



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20541

THIS IS THE BEGINNING OF MUR # 3666

DATE FILMED 2-9-66 CAMERA NO. 2

CAMERA MAN J.P.

TAMBLYN FOR CONGRESS

8th District Democrat

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIN COPY ROOM

OCT 21 11 11 AM '92

October 20, 1992

General Counsel
Federal Election Commission
999 E. Street NW.
Washington DC 20463

MUR 3666

92 OCT 21 PM 3:18

FEDERAL ELECTION COMMISSION

I hereby file with you, pursuant to 11 CFR Ch 1, Section 111.4 (a) and 2 U.S.C. 437g(a)(1), a Complaint for alleged violations by a Candidate for Federal office, Jennifer Dunn, Friends of Jennifer Dunn and Larry W. Wells, Treasurer, of Statutes and Regulations over which the Federal Elections Commission of the United States of America has jurisdiction.

In addition to the filing of this formal Complaint, I respectfully request from you your opinion on the following questions.

Jennifer Dunn was Chairman of the Washington State Republican Party from 1981 to March of 1992. According to her own FEC records Jennifer Dunn began raising money for her own campaign in March of 1991. She declared her candidacy in November 1991 after raising over \$34,000.00, and she was still the Party Chair until March of the following year. Candidate Dunn was expending money in excess of the \$5,000.00 spending threshold long before she Declared her Candidacy in November 1991. Until she finally resigned her Republican Party post in March of 1992, she had been receiving a salary as Party Chairman of approximately \$80,000.00 per year. The first Dunn FEC Report shows that many of her early donors are prominent executives who live outside the District and who made maximum contributions.

1. Is Jennifer Dunn's salary from the Republican State Party a Contribution within the meaning of the Act, since she was clearly campaigning for herself while collecting Republican Party money as her salary, and was using the Party donor base for her campaign?

2. If the salary is a donation, then would the Republican Party be in violation of the Act for Contribution to an individual campaign in excess of the limit set by law?

As the General Election draws near, would there possibly be any way that your response to these questions could be expedited? In any event, I thank you for your attention to these matters.

Respectfully Submitted


Krishna Fells
Campaign Director

George Tamblin Campaign PO Box 1636, Mercer Island WA 98040-1636, Fax 865-9586 • 865-VOTE

9403096277

BEFORE THE FEDERAL ELECTION COMMISSION
OF THE UNITED STATES OF AMERICA

In Re:

JENNIFER B. DUNN,
Candidate, U.S. House
of Representatives,
8th District, State
of Washington

and,

FRIENDS OF JENNIFER
B. DUNN, & LARRY W. WELLS,
TREASURER
Her Principal Campaign
Committee & It's Treasurer

Respondents.

NO:

COMPLAINT
FOR VIOLATION OF FEDERAL
STATUTES AND REGULATIONS
UNDER FEC JURISDICTION

TO: GENERAL COUNSEL
Federal Election Commission, 999 E. Street NW.
Washington DC 20463

COMES NOW the Complainant, KRISHNA FELLOWS, a resident of the state of Washington, who's address is 18327 Wallingford Ave. N., Seattle, Wa 98133, and files this Complaint for alleged violations, by the above-captioned individuals and organizations, of Statutes and Regulations over which the Federal Elections Commission of the United States of America has jurisdiction. In compliance with 11 CFR Ch. 1, Section 111.4 (c) and (d)(2), this Complaint is based upon the information and belief of the Complainant rather than her personal knowledge, and it identifies the

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FEDERAL ELECTION COMMISSION
OCT 21 1992

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source of the information giving rise to the belief in the truth of the statements contained herein:

I. FACTS.

1. Respondent Jennifer B. Dunn (hereinafter Dunn or Candidate Dunn) is a Candidate for Federal office, the 8th Congressional District of the State of Washington. (See attached FEC FORM 2, hereinafter referred to as "Exhibit 1", which was executed November 15, 1991, and filed with the Clerk of the House of Representatives on November 21, 1991.) Respondents "Friends of Jennifer B. Dunn" and Larry W. Well, are respectively Defendant Dunn's Principal Campaign Committee and it's Treasurer. (See attached FEC FORM 2, hereinafter referred to as "Exhibit 2", which was executed November 15, 1991, and filed with the Clerk of the House of Representatives on November 21, 1991.)

2. At the time of such filing Candidate Dunn was Chairman of the Washington State Republican Party, having been Chair since 1981. Dunn later resigned that post in March, 1992. (See literature hereinafter referred to as "Exhibit 3".)

3. According to FEC Report, Candidate Dunn and her Principal Committee had been collecting and amassing contributions since as early as March, 1991 (and possibly before that date). See attached Report of Receipts And Disbursements, FEC FORM 3, by Friends of Jennifer B. Dunn, executed January 16, 1992, FEC #C00256131, covering period of March 29, 1991 through December 31, 1991, hereinafter referred to as "Exhibit 4." See also, chart prepared by Complainant which extracts information from such report, which chart is entitled "Pre-filing FEC Reportable Campaign Contributions To Friends Of Jennifer B. Dunn", hereinafter referred to as Exhibit 5.)

9 4 0 3 0 9 6 2 7 8 0

4. By March 29, 1991 Candidate Dunn had collected contributions totalling at least \$7,000.00. Between March 1991 and November 15, 1991 Candidate Dunn had amassed approximately \$34,875.00, without filing a Statement of Candidacy or Statement of Organization.

5. Attached as "Exhibit 6" is a newspaper article from the Seattle Times dated December 15, 1991. It states that Candidate Dunn told GOP leaders on November 14, 1991 that she will leave her party post early in 1992 to begin to explore running for Congress in the 8th District. The article goes on to state that she has commissioned a poll, and indicates she was talking as if she was undecided. No where was it indicated by her that she had the previous month already filed her candidacy for the 8th District Office.

6. The massive contributions raised by Dunn prior to filing was obtained mainly from real estate, developer, timber and banking executives, most of which were in maximum contribution amounts and were obtained by her while she was still Chairman of the Republican Party.

II. CHARGES.

1. Title 2, Chapter 14, of The United States Code, governs election campaigns for the U.S. House of Representatives. Subchapter I. (Disclosure of Federal Campaign Funds) deals with reporting requirements. Section 431 (2) defines a Candidate as a person who seeks election to a Federal office who receives contributions, or who has consented to another to receive contributions on their behalf, and receives in excess of \$5,000.00, or who expends for the election in excess of \$5,000.00. Upon becoming a

Candidate, Section 432(e) (1) Requires the candidate to designate in writing its Principal Campaign Committee.(FEC Form 1). Regulations also mirror the above requirements and require that within 15 days of becoming a candidate, each candidate file a Statement of Candidacy (FEC Form 2). See also 11 C.F.R. 100, et seq.

Candidate Dunn, although passing the \$5,000.00 FEC filing threshold in March, 1991, never filed as required by law until November, 1991. The Respondents therefor violated Federal Statutes and Regulations. Complainant alleges that the above constituted multiple and gross violations.

2. Dunn FEC 3 (Exhibit 4) also shows that by June, 1991, she had already hired and paid her principal campaign consultants, The Washington Lincoln Group. She had also hired other consultants and made other major expenditures prior to filing. These expenditures passed the \$5,000.00 FEC filing threshold well before Candidate Dunn filed. The Respondents therefor violated Federal Statutes and Regulations. Complainant alleges that the above constituted multiple and gross violations.

3. The \$7,000.00 of contributions in March of 1991 shown on Dunn FEC 3 (Exhibit 4) all state that they were made on March 29, 1991. It is Complainants belief that it would be highly unusual for an unannounced candidate without an organized campaign to have 7 maximum contributions of \$1000.00 made on the same day in March 1991, and therefor believes these contributions were made on dates other than that reported. Therefore Complainant alleges that this reporting was false and fraudulent and in violation of FEC Statutes and Regulations.

4. It appears that Jennifer Dunn was legally a candidate who should have declared her candidacy with the FEC, registered her campaign committee and disclosed her

financial activities, both officially and publicly, months before she actually filed in November 1991. Instead, while she was still head of the Republican Party she was quietly collecting a war chest of maximum contributions from executives. Jennifer Dunn gained a distinct advantage by her activities. She collected money, brought people on board her cause, started to organized her campaign and clothed from the view of the general public and her opponents. Who knows what else the facts would disclose about her other activities and what she said to obtain these contributions. Candidate Dunn's activities in toto raise questions of conflict of interest and in any respect they appear unfair, and therefore violate the spirit, if not the letter, of common law fairness doctrines and Federal Statutes and Regulations.

III. PRAYER FOR RELIEF

Complainant prays that Defendants be assessed the maximum penalties provided by law for their multiple and repeated violations.

SIGNED by COMPLAINANT this 20th day of October, 1992

Krishna Fells
KRISHNA FELS
18327 Wallingford Ave. N.
Seattle, WA 98133

State of Washington)
County of King) ss.

Signed and sworn to before me, a Notary Public in and for the State of Washington, this 20 day of October, 1992.



Bruce G. Hand
Notary Public in and for the
State of Washington
Residing at: Medina

EXHIBIT 1

94030962783

3261-2 ER 11-2-91

STATEMENT OF ORGANIZATION

(See reverse side for instructions)

NOV 15 1991

RECEIVED
NOV 18 1991

1. NAME OF COMMITTEE IN FULL <u>Friends of Jennifer B. Dunn</u>	☐ (Check if name is changed)	2. DATE <u>November 15, 1991</u>
(a) Number and Street Address <u>P. O. Box 40110</u>	☐ (Check if address is changed)	3. FEC IDENTIFICATION NUMBER <u>(To be Assigned)</u>
(c) City, State and ZIP Code <u>Bellevue, WA 98004-0110</u>		4. IS THIS STATEMENT AN AMENDMENT? ☐ YES ☒ NO

5. TYPE OF COMMITTEE (Check one)

- ☒ (a) This committee is a principal campaign committee. (Complete the candidate information below.)
- ☐ (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)
- | | | | |
|--|--|-------------------------------------|---------------------------------|
| Name of Candidate
<u>Jennifer B. Dunn</u> | Candidate Party Affiliation
<u>Republican</u> | Office Sought
<u>U. S. House</u> | State/District
<u>Wash/8</u> |
|--|--|-------------------------------------|---------------------------------|
- ☐ (c) This committee supports/opposes only one candidate _____ and is NOT an authorized committee.
(name of candidate)
- ☐ (d) This committee is a _____ committee of the _____ Party.
(National, State or subordinate) (Democratic, Republican, etc.)
- ☐ (e) This committee is a separate segregated fund.
- ☐ (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund or a party committee.

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

Type of Connected Organization

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

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

Full Name	Mailing Address	Title or Position
<u>Larry W. Wells</u>	<u>P. O. Box 40110 Bellevue, WA 98004-0110</u>	<u>Treasurer</u>

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

Full Name	Mailing Address	Title or Position
<u>Larry W. Wells</u>	<u>P. O. Box 40110 Bellevue, WA 98004-0110</u>	<u>Treasurer</u>

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

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
<u>Security Pacific National Bank</u>	<u>P. O. Box 34455 T25-1, Seattle, WA 98124</u>

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

TYPE OR PRINT NAME OF TREASURER	SIGNATURE OF TREASURER	DATE
<u>Larry W. Wells</u>	<u>Larry W. Wells</u>	<u>Nov. 15, 1991</u>

(NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g. ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.)

For further information contact:
Federal Election Commission
Toll-free 800-425-9530
Local 202-376-3120

FEC FORM 1
(revised 4/87)

94030962784

EXHIBIT 2

94030962785

3261-2 EZ 11-21-91

NOV 15 1991

STATEMENT OF CANDIDACY

(see reverse side for instructions)

RECEIVED
NOV 18 1991

Public Disclosure Commission

1. (a) Name of Candidate (in full) Jennifer B. Dunn			☐ Check if address changed
(b) Address (number and street) 37 Tatooch Key			
(c) City, State, and ZIP Code Bellevue, WA 98006			2. Identification Number (To be assigned)
3. Party Affiliation Republican	4. Office Sought U. S. House	5. State & District of Candidate Wash/B	

DESIGNATION OF PRINCIPAL CAMPAIGN COMMITTEE

6. I hereby designate the following named political committee as my Principal Campaign Committee for the 1992 election(s).
(year of election)

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

(a) Name of Committee (in full) Friends of Jennifer B. Dunn
(b) Address (number and street) P. O. Box 40110
(c) City, State and ZIP Code Bellevue, WA 98004-0110

DESIGNATION OF OTHER AUTHORIZED COMMITTEES

(Including Joint Fundraising Representatives)

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

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

(a) Name of Committee (in full)
(b) Address (number and street)
(c) City, State and ZIP Code

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

Signature of Candidate <i>Jennifer B. Dunn</i>	Date November 15, 1991
---	---------------------------

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

CANDIDATES FOR THE OFFICE OF:

President mail to:	U.S. Senate mail to:	U.S. House of Representatives mail to:	For further information contact:
Federal Election Commission 999 E Street, N.W. Washington, DC 20463	Secretary of the Senate Office of Public Records 232 Hart Senate Office Bldg. Washington, DC 20510-7116	Clerk of the House of Representatives Office of Records and Registration 1036 Longworth Office Bldg. Washington, DC 20515-6612	Federal Election Commission Toll-free 800/424-9530 Local 202/776-3120

FEC FORM 2
(revised 4/87)

24030962786

EXHIBIT 3

94030962787

language." insley, R-the House little. "But e bill, the and void." ent, it's a a program ever fund

be serious as juvenile intervention advocates ld have to

tion and intervention services, the state will end up paying more when some become criminals.

"Legislators are more willing to waste money on building prisons and figuring out ways to lock people up than they are providing early care for children before they get in trouble," said Rep. Margarita Prentice, D-Seattle. "There is too much of an inclination toward a 'quick fix.'"

Representatives and senators agree that several key bills passed this year that will set up at least a

preservation pilot program based on the "Homebuilders" program in which trained professionals do crisis intervention with those who are in danger of losing their children because of child abuse or other problems.

Some advocates are concerned that the bill allows DSHS to take money from the foster care program to finance preservation services. They think that more money is needed for both programs and taking from one for the other works at counterpurposes.

But supporters say the pro-

file justice bill started out with broad reforms but was slimmed down to a few policy changes.

The budget crunch meant there was only \$1.2 million budgeted for juvenile reform, considerably less than the \$55 million a juvenile justice task force said was needed to make sweeping changes in the system.

"It's better than nothing," said Casey.

Advocates hope that a joint select committee formed to look at continuing problems in the juvenile justice system will con-

Superintendent for Public Instruction, four legislators and one representative from the governor's office.

The council will ask local groups to submit proposals for projects and then tell the governor which programs it thinks should be financed in the budget.

The bill also establishes an interagency council to help coordinate all the agencies serving infants and toddlers with disabilities.

"This is the best thing we've done this year," Smith said.

Dunn jumps into race for Chandler's seat

By Ellis E. Conklin
P-I Reporter

Looking for a "little Irish luck," Jennifer Dunn, a consummate political insider with strong ties to the Republican Party-mainstream, chose St. Patrick's Day to announce her candidacy in the 8th Congressional District.

Standing before more than 700 supporters at a Bellevue hotel, Dunn made it plain yesterday that she intends to run against Congress and capitalize on the political fury ignited by the recent check-bouncing scandal.

"For some members of Congress, this has become their own personal gravy train," Dunn said. "They buy a ticket with a bounced check. They eat in the dining room without paying the tab. And when the train enters the tunnel, where it's dark and no one's looking, they give themselves a

pay raise."

Dunn, 50, a Bellevue resident and mother of two children, last month resigned her post as state Republican Party chairwoman after a successful tenure spanning more than 10 years.

So far, she's raised more than \$125,000, has busily amassed an army of volunteers and is widely considered the front-runner in the race to replace Rep. Rod Chandler, who is vacating the seat to run for the U.S. Senate.

Conservative television commentator John Carlson appeared at yesterday's announcement and



Dunn

intends to formally endorse Dunn in the near future. For several months, Carlson had considered making his own campaign bid in the 8th District.

The new 8th District, whose conservative political clout emanates from high-tech hotbeds on the Eastside, begins in Duvall and sweeps through the Snoqualmie Valley past Carnation and east to Skykomish. To the west, it slivers through pieces of Renton, Kent and Auburn before snaking down past Mount Rainier into the once-thriving timber towns of Orting and Eatonville.

Although the battle lines have been tinkered with during redistricting, pollsters say electoral proclivities remain the same. It's still bedrock Republican, the most Republican district west of the Cascades.

No Democrats have yet entered the race, leaving the field at

this point in the hands of four Republicans — state Sen. Pam Roach of Auburn, state Rep. Roy Ferguson of Bellevue, Issaquah sports promoter Michael Campbell and Dunn.

In a recent interview, Dunn said economic matters are certain to be the focal point of the campaign.

Dunn, who is friends with Housing and Urban Development Secretary Jack Kemp, indicated the potential 1996 GOP presidential aspirant might make a Washington appearance or two on her behalf this fall.

Although she considers herself a moderate Republican, her political seeds were first sown in 1984 when she worked for Barry Goldwater. After that, Dunn closely aligned herself with Ronald Reagan. In her favorite candidate's honor, she named one of her sons Reagan.

Braddock: Move to change political equation on health care reform

From Page B1

the voters will reject an initiative that calls for creation of a government-run health insurance system.

"Sooner or later, the governor and Braddock are going to have

"He was a single-minded, single issue legislator," Lauer said. "He wouldn't negotiate. . . . As a result, no reform legislation passed."

Braddock's announcement that he will not run for re-election and that he wants to push for a

House — with Speaker Joe King running for governor and Braddock leaving — will make it difficult for those in the legislative arena to "know who to work with," Crittenden said.

Braddock's strength and weakness both came from his refusal to

functioning (in the Legislature)."

Though Braddock said he hopes Gardner will support the initiative option, Crittenden said that's unlikely.

"We are definitely not supporting an initiative campaign," he said. "That's what happens

PF
Mar 18, 1992

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EXHIBIT 4

94030962789

0282-1-63-129-92

JAN 23 1992

REPORT OF RECEIPTS AND DISBURSEMENTS RECEIVED

For An Authorized Committee
(Summary Page)

JAN 24 1992

Public Disclosure Commission

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) FRIENDS OF JENNIFER B. DUNN		2. FEC IDENTIFICATION NUMBER C 00 256131
ADDRESS (number and street) ☐ Check if different than previously reported. P.O. Box 40110		3. IS THIS REPORT AN AMENDMENT? ☐ YES ☒ NO
CITY, STATE and ZIP CODE BELLEVUE WA 98004 WASH 8		

4. TYPE OF REPORT

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

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

SUMMARY

5. Covering Period <u>March 23, 1991 through December 31, 1991</u>	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e))	69,399.50	69,399.50
(b) Total Contribution Refunds (from Line 20(d))	100.00	100.00
(c) Net Contributions (other than loans) (subtract Line 6(b) from 6(a))	69,299.50	69,299.50
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	29,625.49	29,625.49
(b) Total Offsets to Operating Expenditures (from Line 14)	0	0
(c) Net Operating Expenditures (subtract Line 7(b) from 7(a))	29,625.49	29,625.49
8. Cash on Hand at Close of Reporting Period (from Line 27)	40,353.80	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	NONE	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	NONE	

For further information contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-376-3120

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

Type or Print Name of Treasurer

LARRY W. WELLS

Signature of Treasurer

Larry W. Wells

Date

JAN 16, 1992

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

FEC FORM 3
(revised 1/87)

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0282-1 ER 1-2-92

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

Name of Committee (in full) FRIENDS OF JENNIFER B. DUNN C00256131 Report Covering the Period: From: March 29, 1991 To: Dec. 31, 1991

I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			
(i) Itemized (see Schedule A)	<u>44,635.00</u>		11(a)(i)
(ii) Unitemized	<u>24,624.50</u>		11(a)(ii)
(iii) Total of contributions from individuals	<u>69,249.50</u>	<u>69,249.50</u>	11(a)(iii)
(b) Political Party Committees	<u>0</u>	<u>0</u>	11(b)
(c) Other Political Committees (such as PACs)	<u>150.00</u>	<u>150.00</u>	11(c)
(d) The Candidate	<u>0</u>	<u>0</u>	11(d)
(e) TOTAL CONTRIBUTIONS (other than loans) (add 11(a)(iii), (b), (c) and (d))	<u>69,399.50</u>	<u>69,399.50</u>	11(e)
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES	<u>0</u>	<u>0</u>	12
13. LOANS:			
(a) Made or Guaranteed by the Candidate	<u>0</u>	<u>0</u>	13(a)
(b) All Other Loans	<u>0</u>	<u>0</u>	13(b)
(c) TOTAL LOANS (add 13(a) and (b))	<u>0</u>	<u>0</u>	13(c)
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	<u>0</u>	<u>0</u>	14
15. OTHER RECEIPTS (Dividends, Interest, etc.)	<u>679.79</u>	<u>679.79</u>	15
16. TOTAL RECEIPTS (add 11(e), 12, 13(c), 14 and 15)	<u>70,079.29</u>	<u>70,079.29</u>	16
II. DISBURSEMENTS			
17. OPERATING EXPENDITURES	<u>29,625.49</u>	<u>29,625.49</u>	17
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES	<u>0</u>	<u>0</u>	18
19. LOAN REPAYMENTS:			
(a) Of Loans Made or Guaranteed by the Candidate	<u>0</u>	<u>0</u>	19(a)
(b) Of All Other Loans	<u>0</u>	<u>0</u>	19(b)
(c) TOTAL LOAN REPAYMENTS (add 19(a) and (b))	<u>0</u>	<u>0</u>	19(c)
20. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees	<u>100.00</u>	<u>100.00</u>	20(a)
(b) Political Party Committees	<u>0</u>	<u>0</u>	20(b)
(c) Other Political Committees (such as PACs)	<u>0</u>	<u>0</u>	20(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 20(a), (b) and (c))	<u>100.00</u>	<u>100.00</u>	20(d)
21. OTHER DISBURSEMENTS	<u>0</u>	<u>0</u>	21
22. TOTAL DISBURSEMENTS (add 17, 18, 19(c), 20(d) and 21)	<u>29,725.49</u>	<u>29,725.49</u>	22

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD	\$ <u>0</u>	23
24. TOTAL RECEIPTS THIS PERIOD (from Line 16)	\$ <u>70,079.29</u>	24
25. SUBTOTAL (add Line 23 and Line 24)	\$ <u>70,079.29</u>	25
26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22)	\$ <u>29,725.49</u>	26
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (subtract Line 26 from 25)	\$ <u>40,353.80</u>	27

94030962791

0282-1 ER 1-29-92

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s)
for each category of the
Detailed Summary PagePAGE OF
1 19
FOR LINE NUMBER
11 (a) (i)

INDIVIDUAL CONTRIBUTIONS

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 JENNIFER B. DUNN C 00 256131

A. Full Name, Mailing Address and ZIP Code GRAHAM ANDERSON 520 PINE ST. 20 th FLOOR SEATTLE WASH 98101 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer PETIT, MORAN CO. Occupation INS. BROKER Aggregate Year-to-Date > \$ 250.00	Date (month, day, year) 12-5-91	Amount of Each Receipt this Period 250.00
B. Full Name, Mailing Address and ZIP Code HERBERT BARNES 975 EASTON ROAD WASHINGTON PA Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer THE BARNES ORGANIZATION Occupation EXECUTIVE Aggregate Year-to-Date > \$ 1000.00	Date (month, day, year) 10-9-91	Amount of Each Receipt this Period 1000.00
C. Full Name, Mailing Address and ZIP Code RICHARD BAUER 18627 58 th NW BELLEVUE WASH 98005 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer H.V.D. Occupation ADMINISTRATOR Aggregate Year-to-Date > \$ 250.00	Date (month, day, year) 7-22-91	Amount of Each Receipt this Period 250.00
D. Full Name, Mailing Address and ZIP Code HAGEMAN SMITH BENSEN 832 33 rd AVE. E. SEATTLE WASH 98112 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer HAGEMAN SMITH BENSEN Occupation HOMEMAKER Aggregate Year-to-Date > \$ 500.00	Date (month, day, year) 11-20-91	Amount of Each Receipt this Period 500.00
E. Full Name, Mailing Address and ZIP Code NORTON CLIFF 1616 NORTON BLVD SEATTLE WASH 98108 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer RETIRED Occupation RETIRED Aggregate Year-to-Date > \$ 1000.00	Date (month, day, year) 6-26-91	Amount of Each Receipt this Period 1000.00
F. Full Name, Mailing Address and ZIP Code RICHARD CLARK 2100 3 rd AVE S. SEATTLE WASH 98144 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer RETIRED Occupation RETIRED Aggregate Year-to-Date > \$ 300.00	Date (month, day, year) 12-5-91	Amount of Each Receipt this Period 300.00
G. Full Name, Mailing Address and ZIP Code MA & MRS DAVID GORDON 2440 FLANDERS MESA ILLINOIS WASH 98004 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer GORDON RESTAURANT Occupation EXECUTIVE Aggregate Year-to-Date > \$ 200.00	Date (month, day, year) 11-26-91	Amount of Each Receipt this Period 200.00

SUBTOTAL of Receipts This Page (optional)

3,370.00

NAME AND ADDRESS (not more than one line number only)

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SCHEDULE A

ITEMIZED RECEIPTS

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

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INDIVIDUAL CONTRIBUTIONS

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 each committee.

NAME OF COMMITTEE (in Full)

FRIENDS OF JENNIFER B. DUNN

C-00 256131

A. Full Name, Mailing Address and ZIP Code: WILLIAM CONNER 846 1st Ave S BELLEVUE WASH 98004 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer: CONNER DEVELOPMENT Occupation: OWNER Aggregate Year-to-Date: \$ 2,000.00	Date (month, day, year): 4-22-91 Amount of Each Receipt this Period: 1,000.00
B. Full Name, Mailing Address and ZIP Code: DONALD KOUZ 6301 SUNNY PONT WAY NE SEATTLE WASH 98148 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer: UNICO Occupation: EXECUTIVE Aggregate Year-to-Date: \$ 1,000.00	Date (month, day, year): 5-29-91 Amount of Each Receipt this Period: 1,000.00
C. Full Name, Mailing Address and ZIP Code: BRYANT R DUNN 1420 S 5th Ave 3rd Floor SEATTLE WASH 98101 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer: GRANGER DUNN Occupation: ATTORNEY Aggregate Year-to-Date: \$ 1,000.00	Date (month, day, year): 5-6-91 Amount of Each Receipt this Period: 1,000.00
D. Full Name, Mailing Address and ZIP Code: GARRETT KOPPE 830 LOGAN BUILDING SEATTLE WASH 98101 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer: RAY BROWN TRADING FIRM Occupation: EXECUTIVE Aggregate Year-to-Date: \$ 1,000.00	Date (month, day, year): 6-27-91 Amount of Each Receipt this Period: 1,000.00
E. Full Name, Mailing Address and ZIP Code: GEORGE & KATHY EDWARDS 10013 OBAKE AVE SE HUNTSVILLE ALABAMA Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer: RANDOLPH SELLER Occupation: HEAD MASTER Aggregate Year-to-Date: \$ 250.00	Date (month, day, year): 12-5-91 Amount of Each Receipt this Period: 250.00
F. Full Name, Mailing Address and ZIP Code: RICHARD & JANE BERNARD 8437 SE 4th St MERCER ISLAND WASH 98040 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer: JAMESO PROPERTIES INC Occupation: EXECUTIVE Aggregate Year-to-Date: \$ 1,000.00	Date (month, day, year): 5-29-91 Amount of Each Receipt this Period: 1,000.00
G. Full Name, Mailing Address and ZIP Code: Bill & Beverly Fie P.O. Box 735 MERCER ISLAND WA 98040 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer: THE DUNN Occupation: EXECUTIVE Aggregate Year-to-Date: \$ 1,000.00	Date (month, day, year): 7-15-91 Amount of Each Receipt this Period: 1,000.00

SUBTOTAL of Receipts This Page (optional)

6,250.00

TOTAL This Period (last page this line number only)

3282

32 1299

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s)
for each category of the
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IN THE UNITED STATES OF AMERICA

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NAME OF COMMITTEE (in Full)

FRIENDS OF JENNIFER B. DENN CO25613

A. Full Name, Mailing Address and ZIP Code ART FASILLIAN P.O. Box 1012 BELLEVUE WASH 98009 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation STUDENT Aggregate Year-to-Date > \$ 200.00	Date (month, day, year) 9-6-91 Amount of Each Receipt this Period 800.00
B. Full Name, Mailing Address and ZIP Code KEMPER & BETTY FARMER P.O. Box 1012 BELLEVUE WASH 98009 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer BELLEVUE SQUARE Occupation EXECUTIVE Aggregate Year-to-Date > \$ 400.00	Date (month, day, year) 6-9-91 Amount of Each Receipt this Period 400.00
C. Full Name, Mailing Address and ZIP Code JUDITH FARMER P.O. Box 1012 BELLEVUE WASH 98009 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer BELLEVUE SQUARE Occupation ASSISTANT Aggregate Year-to-Date > \$ 200.00	Date (month, day, year) 9-6-91 Amount of Each Receipt this Period 200.00
D. Full Name, Mailing Address and ZIP Code L. PETER GRAMATI 1411 4th Ave SEATTLE WASH 98101 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer MERRILL RING Occupation EXECUTIVE Aggregate Year-to-Date > \$ 1,000.00	Date (month, day, year) 6-26-91 Amount of Each Receipt this Period 1,000.00
E. Full Name, Mailing Address and ZIP Code LYNN GODDARD 785 PAINE AVE NEW YORK NY 10011 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer CUSHMAN & WATKINS Occupation ATTORNEY Aggregate Year-to-Date > \$ 1,000.00	Date (month, day, year) 8-7-91 Amount of Each Receipt this Period 1,000.00
F. Full Name, Mailing Address and ZIP Code MARGARET JANE GRAMATI 5143 NE LAVALLE COURT LANE SEATTLE WASH 98105 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation RETIRED Aggregate Year-to-Date > \$ 1,000.00	Date (month, day, year) 12-3-91 Amount of Each Receipt this Period 1,000.00
G. Full Name, Mailing Address and ZIP Code JENNIFER GREEN III 1926 BLINDEMAN DR SEATTLE WASH 98112 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer U.S. BANK OF WASH. Occupation EXECUTIVE Aggregate Year-to-Date > \$ 500.00	Date (month, day, year) 11-15-91 Amount of Each Receipt this Period 500.00

SUBTOTAL of Receipts This Page (optional)

84,300.00

TOTAL This Period (last page this line number only)

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SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s)
for each category of the
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INDIVIDUAL CONTRIBUTIONS

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 JENNIFER B DUNN

C 60 256 131

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
ROBERT HOWELEY 2320 N.W. 100th SEATTLE WASH 98177	PEMCO	12-5-91	300.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation EXECUTIVE	Aggregate Year-to-Date > \$ 300.00	
B. Full Name, Mailing Address and ZIP Code HENRY ISAACSON JR 701 DEXTER AVE NW 4110 SEATTLE WASH 98149	RETIREE	5-11-91	1000.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation RETIREE	Aggregate Year-to-Date > \$ 1000.00	
C. Full Name, Mailing Address and ZIP Code HAROLD KERN 18549 CULPEPPER COURT SEATTLE WASH 98177	RETIREE	10-28-91 11-27-91	100.00 1000.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation RETIREE	Aggregate Year-to-Date > \$ 1100.00	
D. Full Name, Mailing Address and ZIP Code CARL KNUDSEN 402 36th AVE E SEATTLE WASH 98112	MARINER POWER RUSH	11-10-91	250.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation EXECUTIVE	Aggregate Year-to-Date > \$ 250.00	
E. Full Name, Mailing Address and ZIP Code DICK & DEANNE LARSEN 2906 7th St MERCEY ISLAND WASH 98044	GOODYEAR - STANLY	12-20-91	500.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation EXECUTIVE	Aggregate Year-to-Date > \$ 500.00	
F. Full Name, Mailing Address and ZIP Code JOHN LARSEN 13559 SHERMAN ROAD NW SEATTLE WASH 98177	MERRILL LYNCH	3-29-91	1000.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation ACCOUNT EXECUTIVE	Aggregate Year-to-Date > \$ 1,000.00	
G. Full Name, Mailing Address and ZIP Code CHARLES LITTLE 1631 BARNHART WAY MERCEY ISLAND WASH 98044	LEISURE-CIRC-INDIA	4-2-91	1,000.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation EXECUTIVE	Aggregate Year-to-Date > \$ 1,000.00	

SUBTOTAL of Receipts This Page (optional)

4-511 RECEIPT CONTRIBUTIONS

5150.00

TOTAL This Period (last page this line number only)

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SCHEDULE A

ITEMIZED RECEIPTS

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

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INDIVIDUAL CONTRIBUTIONS

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NAME OF COMMITTEE (in Full)

FRIENDS OF JENNIFER B. DUNN C 00 256 131

A. Full Name, Mailing Address and ZIP Code JOHN & MARGARET MARGERS 3701 East McGraw St. SEATTLE WASH 98112 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation RETIRED Aggregate Year-to-Date \$ 1,000.00	Date (month, day, year) 4-11-91	Amount of Each Receipt this Period 1,000.00
B. Full Name, Mailing Address and ZIP Code CARROLL MARGENSON 10814 NE 8TH ST BELLEVUE WASH 98006 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation RETIRED Aggregate Year-to-Date \$ 1,000.00	Date (month, day, year) 12-27-91	Amount of Each Receipt this Period 1,000.00
C. Full Name, Mailing Address and ZIP Code BRUCE & CHER McDOUGAL PO Box 413 MEDINA WASH 98039 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer SEA EMPLOYED Occupation BRICKER Aggregate Year-to-Date \$ 400.00	Date (month, day, year) 5-12-91	Amount of Each Receipt this Period 400.00
D. Full Name, Mailing Address and ZIP Code STANLEY S. McNAUGHTON 16109 EMMETT AVE N. SEATTLE WASH 98133 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer PERMER Occupation EXECUTIVE Aggregate Year-to-Date \$ 1,000.00	Date (month, day, year) 5-13-91	Amount of Each Receipt this Period 1,000.00
E. Full Name, Mailing Address and ZIP Code W. H. McDOUGAL 26 COUNTY CLUB DR SW TACOMA WASH 98401 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer WEYENHAEUSER Occupation EXECUTIVE Aggregate Year-to-Date \$ 1,000.00	Date (month, day, year) 6-28-91	Amount of Each Receipt this Period 1,000.00
F. Full Name, Mailing Address and ZIP Code CARL & GAY MYERSEN 10900 NE 4TH AVE BELLEVUE WASH 98004 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer CEM ASSOCIATES Occupation EXECUTIVE Aggregate Year-to-Date \$ 500.00	Date (month, day, year) 6-24-91	Amount of Each Receipt this Period 500.00
G. Full Name, Mailing Address and ZIP Code TIO & ELMORE MELLORIE 6405 W. LAMAR AVE YAKIMA WASH 98403 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer SELF Occupation RETIRED Aggregate Year-to-Date \$ 250.00	Date (month, day, year) 12-4-91	Amount of Each Receipt this Period 250.00

SUBTOTAL of Receipts This Page (captioned)

\$150.00

TOTAL This Period (last page only)

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SCHEDULE A

ITEMIZED RECEIPTS

INDIVIDUAL CONTRIBUTIONS

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

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NAME OF COMMITTEE (in Full)

FRIENDS OF JENNIFER B. DUNN C 00 256 134

A. Full Name, Mailing Address and ZIP Code FRED MEYER 5835 AVERILL WAY DALLAS TEXAS 75225 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer ALADDIN INDUSTRIES Occupation EXECUTIVE Aggregate Year-to-Date > \$ 500.00	Date (month, day, year) 12-27-91	Amount of Each Receipt this Period 500.00
B. Full Name, Mailing Address and ZIP Code JESSIE MINICH 999 3rd AVENUE #4100 SEATTLE WASH 98104 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer SELF Occupation ATTORNEY Aggregate Year-to-Date > \$ 1,000.00	Date (month, day, year) 4-5-91	Amount of Each Receipt this Period 1,000.00
C. Full Name, Mailing Address and ZIP Code ROBERT L CARL OLSEN 2002 E. SUPRA AVENUE WHIDDEY ISLAND WASH 98243 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer H-H Properties Occupation EXECUTIVE Aggregate Year-to-Date > \$ 1,000.00	Date (month, day, year) 4-11-91	Amount of Each Receipt this Period 1,000.00
D. Full Name, Mailing Address and ZIP Code FRANK A. ORLIK 900 5th AVE SUITE 2600 SEATTLE WASH 98104 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation RETIRED Aggregate Year-to-Date > \$ 1,000.00	Date (month, day, year) 3-29-91	Amount of Each Receipt this Period 1,000.00
E. Full Name, Mailing Address and ZIP Code JIM PIERCE 4588 COLMAN CREEK ROAD GIG HARBOR WASH 98224 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation RETIRED Aggregate Year-to-Date > \$ 500.00	Date (month, day, year) 12-2-91	Amount of Each Receipt this Period 500.00
F. Full Name, Mailing Address and ZIP Code CHARLES PIGOTT PO BOX 1518 BELLEVUE WASH 98004 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer PACCAR Occupation EXECUTIVE Aggregate Year-to-Date > \$ 500.00	Date (month, day, year) 9-28-91	Amount of Each Receipt this Period 500.00
G. Full Name, Mailing Address and ZIP Code ARTUR PRATT 1001 4th AVE PLAZA #2600 SEATTLE WASH 98154 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation RETIRED Aggregate Year-to-Date > \$ 1,000.00	Date (month, day, year) 3-29-91	Amount of Each Receipt this Period 1,000.00

SUBTOTAL of Receipts This Page (optional)

5,500.00

TOTAL This Period (last page this line number only)

5,500.00

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SCHEDULE A

ITEMIZED RECEIPTS

Use separate Schedule(s)
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INDIVIDUAL CONTRIBUTIONS

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NAME OF COMMITTEE (in Full)

FRIENDS OF JENNIFER B. DUNN C 00 256 131

A. Full Name, Mailing Address and ZIP Code RICH REDMAN 228 9TH AVE N. SEATTLE WASH 98109 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer SHAW CONSTRUCTION Occupation EXECUTIVE Aggregate Year-to-Date > \$ 500.00	Date (month, day, year) 6-26-91	Amount of Each Receipt this Period 500.00
B. Full Name, Mailing Address and ZIP Code SHARAH RIPPEN 4921 102nd LANE NE KIRKLAND WASH 98024 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer SELF Occupation EXECUTIVE Aggregate Year-to-Date > \$ 300.00	Date (month, day, year) 12-31-91	Amount of Each Receipt this Period 300.00
C. Full Name, Mailing Address and ZIP Code N. STEPHAN ROEHL 801 2nd AVE S. SEATTLE WASH 98104 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation RETIRED Aggregate Year-to-Date > \$ 1000.00	Date (month, day, year) 6-3-91	Amount of Each Receipt this Period 1000.00
D. Full Name, Mailing Address and ZIP Code HERMAN FAYE SHARONOVY 1801 6th AVE S. 2330 SEATTLE WASH 98101 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer SHARONOVY DEVELOPMENT Occupation EXECUTIVE Aggregate Year-to-Date > \$ 1000.00	Date (month, day, year) 3-29-91	Amount of Each Receipt this Period 1000.00
E. Full Name, Mailing Address and ZIP Code EDDIE SHAMMAN 7500 W. MARGINAL WAY S. SEATTLE WASH 98103 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer PACIFIC PLUMBING Occupation OWNER Aggregate Year-to-Date > \$ 1000.00	Date (month, day, year) 12-31-91	Amount of Each Receipt this Period 1000.00
F. Full Name, Mailing Address and ZIP Code MICHAEL STARR PO BOX 3094 READING WASH 98073 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer SELF Occupation LABORER Aggregate Year-to-Date > \$ 1000.00	Date (month, day, year) 11-20-91	Amount of Each Receipt this Period 1000.00
G. Full Name, Mailing Address and ZIP Code SARAH STALTER 9105 NE 21st Pl BELLEVUE WASH 98004 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation HOMEMAKER Aggregate Year-to-Date > \$ 375.00	Date (month, day, year) 7-18-91	Amount of Each Receipt this Period 375.00

SUBTOTAL of Receipts This Page (optional)

5175.00

TOTAL This Period (enter page this line number only)

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SCHEDULE A

ITEMIZED RECEIPTS

INDIVIDUAL CONTRIBUTIONS

Use separate schedule(s)
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NAME OF COMMITTEE (In Full)

FRIENDS OF JENNIFER B. DUNN C.O.D. 256131

A. Full Name, Mailing Address and ZIP Code CANDACE STRAIGHT 518 N.E. PASSAIC AVENUE BIRMINGHAM NJ 7001 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer JOHN HEAD PARTNER Occupation BRUNER Aggregate Year-to-Date > \$ 1,000.00	Date (month, day, year) 6-26-91	Amount of Each Receipt this Period 1,000.00
B. Full Name, Mailing Address and ZIP Code GERALD SWANSON 6120 1st AVE SE MERCER ISLAND WASH. 98040 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer JOHNSON & HIGLENS Occupation EXECUTIVE Aggregate Year-to-Date > \$ 500.00	Date (month, day, year) 4-29-91	Amount of Each Receipt this Period 500.00
C. Full Name, Mailing Address and ZIP Code ALLEN SIMPSON 7502 51st Ave NE SEATTLE WASH 98115 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer SIMPSON INVESTMENT Occupation EXECUTIVE Aggregate Year-to-Date > \$ 1,000.00	Date (month, day, year) 4-2-91	Amount of Each Receipt this Period 1,000.00
D. Full Name, Mailing Address and ZIP Code PETER TORDY P.O. Box 122 KIRKLAND, WASH. 98033 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation RETIRED Aggregate Year-to-Date > \$ 200.00	Date (month, day, year) 7-15-91	Amount of Each Receipt this Period 200.00
E. Full Name, Mailing Address and ZIP Code IRWIN TRIGER 1724 HANCOCK PL SEATTLE WA 98122 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer SELF Occupation ATTORNEY Aggregate Year-to-Date > \$ 250.00	Date (month, day, year) 8-7-91	Amount of Each Receipt this Period 250.00
F. Full Name, Mailing Address and ZIP Code JANET TRUL 2300 3rd Ave E. SEATTLE WASH 98112 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation HOUSEWIFE Aggregate Year-to-Date > \$ 1,000.00	Date (month, day, year) 11-25-91	Amount of Each Receipt this Period 1,000.00
G. Full Name, Mailing Address and ZIP Code JAMES WAASONG 4501 N. 3rd SEATTLE WASH 98103 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer RING-BURNETT TILLY FARMS Occupation EXECUTIVE Aggregate Year-to-Date > \$ 1,000.00	Date (month, day, year) 3-29-91	Amount of Each Receipt this Period 1,000.00

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (This page must be filed)

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SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule
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INDIVIDUAL CONTRIBUTIONS

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NAME OF COMMITTEE (in Full)

FRIENDS OF JENNIFER B. DUNN

A. Full Name, Mailing Address and ZIP Code L. W. WEN 1003 LAKE ST SE, #101 KIRKLAND WASH 98054 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer JAFICO Properties Occupation EXECUTIVE Aggregate Year-to-Date \$ 1,000.00	Date (month, day, year) 5-24-91	Amount of Each Receipt this Period 1,000.00
B. Full Name, Mailing Address and ZIP Code GEORGE W. WEYERHAEUSER 11801 GAVELLY LAKE DR S.W. TACOMA WASH. 98449 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer WEYERHAEUSER Occupation EXECUTIVE Aggregate Year-to-Date \$ 1,000.00	Date (month, day, year) 5-20-91	Amount of Each Receipt this Period 1,000.00
C. Full Name, Mailing Address and ZIP Code WALTER WILLIAMS 4400 52nd NE SEATTLE WASH 98103 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer CONTINENTAL INC. Occupation EXECUTIVE Aggregate Year-to-Date \$ 200.00	Date (month, day, year) 6-7-91	Amount of Each Receipt this Period 200.00
D. Full Name, Mailing Address and ZIP Code CONSTANCE WENDT 3750 45th Ave S SEATTLE WASH 98111 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer SWEDISH FOUNDATION Occupation EXECUTIVE Aggregate Year-to-Date \$ 250.00	Date (month, day, year) 11-14-91	Amount of Each Receipt this Period 250.00
E. Full Name, Mailing Address and ZIP Code HOWARD S. WRIGHT 1111 3rd Avenue #200 SEATTLE WASH 98101 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer SELF Occupation EXECUTIVE Aggregate Year-to-Date \$ 1,000.00	Date (month, day, year) 4-1-91	Amount of Each Receipt this Period 1,000.00
F. Full Name, Mailing Address and ZIP Code CARY WU 4802 SUMMERSET DR SE BELLEVUE WASH 98006 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer SELF Occupation EXECUTIVE Aggregate Year-to-Date \$ 1,000.00	Date (month, day, year) 8-26-91	Amount of Each Receipt this Period 1,000.00
G. Full Name, Mailing Address and ZIP Code LOWAY WYATT 7602 LANGHAM ST SW TACOMA, WASH 98441 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer RETIRED Occupation RETIRED Aggregate Year-to-Date \$ 200.00	Date (month, day, year) 11-20-91	Amount of Each Receipt this Period 200.00

SUBTOTAL of Receipts This Page (optional)

4,650.00

TOTAL This Period (last page this line number only)

4,425.00

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UNIVERSITY

11/29/92 RECEIVED

Use separate schedule(s)
for each category of the
covered individual(s)PAGE 1 OF
FOR LINE NUMBER
116

CONTRIBUTIONS FROM OTHER POLITICAL COMMITTEES (PAC'S)

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 JENNIFER D. DUNN C 00256131

A. Full Name, Mailing Address and ZIP Code POST SWING BANK CORPORATION POLITICAL ACTION COMMITTEE 1114 PACIFIC AVENUE TACOMA WASH 98604	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation	11-25-91	100.00
	Aggregate Year-to-Date	\$ 100.00	\$
B. Full Name, Mailing Address and ZIP Code ARCO PAC 200 UNIVERSITY ST SUITE 3434 SEATTLE WASH 98101	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation	12-20-91	50.00
	Aggregate Year-to-Date	\$ 50.00	\$
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt 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 Period
Receipt 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 Period
Receipt 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 Period
Receipt 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 Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date	\$	\$

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

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SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s)
for each category of the
Detailed Summary PagePAGE 1 OF 1
FOR LINE NUMBER 15

OTHER RECEIPTS

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 JENNIFER B. DUNN

C 00 256131

A. Full Name, Mailing Address and ZIP Code SECURITY PACIFIC BANK PO BOX 34455 SEATTLE WASH 98124 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer INTEREST ON DEPOSIT ACCOUNT Occupation Aggregate Year-to-Date > \$	Date (month, day, year) 3-31-91 4-30-91 5-31-91 6-30-91 7-31-91	Amount of Each Receipt this Period .77 43.17 37.72 69.44 27.94
B. Full Name, Mailing Address and ZIP Code AS ABOVE Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year) 8-31-91 9-30-91 10-31-91 11-30-91 12-31-91	Amount of Each Receipt this Period 71.11 93.44 91.44 59.76 73.17
C. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional)

675.74

TOTAL This Period (last page this line number only)

675.74

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SCHEDULE B

ITEMIZED DISBURSEMENTS

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

PAGE 1 OF 2

FOR LINE NUMBER 17

OPERATING EXPENDITURES

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 JENNIFER B DUNN C.O.O 256131

A. Full Name, Mailing Address and ZIP Code THE WASHINGTON LINCOLN GARDEN 1003 LANE ST SE #101 KIRKLAND WASH 98033	Purpose of Disbursement CONSULTING SERVICES Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 6-20-91 7-17-91 8-12-91 9-16-91	Amount of Each Disbursement This Period 1,100.00 1,100.00 1,100.00 1,100.00
B. Full Name, Mailing Address and ZIP Code AS ABOVE	Purpose of Disbursement AS ABOVE Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 10-14-91 11-14-91 12-11-91	Amount of Each Disbursement This Period 1,100.00 1,100.00 1,100.00
C. Full Name, Mailing Address and ZIP Code AS ABOVE	Purpose of Disbursement OFFICE RENT Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 12-9-91	Amount of Each Disbursement This Period 100.00
D. Full Name, Mailing Address and ZIP Code AS ABOVE	Purpose of Disbursement PRINTING, STATIONERY, MAILING Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 11-23-91	Amount of Each Disbursement This Period 1,045.90
E. Full Name, Mailing Address and ZIP Code EDNA SMITH 2110 OAK ROAD LYNNWOOD WASH 98037	Purpose of Disbursement POSTAGE & REPLACES Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 9-9-91 12-19-91	Amount of Each Disbursement This Period 21.11 56.47
F. Full Name, Mailing Address and ZIP Code JOHN RICE & ASSOCIATES 1814 EAST OLYMPIA DRIVE OLYMPIA WASH 98506	Purpose of Disbursement CONSULTING SERVICES Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 10-10-91 11-1-91 11-27-91	Amount of Each Disbursement This Period 400.00 200.00 200.00
G. Full Name, Mailing Address and ZIP Code U S POSTMASTER 1171 BENSON WAY NE BELLINGHAM WASH 98201	Purpose of Disbursement BUS RENTAL, STAMP PERMITS, MAILING Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 11-1-91 11-11-91 11-20-91 11-25-91	Amount of Each Disbursement This Period 458.22 41.74 59.01 15.00
H. Full Name, Mailing Address and ZIP Code CLASSIC DESIGN 96 ARDEN WAY SACRAMENTO CA 95811	Purpose of Disbursement LOGO DESIGN & REPRODUCTION Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 11-5-91	Amount of Each Disbursement This Period 300.00
I. Full Name, Mailing Address and ZIP Code RED LEON HOTEL 100 112th AVE SE BELLEVUE WASH 98003	Purpose of Disbursement MEETING ROOM DISBURSEMENT Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 12-2-91	Amount of Each Disbursement This Period 456.00

SUBTOTAL of Disbursements This Page (optional)

24,566.11

TOTAL This Period (last page this line number only)

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SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category of the
Detailed Summary PagePAGE OF
FOR LINE NUMBER
20 (a)

REFUNDS OF CONTRIBUTIONS TO INDIVIDUALS

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 JENNIFER B DUNN C00256131

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
HAROLD KEAR 10509 CULPEPPER CT. SEATTLE WASH 98177	Refund on 11-27-91 CONTRIBUTION Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	11-27-91	100.00
B. 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
C. 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
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 of Disbursements This Page (optional)

100.00

TOTAL This Period (last page this line number only)

100.00

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SCHEDULE B

ITEMIZED DISBURSEMENTS

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

PAGE 1 OF 2
FOR LINE NUMBER 17

OPERATING EXPENDITURES

Any information copied from such Reports and Statements may not be sold or used for 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 JENNIFER B DUNN C.O.D. 256131

A. Full Name, Mailing Address and ZIP Code THE WASHINGTON LINCOLN GARDEN 1003 LANE ST SE #101 KIRKLAND WASH 98033	Purpose of Disbursement COMMUNICATING SERVICES Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 6-20-91 7-17-91 8-12-91 9-16-91	Amount of Each Disbursement This Period 1,100.00 1,100.00 1,100.00 1,100.00
B. Full Name, Mailing Address and ZIP Code AS ABOVE	Purpose of Disbursement AS ABOVE Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 10-10-91 11-14-91 12-11-91	Amount of Each Disbursement This Period 1,100.00 1,100.00 1,100.00
C. Full Name, Mailing Address and ZIP Code AS ABOVE	Purpose of Disbursement OFFICE RENT Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 12-4-91	Amount of Each Disbursement This Period 1,100.00
D. Full Name, Mailing Address and ZIP Code AS ABOVE	Purpose of Disbursement PRINTING, STATIONERY, MAILING Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 11-23-91	Amount of Each Disbursement This Period 8,090.90
E. Full Name, Mailing Address and ZIP Code EDNA SMITH 2114 OAK AVE LYNN WASH 98037	Purpose of Disbursement POSTAGE & FREIGHT Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 9-4-91 10-19-91	Amount of Each Disbursement This Period 21.11 56.41
F. Full Name, Mailing Address and ZIP Code JOHN RICH & ASSOCIATES 1815 EAST 100 PMB OLYMPIA WASH 98504	Purpose of Disbursement CONSULTING SERVICES Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 10-10-91 11-1-91 11-25-91	Amount of Each Disbursement This Period 2,000.00 2,000.00 2,000.00
G. Full Name, Mailing Address and ZIP Code U S POSTMASTER 1171 BERNARD WAY NE BURLINGAME WASH 98007	Purpose of Disbursement BUS RENTAL, STAMP PERMITS Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 11-1-91 11-11-91 11-20-91 11-25-91	Amount of Each Disbursement This Period 428.20 21.76 58.00 13.00
H. Full Name, Mailing Address and ZIP Code CLASSIC DISBURSEMENTS 96 ARBOREWAY SACRAMENTO CA 95811	Purpose of Disbursement LOGO DESIGN & PRODUCTION Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 11-5-91	Amount of Each Disbursement This Period 300.00
I. Full Name, Mailing Address and ZIP Code RED LION HOTEL 100 112th AVE SE BELLEVUE WASH 98004	Purpose of Disbursement MEETING ROOM RENTALS Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 12-2-91	Amount of Each Disbursement This Period 450.00

SUBTOTAL of Disbursements This Page (optional)	24,566.41
TOTAL This Period (last page only and number only)	16

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SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule for each category of the Detailed Summary Page.

PAGE 1 OF 3
FOR LINE NUMBER 17

OPERATING EXPENDITURES

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 campaign 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 JENNIFER B. DUNN

C 00 256123

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
FEDERAL EXPRESS CO. PO BOX 1140 DEPT A MEMPHIS TENN 38101-1140	Shipping Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	12-4-91	21.75
B. Full Name, Mailing Address and ZIP Code WILLIAM AGRAWAL 1656 EAST OLIVE WAY SEATTLE WASH 98102	Purpose of Disbursement BROCHURE PICTURES Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	12-4-91	13.74
C. Full Name, Mailing Address and ZIP Code ADVANCE MACHINE SYSTEMS 1912 MINOR AVE SEATTLE WASH 98101	Purpose of Disbursement RUNNER DEMO STAMP Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	12-14-91	23.75
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 of Disbursements This Page (optional)

59.24

TOTAL This Period (last page this line number only)

29,425.49

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EXHIBIT 5

94030962807

PRE-FILING FEC REPORTABLE CAMPAIGN CONTRIBUTIONS TO FRIENDS OF JENNIFER DUNN

(From Federal Election Commission Reports)

Date	Payment	From	Employer & Occupation
<i>March</i>			
03-29-91	1,000.00	R. Eichler	Safeco Properties - Exec.
03-29-91	1,000.00	J. Larson	Merrill Lynch - Exec.
03-29-91	1,000.00	F. Orico	Retired
03-29-91	1,000.00	A. Pratt	Retired
03-29-91	1,000.00	H. Sarkowsky	Sarkowsky Development - Exec.
03-29-91	1,000.00	J. Warjone	Port Blakely Tree Farm - Exec.
03-29-91	1,000.00	L. Wells	Safeco Properties - Exec.
<i>Total 3/91:</i>	<i>7,000.00</i>		
<i>April</i>			
04-01-91	1,000.00	H. S. Wright	Self
04-02-91	1,000.00	C. Lytle	Leisure Craft, Inc. - Exec.
04-02-91	1,000.00	A. Symington	Simpson Investment - Exec.
04-05-91	1,000.00	J. Mijich	Attorney
04-11-91	1,000.00	J. Mangles	Retired (Rainier Bank Pres)
04-11-91	1,000.00	R. Olson	H & H Properties - Exec.
04-22-91	1,000.00	W. Connor	Connor Development - Own.
04-29-91	500.00	G. Swanson	Johnson & Higgins - Exec.
<i>Total 4/91:</i>	<i>7,500.00</i>		
<i>May</i>			
05-06-91	1,000.00	B. Dunn	Graham & Dunn - Attorney
05-16-91	1,000.00	H. Isaacson	Retired
05-20-91	1,000.00	G. Weyerhauser	Weyerhauser - Exec.
05-29-91	1,000.00	D. Covey	UNICO - Exec.
<i>Total 5/91:</i>	<i>4,000.00</i>		
<i>June</i>			
06-03-91	1,000.00	N. Rogers	Retired
06-07-91	200.00	W. Williams	Continental, Inc. - Exec.
06-09-91	400.00	K. Freeman	Bellevue Square - Exec.
06-24-91	500.00	C. Meitzen	CEM Associates - Exec.
06-26-91	1,000.00	E. Garrett	Merrill & Ring - Exec.
06-26-91	1,000.00	N. Clapp	Retired
06-26-91	1,000.00	C. Straight	J. Head Partners - Broker
06-26-91	500.00	R. Redman	Sellen Construction - Exec.
06-27-91	1,000.00	G. Eppy	Port Blakely Tree Farm - Exec.
06-28-91	1,000.00	H. Meadowcroft	Weyerhauser Exec.
<i>Total 6/91:</i>	<i>7,600.00</i>		

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Contributions (cont.) - Pa

Date	Payment	From	Employer & Occupation
<i>July</i>			
07-15-91	1,000.00	B. Fix	The Bon - Exec.
07-15-91	200.00	P. Toady	Retired
07-22-91	250.00	R. Bauer	H.U.D. - Administrator
Total 7/91:	1,450.00		
<i>August</i>			
08-07-91	1,000.00	L. Goddess	Cushman & Wakefields - Broker
08-07-91	250.00	I. Treiger	Attorney
08-12-91	1,000.00	S. McNaughton	Pamco - Exec.
08-12-91	400.00	B. McDougall	Self - Broker
08-26-91	1,000.00	C. Wo	Self - Exec.
Total 8/91:	3,650.00		
<i>September</i>			
09-06-91	300.00	A. Freeman	Student
09-06-91	300.00	S. Freeman	Bellevue Square - Asst.
09-16-91	375.00	S. Steller	Homemaker
09-20-91	500.00	C. Pigott	PACCAR - Exec.
Total 9/91:	1,475.00		
<i>October</i>			
10-09-91	1,000.00	H. Barnes	Barnes Organization - Exec.
10-28-91	100.00	H. Kean	Retired
Total 10/91:	1,100.00		
<i>November (To the 15th filing date)</i>			
11-04-91	500.00	R. Olson	H & H Properties - Exec.
11-14-91	250.00	C. Knudsen	McMillan Powell River - Exec.
11-14-91	250.00	C. Winberry	Swedish Foundation - Exec.
11-15-91	500.00	J. Green III	U.S. Bank - Exec.
Total 11/91:	1,100.00		

TOTAL REPORTABLE CONTRIBUTIONS PRIOR TO NOVEMBER 15, 1991 - \$34, 875.00

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EXHIBIT 6

94030962810

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...sion. Some blame over-fishing.
Others blame flood-control projects or clear-cut logging.
But biologists say low
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Please see **WATER** on B 1

The area around Sequim is changing from farmland to retirement homes. Since 1970 the area population has tripled to more than 17,000.

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The Times

Dunn sets sights on Congress

GOP chair will leave state post in bid to replace Chandler in 8th Dist.

by Eric Pryne
Times staff reporter

State Republican Party Chairwoman Jennifer Dunn told GOP leaders yesterday she will leave her party post early next year to explore running for Congress in the suburban 8th District.

Her announcement wasn't unexpected. Dunn is one of several prominent Republicans who has been considering a race for the seat being vacated by Rep. Rod Chandler, R-Bellevue.

Chandler plans to challenge Democratic Sen. Brock Adams.

In an interview, Dunn made no pretense of portraying herself as an outsider — a popular theme this political season.

"I have a good sense of the system, the process, how things work," she said. "I'd be going in as something more than a freshman. I have a lot of contacts. I know a lot of folks in the administration."

That experience sets her apart from potential rivals in the 8th, Dunn said. And she ac-

knowledge
her gender
might be an
advantage in
1992.

Dunn, 50, has headed the state GOP for 11 years, the longest tenure of any state Republican chairperson in the country. A staunch conservative, she was appointed to several advisory positions by presidents Reagan and Bush.

The 8th District, as now configured, includes most of the East-side suburbs and part of South King County. It is solid Republican turf.

State Rep. Roy Ferguson, R-Bellevue, announced in September that he was exploring running. Other possible GOP contenders include television commentator and newspaper columnist John Carlson and King County Councilman Paul



Jennifer Dunn

Barden, R-Normandy Park.

Barden may be redistricted into a new 9th District, however.

Dunn, who lives in Bellevue, said she probably will run if redistricting keeps her in the 8th, if support firms up and if she senses she can raise enough money. She estimated a successful primary campaign might cost \$550,000.

She said she has commissioned a poll but declined to disclose results.

Dunn said the economy will be the top issue in the race, followed by health care, transportation and education.

But she demurred on specifics, saying position papers would come later.

Dunn will remain as party chairwoman until the Republican State Committee chooses a successor Feb. 8.

Ben Bettridge, state GOP vice chair and Pierce County Republican leader, said yesterday he will be a candidate to replace Dunn.

Times Dec. 15, 91 BT



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 27, 1992

Krishna Fells, Campaign Director
George Tamblyn for Congress
4122 128th Avenue S.E.
Suite 300
Bellevue, WA 98006

RE: MUR 3666

Dear Ms. Fells:

This letter acknowledges receipt on October 21, 1992, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by Jennifer B. Dunn, Friends of Jennifer B. Dunn, and Larry W. Wells, as treasurer, and the Washington State Republican Party. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 3666. Please refer to this number in all future correspondence. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lisa E. Klein
Assistant General Counsel

Enclosure
Procedures

94030962812



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

October 27, 1992

Larry W. Wells, Treasurer
Friends of Jennifer B. Dunn
P.O. Box 40110
Bellevue, WA 98004

RE: MUR 3666

Dear Mr. Wells:

The Federal Election Commission received a complaint which indicates that the Friends of Jennifer B. Dunn ("Committee") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3666. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against the Committee and you, as treasurer, in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

94030962813

Larry W. Wells, Treasurer
Friends of Jennifer B. Dunn
Page 2

If you have any questions, please contact Craig D. Reffner, the attorney assigned to this matter, at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Lisa E. Klein
Assistant General Counsel

Enclosures

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

94030962814



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 27, 1992

Jennifer B. Dunn
37 Tatoosh Key
Bellevue, WA 98006

RE: MUR 3666

Dear Ms. Dunn:

The Federal Election Commission received a complaint which indicates that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3666. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

94030962815

Jennifer B. Dunn
Page 2

If you have any questions, please contact Craig D. Reffner, the attorney assigned to this matter, at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Lisa E. Klein
Assistant General Counsel

Enclosures

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

94030962816



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 27, 1992

Ben Bettridge, Chairman
Washington State Republican Party
9 Lake Bellevue Drive
Bellevue, WA 98005

RE: MUR 3666

Dear Mr. Bettridge:

The Federal Election Commission received a complaint which indicates that the Washington State Republican Party may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3666. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against the Washington State Republican Party in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

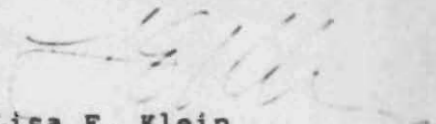
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

94030962817

Ben Bettridge, Chairman
Washington State Republican Party
Page 2

If you have any questions, please contact Craig D. Reffner, the attorney assigned to this matter, at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,


Lisa E. Klein
Assistant General Counsel

Enclosures

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

94030962818

DAVIS WRIGHT TREMAINE

LAW OFFICES

2600 CENTURY SQUARE • 1501 FOURTH AVENUE • SEATTLE, WASHINGTON 98101-1688
(206) 622-3150

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIN COPY ROOM

Nov 12 9 19 AM '92

DANIEL B. RITTER
(206) 628-7751

November 11, 1992

BY FEDERAL EXPRESS

92 NOV 12 PM 3:03

Ms. Lisa E. Klein
Assistant General Counsel
Federal Election Commission
999 E. Street N.W.
Washington, DC 20463

Re: MUR 3666

Dear Ms. Klein:

When a campaign is in trouble, how can the candidate bolster his flagging prospects? An increasingly popular solution is to file, just before the election, unsubstantiated allegations of illegal campaign practices by the opponent. This is such a case. The complaint was filed exactly one week before the election by Krishna Fells, campaign director for George Tamblyn, candidate for Congress in Washington's 8th District who received 34% of the vote. Respondent Jennifer Dunn received 60%.

It is not easy to sift through Ms. Fells' complaint, but there and in her accompanying letter she seems to allege three specific violations of law:

1. Jennifer Dunn should have filed sooner with the FEC.
2. Her salary from the Washington State Republican Party should have been reported as a contribution.
3. Her committee did not receive \$7,000 on March 29, 1991, as reported.

These charges will be addressed seriatim.

RITTD\01725.D20
Seattle

FAX: (206) 628-7040 • TELEX: 328919 DWT SEA

ANCHORAGE, ALASKA • BELLEVUE, WASHINGTON • BOISE, IDAHO • LOS ANGELES, CALIFORNIA
PORTLAND, OREGON • RICHLAND, WASHINGTON • WASHINGTON, D.C.

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1. Filing Was Timely. A candidate shall file a Statement of Candidacy within 15 days after becoming a candidate. 11 C.F.R. § 101.1(a). A person becomes a candidate upon receiving contributions or making expenditures in excess of \$5,000. 11 C.F.R. 100.3(a). A contribution does not include funds received solely for the purpose of determining whether an individual shall become a candidate. 11 C.F.R. 100.7(b)(1). Likewise, expenditures do not include payments made solely for that purpose. 11 C.F.R. 100.8(b)(1). The accompanying affidavit of Jennifer B. Dunn establishes that all contributions received and all payments made on her behalf before November 15, 1991 were made for that exempt purpose.

2. Salary Was Earned. A payment is a reportable contribution only if made "for the purpose of influencing an election for Federal office ..." 11 C.F.R. § 100.7(a)(1). A payment to a candidate or prospective candidate of her regular salary while she continues to perform a regular full-time job is a payment made for services rendered, not to influence an election. Therefore, ordinary salary payments are not "contributions."

The affidavits of Jennifer B. Dunn and Larry W. Wells establish that she continued to earn her salary until she resigned as state party chairman on February 8, 1992. Since her salary stopped then, salary paid for services previously rendered was not reportable.

3. March 1991 Receipts. The affidavit of Larry W. Wells explains that March 29, 1991 is the date on which he opened a campaign bank account and deposited the seven checks mentioned in the complaint. The six checks other than his own had come to him between March 18 and March 28, but when he prepared the FEC report ten months later he referred to the bank statement. If the date given in the report is erroneous, the error is inadvertent and trivial.

We enclose the above-referenced affidavits of Jennifer B. Dunn and Larry W. Wells and statements of designation of counsel signed by each of the three respondents. We trust this letter and the accompanying affidavits will enable the FEC to close its

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Ms. Lisa E. Klein
November 11, 1992
Page 3

file on Fells' complaint. On the other hand, please do not
hesitate to contact us if additional information or documentation
would assist you in resolving this matter.

Very truly yours,

DAVIS WRIGHT TREMAINE

Daniel B. Ritter

Daniel B. Ritter

DBR:jt/jdd
Enclosures

cc/enc: Mr. Larry W. Wells
Mrs. Jennifer B. Dunn

94030962821

AFFIDAVIT OF JENNIFER B. DUNN

STATE OF WASHINGTON)
) ss.
COUNTY OF KING)

JENNIFER B. DUNN, being first duly sworn, on oath deposes and says:

1. On November 3, 1992 I was elected to the United States Congress from the Eighth Congressional District of the State of Washington, and I make this affidavit in response to complaint MUR 3666 filed with the Federal Election Commission by Krishna Fells, campaign director for my election opponent, George Tamblyn.

2. From January, 1981 until February 8, 1992, I served as Chairman of the Washington State Republican Party. I submitted my resignation at a meeting of the State Committee held on February 8, and until then I worked full-time as the state party chairman, continuing to perform all the duties of my job.

3. Since March of the previous year, 1991, I had seriously considered becoming a candidate for Congress. I knew there would be a vacancy because the incumbent, Representative Rod Chandler, had indicated his intention to run for the United States Senate, as he eventually did. However, there were many reasons why I delayed making a definite decision. Not least of these reasons was uncertainty about the effect of redistricting. Even though I resigned my state chairmanship at the state committee meeting on February 8, I did not make a final decision until late in

February when the Supreme Court rejected Massachusetts' challenge to the U.S. Census Bureau's allocation formula, thereby assuring that Washington State would receive an additional congressional district and that the boundaries of the Eighth Congressional District would be those determined by our State redistricting commission. Until the Court decided, it was impossible for me to know what district I would reside in and this information was crucial to assessing my prospects for a successful campaign.

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4. Notwithstanding that my final decision to run was made in February of 1992, I had by way of precaution filed my Statement of Candidacy with the Federal Election Commission on November 15, 1991. Therefore, the period relevant to Fell's complaint is the period prior to November 15, 1991. Until that date no funds were received by me or on my behalf and no payments were made by me or on my behalf in connection with any federal election except funds received and payments made solely for the purpose of determining whether I should become a candidate. However, payments were made and funds were received to pay for activities such as conducting polls, making telephone calls, and traveling.

5. Before November 15, 1991, I engaged in no activities indicating that I had decided to become a candidate nor did I engage in any activities relevant to conducting a campaign for my election to federal office. Without limiting the generality of the foregoing, I did not use general public political advertising to publicize any intention to campaign for federal office; I did

not raise funds in excess of what could reasonably be expected to be used (or what was actually used) for exploratory activities; I did not undertake activities designed to amass campaign funds that would be spent after I might become a candidate; I did not make or authorize written or oral statements that referred to me as a candidate; I did not conduct exploratory activities prior to March of 1991; and I did not take any action to qualify for the ballot under state law. On the contrary, I was careful to limit my activities and to see that payments made on my behalf were limited to activities that were designed solely to "test the waters."

Jennifer B. Dunn
JENNIFER B. DUNN

SUBSCRIBED AND SWORN to before me this 11th day of November, 1992.

DIANE BOGUE
Commission expires Apr. 20, 1994
NOTARY PUBLIC
STATE OF WASHINGTON

Diane Bogue
NOTARY PUBLIC in and for the State
of Washington, residing at Bellevue
My appointment expires 4/20/94

AFFIDAVIT OF LARRY W. WELLS

STATE OF WASHINGTON)
COUNTY OF KING) ss.

LARRY W. WELLS, being first duly sworn, on oath deposes and says:

1. I am Treasurer of Friends of Jennifer B. Dunn and make this affidavit in response to complaint MUR 3666 filed with the Federal Election Commission by Krishna Fells, campaign director for George Tamblyn.

2. The report I filed with the Federal Election Commission in January 1992 lists seven donations as received on March 29, 1992. That was the date on which I opened the exploratory committee's bank account and deposited the seven checks. In preparing the FEC Report I relied on the bank statement.

3. On consulting my records, I now find that I began soliciting funds for the exploratory committee on March 13, 1991. The six checks besides my own arrived between March 18 and March 28. If it was error to report March 29 as the date of these donations, the error was accidental and inadvertent.

4. In my capacity as Treasurer of the Friends of Jennifer B. Dunn Committee I have had the opportunity to observe Jennifer Dunn at work as state party chairman, especially in the area of fund raising. Based on this observation, I know of my own personal knowledge that until her resignation on February 8, 1992, Jennifer Dunn continued to

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devote full-time (and more) to her duties as state chairman. In particular, she actively continued her fund raising efforts on behalf of the party because she did not want to leave the party in poor financial condition. In fact she left it in good financial condition.

Larry W. Wells
LARRY W. WELLS

SUBSCRIBED AND SWORN to before me this 11th day of November, 1992.

DIANE BOGUE
Commission expires Apr. 20, 1994
NOTARY PUBLIC
STATE OF WASHINGTON

Diane Bogue
NOTARY PUBLIC in and for the State
of Washington, residing at Bellevue
My appointment expires 4/20/94

94030962826

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3666

NAME OF COUNSEL: Daniel B. Ritter of Davis Wright Tremaine

ADDRESS: 2600 Century Square

1501 Fourth Avenue

Seattle, Washington 98101-1688

TELEPHONE: (206) 628-7751

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.

FRIENDS OF JENNIFER B. DUNN

Nov 11 1992
Date

Larry W. Wells
Signature Larry W. Wells, Treasurer

RESPONDENT'S NAME: Friends of Jennifer B. Dunn

ADDRESS: PO Box 40110

BELLEVUE WA 98004

TELEPHONE: HOME()

BUSINESS(206) 455 8875

94030962827

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3666

NAME OF COUNSEL: Daniel B. Ritter of Davis Wright Tremaine

ADDRESS: 2600 Century Square
1501 Fourth Avenue
Seattle, Washington 98101-1688

TELEPHONE: (206) 628-7751

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.

Nov 11 1992
Date

Larry W. Wells
Signature

RESPONDENT'S NAME: Larry W. Wells

ADDRESS: WATERFORD EAST
1003 LAKE ST So #101
KIRKLAND WASH 98033

TELEPHONE: HOME

BUSINESS (206) 223 4518

9403096288

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3666

NAME OF COUNSEL: Daniel B. Ritter of Davis Wright Tremaine

ADDRESS: 2600 Century Square

1501 Fourth Avenue

Seattle, Washington 98101-1688

TELEPHONE: (206) 628-7751

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.

Nov 11 1992
Date

Jennifer B. Dunn
Signature

RESPONDENT'S NAME: Jennifer B. Dunn

ADDRESS: 37 TATOOSH KEY

BELLEVUE WA 98006

TELEPHONE: HOME

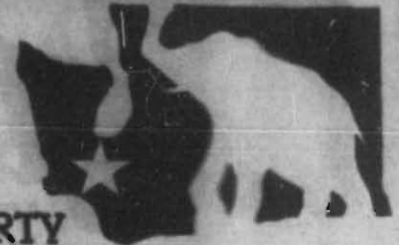
BUSINESS(206) 455 8875

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WASHINGTON STATE REPUBLICAN PARTY



Ben Bettridge
Chairman

92 DEC -2 AM 9:36

RECEIVED
FEDERAL ELECTION COMMISSION

November 16, 1992

Ms. Lisa E. Klein
Assistant General Counsel
Federal Election Commission
Washington, D.C. 98005

RE: MUR 3666

Dear Ms. Klein:

I am responding to your letter dated October 27, 1992 addressed to Chairman Ben Bettridge. I am the Executive Director of the Washington State Republican Party and I am authorized to make respond to your inquiries on behalf of the Republican Party.

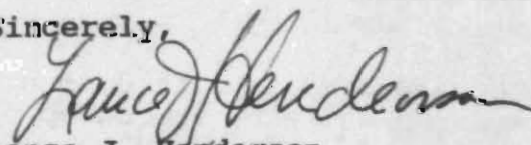
We do not believe the Commission should take any action regarding the complaint of Krishna Fells dated October 20, 1992.

The office of Chairman of the Washington State Republican Party is a full-time compensated position. The Chairman is the chief executive officer of the party. Jennifer Dunn was first elected Chairman of the Washington State Republican Party in January, 1981. She resigned her office on February 8, 1992. Ms. Dunn worked full time for the party during this period. She was compensated in accordance with party policies and at levels authorized by the Executive Board of the party. Her compensation as Chairman of the party was proper and legal.

The Washington State Republican Party has not made any contribution to Jennifer Dunn or Friends of Jennifer Dunn.

The complaint of Krishna Fells is without merit and should be dismissed.

Sincerely,


Lance J. Henderson
Executive Director

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F.E.C.
SECRETARIAT

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

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SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

MUR #3666
DATE COMPLAINT RECEIVED
BY OGC: 10/21/92
DATE OF NOTIFICATION TO
RESPONDENTS: 10/27/92
STAFF MEMBER: Frances B. Hagan

COMPLAINANT:

Krishna Fells

RESPONDENTS:

Friends of Jennifer B. Dunn
Larry W. Wells, as treasurer
Jennifer B. Dunn
Washington State Republican
Party

RELEVANT STATUTES:

2 U.S.C. § 432(e)
2 U.S.C. § 433(a)
2 U.S.C. § 441a(a)(1)(A)
2 U.S.C. § 441a(f)
2 U.S.C. § 434(b)
2 U.S.C. § 431(a)
11 C.F.R. § 100.7(b)(1)(i)
11 C.F.R. § 100.7(b)(1)(ii)
11 C.F.R. § 100.8(b)(1)(i)

INTERNAL REPORTS CHECKED:

Disclosure indexes

FEDERAL AGENCIES CHECKED:

none

I. GENERATION OF MATTER

Complainant Krishna Fells filed a complaint alleging that Jennifer B. Dunn, a candidate for U.S. House of Representatives, reached the statutory threshold establishing her candidacy for federal office, but failed to file a Statement of Candidacy in a timely manner in violation of 2 U.S.C. § 432(e).¹ Complainant alleged that the Friends of Jennifer B. Dunn ("the Committee") and

1. On November 3, 1992, Jennifer B. Dunn won election to Congress from Washington State's Eighth Congressional District.

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Larry W. Wells, as treasurer, violated 2 U.S.C. § 433(a) by failing to register as a political committee in a timely manner. Complainant alleged that the Committee and its treasurer subsequently violated 434(b) by reporting receipt of certain contributions on the wrong date. Complainant also suggested that Jennifer Dunn's salary as Chairman of the Washington State Republican Party ("the State Party") could constitute an excessive contribution from the State Party if Ms. Dunn were a candidate while employed there. 2 U.S.C. § 441a(a)(1)(A) and 2 U.S.C. § 441a(f).

II. FACTUAL AND LEGAL ANALYSIS

An individual becomes a candidate under the Federal Election Campaign Act of 1971, as amended ("the Act") if such individual or a person authorized by such individual has received contributions aggregating in excess of \$5,000. 2 U.S.C. § 431(a). Within 15 days of becoming a candidate, an individual must file a Statement of Candidacy which designates a principal campaign committee 2 U.S.C. § 432(e)(1). Authorized committees must file a Statement of Organization within 10 days after designation. 2 U.S.C. § 433(a).

Under the Act, the term contribution includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office. 2 U.S.C. § 431(8). There are exemptions from the definition of contribution. Commission regulations permit an individual to receive funds and make payments if done solely for the purpose of determining whether he

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or she should become a candidate, without such funds being considered at that time a contribution to or an expenditure on behalf of that individual. Only funds permissible under the Act can be used for these "testing the waters" activities, and records must be kept of all the funds that are received for such purposes. 11 C.F.R. §§ 100.7(b)(1)(i) and 100.8(b)(1)(i). Nevertheless, if the individual subsequently becomes a candidate, the funds received or payments made in connection with testing the waters activities are then considered contributions and expenditures under the Act, and they must be reported in the first report filed by the candidate's principal campaign committee. 11 C.F.R. § 101.3.

All political committees must file reports listing the political committee's receipts and disbursements. 2 U.S.C. § 434(a). The Act requires that reports filed by a political committee disclose all contributions received from individuals and other political committees. 2 U.S.C. § 434(b)(2). A political committee is likewise required to disclose all expenditures it has made in a federal campaign. 2 U.S.C. § 434(b)(4).

Under 2 U.S.C. § 441a(a)(1)(A), no person shall make contributions to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. The term "person" includes an individual, partnership, committee, association, corporation, labor organization or any other organization or group of persons. 2 U.S.C. § 431(11). Under 2 U.S.C. § 441a(f), no candidate or political committee shall knowingly accept any contribution or

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make any expenditure in violation of the limitations set forth in Section 441a of the Act.

Testing the Waters

Based on Committee reports, complainant alleged that Jennifer Dunn and the Committee received contributions in excess of \$5,000 by March 1991, and began making "major expenditures" to campaign consultants and others by June 1991. See Complaint at 4. Complainant alleged that the Committee's receipts and expenditures establish that Ms. Dunn became a candidate for federal office in March 1991, and that she failed to file a Statement of Candidacy and that the Committee failed to file a Statement of Organization until November 15, 1991.

In response to this allegation, Ms. Dunn submitted a sworn affidavit denying that any payments were received or made except those "solely for the purpose of determining whether I should become a candidate." She asserted that her final decision to run for office was made in February 1992 after the State redistricting boundaries were determined, but she filed in November 1991 "by way of precaution." Ms. Dunn denied engaging in any activities before November 1991 that would indicate candidacy as stated in Commission Regulations at 11 C.F.R. § 100.7(b)(1)(ii).

A review of the Committee's initial report (3/29/91 - 12/31/91) shows expenditures of \$15,700 to two agencies for consulting services, and approximately \$13,000 for printing, mailing, postage, and mail box rental. Ms. Dunn stated that the "payments were made and funds were received to pay for activities such as conducting polls, making telephone calls, and traveling."

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Attachment A, p. 2. It appears that the amount and nature of receipts and disbursements are consistent with testing the waters activities such as hiring consultants and conducting polls. Furthermore, in a primary campaign with expenditures of \$431,660, exploratory disbursements totaling \$29,725 over nine months constitute a small proportion. Thus, absent more specific allegations, it appears that the activities in question fall within the testing the waters exemptions in the regulations at 11 C.F.R. §§ 100.7(b)(1)(i) and 100.8(b)(1)(i). The Office of the General Counsel recommends that the Commission find no reason to believe that Jennifer B. Dunn violated 2 U.S.C. § 432(e), or that the Committee and its treasurer violated 2 U.S.C. § 433(a).

Salary as Contribution

Complainant suggested that as Chairman of the Washington State Republican Party before resigning to formally run for federal office, Jennifer Dunn received contributions from the Party in the form of salary payments. Complainant alleged that the candidate received approximately \$80,000 per year in salary.

Ms. Dunn stated that she worked full time as State Party Chairman, performing all duties of the job from January 1981 until February 1992 when she resigned to run for office. The State Party's Executive Director similarly asserted that Ms. Dunn earned her salary, working full time until her departure. He argued that the Party had not made a contribution, noting that "Ms. Dunn was compensated in accordance with party policies and at levels authorized by the Executive Board of the party."

In Advisory Opinion 1977-68, the Commission advised that

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salary earned by a candidate does not qualify as a contribution from the employer to the extent that: (1) the requisite bona fide employment relationship exists between the candidate and his employer, for purposes genuinely independent of his candidacy; and (2) provided that any compensation paid to the candidate is exclusively in consideration of employment services performed by [her]. In Advisory Opinion 1978-6, the Commission further advised that to the extent the candidate's compensation is not reduced to reflect a decrease in hours worked because of the candidacy (as in billable hours for a law firm), the amount of the difference between the full amount paid and the amount reflecting the reduction in hours worked is a contribution by the employer.

Complainant provided no evidence that Ms. Dunn reduced her work hours or relinquished any responsibilities as State Party Chairman during the period in question. On the contrary, she apparently continued to work full time and was compensated accordingly. Thus, based on the available information, it appears that the State Party's salary payments to Ms. Dunn do not constitute a contribution to the Dunn campaign. Therefore, this Office recommends that the Commission find no reason to believe that the candidate or the Committee and its treasurer violated 2 U.S.C. § 441a(f), or that the State Party violated 2 U.S.C. § 441a(a)(1)(A).

Reporting of Disbursements

Complainant alleged that seven contributions of \$1,000 each were made on dates other than March 29, 1991, the reported date of receipt on the Committee's 1991 Year End Report. According to the

Committee treasurer's sworn statement, the treasurer prepared the FEC report based on a bank statement showing March 29, 1991, as the date of deposit. After consulting his records, he found that the seven contributions were made between March 18 and March 28, 1991. He asserted that the error was "accidental and inadvertent."

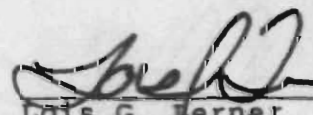
This Office recommends that the Commission find reason to believe that the Committee violated 2 U.S.C. § 434(b), but take no further action based on the circumstances involved.

III. RECOMMENDATIONS

1. Find no reason to believe that Jennifer B. Dunn violated 2 U.S.C. §§ 432(e) or 441a(f).
2. Find no reason to believe that the Friends of Jennifer B. Dunn and Larry W. Wells, as treasurer, violated 2 U.S.C. §§ 433(a) or 441a(f).
3. Find no reason to believe that the Washington State Republican Party violated 2 U.S.C. § 441a(a)(1)(A).
4. Find reason to believe that the Friends of Jennifer B. Dunn and Larry W. Wells, as treasurer, violated 2 U.S.C. § 434(b), but take no further action.
5. Approve the appropriate letters.
6. Close the file.

Lawrence M. Noble
General Counsel

1/13/94
Date

BY: 
Lois G. Lerner
Associate General Counsel

Attachment

- A. Committee/Candidate response to complaint
- B. State Party response to complaint

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Friends of Jennifer B. Dunn and) MUR 3666
Larry W. Wells, as treasurer;)
Jennifer B. Dunn;)
Washington State Republican Party.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 21, 1994, the Commission decided by a vote of 5-0 to take the following actions in MUR 3666:

1. Find no reason to believe that Jennifer B. Dunn violated 2 U.S.C. §§ 432(e) or 441a(f).
2. Find no reason to believe that the Friends of Jennifer B. Dunn and Larry W. Wells, as treasurer, violated 2 U.S.C. §§ 433(a) or 441a(f).
3. Find no reason to believe that the Washington State Republican Party violated 2 U.S.C. § 441a(a)(1)(A).
4. Find reason to believe that the Friends of Jennifer B. Dunn and Larry W. Wells, as treasurer, violated 2 U.S.C. § 434(b), but take no further action.

(continued)

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5. Approve the appropriate letters, as recommended in the General Counsel's Report dated January 13, 1994.
6. Close the file.

Commissioners Aikens, Elliott, McDonald, Potter, and Thomas voted affirmatively for the decision; Commissioner McGarry did not cast a vote.

Attest:

1-21-94
Date

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

Received in the Secretariat: Thurs., Jan. 13, 1994 10:22 a.m.
Circulated to the Commission: Thurs., Jan. 13, 1994 11:00 a.m.
Deadline for vote: Wed., Jan. 19, 1994 4:00 p.m.

bjr

94030962839



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

JANUARY 26, 1994

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Krishna Fells, Campaign Director
George Tamblyn for Congress
4122 128th Avenue S.E.
Suite 300
Bellevue, WA 98006

RE: MUR 3666

Dear Ms. Fells:

On January 21, 1994, the Federal Election Commission reviewed the allegations of your complaint dated October 20, 1992, and found that on the basis of the information provided in your complaint, and information provided by respondents, there is no reason to believe that: 1) Jennifer B. Dunn violated 2 U.S.C. §§ 432(e) or 441a(f); 2) that the Friends of Jennifer B. Dunn and Larry W. Wells, as treasurer, violated 2 U.S.C. § 433(a) or 441a(f); or 3) that the Washington State Republican Party violated 2 U.S.C. § 441a(a)(1)(A). At the same time, the Commission found reason to believe that the Friends of Jennifer B. Dunn and Larry W. Wells, as treasurer, violated 2 U.S.C. § 434(b). However, after considering the circumstances of this matter, the Commission determined to take no further action against the respondents and closed the file.

The Federal Election Campaign Act of 1971, as amended ("the Act") allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JANUARY 26, 1994

Mr. Lance J. Henderson
Executive Director
Washington State Republican Party
9 Lake Bellevue Drive
Bellevue, Washington 98005

RE: MUR 3666
Washington State Republican Party

Dear Mr. Henderson:

On October 27, 1992, the Federal Election Commission notified your organization of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On January 21, 1994, the Commission found, on the basis of the information in the complaint and information you provided, that there is no reason to believe the Washington State Republican Party violated 2 U.S.C. §441a(a)(1)(A). Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JANUARY 26, 1994

Daniel B. Ritter, Esquire
Davis Wright Tremaine
2600 Century Square
1501 Fourth Avenue
Seattle, Washington 98101-1688

RE: MUR 3656
Friends of Jennifer B. Dunn
Larry W. Wells, as treasurer
Jennifer B. Dunn

Dear Mr. Ritter:

On January 21, 1994, the Federal Election Commission took the following actions concerning your clients: 1) Found no reason to believe that the Friends of Jennifer B. Dunn Committee ("Committee") and Larry W. Wells, as treasurer, violated 2 U.S.C. §§ 433(a) or 441a(f), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"); 2) Found no reason to believe that Jennifer B. Dunn violated 2 U.S.C. §§ 432(e) or 441a(f); 3) Found reason to believe that the Committee and its treasurer violated 2 U.S.C. § 434(b). However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed its file. The General Counsel's Report, which formed a basis for the Commission's finding, is attached for your information.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 319-3400.

For the Commission,


Trevor Potter
Chairman

Enclosure
General Counsel's Report

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3666

DATE FILMED 2-9-94 CAMERA NO. 2

CAMERAMAN J.M.H.

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