	LONGS DRUG STORES	\$ 300.00	10/20/86
C	THE FIELDSTONE CO	500.00	10/20/86
C	STANDARD PACIFIC CORP.	400.00	10/20/86
C	A-M COMPANY	200.00	10/20/86
C	KEITH ENGINEERING, INC.	500.00	10/20/86
C	J.M. PETERS COMPANY, INC.	750.00	10/20/86
L	THE LINCOLN CLUB OF ORANGE COUNTY	2,000.00	10/20/86
C	THE FIELDSTONE COMPANY	125.00	10/20/86
L	PG&E EMPLOYEES GOOD GOV'T FUND	1,000.00	10/20/86
C	NORTHROP CORPORATION	250.00	10/20/86
C	PACIFIC LIGHTING CORP.	2,000.00	10/20/86
C	ATLANTIC RICHFIELD COMPANY	2,000.00	10/20/86
C	OCCIDENTAL PETROLEUM CORP.	500.00	10/20/86
N	FIRST INTERSTATE BANK	500.00	10/20/86
C	LITTON INDUSTRIES	1,000.00	10/20/86
C	NATIONAL MEDICAL ENTERPRISES, INC.	500.00	10/20/86
N	WELLS FARGO BANK	375.00	10/20/86
C	MICROPRO	200.00	10/20/86
C	THRIFTY CORP.	500.00	10/20/86
L	O'MELVENY AND MYERS PAC	500.00	10/20/86
	HOWARD P. MARGULEAS	500.00	10/20/86
C	FRIENDS OF MIKE ANTONOVICH	5,000.00	10/10/86
C	HUGHES AIRCRAFT COMPANY	1,000.00	10/10/86
C	GISSON DUNN & CRUTCHER	500.00	10/10/86
C	WALT DISNEY PRODUCTIONS	1,000.00	10/10/86
C	ADVANCED MICRO DEVICES	200.00	10/10/86
C	TOSCO CORPORATION	1,000.00	10/10/86
C	BIXBY RANCH COMPANY	250.00	10/10/86
L	CALIF. AUTOMATIC VENDORS PAC	500.00	10/10/86
C	BOB WONDRIES FORD	250.00	10/10/86
L	CALIF. ASSOC. OF EQUIPMENT LESSORS	250.00	10/10/86
C	RAY N. MCCLAVE, D.D.S., INC.	50.00	10/10/86
C	BAKER, ANGEL, MORRIS & HRUBY	250.00	10/10/86
C	TOPA CAPITAL CORP.	500.00	10/10/86
	FRANKLIN C. LATCHAM	250.00	10/10/86
C	BLOCK CO., INC.	250.00	9/30/86
L	CITPAC	1,500.00	9/30/86
L	S.D. FEDERATION OF REPUBLICAN WOMEN	25.00	9/30/86
L	GENERAL TELEPHONE EMPLOYEES	1,000.00	9/30/86
C	MDCI CORP.	500.00	9/30/86
C	DIGITAL RESEARCH	400.00	9/30/86
L	WATT PAC	500.00	9/30/86

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FRIENDS OF DRONENBURG PAC

4. SOURCES OF FUNDS CONSTITUTING THE NOVEMBER 13, 1986 BALANCE
(CONTINUED).

	CONTRIBUTOR	AMOUNT	DEPOSIT DATE
C	SUPERIOR STAMP & COIN	250.00	9/30/86
C	CAPITAL INDUSTRIES	500.00	9/30/86
C	METRO	250.00	9/30/86
C	EVANS TELEPHONE COMPANY	250.00	9/30/86
C	VICRO MFG. CORP.	\$ 250.00	9/30/86
C	URBAN DEVCO INC.	500.00	9/30/86
C	MAX ROUSE & SONS, INC.	500.00	9/30/86
L	PG&E EMPLOYEES	500.00	9/30/86
C	GREAT WESTERN SHOWS INC.	25.00	9/30/86
L	TEXACO POLITICAL INVOLVEMENT	500.00	9/30/86
L	SYNTEX COMMITTEE	200.00	9/30/86
C	H. WITMER DECORATIVES	100.00	9/30/86
C	GRANITE CONSTRUCTION	1,000.00	9/19/86
C	INTEL CORPORATION	200.00	9/19/86
C	FENWICK, DAVIS & WEST	200.00	9/19/86
C	THE SOUTHLAND CORPORATION	1,007.11	9/19/86
C	PARAMOUNT PICTURES	1,000.00	9/4/86
C	COOPERVISION, INC.	1,000.00	9/3/86
	STATE CAL TAX REFUND	101.25	9/3/86
L	CA. GRAIN & FEED ASSOC.	400.00	8/13/86
L	AT&T WEST PAC.	150.00	7/23/86
L	SHELL GOOD GOV. FUND	1,000.00	7/23/86
C	PACIFIC TELESIS GROUP	1,500.00	6/19/86
C	INTEGRATED SIGN	100.00	6/19/86
C	PETTER OIL COMPANY	250.00	6/19/86
C	MILLER BREWING CO.	250.00	6/19/86
	JOSEPH DOLPHIN	1,250.00	6/19/86
N	GREAT AMERICAN 1ST SAVINGS	250.00	6/19/86
C	SAN DIEGO GAS & ELECTRIC	500.00	6/5/86
C	EYE PHYSICIANS MEDICAL CENTER	250.00	6/5/86
C	WALDEN FINANCIAL	250.00	6/5/86
C	CONTINENTAL ASSOCIATES	625.00	6/5/86
C	HOME CAPITAL CORP.	375.00	6/5/86
C	INVESTORS LEASING CORP.	125.00	6/5/86
C	C.O.G.G.	1,250.00	6/5/86
C	PACIFIC PALLISADES REPUBLICAN	25.00	6/5/86
	LIQUIDATION OF INVESTMENT	50,000.00	6/5/86
	TOTAL	\$113,243.36	

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4. SOURCES OF FUNDS CONSTITUTING THE MAY 9, 1986 BALANCE.

	CONTRIBUTOR	AMOUNT	DEPOSIT DATE
C	BROOKES & BROKES	\$ 300.00	5/9/86
C	AMFAC	500.00	5/9/86
C	WORLD AIRWAYS, INC.	150.00	5/9/86
	SEAFIRST BANK (INTEREST ON BONDS)	1,625.00	5/9/86
	COUNTY OF SAN DIEGO (REFUND)	52.25	4/11/86
C	FRANK DEVORE CONSULTING, INC.	100.00	4/11/86
L	SHELL GOOD GOVT. FUND	1,000.00	4/11/86
	LOUIS BRUTOCAD	100.00	4/11/86
N	SECURITY PACIFIC CORPORATION	500.00	3/18/86
N	CROCKER NATIONAL CORPORATION	250.00	3/18/86
C	FRANK DEVORE CONSULTING, INC.	100.00	3/18/86
L	ALLIANCE OF MOTION PICTURE & TELEVISION PRODUCERS	250.00	3/18/86
L	TRW STATE GOOD GOVT. FUND	250.00	3/18/86
L	LONG BEACH REPUBLICAN WOMEN	25.00	3/18/86
	H. GABRIEL	25.00	3/18/86
	AFTON MILLER	100.00	3/18/86
	TOTAL \$	5,327.25	

SOURCES OF FUNDS CONSTITUTING THE MARCH 9 & 12, 1986 BALANCE.

	CONTRIBUTOR	AMOUNT	DEPOSIT DATE
C	THE CLOROX COMPANY	\$ 500.00	2/18/86
	CHARLES S. SHUKEN	100.00	2/18/86
	FRANKLIN & PATRICIA LATCHAM	250.00	2/18/86
	J. & LILA DICKSON	\$ 150.00	2/18/86
C	HOUSEHOLD FINANCE INTER.	250.00	2/18/86
C	MR. W.K. MORRIS/CHEVRON CORP.	500.00	2/18/86
	SAMUEL STEIN	25.00	2/18/86
L	SANTA MONICA REPUB. WOMEN'S CLUB	25.00	2/18/86
L	CITIZENS UTILITIES CO. #70	250.00	2/18/86
N	BANK OF AMERICA	500.00	2/1/86
	HILBERT K. CHU C.P.A.	30.00	2/1/86
	JOHN G. FRANKOT, JR.	100.00	1/10/86
C	DON THAYER, INC.	100.00	1/10/86
N	GREAT AMERICAN SAVINGS	250.00	1/10/86
	JAMES S. GRAHAM (LOAN RECEIVED)	7,000.00	12/31/85
	STANWOOD C. JOHNSON (LOAN RECEIVED)	3,000.00	12/31/85
L	OUTDOOR ADVERTISING ASSN	200.00	12/31/85
L	STATE & LOCAL CITIZENSHIP RESPONSIBILITY	750.00	12/31/85

PAGE 5
FRIENDS OF DRONENBURG PAC

4. SOURCES OF FUNDS CONSTITUTING THE MARCH 9 & 12, 1986 BALANCE
(CONTINUED).

	CONTRIBUTOR	AMOUNT	DEPOSIT DATE
C	PRESSEY PETERBILT	100.00	12/31/85
C	SAN DIEGO GAS & ELECTRIC	1,000.00	12/31/85
C	WYMAN, BAUTZER, ROTHMAN, KUCHEL & SIL	500.00	12/31/85
C	NCR CORPORATION	500.00	12/31/85
C	CUBIC CORPORATION	100.00	12/26/85
	C.A. DUNN	100.00	12/26/85
C	ATLANTIC RICHFIELD CO.	2,500.00	12/26/85
C	EVANS TELEPHONE COMPANY	250.00	12/26/85
	W.E. LANGSTON	250.00	12/26/85
	SAM DEVITT	100.00	12/26/85
	KEN OLIPHANT	250.00	12/26/85
	DANIEL RYAN	500.00	12/26/85
C	FLUOR CORPORATION	500.00	12/26/85
	LAW OFFICES JOHN THOMAS MONTAG	150.00	12/26/85
	DARYL C. IDLER, JR.	150.00	12/26/85
C	PEPPER OIL CO., INC.	150.00	12/26/85
C	IDEAL PLUMBING & HEATING	100.00	12/26/85
	ERNEST J. DRONENBURG, SR.	200.00	12/26/85
	ERNEST S. TUCKER, III	150.00	12/26/85
	KIM FLETCHER	200.00	12/26/85
	HAWKINS FAMILY TRUST	150.00	12/26/85
C	JACOBS DEVELOPMENT CO.	250.00	12/11/85
	FREDERICK A. GAGE	250.00	12/11/85
C	MCMAHON DEVELOPMENT	500.00	12/11/85
C	MAGNOLIA ENTERPRISES	250.00	12/11/85
	WILLIAM BUCK JOHNS	250.00	12/11/85
	ART AGAJANIAN	250.00	12/11/85
	DOY HENLEY	250.00	12/11/85
	JOHN KONWISER	150.00	12/11/85
	E. TYLER MILLER, JR.	250.00	12/11/85
	MICHAEL P. ALESSIO	150.00	12/11/85
	CHARLES S. SHUKEN	100.00	12/11/85
	ELEANOR R. STORRS	100.00	12/11/85
C	SUNCOAST FINANCIAL CORP.	1,000.00	12/11/85
	T.W. HOEHN, III	150.00	12/11/85
C	ANVIL CORPORATION	250.00	12/11/85
C	DIXIELINE LUMBER CO.	250.00	12/11/85
C	THE BERGHEER COMPANY	100.00	12/11/85
C	C. J. SEGERSTROM & SONS	250.00	12/11/85
	ROBERT F. BEAVER	250.00	12/11/85
C	ORCO BLOCK CO., INC.	500.00	12/11/85
	MAY CO.	500.00	12/11/85
	HARRIETTE F. WITMER	250.00	12/11/85
	KEN WILLIG	150.00	12/11/85

PAGE 6
FRIENDS OF DRONENBURG PAC

4. SOURCES OF FUNDS CONSTITUTING THE MARCH 9 & 12, 1986 BALANCE
(CONTINUED).

	CONTRIBUTOR	AMOUNT	DEPOSIT DATE
	-----	-----	-----
	FITZPATRICK & ASSOCIATES	500.00	12/11/85
	JAMES R. SPIEVAK	150.00	12/11/85
C	ROHR INDUSTRIES, INC.	150.00	12/11/85
C	THE SIGNAL COMPANIES, INC.	300.00	12/11/85
C	WILLIAM A. HINRICHS, M.D., INC.	100.00	12/11/85
C	KAISER STEEL CORP.	750.00	12/11/85
	WILLIAM D. HEIMBACH	500.00	12/11/85
	J. JAMES WOODYARD	500.00	11/27/85
C	PACIFIC TELESIS GROUP	1,500.00	11/27/85
	ROBERT M. ARAN, ATTY.	500.00	11/27/85

	TOTAL	\$ 33,230.00	

5. SEE CODES USED IN INTERROGATORY NO. 4.
C - CORPORATION
L - LABOR ORGANIZATION
N - NATIONAL BANK

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BEFORE THE FEDERAL ELECTION COMMISSION

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In the Matter of)
)
Friends of Dronenberg PAC) MUR 2663
(Federal/Non-Federal Accounts) and)
David Hawkins, as treasurer)

GENERAL COUNSEL'S REPORT

SENSITIVE

I. BACKGROUND

On July 26, 1988, the Commission found reason to believe Friends of Dronenberg PAC (Federal Account) and David Hawkins, as treasurer, violated 2 U.S.C. § 441a(a)(1)(A) with respect to a five thousand dollar contribution to Michael Antonovich on October 1, 1986, and a five thousand dollar contribution to Robert W. Naylor on October 10, 1986. The Commission also found reason to believe Friends of Dronenberg PAC (Federal/Non-Federal Accounts) and David Hawkins, as treasurer, violated 11 C.F.R. § 102.5(a) and 2 U.S.C. § 441b because of a transfer of funds to the Federal Account and contributions to federal committees by the Non-Federal Account. The Commission approved the sending of interrogatories and a request for production of documents to the Federal/Non-Federal Accounts on August 31, 1988. The Commission's interrogatories and request for documents explored the issue of whether there were, in fact, prohibited funds in the Non-Federal Account at the time of the transfer and contributions. The Respondents requested and were granted an extension of time until October 15, 1988, in which to answer the interrogatories and produce the documents. On October 20, 1988, the Office of the General Counsel received answers to the interrogatories as well as documents. As noted in Comprehensive Investigative Report #1 dated December 30, 1988, the Respondents'

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October 20, 1988, submission was inadequate for determining whether the contributions or transfer in question contained prohibited funds.

On December 27, 1988, the Office of the General Counsel received a supplemental response from the Respondents. (Attachment 1). That response, however, was insufficient because Respondents failed to include information regarding the May 9, 1986 transfer. In response to a telephone conversation with this office, Respondents submitted another supplement with the missing information on January 17, 1989. This information contained errors in dates for the source of funds constituting the account balances for March 9 and 12, 1986. On February 3, 1989, Respondents submitted a final supplement containing complete information for the transactions in question. (Attachment 2). The final supplement dated February 3, 1989, also requested conciliation prior to a finding of probable cause to believe.

II. ANALYSIS

Respondents' submission of December 27, 1988, does not dispute the Commission's findings of violations of the Act by Friends of Dronenberg PAC (Federal and Federal/Non Federal Accounts). Attachment 1, pages 1-7. With regard to the two contributions of \$5,000 each made by the Federal Account to Michael B. Antonovich and Robert W. Naylor, respectively, the Respondents state that upon learning that the Committee had exceeded the limits of the Act (because they were not yet a multicandidate committee), the Federal Account requested refunds

from the candidate committees. (Attachment 1, page 1). As noted in the General Counsel's Report dated July 5, 1988, the excessive portion of these contributions has been refunded by the recipient federal candidate committees.

Respondents' December 27, 1988, submission confirms that the Non-Federal Account made contributions to federal candidate committees and a transfer to its Federal Account.

(Attachment 1). The Respondents state that the Non-Federal Account inadvertently made two contributions of \$1,000 each to the authorized committee of federal candidate Wally Herger on March 9, 1986 and November 13, 1986 and one contribution of \$1,000 to the authorized committee of federal candidate Konneyu on March 12, 1986. The Office of the General Counsel notes that one of the two (\$1,000) contributions to federal candidate Wally Herger was not previously known to have been made by the Non-Federal Account. (Attachment 1, page 1).

In addition to the contributions made by the Non-Federal Account to federal candidate committees, the Non-Federal Account indicates that it transferred \$1,000 to the Federal Account on May 9, 1986. (Attachment 1, page 2). With the exception of the recently discovered \$1,000 contribution to the Wally Herger for Congress Committee, the Federal Account has reimbursed the Non-Federal Account for two (\$1,000) contributions (Herger and Konneyu) and the transfer of funds (\$1,000) to the Federal Account.

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The purpose of the Commission's interrogatories and request for documents was to provide information so that it could be determined whether on the dates of the contributions to federal candidate committees and the transfer of funds to the Federal Account, the Non-Federal Account contained monies prohibited by the Act. In this regard, Respondents submit account dates, amounts, account balances and the source of funds constituting the account balances. Attachment 2, pages 3-7. Respondents' submission uses a LIFO (last-in first-out) analysis of the receipts in the Non-Federal Account on the transaction dates in question.

Examination of these receipts indicates that on the transaction dates noted, the funds constituting the account balance included corporate, labor or national bank monies. Therefore, the contributions to federal committees by the Non-Federal Account and the transfer of funds by the Non-Federal to the Federal Account contained monies prohibited by 2 U.S.C. § 441b.

Friends of Dronenberg PAC (Federal/Non-Federal Accounts) has requested settlement of this matter prior to a finding of probable cause to believe.

III. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

IV. RECOMMENDATIONS

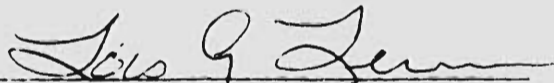
1. Enter into conciliation with Friends of Dronenberg PAC (Federal/Non-Federal Accounts) and David Hawkins, as treasurer, prior to a finding of probable cause to believe.
2. Approve the attached proposed Conciliation Agreement and Letter.

Lawrence M. Noble
General Counsel

3 2 0 4 0 7 6 4 6 7 5
Date

2/22/89

BY:


Lois G. Lerner
Associate General Counsel

Attachments

1. Response of Committee
2. Supplemental Response
3. Conciliation Agreement and Letter

Staff Person: Debby Curry

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Friends of Dronenberg PAC
(Federal/Non-Federal Accounts) and
David Hawkins, as treasurer

)
)
)
)
)

MUR 2663

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal
Election Commission, do hereby certify that on February 27,
1989, the Commission decided by a vote of 6-0 to take
the following actions in MUR 2663:

1. Enter into conciliation with Friends of
Dronenberg PAC (Federal/Non-Federal Accounts)
and David Hawkins, as treasurer, prior to a
finding of probable cause to believe.
2. Approve the proposed Conciliation Agreement
and Letter, as recommended in the General
Counsel's report signed February 22, 1989.

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

Attest:

2/27/89

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Wed., 2-22-89, 1:17
Circulated on 48 hour tally basis: Thurs., 2-23-89, 1:10
Deadline for vote: Mon., 2-27-89, 1:10



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 8, 1989

David Hawkins, Treasurer
Friends of Dronenberg PAC
1629 Columbia Street
San Diego, CA 92101

RE: MUR 2663
Friends of Dronenberg PAC
(Federal/Non-Federal Accounts)
and David Hawkins, as
treasurer

Dear Mr. Hawkins:

On July 26, 1988, the Federal Election Commission found reason to believe that Friends of Dronenberg PAC (Federal/Non-Federal Accounts) and you, as treasurer, violated 11 C.F.R. § 102.5(a) of Commission regulations and 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Commission also found reason to believe Friends of Dronenberg PAC (Federal Account) and you, as treasurer, violated 2 U.S.C. § 441a(a)(1)(A). At your request, on February 27, 1989, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you and your committee agree with the provisions of the enclosed agreement, please sign and return it along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

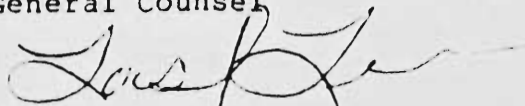
If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact

David Hawkins
Page 2

Deborah Curry, the attorney assigned to this matter, at (202)
376-8200.

Sincerely,

Lawrence M. Noble
General Counsel



BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

8 4 7 4 0 7 0 4 6 7 8

110 WEST C STREET, SUITE
SAN DIEGO, CA 92101
(619) 237-7844



06 C# 2732
1020 N STREET
SACRAMENTO, CA 95814
(916) 445-5713

09 MAY 12 PM 12:04

ERNEST J. DRONENBURG, JR.
MEMBER, STATE BOARD OF EQUALIZATION
May 10, 1989

Ms. Deborah Curry
Federal Election Commission
Washington, DC 20463

RE: MUR 2663, Friends of Dronenburg PAC
(Federal/Non Federal Accounts) and David Hawkins, as Treasurer

Dear Deborah:

Thank you for the extension you granted my committee in our telephone conversation of May 5, 1989. This additional time will allow me to brief you on the two issues that have been raised on the above referenced case.

For more than ten years, I have served in elective office in the State of California and currently represent over 7 million people. My committee, Friends of Dronenburg, has been the subject of mandatory audits conducted by the California Fair Political Practices Commission (FPPC) after each one of my three elections. The committee has raised and spent hundreds of thousands of dollars during this time period. The FPPC has found no material errors. I take pride in the fact that strict interpretation of the spirit and letter of the law have always been a focus for Friends of Dronenburg, as well as in my personal affairs. In the case at hand, I truly believe we did nothing improper, based on the information available at the time as well as the circumstances involved.

The following will be a chronological outline of the alleged violations within each issue area:

ISSUE #1: CONTRIBUTIONS FROM THE NON-FEDERAL AFFILIATED ACCOUNT

MARCH of 1986

While Congressman Wally Herger was still a member of the State Assembly he asked for a contribution to his federal candidate committee. At that time, Congressman Herger showed me a legal opinion based on Title 11 of the Code of Federal Regulations, Section 102.5(b)(1)(ii) stating that a contribution of one thousand dollars (\$1,000) or less could be made by the non-federal account of a state office holder to a federal candidate committee (a copy of this legal opinion shall be forthcoming). In order to make such a contribution, however, the non-federal account had to identify amounts that could qualify for a contribution to a federal account (clean dollars).

We identified approximately eight thousand fifty-five (8,055) clean dollars under the Last In First Out (LIFO) method. Those dollars are highlighted on Schedule A (see Exhibit #1, which is a copy of a previous submittal we sent your office on January 28, 1989).

On March 17, 1986, the non-federal affiliated account made two (2) contributions of one thousand dollars (\$1,000) each to the two (2) following federal candidate committees; Wally Herger for Congress and Konneyu Election Committee. At that point in time, Mr. Konneyu was also a member of the California State Assembly. Both men had made transfers from their non-federal accounts to their federal accounts.

APRIL of 1986

Friends of Dronenburg opened a federal account.

MAY of 1986

On May 9, 1986, a contribution of one thousand dollars (\$1,000) was made from the non-federal affiliated account to the newly opened federal account (see Exhibit #2). At that point in time there was approximately five thousand thirty (5,030) clean dollars left in the non-federal affiliated account.

NOVEMBER of 1986

The last contribution made to a federal candidate committee from the non-federal affiliated account came in November of 1986. At that time there was approximately four thousand thirty (4,030) clean dollars left in the non-federal affiliated account. A check for one thousand dollars (\$1,000) was given to Wally Herger for Congress.

At all times during the above transactions, we were in contact with the Federal Elections Commission's (FEC) RAD analyst. I was led to believe that I was operating completely within applicable regulations and the law.

Note: There are two errors on Page 3 of the FEC Factual and Legal Analysis, Section 2: 1) the second contribution made to Wally Herger for Congress took place in November of 1986, not December, and 2) there was only one contribution made to Konneyu Election Committee and that occurred on March 17, 1986 as stated above.

JUNE of 1987

David Hawkins, the Friends of Dronenburg treasurer, was informed by the RAD analyst that the federal account and the non-federal affiliated accounts were not in compliance and that monies from the federal account should be transferred to the non-federal affiliated account. At that point, Mr. Hawkins relayed to me his discussion with the RAD analyst. Neither Mr. Hawkins nor I thought the committee was in violation of the law, however, as the RAD analyst was the FEC's representative, we took his suggestions as the easiest manner to resolve the alleged violations. Thus, in June of 1987 the federal account wrote three separate checks of one thousand dollars (\$1,000) each to the non-federal affiliated committee.

Since that point in time the non-federal affiliated account has not written any checks to any federal candidate committees.

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ISSUE #2: FRIENDS OF DRONENBURG IS NOT A MULTI-CANDIDATE COMMITTEE

OCTOBER of 1986

The federal account made five (5) contributions to federal candidate committees for both Congressional and Senatorial candidates. Three (3) were for one hundred dollars (\$100) and two (2) were for five thousand dollars (\$5,000) each to Antonovich for Senate and Bob Naylor for US Senate.

APRIL of 1987

We were notified by the RAD analyst that the transactions of October 1986 were alleged violations. He told us to ask for a refund of four thousand dollars (\$4,000) from each of the two (2) federal candidate committees.

JUNE of 1987

The federal account received a four thousand dollar (\$4,000) check back from Antonovich for Senate.

AUGUST of 1987

The federal account received a four thousand dollar (\$4,000) check back from Bob Naylor for US Senate.

SEPTEMBER of 1987

The federal account issued a new check in the amount of four thousand dollars (\$4,000) to Bob Naylor for US Senate.

OCTOBER of 1987

The federal account issued a new check in the amount of two thousand dollars (\$2,000) to Antonovich for Senate.

In this case the form of the transactions seems more important than the substance, but in the spirit of cooperation, we asked for a refund and then issued second checks. At each of the above mentioned dates, we called the RAD analyst and asked for assistance. Once we understood exactly what the RAD analyst believed was the law, we did as suggested, whether or not we believed his contentions.

SEPTEMBER of 1988

Mr. Hawkins received a letter dated September 7, 1988 from Thomas J. Josefiak, the Chairman of the FEC. At that point Mr. Hawkins and I were frustrated as we had relied on the RAD analyst's earlier statements. We were earlier told that if we amended our statements rather than arguing the law over errors which were not material, that this problem would be easily resolved.

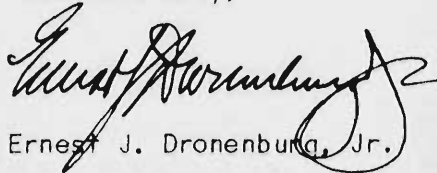
In conclusion and as I stated before, I take pride in the fact that strict interpretation of the spirit and letter of the law have always been a focus for me. I truly believe that any errors made by this committee were not material. Our intent has never been to circumvent the law, but rather to uphold the law.

3304076481

Ms. Deborah Curry
May 10, 1989
Page 4 of 4 pages

I will be in touch with you by telephone and look forward to a personal meeting next Wednesday, May 17th. Thank you again for your time and patience.

Most Cordially,



Ernest J. Dronenburg, Jr.

ENCLOSURES

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MAY 12 1986 12:05

PAGE 4
FRIENDS OF DRONENBURG PAC

4. SOURCES OF FUNDS CONSTITUTING THE MAY 9, 1986 BALANCE.

	CONTRIBUTOR	AMOUNT	DEPOSIT DATE
C	BROOKES & BROKES	\$ 300.00	5/9/86
C	AMFAC	500.00	5/9/86
C	WORLD AIRWAYS, INC.	150.00	5/9/86
	SEAFIRST BANK (INTEREST ON BONDS)	1,625.00	5/9/86
	COUNTY OF SAN DIEGO (REFUND)	52.25	4/11/86
C	FRANK DEVORE CONSULTING, INC.	100.00	4/11/86
L	SHELL GOOD GOVT. FUND	1,000.00	4/11/86
	LOUIS BRUTOCAD	100.00	4/11/86
N	SECURITY PACIFIC CORPORATION	500.00	3/18/86
N	CROCKER NATIONAL CORPORATION	250.00	3/18/86
C	FRANK DEVORE CONSULTING, INC.	100.00	3/18/86
L	ALLIANCE OF MOTION PICTURE & TELEVISION PRODUCERS	250.00	3/18/86
L	TRW STATE GOOD GOVT. FUND	250.00	3/18/86
L	LONG BEACH REPUBLICAN WOMEN	25.00	3/18/86
	H. GABRIEL	25.00	3/18/86
	AFTON MILLER	100.00	3/18/86
	TOTAL \$	5,327.25	

SOURCES OF FUNDS CONSTITUTING THE MARCH 9 & 12, 1986 BALANCE.

	CONTRIBUTOR	AMOUNT	DEPOSIT DATE
C	THE CLOROX COMPANY	\$ 500.00	2/18/86
	CHARLES S. SHUKEN	100.00	2/18/86
	FRANKLIN & PATRICIA LATCHAM	250.00	2/18/86
	J. & LILA DICKSON	\$ 150.00	2/18/86
C	HOUSEHOLD FINANCE INTER.	250.00	2/18/86
C	MR. W.K. MORRIS/CHEVRON CORP.	500.00	2/18/86
	SAMUEL STEIN	25.00	2/18/86
L	SANTA MONICA REPUB. WOMEN'S CLUB	25.00	2/18/86
L	CITIZENS UTILITIES CO. #70	250.00	2/18/86
N	BANK OF AMERICA	500.00	2/1/86
	HILBERT K. CHU C.P.A.	30.00	2/1/86
	JOHN G. FRANKOT, JR.	100.00	1/10/86
C	DON THAYER, INC.	100.00	1/10/86
N	GREAT AMERICAN SAVINGS	250.00	1/10/86
	JAMES S. GRAHAM (LOAN RECEIVED)	7,000.00	12/31/85
	STANWOOD C. JOHNSON (LOAN RECEIVED)	3,000.00	12/31/85
L	OUTDOOR ADVERTISING ASSN	200.00	12/31/85
L	STATE & LOCAL CITIZENSHIP RESPONSIBILITY	750.00	12/31/85

PAGE 5
FRIENDS OF DRONENBURG PAC4. SOURCES OF FUNDS CONSTITUTING THE MARCH 9 & 12, 1986 BALANCE
(CONTINUED).

	CONTRIBUTOR	AMOUNT	DEPOSIT DATE
C	PRESSEY PETERBILT	100.00	12/31/85
C	SAN DIEGO GAS & ELECTRIC	1,000.00	12/31/85
C	WYMAN, BAUTZER, ROTHMAN, KUCHEL & SIL	500.00	12/31/85
C	NCR CORPORATION	500.00	12/31/85
C	CUBIC CORPORATION	100.00	12/26/85
	C.A. DUNN	100.00	12/26/85
C	ATLANTIC RICHFIELD CO.	2,500.00	12/26/85
C	EVANS TELEPHONE COMPANY	250.00	12/26/85
	W.E. LANGSTON	250.00	12/26/85
	SAM DEVITT	100.00	12/26/85
	KEN OLIPHANT	250.00	12/26/85
	DANIEL RYAN	500.00	12/26/85
C	FLUOR CORPORATION	500.00	12/26/85
	LAW OFFICES JOHN THOMAS MONTAG	150.00	12/26/85
	DARYL C. IDLER, JR.	150.00	12/26/85
C	PEPPER OIL CO., INC.	150.00	12/26/85
C	IDEAL PLUMBING & HEATING	100.00	12/26/85
	ERNEST J. DRONENBURG, SR.	200.00	12/26/85
	ERNEST S. TUCKER, III	150.00	12/26/85
	KIM FLETCHER	200.00	12/26/85
	HAWKINS FAMILY TRUST	150.00	12/26/85
C	JACOBS DEVELOPMENT CO.	250.00	12/11/85
	FREDERICK A. GAGE	250.00	12/11/85
C	MCMAHON DEVELOPMENT	500.00	12/11/85
C	MAGNOLIA ENTERPRISES	250.00	12/11/85
	WILLIAM BUCK JOHNS	250.00	12/11/85
	ART AGAJANIAN	250.00	12/11/85
	DOY HENLEY	250.00	12/11/85
	JOHN KONWISER	150.00	12/11/85
	E. TYLER MILLER, JR.	250.00	12/11/85
	MICHAEL P. ALESSIO	150.00	12/11/85
	CHARLES S. SHUKEN	100.00	12/11/85
	ELEANOR R. STORRS	100.00	12/11/85
C	SUNCOAST FINANCIAL CORP.	1,000.00	12/11/85
	T.W. HOEHN, III	150.00	12/11/85
C	ANVIL CORPORATION	250.00	12/11/85
C	DIXIELINE LUMBER CO.	250.00	12/11/85
C	THE BERGHEER COMPANY	100.00	12/11/85
C	C. J. SEGERSTROM & SONS	250.00	12/11/85
	ROBERT F. BEAVER	250.00	12/11/85
C	ORCO BLOCK CO., INC.	500.00	12/11/85
	MAY CO.	500.00	12/11/85
	HARRIETTE F. WITMER	250.00	12/11/85
	KEN WILLIG	150.00	12/11/85

PAGE 6
FRIENDS OF DRONENBURG PAC

4. SOURCES OF FUNDS CONSTITUTING THE MARCH 9 & 12, 1986 BALANCE
(CONTINUED).

	CONTRIBUTOR	AMOUNT	DEPOSIT DATE
	FITZPATRICK & ASSOCIATES	500.00	12/11/85
	JAMES R. SPIEVAK	150.00	12/11/85
C	ROHR INDUSTRIES, INC.	150.00	12/11/85
C	THE SIGNAL COMPANIES, INC.	300.00	12/11/85
C	WILLIAM A. HINRICHS, M.D., INC.	100.00	12/11/85
C	KAISER STEEL CORP.	750.00	12/11/85
	WILLIAM D. HEIMBACH	500.00	12/11/85
	J. JAMES WOODYARD	500.00	11/27/85
C	PACIFIC TELESIS GROUP	1,500.00	11/27/85
	ROBERT M. ARAN, ATTY.	500.00	11/27/85
	TOTAL	\$ 33,230.00	

5. SEE CODES USED IN INTERROGATORY NO. 4.
C - CORPORATION
L - LABOR ORGANIZATION
N - NATIONAL BANK

of Committee (in Full)

FRIENDS OF DRONENBURG PAC

Report Covering the Period

From: APRIL 1, 1986 to JUNE 30, 1986

I. RECEIPTS

11. CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than Political Committees.

(Memo Entry Unitemized \$ 2,015.00)

(b) Political Party Committees

(c) Other Political Committees.

(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))

12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES.

13. ALL LOANS RECEIVED

14. LOAN REPAYMENTS RECEIVED.

15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)

16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES

AND OTHER POLITICAL COMMITTEES

17. OTHER RECEIPTS (Dividends, Interest, etc.)

18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)

II. DISBURSEMENTS

19. OPERATING EXPENDITURES.

20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES.

21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND

OTHER POLITICAL COMMITTEES

22. INDEPENDENT EXPENDITURES (use Schedule E)

23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES.

(2 U.S.C. § 441 a(d)) (Use Schedule F)

24. LOAN REPAYMENTS MADE.

25. LOANS MADE

26. REFUNDS OF CONTRIBUTIONS TO

(a) Individuals/Persons Other Than Political Committees.

(b) Political Party Committees

(c) Other Political Committees.

(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))

27. OTHER DISBURSEMENTS

28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)

III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES

29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)

30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)

31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)

32. TOTAL OPERATING EXPENDITURES from Line 19

33. OFFSETS TO OPERATING EXPENDITURES from Line 15

34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)

COLUMN A
Total This PeriodCOLUMN B
Calendar Year-To Date

8,015.00

8,015.00

8,015.00

8,015.00

1,000.00

1,000.00

9.00

9.00

9,024.00

9,024.00

0

0

7,890.00

7,890.00

7,890.00

7,890.00

0

0

RECEIVED
FEDERAL ELECTION COMMISSION

89 MAY 15 PM 12:21

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Friends of Dronenberg PAC) MUR 2663
(Federal/Non-Federal Accounts) and)
David Hawkins, as treasurer)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On February 14, 1989, the Commission decided to enter into pre-probable cause conciliation with Respondents in the above captioned matter. On March 8, 1989, the notification letter and proposed conciliation agreement were mailed to the Respondents.

On April 21, 1989, Respondents requested an extension of time until April 28, 1989 to respond to the Commission's proposed agreement because of workload considerations caused by the tax season. After considering the circumstances of the matter, this Office granted Respondents' request for an extension of time. (Attachment). Therefore, Respondents' counterproposal was due on April 28, 1989.

On May 5, 1989, Ernest Dronenberg, the State candidate who established these committees, called to explain that he had just learned about the Commission's conciliation proposal that week. Mr. Dronenberg indicated that due to the heavy tax season, Mr. Hawkins (an accountant) failed to communicate with him that conciliation negotiations had begun.

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Mr. Dronenberg also expressed concern that information that could possibly impact on conciliation negotiations had not been conveyed to the Commission by Mr. Hawkins. During the telephone conversation, Mr. Dronenberg agreed to make a written submission to the Commission detailing the circumstances not previously communicated to the Commission. Mr. Dronenberg will make a written submission by close of business on May 11, 1989. On May 17, 1989, Mr. Dronenberg will be in Washington and will meet staff members in this Office to discuss pre-probable cause conciliation.

Because Mr. Dronenberg was just recently apprised of the status of the matter and he intends to make positive efforts to conciliate, this Office believes that an additional 30 days of pre-probable cause conciliation are warranted in this case. After receiving the additional material noted and meeting with Mr. Dronenberg, this Office will submit a report with appropriate recommendations.

Lawrence M. Noble
General Counsel

May 15, 1989
Date

BY:

George F. Riskel
George F. Riskel
Acting Associate General Counsel

Attachment
Letter from Respondent

Staff assigned: Deborah Curry

110 WEST C STREET, SUITE 170
SAN DIEGO, CA 92101
(619) 237-7844



1020 N STREET
SACRAMENTO, CA 95814
(916) 445-5713

OGC 2865

MR 2663

ERNEST J. DRONENBURG, JR.
MEMBER, STATE BOARD OF EQUALIZATION

May 22, 1989

Ms. Deborah Curry
Office of General Counsel
Federal Election Commission
Washington, D.C. 20463

Dear Ms. Curry:

Thank you so much for your time and understanding at our meeting in Washington. This letter is to give you an update as to where I am in the process of developing a response to your offer in compromise.

Upon my return to San Diego, I immediately transferred the \$1,000.00 from the Federal Committee to the Non-Federal Committee. A copy of the deposit receipt and the check are enclosed. My treasurer, Mr. David Hawkins, did not arrive back from his vacation in Hawaii until Friday, May 19th. Consequently, we did not have a chance to discuss and prepare a formal response last week, but I hope to have that out to you by the end of this week.

Thanks again for your time, and I look forward to a speedy resolution to the situation.

Most cordially,

Ernest J. Dronenburg, Jr.
Ernest J. Dronenburg, Jr.

EJD:sal

Enclosures

89 MAY 26 AM 10:07

89 SEP -1 AM 10:54

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Friends of Dronenberg PAC)
(Federal/Non-Federal Accounts) and)
David Hawkins, as treasurer)

MUR 2663

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On July 26, 1988, the Commission found reason to believe Friends of Dronenberg PAC (Federal Account) and David Hawkins, as treasurer, violated 2 U.S.C. § 441a(a)(1)(A) with respect to a five thousand dollar contribution to Michael Antonovich on October 1, 1986, and a five thousand dollar contribution to Robert W. Naylor on October 10, 1986. The Commission also found reason to believe Friends of Dronenberg PAC (Federal/Non-Federal Accounts) and David Hawkins, as treasurer, violated 11 C.F.R. § 102.5(a) and 2 U.S.C. § 441b because of a transfer of funds to the Federal Account and contributions to federal committees by the Non-Federal Account.

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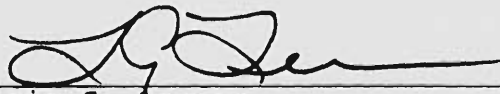
III. RECOMMENDATIONS

1. Accept the attached counterproposed agreement with Friends of Dronenberg PAC (Federal/Non-Federal Accounts) and David Hawkins, as treasurer.
2. Close the file.
3. Approve the attached letter.

Lawrence M. Noble
General Counsel

8/31/88
Date

BY:


Lois G. Lerner
Associate General Counsel

Attachments

1. Submission of Ernest Dronenberg
2. Supplemental Submission of Ernest Dronenberg
3. Respondents Counterproposed Conciliation Agreement and Civil Penalty Check
4. Letter to Respondents

Staff Assigned: Debby Curry

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Friends of Dronenberg PAC)
(Federal/Non-Federal Accounts) and)
David Hawkins, as treasurer)

MUR 2663

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the
Federal Election Commission, do hereby certify that on September
7, 1989, the Commission decided by a vote of 4-0 to take the
following actions in MUR 2663:

1. Accept the attached counterproposed
agreement with Friends of Dronenberg
PAC (Federal/Non-Federal Accounts) and
David Hawkins, as treasurer.
2. Close the file as recommended in the
General Counsel's Report dated
August 31, 1989.
3. Approve the letter attached to the
General Counsel's Report dated
August 31, 1989.

Commissioners Aikens, Elliott, McDonald and McGarry voted
affirmatively for the decision; Commissioners Josefiak and
Thomas did not vote.

Attest:

9/8/89
Date

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

Received in the Secretariat: Friday, September 1, 1989 10:54
Circulated to the Commission: Friday, September 1, 1989 2:00
Deadline for vote: Wednesday, September 6, 1989 4:00
At the time of deadline, a majority of votes had not been
received.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 14, 1989

David A. Hawkins
Hawkins & Scott
1629 Columbia Street
San Diego, CA 92101-2572

RE: MUR 2663
Friends of Dronenberg PAC
(Federal/Non-Federal Accounts)
and David Hawkins, as treasurer

Dear Mr. Hawkins:

On September 7, 1989, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted by Friends of Dronenberg PAC (Federal/Non-Federal Accounts) and you, as treasurer, in settlement of violations of 2 U.S.C. §§ 441a(a)(1)(A) and 441b, provisions of the Federal Election Campaign Act of 1971, as amended, and 11 C.F.R. § 102.5(a) of Commission Regulations. Accordingly, the file has been closed in this matter as it pertains to Friends of Dronenberg PAC (Federal/Non-Federal Accounts) and you, as treasurer. This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

David A. Hawkins
Page 2

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Deborah Curry, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel



BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

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MUR 2663

NOW, THEREFORE, the Commission and the Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enter voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

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2. Friends of Dronenberg Committee ("Non-Federal Account") is the state committee.

3. David Hawkins is treasurer of the Federal and Non-Federal Accounts.

4. The Act precludes a political committee from making a contribution to a candidate for federal office in excess of \$1,000 per election. 2 U.S.C. § 441a(a)(1)(A).

5. Under the Act, however, multicandidate committees may make contributions to a federal candidate that do not exceed \$5,000 per election. 2 U.S.C. § 441a(a)(2)(A)

6. The criteria for multicandidate committee status is six months registration with the Commission, contributions from more than fifty persons and contributions to five or more candidates for federal office. 2 U.S.C. § 441a(a)(4).

7. 11 C.F.R. § 102.5 permits organizations that intend to finance both federal and non-federal activity to set up a separate federal account.

8. Pursuant to 11 C.F.R. § 102.5(a)(1)(i), only funds subject to the prohibitions and limitations of the Act may be deposited into the federal account and all disbursements, contributions, expenditures and transfers by such committee in connection with federal elections must be made by the Federal Account.

9. Furthermore, no transfers may be made to such federal account from any other account maintained by such

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organization for purposes of financing activity in connection with non-federal elections. 11 C.F.R. § 102.5(a)(1)(i).

10. Additionally, pursuant to 11 C.F.R. § 102.5(a)(2), only contributions meeting certain conditions may be deposited in a federal account.

11. Pursuant to 2 U.S.C. § 441b contributions or expenditures by national banks, corporations and labor organizations in connection with federal elections are prohibited.

12. The Federal Account made a \$5,000 contribution to Antonovich for Senate Committee on October 1, 1986 and a \$5,000 contribution to Bob Naylor for U.S. Senate Committee on October 10, 1986.

13. The Federal Account was not a multicandidate committee at the time these contributions were made.

14. Therefore, the Federal Account was limited to a \$1,000 contribution per election for each federal candidate committee.

15. The Federal Account has received a \$4,000 refund per federal candidate committee.

16. The Non-Federal Account made a \$1,000 contribution to Konneyu Election Committee on March 12, 1986 and two \$1,000 contributions to Wally Herger for Congress Committee on March 9, 1986 and November 13, 1986.

17. On May 9, 1986, the Non-Federal Account made a \$1,000 transfer to the Federal Account.

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18. These contributions to federal candidates and the transfer of funds by the Non-Federal Account were not made in accordance with 11 C.F.R. § 102.5(a).

19. Additionally, the contributions and the transfer contained funds prohibited under 2 U.S.C. § 441b. Except for one \$1,000 contribution to Wally Herger for Congress Committee, the Federal Account has reimbursed the Non-Federal Account for the contributions and the transfer.

V. The Friends of Dronenberg PAC ("Federal Account") and David Hawkins, as treasurer, exceeded the contribution limits by \$4,000 with respect to two federal candidate committees, in violation of 2 U.S.C. § 441a(a)(1)(A).

VI. Respondents made contributions to federal candidates and a transfer to their Federal Account from their Non-Federal Account in violation of 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a).

VII. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Fifteen hundred dollars (\$1,500), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VIII. Friends of Dronenberg PAC Non-Federal Account will obtain a refund of the contribution (\$1,000) to Herger for Congress Committee or Friends of Dronenberg PAC Federal Account will reimburse the Non-Federal Account for this contribution.

IX. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issues herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any

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requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

X. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

XI. Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

XII. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

9-13-89
Date

FOR THE RESPONDENTS:


David Hawkins
Treasurer

June 16, 1987
Date

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FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

THIS IS THE END OF MUR # 2663

DATE FILMED 9/28/89 CAMERA NO. 3

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