



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 4150

DATE FILMED 4-28-97 CAMERA NO. 1

CAMERAMAN JMW

97043793429

ANTHONY P. LOCICCHIO

ATTORNEY AT LAW

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RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

October 31, 1994

Nov 7 2 44 PM '94

Mr. D. L. McDonald
Chairman of the Federal Election Commission
Mr. Lawrence M. Noble
General Counsel
999 E Street N. W.
Washington, D. C. 20463

In Re: Campaign Contributions From Foreign Nationals To
Frank Fasi, Mayor of Honolulu

Related Matters: MURs 2846, 2892, and 3004

Gentlemen:

We have obtained new evidence of intentional violation of Federal and State Campaign Spending Laws by Frank F. Fasi ex-Mayor of Honolulu and two foreign contributors. This evidence while related to the above cited complaints merits in our opinion a new complaint because of the clear cut nature of the knowing violation and attempted cover-up and conspiracy to circumvent Federal and State laws.^{1 2}

Count One

The first portion of this complaint will focus on five checks issued to Frank Fasi on the same day³ by the Osaka Japan based ECC Foreign Language School. All checks were in the amount of \$2,000.00 and all were issued in the names of Foreign Nationals which violates Federal Law.

D:\fec\2.cmp

¹. It is important to note here that Frank Fasi admits knowing of the Federal prohibition against acceptance of Foreign contributions in a press interview that dates that prior knowledge to a time before the conduct and conspiracy cited herein.

². State of Hawaii Law violations have also been included in this complaint for your information and as evidence of the knowing nature of the conspiracy to circumvent detection of violations of Federal and State Laws. A copy of this sworn complaint is also being forwarded to the State of Hawaii Campaign Spending Commission for parallel action on State violations.

³. All checks are believed to have been dated on the same day but one of the checks was received or logged by the Friends for Fasi group after an intervening long holiday weekend.

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The Friends for Fasi Campaign records as shown in Exhibit A make it clear that the checks are all from a single source and not from individuals; this attempt is referred to as "bundling" of contributions. The attempt to make it appear as though the checks came from five separate sources are violations of State of Hawaii Campaign Spending Laws on two counts. First the maximum contribution under State law is \$2,000.00 and second it is also illegal under State law to place a name on a check other than the actual donor. In this case the actual donor was ECC foreign Language Institute as indicated by the notation a careless campaign worker placed under each name and not the following individuals:

- 1) Hirofumi Ohnishi \$2,000.00 Dated October 5, 1987
- 2) Eiji Sakemoto \$2,000.00 Dated September 30, 1987
- 3) Kenji Sakemoto \$2,000.00 Dated September 30, 1987
- 4) Isamu Yamaguchi \$2,000.00 Dated September 30, 1987
- 5) Katsumi Yamaguchi \$2,000.00 Dated September 30, 1987

One year later after a law suit was filed by my clients in a related matter, Fasi claimed that he was now aware that such campaign contributions from foreign nationals were illegal under Federal Law. Faced with the obvious nature of the "bundling" which would have revealed State violations where the contribution made the subject of public scrutiny, he secretly⁴ returned the money to ECC contributors in five separate checks violating State law by failure to report the refund. Copies of checks from Friends for Fasi signed by Fasi's daughter and campaign official George Hong⁵ are attached hereto as Exhibit B and all are dated on the same date.

⁴. State campaign spending law requires that any amendment to campaign contributions such as refunds must be reported to the State Campaign Spending Commission. Because of the nature of our prior complaint filed with the commission in 1989 we attest to the fact that Fasi did not ever file an amended report which would have revealed the State and Federal violations at that time given our vigilant watch dogging of the records.

⁵. Mr. George Hong has been, from time to time, Fasi's personal attorney and reportedly is Fasi's "bag man" who reportedly had to give approval to all non-bid contracts over \$100,000.00 issued by the City and County of Honolulu, according to former Fasi cabinet member John Hirten. Mr. Hong and his associate Neil Hulbert was also the attorney for Y.Y. Valley Corporation, Yasuo Yasuda and Tetsuo Yasuda in a Federal RICO case now pending in the United States District Court. Hulbert and Hong represented various parties before this Commission in the prior complaint without revealing to the Commission the fact of Hong's conflict of interest role as Fasi's campaign official and attorney. See count two for further discussion of the cover-up involving these parties.

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- 1) Hirofumi Ohnishi \$2,000.00 Dated September 1, 1988
 - 2) Eiji Sakemoto \$2,000.00 Dated September 1, 1988
 - 3) Kenji Sakemoto \$2,000.00 Dated September 1, 1988
 - 4) Isamu Yamaguchi \$2,000.00 Dated September 1, 1988
 - 5) Katsumi Yamaguchi \$2,000.00 Dated September 1, 1988

From the back of those checks it is possible to ascertain the following details that give rise to the charges of conspiracy to cover-up the conduct of Fasi himself:

- 1) That all five of the Friends for Fasi checks are all deposited in the same account in the Sanwa Bank in Osaka Japan on the same date November 26, 1988.⁶ This establishes both the violation of Federal Law and the State excess contribution laws as it establishes that the contribution came from a single source and was in excess of the \$2,000.00 limit by \$8,000.00.⁷
- 2) The fact that the checks are deposited back in the originating foreign bank is clear evidence of the foreign nature of the contribution and establish the violation of Federal Law.

SMOKING GUN LETTER DATED JANUARY 7, 1989 FROM ISAMU YAMAGUCHI TO FRANK FASI WITH ACCOMPANYING CHECK FOR \$10,000.00.

By anonymous mail this past weekend I received Exhibit C which I believe to be a valid document and a valid check for \$10,000.00 written in the name of Frank Fasi's son Charles. This letter is the proverbial SMOKING GUN and clearly lays out the conspiracy to avoid Federal and State Law.

⁶. The delay of almost three months from the date placed on the checks by the Fasi Campaign organization (September 1, 1988) and the date of the deposit of the checks (November 26, 1988) opens questions of whether or not the original checks were held back before being sent to Osaka or if the check dates were backdated. None the less, there is an unexplained delay in deposit of the checks.

⁷. This fact would explain why no amendment was filed with the State Campaign Spending Commission because to have done so would have made known the existence of the checks and the bank data on the back. It is included in this Federal complaint as further evidence of the knowing cover-up and conspiracy to hide the Federal and State violations.

Mr. Frank F. Fasi
Mayor
City and County of Honolulu
Office of the Mayor
Honolulu Hale, 530 South King Street
Honolulu, Hawaii 96813

Dear Mayor Fasi:

I hope that this letter finds you in the best of health. I would also like to take this opportunity to wish you and your family all the best in 1989.

As you can see from the enclosed check, the bank has finally been able to release the funds⁸ to us. As per your instructions⁹, we have made one¹⁰ check for 10,000 US dollars to Charles¹¹ Fasi. I hope that this token of friendship will be of help.

Looking forward to seeing you in Osaka in June.

Sincerely yours,

Isamu Yamaguchi

The letter arrived at the Mayors Office on January 11, 1989 (see time-date stamp on face of letter)¹². We do not have any

⁸. We believe these "funds to be the same \$10,000.00 from Friends for Fasi deposited on November 26, 1988.

⁹. Emphasis added to show Fasi personal knowing involvement at a time after he was fully aware of the Federal and State laws by his own admission. Penalties that should be assessed herein involve punitive remedies.

¹⁰. This reference to "one" check is clearly intended to differentiate the "one" check from the previous five checks that Fasi secretly returned to Yamaguchi.

¹¹. Charles is Frank Fasi's oldest son.

¹². Our belief is that the letter and check were copied by a shocked staff member who was assigned to open all incoming mail. Our sources indicate that Fasi who has a reputation for keeping his distance from campaign contributions of this nature so as to avoid prosecution was furious when he found out that the letter had mistakenly been sent directly to his office and had been opened by a non-trusted staff member. A subpoena from either the State or Federal Commissions may be effective in having this person come

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evidence of whether or not the check was ever cashed¹³ but are filing this complaint based on the original violations that occurred in the acceptance of the five checks and the discovery of this plot to get the funds back through Fasi's son Charles as evidence of knowingly violating the Law "as per your instructions."

Fasi has since produced the uncashed check. He attributes the money to an "honorarium". We are forwarding this sworn complaint because we believe given the supporting check data we have disproved that excuse.

Count Two:

Attached please find Exhibit D the Affidavit of Robert Carter regarding the fact that the funds that were the subject matter of the prior complaint with the FEC and for which \$46,000.00 in fines were issued by the Commission, we now have cause to believe that contrary to representations made under sworn Affidavit by Yoshinori "Ken" Hayashida the funds were not returned by Fasi in that according to the Affidavit the money from the "returned funds" checks were placed back in the Y.Y. Valley account and a cash amount identical to the "returned" amount was then forwarded back to the Fasi Campaign.

The Fasi Campaign was being run at that time by George Hong, Attorney for Frank Fasi and a signer of the so called return checks to ECC (see count one) and to the 11 named parties who were in reality Y.Y. Valley Corporation.

George Hong signed the Fasi campaign checks to George Hong's client Y.Y. Valley. Hong's firm through his associate Neil Hulbert also represented Yoshinori "Ken" Hayashida before the Federal Elections Commission without informing the Commission of the conflict of interest that Hong had in legally representing (1) Frank Fasi, (2) The Friends for Fasi Campaign Committee, (3) The foreign donor of the illegal campaign contribution Y.Y. Valley Corporation, (4) Yasuo Yasuda aka Han Kuk Chun, (5) Tetsuo Yasuda and as well as (6) Yoshinori "Ken" Hayashida.

In addition, it appears that Mr. Hong and Mr. Hulbert also represent the Mokuleia Land Company in their illegal donation to Frank Fasi at the time the Alston Hunt Floyd and Ing firm was representing that entity before this commission in the prior

forward. I believe that the same person may be the one who sent me the documents in Exhibit C this weekend.

¹³. We have since this complaint was first prepared learned that the check was not cashed. We believe that once Fasi learned the letter had been opened by an "outsider" he did not take the additional risk of cashing the check.

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referenced case.¹⁴ In this capacity Hong issued the check to his clients Mokuleia Land Company from his client Friends for Fasi on behalf of his client Frank Fasi. At no time did the Fasi campaign amend to this date any of its campaign spending reports acknowledging the "refunds". This appears to be an additional violation of State law and which has occurred in over 20 instances (the latest "refund" checks were issued in March of 1994) and no report has yet been filed.

Current Status:

Attempt to question the parties making the donations and returning the cash to Fasi's campaign have met with the following results:

A. George Hong: Has taken the Fifth Amendment on all questions asked including, "Do you have a law firm." Mr. Hong asserted that he would take the Fifth on any and all questions regarding campaign contributions to Frank Fasi Campaign. Future prognosis, in the event that Office of Disciplinary Counsel for the State of Hawaii becomes involved in the matter, Mr. Hong would be permitted to take the Fifth Amendment but could place his license to practice law in the State in Jeopardy. Given that circumstance he might possibly agree to waive Fifth Amendment claims.

B. Neil Hulbert: Deposition has not yet been taken but is scheduled for the end of this week.

C. Yoshinori "Ken" Hayashida: At his deposition on this matter Hayashida has plead the Fifth Amendment for all questions dealing with campaign contributions despite the sworn Affidavit filed with this commission. In that it appears that Affidavit might contain perjury and that new information might in fact involve forgery of the many of the endorsements on the back of the checks¹⁵ it is expected that he will continue to assert Fifth Amendment privileges. Future Prognosis: Mr. Hayashida is a green card status holder in the United States and not a citizen. While he would have the right to maintain his Fifth Amendment privilege

¹⁴. The Alston firm was co-counsel with the Hong firm in representing the donor of the illegal contributions Y.Y. Valley Corporation as well as the Yasuda brothers who are foreign nationals and whom this commission issued a fine of \$23,000.00 against in the prior matter. Alston's co-counsel George Hong and Hulbert also represented the parent company of Mokuleia Land company.

¹⁵. Complainants have already obtained sworn affidavits that endorsements on the back of the so-called refund checks are not the signature of the propertied endorser and that no authorization was ever made to sign the endorser signature.

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against any green card status hearing, he does not have a right to violate Federal or State law. His sworn statement on file in the prior matter is probably sufficient to establish a prima facie case against him for violation of the law. Mr. Hayashida does not have a right to remain in the United States once a finding is made on his violation of these laws. For that reason there is some reason to believe he may cooperate with this new investigation to preserve his residency here in the United States.

D. Masanori Kobayashi: At his deposition on this matter Kobayashi has plead the Fifth Amendment for all questions dealing with campaign contributions. It is expected that he will continue to assert Fifth Amendment privileges. Future Prognosis: Mr. Masanori Kobayashi is a green card status holder in the United States and not a citizen. While he would have the right to maintain his Fifth Amendment privilege against any green card status hearing, he does not have a right to violate Federal or State law.

Mr. Kobayashi remained silent and did not inform INS, FEC or State authorities of the "unauthorized"¹⁶ use of his name and thus became a willing and knowing party to the violations of the State and Federal Laws violated by Royal Hawaiian Country Club, Y.Y. Valley, the Yasuda brothers and nor does Kobayashi have a right to remain in the United States once a finding is made on his violation of these laws. For that reason there might be some reason to believe he may cooperate with this new investigation to preserve his residency here in the United States.

E. Linda Wong: Fasi campaign aid and his former Executive Assistant. She has taken the Fifth Amendment also with regard to all questions including her age and high school. We believe she has removed official City and County documents from the Mayors office files including the Smoking Gun Letter from Count One. Travel records and telephone logs may also have disappeared and we have been unable to obtain them through discovery. Future Prognosis: Because of her relationship with Fasi we believe that she will continue to take the Fifth Amendment. We are contemplating adding her to our Civil RICO or filing a second RICO that names her if the court does not approve adding more defendants at this time. Thus the outlook for her cooperation does not appear to be good.

F. Frank Fasi: We were limited by the Court to a two and a half hour deposition from Fasi during which time he refused to answer without asserting the Fifth Amendment questions relating to campaign contribution matters. He has been ordered by the Court to answer the questions through the granting of our motion to compel. We are also going to be permitted to take a new deposition after

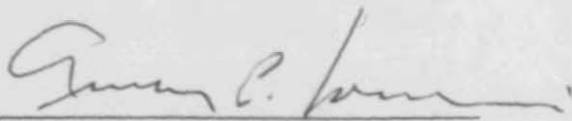
¹⁶. Even giving Mr. Kobayashi the most favorable interpretation of the facts.

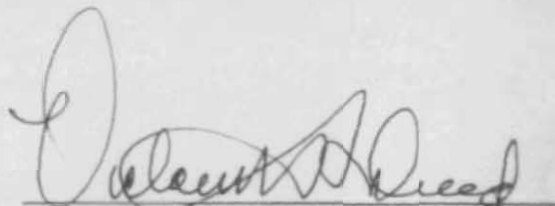
the election, but the Court delayed the compelled answers until after the election for Governor which occurs on November 8, 1994. Future Prognosis: We anticipate answers to questions at that time or will move for sanctions in light of the Courts Order to Compel. If Fasi wins the election then we have the future Governor in a position where he will receive horrendous bad press in taking the Fifth Amendment on a campaign contribution matter. If he loses the election he will not care as much about what the public thinks and may also join his lawyer and campaign officials in taking the Fifth.

SUMMARY:

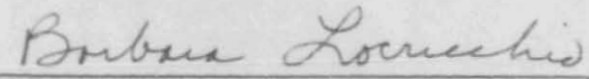
In summary, it appears in an attempt to hide from the State and Federal Government Laws regarding excessive and foreign contribution a conspiracy was entered into by donors and candidate to circumvent the Law. Without any additional cooperation from the parties who may continue to take the Fifth the prima facia evidence is clear to establish violations of both State and Federal campaign commission laws. We file this complaint requesting that you use the full power of your office to assure this conduct does not continue.

Yours truly,


ANTHONY P. LOCRICCHIO, ESQ.


VICTORIA S. CREED

On this 3/8th day of October, 1994
appeared before me Anthony P. Locricchio
and Victoria S. Creed and in my presence
did affix their signatures to the
foregoing complaint.


NOTARY PUBLIC, STATE OF HAWAII

My Commission expires 3-26 1998



CAMPAIGN SPENDING COMMISSION

AGGREGATE CONTRIBUTIONS OVER \$100

Page 90 of

NAME OF CANDIDATE, COMMITTEE OR PARTY
FRIENDS FOR FASI

DATE RECEIVED 1987	NAME AND ADDRESS OF DONOR	OCCUPATION	(COLUMN 1) AMOUNT OF THIS CASH CONTRIBUTION	(COLUMN 2)	(COLUMN 3) AGGREGATE TOTALS FROM DONOR
		IF A MINOR, ENTER NAME OF PARENT		VALUE OF THIS IN- KIND CONTRIBUTION	
10/5	ODA, Howard K. 1912 Leimomi Place Wahiawa 96786		2,000		2,000
9/4	ODA, James E. Dr. 3456 Niolopua Dr Honolulu 96817		2,000		2,000
9/14	OGASAWARA, Thomas K. 1724 Kalauckalani Way Suite 101 Honolulu 96814		2,000		2,000
9/4	OGATA, Bob 4710 Likini St Honolulu 96818		500		500
8/17	OGAWA, Miyeko P. O. Box 381 Ewa 96706		250		250
9/14	OH, Sung Nam 1517 Makiki St No 1202 Honolulu 96822		250		250
8/24	Ohbayashi Hawaii Corp 1001 Bishop St Suite 2680 Honolulu 96813		1,000		1,000
10/5	OHNISHI, Hirofumi ECC Namba Foreign Language Institute		2,000		2,000
7/27	OKADA, Judy 1102 10th Avenue Honolulu 96816		2,000		2,000
7/27	OKADA, Sonny 2065 So. King St Honolulu 96826		2,000		2,000
8/4	Okahara & Associates Inc 200 Kohola St Hilo 96720		1,250		1,250

TOTAL
COLUMN 1:

TOTAL
COLUMN 2:

NOTE: IN-KIND
CONTRIBUTIONS
ARE ALSO EXPENDI-
TURES WHEN USED.

1. SUBTOTAL of Contributions Over \$100 This Page
2. TOTAL This Period (last page this line only)

EXHIBIT

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STATE OF HAWAII
CAMPAIGN SPENDING COMMISSION

AGGREGATE CONTRIBUTIONS OVER \$100

Page 106 of

NAME OF CANDIDATE, COMMITTEE OR PARTY

DATE RECEIVED	NAME AND ADDRESS OF DONOR	OCCUPATION IF A MINOR, ENTER NAME OF PARENT	(COLUMN 1) AMOUNT OF THIS CASH CONTRIBUTION	(COLUMN 2) VALUE OF THIS IN-KIND CONTRIBUTION DESCRIPTION	(COLUMN 3) AGGREGATE TOTALS FROM DONOR
87					
9/4	SAKAI, Carolyn M. 45-118 Mimo Place Kaneohe, Hawaii 96744		750.00		750.00
9/4	SAKAI, Don I. 45-118 Mimo Place Kaneohe, Hawaii 96744		500.00		500.00
9/4	SAKAI, K. 2464 Kanealii Avenue Honolulu, Hawaii 96813		250.00		250.00
8/14	SAKAI, Kenneth T. 1229 Ala Amoamo Street Honolulu, Hawaii 96819		500.00		500.00
8/14	SAKAI, Rhonda L. M. 1229 Ala Amoamo Street Honolulu, Hawaii 96819		500.00		500.00
9/30	SAKEMOTO, Elji ECC Junior Foreign Language Institute		2000.00		2000.00
9/30	SAKEMOTO, Kenji ECC Kansai Foreign Language Institute		2000.00		2000.00
8/25	SALVA CRUZ, Rafael M. 98-432 Hoomailani Street Pearl City, Hawaii 96782		250.00		250.00
9/8	SAM SUNG Electronics, Inc. 1370 Makaloa Street Honolulu, Hawaii 96814		250.00		250.00
9/4	SANDERS, Whitney A., II 1100 Reading Blvd. Wyomissing, PA 19610		1000.00		1000.00
8/14	SANPEI, Alice C. 98-140 Keanae Street Aiea, Hawaii 96701		500.00		500.00
			TOTAL COLUMN 1:	TOTAL COLUMN 2:	NOTE: IN-KIND CONTRIBUTIONS ARE ALSO EXPENDITURES WHEN USED.

1. SUBTOTAL of Contributions Over \$100 This Page

2. TOTAL This Period (Not over this Page)

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CAMPAIGN SPENDING COMMISSION

AGGREGATE CONTRIBUTIONS OVER \$100

Page 133 of

NAME OF CANDIDATE, COMMITTEE OR PARTY

DATE RECEIVED	NAME AND ADDRESS OF DONOR	OCCUPATION IF A MINOR, ENTER NAME OF PARENT	(COLUMN 1) AMOUNT OF THIS CASH CONTRIBUTION	(COLUMN 2) VALUE OF THIS IN- KIND CONTRIBUTION DESCRIPTION	(COLUMN 3) AGGREGATE TOTALS FROM DONOR
8/20	YAMA, Roy T. 3483 Ala Ilima Street Honolulu, Hawaii 96818		1000.00		1000.00
8/20	YAMA, Sally Y. 3483 Ala Ilima Street Honolulu, Hawaii 96818		1000.00		1000.00
9/30	YAMAGUCHI, Isamu ECC Foreign Language Institute		2000.00		2000.00
9/30	YAMAGUCHI, Katsumi ECC Nagoya Foreign Language Institute		2000.00		2000.00
8/25	YAMAGUCHI, Michael S. 47-443 Aialii Place Kaneohe, Hawaii 96744		1500.00		1500.00
8/27	YAMAKI, Berlye F. 1755 Hooikaika Place Pearl City, Hawaii 96782		250.00		250.00
10/19	YAMAMOTO, Bert A. 1687 Pensacola Street, No. 802 Honolulu, Hawaii 96822		750.00		750.00
8/12	YAMAMOTO, David M. 98-1698 Kapaki Street Aiea, Hawaii 96701		250.00		250.00
8/31	YAMAMOTO, Eiman c/o Central Pacific Bank		2000.00		2000.00
8/27	YAMAMOTO, Helena 98-1698 Kapaki Street Aiea, Hawaii 96701		250.00		250.00
9/4	YAMAMOTO, Jean K. 3240 Ala Laulani Street Honolulu, Hawaii 96818		948.00		948.00
			TOTAL COLUMN 1:	TOTAL COLUMN 2:	NOTE: IN-KIND CONTRIBUTIONS ARE ALSO EXPENDI- TURES WHEN USED.

- SUBTOTAL of Contributions Over \$100 This Page
- TOTAL This Period (last page this line only)

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FRIENDS FOR FASI
100 N. BERETANIA ST., NO. 203
HONOLULU, HI 96817

No. 346

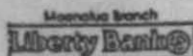
59-105/1213

Oct. 17, 1988

PAY
TO THE
ORDER OF Masanori Kobayashi

\$ 2,000.00

*****Two Thousand and no/100*****
~~PROCESSED - OCT 19 1988~~ DOLLARS



FOR Return Contribution

⑆121301057⑆

13⑈003505⑈

⑈0000200000⑈

Gina M. Fari
[Signature]

FRIENDS FOR FASI
100 N. BERETANIA ST., NO. 203
HONOLULU, HI 96817

No. 347

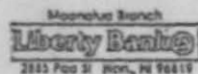
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Oct. 17, 1988

PAY
TO THE
ORDER OF Yoshinori Hayashida

\$ 2,000.00

*****Two Thousand and no/100*****
~~PROCESSED - OCT 19 1988~~ DOLLARS



FOR Return Contribution

⑆121301057⑆

13⑈003505⑈

⑈0000200000⑈

Gina M. Fari
[Signature]

FRIENDS FOR FASI
100 N. BERETANIA ST., NO. 203
HONOLULU, HI 96817

No. 272

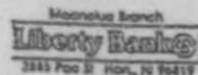
59-105/1213

Sept. 1, 1988

PAY
TO THE
ORDER OF Hirofumi Ohnishi

\$ 2,000.00

*****Two Thousand and no/100*****
~~PROCESSED - OCT 19 1988~~ DOLLARS



FOR Return Contribution

⑆121301057⑆

13⑈003505⑈

⑈0000200000⑈

Gina M. Fari
[Signature]

✓①

FRIENDS FOR FASI
100 N. BERETANIA ST., NO. 203
HONOLULU, HI 96817

No. 273

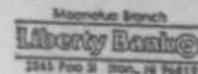
59-105/1213

Sept. 1, 1988

PAY
TO THE
ORDER OF Eiji Sakemoto

\$ 2,000.00

*****Two Thousand and no/100*****
~~PROCESSED - OCT 19 1988~~ DOLLARS



FOR Return Contribution

⑆121301057⑆

13⑈003505⑈

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Gina M. Fari
[Signature]

✓② B

EXHIBIT

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Y. W. Kelly Corp

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HONOLULU, HI 96817

88-105/1213

1988

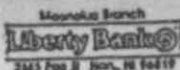
PAY
TO THE
ORDER OF

Kenji Sakemoto

\$ 2,000.00

*****Two Thousand and no/100*****

PROCESSED - 00000538 DOLLARS



FOR Return Contribution

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13⑈003505⑈

⑈0000200000⑈

Foreign Language

FRIENDS FOR FASI
100 N. BERETANIA ST., NO. 203
HONOLULU, HI 96817

No. 275

88-105/1213

Sept. 1, 1988

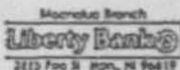
PAY
TO THE
ORDER OF

Isamu Yamaguchi

\$ 2,000.00

*****Two Thousand and no/100*****

PROCESSED - 00000538 DOLLARS



FOR Return Contribution

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Foreign Language Institute

FRIENDS FOR FASI
100 N. BERETANIA ST., NO. 203
HONOLULU, HI 96817

No. 276

88-105/1213

Sept. 1, 1988

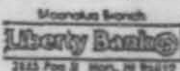
PAY
TO THE
ORDER OF

Katsumi Yamaguchi

\$ 2,000.00

*****Two Thousand and no/100*****

PROCESSED - 00000538 DOLLARS



FOR Return Contribution

⑆121301057⑆

13⑈003505⑈

⑈0000200000⑈

Foreign Language Institute

FRIENDS FOR FASI
100 N. BERETANIA ST., NO. 203
HONOLULU, HI 96817

No. 334

88-105/1213

Oct. 17, 1988

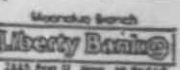
PAY
TO THE
ORDER OF

Royal Hawaiian Country Club

\$ 2,000.00

*****Two Thousand and no/100*****

PROCESSED - 00000538 DOLLARS



FOR Return Contribution

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13⑈003505⑈

⑈0000200000⑈

FF 000009

97043793443

OUR COLLECTION

Kenji Sakamoto

③

SEASIDE CLUB COLLECTION

James Yamaguchi

④

OR COLLECTION

Katami Tamaguchi

5

ROYAL HAWAIIAN COUNTRY CLUB
For Enquiries Write
CENTRAL PACIFIC BANK

FF 000010

ECC

ECC FOREIGN LANGUAGE INSTITUTE

HEAD OFFICE 1-1 Nakazaki-Nishi 2 chome Kita-ku Osaka 530 Japan 06-362-0578 FAX 06-362-0585

HONOLULU
CITY & COUNTY

January 7, 1989 JAN 11 A8:27

Mr. Frank F. Fasi
Mayor
City and County of Honolulu
Office of the Mayor
Honolulu Hale, 530 South King Street
Honolulu, Hawaii 96813

Dear Mayor Fasi:

I hope that this letter finds you in the best of health. I would also like to take this opportunity to wish you and your family all the best in 1989.

As you can see from the enclosed check, the bank has finally been able to release the funds to us. As per your instructions, we have made one check for 10,000 US dollars to Charles Fasi. I hope that this token of friendship will be of help.

Looking forward to seeing you in Osaka in June.

Sincerely yours,


Isamu Yamaguchi

 The Sanwa Bank Limited

42023 127429408

Against this Sola check

Pay to the Order of CHARLES FASI

Ref.No. 52-1764316-044 Place OSAKA

Date JAN. 6, 1989

US \$10,000.00*

the Sum of U.S. DOLLARS TEN THOUSAND ONLY

TO CITIBANK (NEW YORK STATE)
ROCHESTER, NEW YORK, U.S.A.

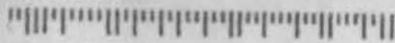
AUTHORIZED SIGNATURE

DRAWER SANWA BANK

EXHIBIT

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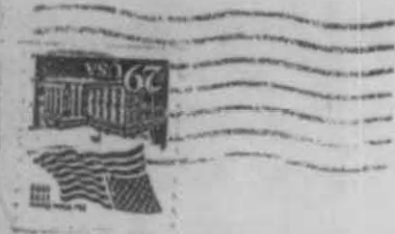


96734-4628 14

Urgent



Mr. Anthony P. Locricchio
903 Maunawili Circle
Kaliua, Hawaii 96734



AFFIDAVIT OF ROBERT D. L. CARTER

CITY AND COUNTY OF HONOLULU)
) SS
STATE OF HAWAII)

Affiant, ROBERT D. L. CARTER, being first duly sworn, on oath,
hereby attests to the following:

1. That my name is Robert Carter and that I am a resident of
the City and County of Honolulu.

2. That I was employed as an independent Contractor for
Royal Hawaiian Country Club Incorporated and Y.Y. Valley
Corporation almost continually (except for a period in
1985) from 1985 to Jan. 1, 1990 when I became an employee
of Royal Hawaiian Country Club Incorporated until the
time my employment was terminated 11-30-92.

3. That at no time did I ever sign a wavier or agreement to
keep confidential information about anything I received
as an independent contractor or employee of RHCC.

4. That I was involved in the distribution of campaign
contributions in cash and goods to various elected
officials and candidates for office.

5. That I held the title of Land Manager of Royal Hawaiian
Country Club in 1988 while still an independent
contractor.

6. That I was informed by Masanori Kobayashi, President of
Royal Hawaiian Country Club, that the checks written by
the Friends for Fasi to refund campaign contributions to
Y.Y. Valley Corporation were all deposited in the Y.Y.
Valley Corporation bank account by Mitsunori Inoue or Ken

EXHIBIT

D

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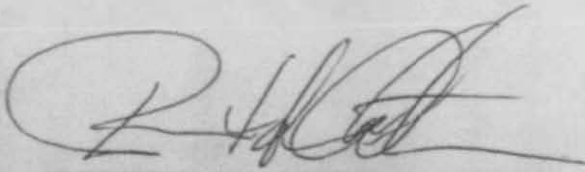
Hayashida.

7. That I was also informed by Masanori Kobayashi that Fasi's campaign was given back the "returned" funds in cash.
8. That I was further able to confirm that the cash refund had occurred through my discussions with Mitsunori Inoue, the accountant/bookkeeper for Royal Hawaiian Country Club and Y.Y. Valley Corporation, who confirmed that the cash had been given back to Fasi in the amount of the refund checks (\$24,000.00).
9. That Mr. Inoue admitted that on the original contribution checks names of Japan Nationals were used who did not know or approve that the campaign contribution checks were made out to Friends for Fasi.
10. That once the existence of the illegal campaign contribution checks were made public by Locricchio, I asked Inoue why American names like my own were not used on the illegal checks.
11. That, further, I asked why instead of my name, a member of the Japan's Royal Family's name, Mr. Hiroaki Fushimi, was used as a Fasi \$2000.00 contributor without his consent or knowledge.
12. That Mr. Masanori Kobayashi was furious when he discovered that Ken Hayashida had used Fushimi's name and forged his signature.
13. That Mr. Masanori Kobayashi had brought Mr. Fushimi into the organization as honorary president of Royal Hawaiian

Country club.

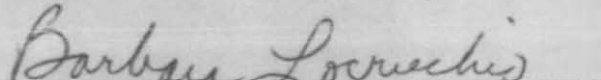
14. That about this same time period, Mr. Masanori Kobayashi held a gun to my head in a threatening manner that caused me to fear for my life.
15. That I became aware during the period of my employment of a plan by Royal Hawaiian Country Club Officials and staff including its general manager to hire agents to kill and rob Anthony Locricchio while he was visiting Detroit, Michigan and make it appear that Locricchio was the victim of random black urban violence.
16. That this plan was to eventually happen no matter how long it took.

That further affiant says not,



ROBERT D. L. CARTER
Affiant

On this 30th day of October, 1994
appeared before me above Affiant who
is known to me and sworn this to be
his true statement.


NOTARY PUBLIC, STATE OF HAWAII

My commission expires 3-26-1998





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 15, 1994

Anthony P. Locricchio
903 Maunawili Circle
Kailua, HI 96734

Dear Mr. Locricchio:

This is to acknowledge receipt on November 7, 1994, of your letter dated October 31, 1994. The Federal Election Campaign Act of 1971, as amended ("the Act") and Commission Regulations require that the contents of a complaint meet certain specific requirements. One of these requirements is that a complaint be sworn to and signed in the presence of a notary public and notarized. Your letter was not properly sworn to.

In order to file a legally sufficient complaint, you must swear before a notary that the contents of your complaint are true to the best of your knowledge and the notary must represent as part of the jurat that such swearing occurred. The preferred form is "Subscribed and sworn to before me on this ____ day of ____, 19__." A statement by the notary that the complaint was sworn to and subscribed before her also will be sufficient. We regret the inconvenience that these requirements may cause you, but we are not statutorily empowered to proceed with the handling of a compliance action unless all the statutory requirements are fulfilled. See 2 U.S.C. § 437g.

Enclosed is a Commission brochure entitled "Filing a Complaint." I hope this material will be helpful to you should you wish to file a legally sufficient complaint with the Commission.

Please note that this matter will remain confidential for a 15 day period to allow you to correct the defects in your complaint. If the complaint is corrected and refiled within the 15 day period, the respondents will be so informed and provided a copy of the corrected complaint. The respondents will then have an additional 15 days to respond to the complaint on the merits. If the complaint is not corrected, the file will be closed and no additional notification will be provided to the respondents.

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If you have any questions concerning this matter, please
contact me at (202) 219-3410.

Sincerely,

Retha Dixon

Retha Dixon
Docket Chief

Enclosure

cc: Friends for Fasi
ECC Foreign Language School
Y.Y. Valley

97043793451

ANTHONY P. LOCICCHIO

ATTORNEY AT LAW

903 MAUNAWILI CIRCLE

KAILUA, HAWAII 96734

(808) 261-7733 / 261-8372

FAX: 263-4128

October 31, 1994

Mr. D. L. McDonald
Chairman of the Federal Election Commission
Mr. Lawrence M. Noble
General Counsel
999 E Street N. W.
Washington, D. C. 20463

MUR 4150

NOV 20 11 49 AM '94

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

In Re: Campaign Contributions From Foreign Nationals To
Frank Fasi, Mayor of Honolulu

Related Matters: MURs 2846, 2892, and 3004

Gentlemen:

We have obtained new evidence of intentional violation of Federal and State Campaign Spending Laws by Frank F. Fasi ex-Mayor of Honolulu and two foreign contributors. This evidence while related to the above cited complaints merits in our opinion a new complaint because of the clear cut nature of the knowing violation and attempted cover-up and conspiracy to circumvent Federal and State laws.^{1 2}

Count One

The first portion of this complaint will focus on five checks issued to Frank Fasi on the same day³ by the Osaka Japan based ECC Foreign Language School. All checks were in the amount of \$2,000.00 and all were issued in the names of Foreign Nationals which violates Federal Law.

D:\fec\2.cmp

¹. It is important to note here that Frank Fasi admits knowing of the Federal prohibition against acceptance of Foreign contributions in a press interview that dates that prior knowledge to a time before the conduct and conspiracy cited herein.

². State of Hawaii Law violations have also been included in this complaint for your information and as evidence of the knowing nature of the conspiracy to circumvent detection of violations of Federal and State Laws. A copy of this sworn complaint is also being forwarded to the State of Hawaii Campaign Spending Commission for parallel action on State violations.

³. All checks are believed to have been dated on the same day but one of the checks was received or logged by the Friends for Fasi group after an intervening long holiday weekend.

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The Friends for Fasi Campaign records as shown in Exhibit A make it clear that the checks are all from a single source and not from individuals; this attempt is referred to as "bundling" of contributions. The attempt to make it appear as though the checks came from five separate sources are violations of State of Hawaii Campaign Spending Laws on two counts. First the maximum contribution under State law is \$2,000.00 and second it is also illegal under State law to place a name on a check other than the actual donor. In this case the actual donor was ECC foreign Language Institute as indicated by the notation a careless campaign worker placed under each name and not the following individuals:

- 1) Hirofumi Ohnishi \$2,000.00 Dated October 5, 1987
- 2) Eiji Sakemoto \$2,000.00 Dated September 30, 1987
- 3) Kenji Sakemoto \$2,000.00 Dated September 30, 1987
- 4) Isamu Yamaguchi \$2,000.00 Dated September 30, 1987
- 5) Katsumi Yamaguchi \$2,000.00 Dated September 30, 1987

One year later after a law suit was filed by my clients in a related matter, Fasi claimed that he was now aware that such campaign contributions from foreign nationals were illegal under Federal Law. Faced with the obvious nature of the "bundling" which would have revealed State violations where the contribution made the subject of public scrutiny, he secretly⁴ returned the money to ECC contributors in five separate checks violating State law by failure to report the refund. Copies of checks from Friends for Fasi signed by Fasi's daughter and campaign official George Hong⁵ are attached hereto as Exhibit B and all are dated on the same date.

⁴. State campaign spending law requires that any amendment to campaign contributions such as refunds must be reported to the State Campaign Spending Commission. Because of the nature of our prior complaint filed with the commission in 1989 we attest to the fact that Fasi did not ever file an amended report which would have revealed the State and Federal violations at that time given our vigilant watch dogging of the records.

⁵. Mr. George Hong has been, from time to time, Fasi's personal attorney and reportedly is Fasi's "bag man" who reportedly had to give approval to all non-bid contracts over \$100,000.00 issued by the City and County of Honolulu, according to former Fasi cabinet member John Hirten. Mr. Hong and his associate Neil Hulbert was also the attorney for Y.Y. Valley Corporation, Yasuo Yasuda and Tetsuo Yasuda in a Federal RICO case now pending in the United States District Court. Hulbert and Hong represented various parties before this Commission in the prior complaint without revealing to the Commission the fact of Hong's conflict of interest role as Fasi's campaign official and attorney. See count two for further discussion of the cover-up involving these parties.

- 9 7 0 4 3 7 9 3 4 5 4
- 1) Hirofumi Ohnishi \$2,000.00 Dated September 1, 1988
 - 2) Eiji Sakemoto \$2,000.00 Dated September 1, 1988
 - 3) Kenji Sakemoto \$2,000.00 Dated September 1, 1988
 - 4) Isamu Yamaguchi \$2,000.00 Dated September 1, 1988
 - 5) Katsumi Yamaguchi \$2,000.00 Dated September 1, 1988

From the back of those checks it is possible to ascertain the following details that give rise to the charges of conspiracy to cover-up the conduct of Fasi himself:

1) That all five of the Friends for Fasi checks are all deposited in the same account in the Sanwa Bank in Osaka Japan on the same date November 26, 1988.⁶ This establishes both the violation of Federal Law and the State excess contribution laws as it establishes that the contribution came from a single source and was in excess of the \$2,000.00 limit by \$8,000.00.⁷

2) The fact that the checks are deposited back in the originating foreign bank is clear evidence of the foreign nature of the contribution and establish the violation of Federal Law.

SMOKING GUN LETTER DATED JANUARY 7, 1989 FROM ISAMU YAMAGUCHI TO FRANK FASI WITH ACCOMPANYING CHECK FOR \$10,000.00.

By anonymous mail this past weekend I received Exhibit C which I believe to be a valid document and a valid check for \$10,000.00 written in the name of Frank Fasi's son Charles. This letter is the proverbial SMOKING GUN and clearly lays out the conspiracy to avoid Federal and State Law.

⁶. The delay of almost three months from the date placed on the checks by the Fasi Campaign organization (September 1, 1988) and the date of the deposit of the checks (November 26, 1988) opens questions of whether or not the original checks were held back before being sent to Osaka or if the check dates were backdated. None the less, there is an unexplained delay in deposit of the checks.

⁷. This fact would explain why no amendment was filed with the State Campaign Spending Commission because to have done so would have made known the existence of the checks and the bank data on the back. It is included in this Federal complaint as further evidence of the knowing cover-up and conspiracy to hide the Federal and State violations.

Mr. Frank F. Fasi
Mayor
City and County of Honolulu
Office of the Mayor
Honolulu Hale, 530 South King Street
Honolulu, Hawaii 96813

Dear Mayor Fasi:

I hope that this letter finds you in the best of health. I would also like to take this opportunity to wish you and your family all the best in 1989.

As you can see from the enclosed check, the bank has finally been able to release the funds⁸ to us. As per your instructions⁹, we have made one¹⁰ check for 10,000 US dollars to Charles¹¹ Fasi. I hope that this token of friendship will be of help.

Looking forward to seeing you in Osaka in June.

Sincerely yours,

Isamu Yamaguchi

The letter arrived at the Mayors Office on January 11, 1989 (see time-date stamp on face of letter)¹². We do not have any

⁸. We believe these "funds to be the same \$10,000.00 from Friends for Fasi deposited on November 26, 1988.

⁹. Emphasis added to show Fasi personal knowing involvement at a time after he was fully aware of the Federal and State laws by his own admission. Penalties that should be assessed herein involve punitive remedies.

¹⁰. This reference to "one" check is clearly intended to differentiate the "one" check from the previous five checks that Fasi secretly returned to Yamaguchi.

¹¹. Charles is Frank Fasi's oldest son.

¹². Our belief is that the letter and check were copied by a shocked staff member who was assigned to open all incoming mail. Our sources indicate that Fasi who has a reputation for keeping his distance from campaign contributions of this nature so as to avoid prosecution was furious when he found out that the letter had mistakenly been sent directly to his office and had been opened by a non-trusted staff member. A subpoena from either the State or Federal Commissions may be effective in having this person come

evidence of whether or not the check was ever cashed¹³ but are filing this complaint based on the original violations that occurred in the acceptance of the five checks and the discovery of this plot to get the funds back through Fasi's son Charles as evidence of knowingly violating the Law "as per your instructions."

Fasi has since produced the uncashed check. He attributes the money to an "honorarium". We are forwarding this sworn complaint because we believe given the supporting check data we have disproved that excuse.

Count Two:

Attached please find Exhibit D the Affidavit of Robert Carter regarding the fact that the funds that were the subject matter of the prior complaint with the FEC and for which \$46,000.00 in fines were issued by the Commission, we now have cause to believe that contrary to representations made under sworn Affidavit by Yoshinori "Ken" Hayashida the funds were not returned by Fasi in that according to the Affidavit the money from the "returned funds" checks were placed back in the Y.Y. Valley account and a cash amount identical to the "returned" amount was then forwarded back to the Fasi Campaign.

The Fasi Campaign was being run at that time by George Hong, Attorney for Frank Fasi and a signer of the so called return checks to ECC (see count one) and to the 11 named parties who were in reality Y.Y. Valley Corporation.

George Hong signed the Fasi campaign checks to George Hong's client Y.Y. Valley. Hong's firm through his associate Neil Hulbert also represented Yoshinori "Ken" Hayashida before the Federal Elections Commission without informing the Commission of the conflict of interest that Hong had in legally representing (1) Frank Fasi, (2) The Friends for Fasi Campaign Committee, (3) The foreign donor of the illegal campaign contribution Y.Y. Valley Corporation, (4) Yasuo Yasuda aka Han Kuk Chun, (5) Tetsuo Yasuda and as well as (6) Yoshinori "Ken" Hayashida.

In addition, it appears that Mr. Hong and Mr. Hulbert also represent the Mokuleia Land Company in their illegal donation to Frank Fasi at the time the Alston Hunt Floyd and Ing firm was representing that entity before this commission in the prior

forward. I believe that the same person may be the one who sent me the documents in Exhibit C this weekend.

¹³. We have since this complaint was first prepared learned that the check was not cashed. We believe that once Fasi learned the letter had been opened by an "outsider" he did not take the additional risk of cashing the check.

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referenced case.¹⁴ In this capacity Hong issued the check to his clients Mokuleia Land Company from his client Friends for Fasi on behalf of his client Frank Fasi. At no time did the Fasi campaign amend to this date any of its campaign spending reports acknowledging the "refunds". This appears to be an additional violation of State law and which has occurred in over 20 instances (the latest "refund" checks were issued in March of 1994) and no report has yet been filed.

Current Status:

Attempt to question the parties making the donations and returning the cash to Fasi's campaign have met with the following results:

A. George Hong: Has taken the Fifth Amendment on all questions asked including, "Do you have a law firm." Mr. Hong asserted that he would take the Fifth on any and all questions regarding campaign contributions to Frank Fasi Campaign. Future prognosis, in the event that Office of Disciplinary Counsel for the State of Hawaii becomes involved in the matter, Mr. Hong would be permitted to take the Fifth Amendment but could place his license to practice law in the State in Jeopardy. Given that circumstance he might possibly agree to waive Fifth Amendment claims.

B. Neil Hulbert: Deposition has not yet been taken but is scheduled for the end of this week.

C. Yoshinori "Ken" Hayashida: At his deposition on this matter Hayashida has plead the Fifth Amendment for all questions dealing with campaign contributions despite the sworn Affidavit filed with this commission. In that it appears that Affidavit might contain perjury and that new information might in fact involve forgery of the many of the endorsements on the back of the checks¹⁵ it is expected that he will continue to assert Fifth Amendment privileges. Future Prognosis: Mr. Hayashida is a green card status holder in the United States and not a citizen. While he would have the right to maintain his Fifth Amendment privilege

¹⁴. The Alston firm was co-counsel with the Hong firm in representing the donor of the illegal contributions Y.Y. Valley Corporation as well as the Yasuda brothers who are foreign nationals and whom this commission issued a fine of \$23,000.00 against in the prior matter. Alston's co-counsel George Hong and Hulbert also represented the parent company of Mokuleia Land company.

¹⁵. Complainants have already obtained sworn affidavits that endorsements on the back of the so-called refund checks are not the signature of the propertied endorser and that no authorization was ever made to sign the endorser signature.

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against any green card status hearing, he does not have a right to violate Federal or State law. His sworn statement on file in the prior matter is probably sufficient to establish a prima facie case against him for violation of the law. Mr. Hayashida does not have a right to remain in the United States once a finding is made on his violation of these laws. For that reason there is some reason to believe he may cooperate with this new investigation to preserve his residency here in the United States.

D. Masanori Kobayashi: At his deposition on this matter Kobayashi has plead the Fifth Amendment for all questions dealing with campaign contributions. It is expected that he will continue to assert Fifth Amendment privileges. Future Prognosis: Mr. Masanori Kobayashi is a green card status holder in the United States and not a citizen. While he would have the right to maintain his Fifth Amendment privilege against any green card status hearing, he does not have a right to violate Federal or State law.

Mr. Kobayashi remained silent and did not inform INS, FEC or State authorities of the "unauthorized"¹⁶ use of his name and thus became a willing and knowing party to the violations of the State and Federal Laws violated by Royal Hawaiian Country Club, Y.Y. Valley, the Yasuda brothers and nor does Kobayashi have a right to remain in the United States once a finding is made on his violation of these laws. For that reason there might be some reason to believe he may cooperate with this new investigation to preserve his residency here in the United States.

E. Linda Wong: Fasi campaign aid and his former Executive Assistant. She has taken the Fifth Amendment also with regard to all questions including her age and high school. We believe she has removed official City and County documents from the Mayors office files including the Smoking Gun Letter from Count One. Travel records and telephone logs may also have disappeared and we have been unable to obtain them through discovery. Future Prognosis: Because of her relationship with Fasi we believe that she will continue to take the Fifth Amendment. We are contemplating adding her to our Civil RICO or filing a second RICO that names her if the court does not approve adding more defendants at this time. Thus the outlook for her cooperation does not appear to be good.

F. Frank Fasi: We were limited by the Court to a two and a half hour deposition from Fasi during which time he refused to answer without asserting the Fifth Amendment questions relating to campaign contribution matters. He has been ordered by the Court to answer the questions through the granting of our motion to compel. We are also going to be permitted to take a new deposition after

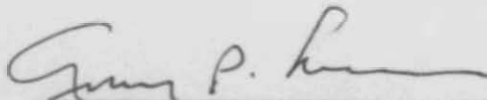
¹⁶. Even giving Mr. Kobayashi the most favorable interpretation of the facts.

the election, but the Court delayed the compelled answers until after the election for Governor which occurs on November 8, 1994. Future Prognosis: We anticipate answers to questions at that time or will move for sanctions in light of the Courts Order to Compel. If Fasi wins the election then we have the future Governor in a position where he will receive horrendous bad press in taking the Fifth Amendment on a campaign contribution matter. If he loses the election he will not care as much about what the public thinks and may also join his lawyer and campaign officials in taking the Fifth.

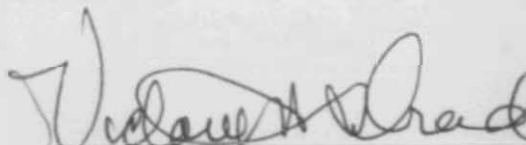
SUMMARY:

In summary, it appears in an attempt to hide from the State and Federal Government Laws regarding excessive and foreign contribution a conspiracy was entered into by donors and candidate to circumvent the Law. Without any additional cooperation from the parties who may continue to take the Fifth the prima facia evidence is clear to establish violations of both State and Federal campaign commission laws. We file this complaint requesting that you use the full power of your office to assure this conduct does not continue.

Yours truly,



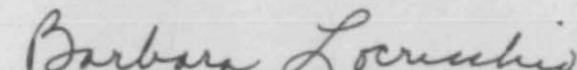
ANTHONY P. LOCRICCHIO, ESQ.



VICTORIA S. CREED

Subscribed and sworn to before me on this 21st day of November, 1994
Anthony P. Locricchio and Victoria S. Creed and in my presence did affix their signatures to the foregoing complaint.




NOTARY PUBLIC, STATE OF HAWAII

My Commission expires 3-26-1998

NAME OF CANDIDATE, COMMITTEE OR PARTY
FRIENDS FOR FASI

DATE RECEIVED 1987	NAME AND ADDRESS OF DONOR	OCCUPATION IF A MINOR, ENTER NAME OF PARENT	(COLUMN 1) AMOUNT OF THIS CASH CONTRIBUTION	(COLUMN 2) VALUE OF THIS IN- KIND CONTRIBUTION DESCRIPTION	(COLUMN 3) AGGREGATE TOTALS FROM DONOR
10/5	ODA, Howard K. 1912 Leimani Place Wahiawa 96786		2,000		2,000
9/4	ODA, James E. Dr. 3456 Niolopua Dr Honolulu 96817		2,000		2,000
9/14	OGASAWARA, Thomas K. 1724 Kalauokalani Way Suite 101 Honolulu 96814		2,000		2,000
9/4	OGATA, Bob 4710 Likini St Honolulu 96818		500		500
8/17	OGAWA, Miyeko P. O. Box 381 Ewa 96706		250		250
9/14	OH, Sung Nam 1517 Makiki St No 1202 Honolulu 96822		250		250
8/24	Ohbayashi Hawaii Corp 1001 Bishop St Suite 2680 Honolulu 96813		1,000		1,000
10/5	OHNISHI, Hirofumi ECC Namba Foreign Language Institute		2,000		2,000
7/27	OKADA, Judy 1102 10th Avenue Honolulu 96816		2,000		2,000
7/27	OKADA, Sonny 2065 So. King St Honolulu 96826		2,000		2,000
8/4	Okahara & Associates Inc 200 Kohola St Hilo 96720		1,250		1,250
			TOTAL COLUMN 1:	TOTAL COLUMN 2:	NOTE: IN-KIND CONTRIBUTIONS ARE ALSO EXPENDI- TURES WHEN USED.

1. SUBTOTAL of Contributions Over \$100 This Page
2. TOTAL This Period (last page this line only)

EXHIBIT

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NAME OF CANDIDATE, COMMITTEE OR PARTY

DATE RECEIVED	NAME AND ADDRESS OF DONOR	OCCUPATION IF A MINOR, ENTER NAME OF PARENT	(COLUMN 1) AMOUNT OF THIS CASH CONTRIBUTION	(COLUMN 2) VALUE OF THIS IN-KIND CONTRIBUTION	(COLUMN 3) AGGREGATE TOTALS FROM DONOR
				DESCRIPTION	
8/7					
9/4	SAKAI, Carolyn M. 45-118 Mimo Place Kaneohe, Hawaii 96744		750.00		750.00
9/4	SAKAI, Don I. 45-118 Mimo Place Kaneohe, Hawaii 96744		500.00		500.00
9/4	SAKAI, K. 2464 Kanealii Avenue Honolulu, Hawaii 96813		250.00		250.00
8/14	SAKAI, Kenneth T. 1229 Ala Amonoo Street Honolulu, Hawaii 96819		500.00		500.00
8/14	SAKAI, Rhonda L. M. 1229 Ala Amonoo Street Honolulu, Hawaii 96819		500.00		500.00
9/30	SAKEMOTO, Eiji ECC Junior Foreign Language Institute		2000.00		2000.00
9/30	SAKEMOTO, Kenji ECC Kansai Foreign Language Institute		2000.00		2000.00
8/25	SALVA CRUZ, Rafael M. 98-432 Hoomailani Street Pearl City, Hawaii 96782		250.00		250.00
9/8	SAM SUNG Electronics, Inc. 1370 Makalao Street Honolulu, Hawaii 96814		250.00		250.00
9/4	SANDERS, Whitney A., II 1100 Reading Blvd. Wyomissing, PA 19610		1000.00		1000.00
8/14	SANPEI, Alice C. 98-140 Keanee Street Aiea, Hawaii 96701		500.00		500.00
			TOTAL COLUMN 1:	TOTAL COLUMN 2:	NOTE: IN-KIND CONTRIBUTIONS ARE ALSO EXPENDITURES WHEN USED.

1. SUBTOTAL of Contributions Over \$100 This Page

2. TOTAL This Page

97043793461

CAMPAIGN SPENDING COMMISSION

AGGREGATE CONTRIBUTIONS OVER \$100

Page 133 of

NAME OF CANDIDATE, COMMITTEE OR PARTY

DATE RECEIVED	NAME AND ADDRESS OF DONOR	OCCUPATION	(COLUMN 1) AMOUNT OF THIS CASH CONTRIBUTION	(COLUMN 2) VALUE OF THIS IN-KIND CONTRIBUTION	(COLUMN 3) AGGREGATE TOTALS FROM DONOR
		IF A MINOR, ENTER NAME OF PARENT		DESCRIPTION	
8/20	YAMA, Roy T. 3483 Ala Ilima Street Honolulu, Hawaii 96818		1000.00		1000.00
8/20	YAMA, Sally Y. 3483 Ala Ilima Street Honolulu, Hawaii 96818		1000.00		1000.00
9/30	YAMAGUCHI, Isamu ECC Foreign Language Institute		2000.00		2000.00
9/30	YAMAGUCHI, Katsumi ECC Nogoya Foreign Language Institute		2000.00		2000.00
8/25	YAMAGUCHI, Michael S. 47-443 Aialii Place Kaneohe, Hawaii 96744		1500.00		1500.00
8/27	YAMAKI, Berlye F. 1755 Hooikaika Place Pearl City, Hawaii 96782		250.00		250.00
10/19	YAMAMOTO, Bert A. 1687 Pensacola Street, No. 802 Honolulu, Hawaii 96822		750.00		750.00
8/12	YAMAMOTO, David M. 98-1698 Kapaki Street Aiea, Hawaii 96701		250.00		250.00
8/31	YAMAMOTO, Eiman c/o Central Pacific Bank		2000.00		2000.00
8/27	YAMAMOTO, Helena 98-1698 Kapaki Street Aiea, Hawaii 96701		250.00		250.00
9/4	YAMAMOTO, Jean K. 3240 Ala Laulani Street Honolulu, Hawaii 96818		948.00		948.00
			TOTAL COLUMN 1:	TOTAL COLUMN 2:	NOTE: IN-KIND CONTRIBUTIONS ARE ALSO EXPENDITURES WHEN USED.

1. SUBTOTAL of Contributions Over \$100 This Page
2. TOTAL This Period (last page this line only)

97043793462

FRIENDS FOR FASI
100 N. BERETANIA ST., NO. 203
HONOLULU, HI 96817

No. 346

89-105/1213

Oct. 17, 1988

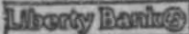
PAY
TO THE
ORDER OF

Masanori Kobayashi

\$ 2,000.00

*****Two Thousand and no/100***** DOLLARS

Maunaloa Branch



2543 Pao St. Hon., HI 96817

FOR Return Contribution

⑆121301057⑆

13⑈003505⑈

⑈0000200000⑈

FRIENDS FOR FASI

100 N. BERETANIA ST., NO. 203
HONOLULU, HI 96817

No. 347

89-105/1213

Oct. 17, 1988

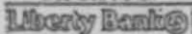
PAY
TO THE
ORDER OF

Yoshinori Hayashida

\$ 2,000.00

*****Two Thousand and no/100***** DOLLARS

Maunaloa Branch



2543 Pao St. Hon., HI 96817

FOR Return Contribution

⑆121301057⑆

13⑈003505⑈

⑈0000200000⑈

FRIENDS FOR FASI

100 N. BERETANIA ST., NO. 203
HONOLULU, HI 96817

No. 272

89-105/1213

Sept. 1, 1988

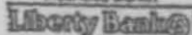
PAY
TO THE
ORDER OF

Hirofumi Ohnishi

\$ 2,000.00

*****Two Thousand and no/100***** DOLLARS

Maunaloa Branch



2543 Pao St. Hon., HI 96817

FOR Return Contribution

⑆121301057⑆

13⑈003505⑈

⑈0000200000⑈

FRIENDS FOR FASI

100 N. BERETANIA ST., NO. 203
HONOLULU, HI 96817

No. 273

89-105/1213

Sept. 1, 1988

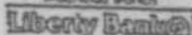
PAY
TO THE
ORDER OF

Eiji Sakamoto

\$ 2,000.00

*****Two Thousand and no/100***** DOLLARS

Maunaloa Branch



2543 Pao St. Hon., HI 96817

FOR Return Contribution

⑆121301057⑆

13⑈003505⑈

⑈0000200000⑈

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✓①

✓② B

EXHIBIT

PAY
TO THE
ORDER OF

Kenji Sakemoto

1988

\$ 2,000.00

*****Two Thousand and no/100*****

Maunaloa Branch

Liberty Bank

2115 POU A ST., HI 96817

FOR Return Contribution

⑆121301057⑆

13⑈003505⑈

⑈0000200000⑈

Foreign Exchange

FRIENDS FOR FASI

No. 275

100 N. BERETANIA ST., NO. 203
HONOLULU, HI 96817

88-105/1213

Sept. 1, 1988

PAY
TO THE
ORDER OF

Isamu Yamaguchi

\$ 2,000.00

*****Two Thousand and no/100*****

Maunaloa Branch

Liberty Bank

2115 POU A ST., HI 96817

FOR Return Contribution

⑆121301057⑆

13⑈003505⑈

⑈0000200000⑈

Foreign Exchange Institute

FRIENDS FOR FASI

No. 276

100 N. BERETANIA ST., NO. 203
HONOLULU, HI 96817

88-105/1213

Sept. 1, 1988

PAY
TO THE
ORDER OF

Katsuni Yamaguchi

\$ 2,000.00

*****Two Thousand and no/100*****

Maunaloa Branch

Liberty Bank

2115 POU A ST., HI 96817

FOR Return Contribution

⑆121301057⑆

13⑈003505⑈

⑈0000200000⑈

Foreign Exchange Institute

FRIENDS FOR FASI

No. 334

100 N. BERETANIA ST., NO. 203
HONOLULU, HI 96817

88-105/1213

Oct. 17, 1988

PAY
TO THE
ORDER OF

Royal Hawaiian Country Club

\$ 2,000.00

*****Two Thousand and no/100*****

Maunaloa Branch

Liberty Bank

2115 POU A ST., HI 96817

FOR Return Contribution

⑆121301057⑆

13⑈003505⑈

⑈0000200000⑈

FF 000009

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ECC

ECC FOREIGN LANGUAGE INSTITUTE

HEAD OFFICE 1-1 Nakazaki-Nishi 2 chome Kita-ku Osaka 530 Japan 06-362-0578 FAX 06-362-0585

MAILED
CITY & COUNTY
HONOLULU

January 7, 1989 JAN 11 A8:27

Mr. Frank F. Fasi
Mayor
City and County of Honolulu
Office of the Mayor
Honolulu Hale, 530 South King Street
Honolulu, Hawaii 96813

Dear Mayor Fasi:

I hope that this letter finds you in the best of health. I would also like to take this opportunity to wish you and your family all the best in 1989.

As you can see from the enclosed check, the bank has finally been able to release the funds to us. As per your instructions, we have made one check for 10,000 US dollars to Charles Fasi. I hope that this token of friendship will be of help.

Looking forward to seeing you in Osaka in June.

Sincerely yours,


Isamu Yamashichi

 The Sanwa Bank Limited

42023 127429408

Against this Sole check

Ref.No. 52-1754316-044 Place OSAKA

Date JAN. 6. 1989

Pay to the Order of CHARLES FASI

US \$10,000.00*

Sum of U.S. DOLLARS TEN THOUSAND ONLY *****

TO CITIBANK (NEW YORK STATE)
ROCHESTER, NEW YORK, U.S.A.

AUTHORIZED SIGNATURE

DRAWER: SANWA BANK

EXHIBIT

Urgent



Mr. Anthony P. Locricchio
903 Maunawili Circle
Kailua, Hawaii 96734



96734-4620 14



89426724076

AFFIDAVIT OF ROBERT D. L. CARTER

CITY AND COUNTY OF HONOLULU)
) SS
STATE OF HAWAII)

Affiant, ROBERT D. L. CARTER, being first duly sworn, on oath,
hereby attests to the following:

1. That my name is Robert Carter and that I am a resident of
the City and County of Honolulu.

2. That I was employed as an independent Contractor for
Royal Hawaiian Country Club Incorporated and Y.Y. Valley
Corporation almost continually (except for a period in
1985) from 1985 to Jan. 1, 1990 when I became an employee
of Royal Hawaiian Country Club Incorporated until the
time my employment was terminated 11-30-92.

3. That at no time did I ever sign a wavier or agreement to
keep confidential information about anything I received
as an independent contractor or employee of RHCC.

4. That I was involved in the distribution of campaign
contributions in cash and goods to various elected
officials and candidates for office.

5. That I held the title of Land Manager of Royal Hawaiian
Country Club in 1988 while still an independent
contractor.

6. That I was informed by Masanori Kobayashi, President of
Royal Hawaiian Country Club, that the checks written by
the Friends for Fasi to refund campaign contributions to
Y.Y. Valley Corporation were all deposited in the Y.Y.
Valley Corporation bank account by-Mitsunori Inoue or Ken

EXHIBIT D

97043793469

Hayashida.

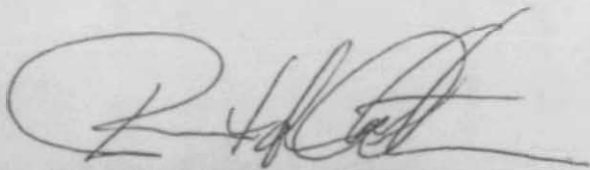
7. That I was also informed by Masanori Kobayashi that Fasi's campaign was given back the "returned" funds in cash.
8. That I was further able to confirm that the cash refund had occurred through my discussions with Mitsunori Inoue, the accountant/bookkeeper for Royal Hawaiian Country Club and Y.Y. Valley Corporation, who confirmed that the cash had been given back to Fasi in the amount of the refund checks (\$24,000.00).
9. That Mr. Inoue admitted that on the original contribution checks names of Japan Nationals were used who did not know or approve that the campaign contribution checks were made out to Friends for Fasi.
10. That once the existence of the illegal campaign contribution checks were made public by Locricchio, I asked Inoue why American names like my own were not used on the illegal checks.
11. That, further, I asked why instead of my name, a member of the Japan's Royal Family's name, Mr. Hiroaki Fushimi, was used as a Fasi \$2000.00 contributor without his consent or knowledge.
12. That Mr. Masanori Kobayashi was furious when he discovered that Ken Hayashida had used Fushimi's name and forged his signature.
13. That Mr. Masanori Kobayashi had brought Mr. Fushimi into the organization as honorary president of Royal Hawaiian

9704379347C

Country club.

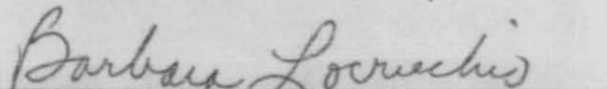
14. That about this same time period, Mr. Masanori Kobayashi held a gun to my head in a threatening manner that caused me to fear for my life.
15. That I became aware during the period of my employment of a plan by Royal Hawaiian Country Club Officials and staff including its general manager to hire agents to kill and rob Anthony Locricchio while he was visiting Detroit, Michigan and make it appear that Locricchio was the victim of random black urban violence.
16. That this plan was to eventually happen no matter how long it took.

That further affiant says not,



ROBERT D. L. CARTER
Affiant

On this 30th day of October, 1994
appeared before me above Affiant who
is known to me and sworn this to be
his true statement.


NOTARY PUBLIC, STATE OF HAWAII

My commission expires 3-26-1998





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 5, 1994

Anthony P. Locricchio, Esq.
903 Maunawili Circle
Kailua, HI 96734

RE: MUR 4150

Dear Mr. Locricchio:

This letter acknowledges receipt on November 28, 1994, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). The respondent(s) 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 4150. Please refer to this number in all future communications. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar (JTS)

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosure
Procedures

97043793472



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 5, 1994

Treasurer
Friends for Fasi
100 N. Beretania Street, No. 203
Honolulu, HI 96817

RE: MUR 4150

Dear Sir or Madam:

The Federal Election Commission received a complaint which indicates that Friends for Fasi ("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 4150. 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.

9704373

If you have any questions, please contact Alva E. Smith at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar (HES)

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

97043793474



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

December 5, 1994

Frank F. Fasi
c/o Friends for Fasi
100 N. Beretania Street, No. 203
Honolulu, HI 96817

RE: MUR 4150

Dear Mr. Fasi:

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 4150. 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.

97043793475

If you have any questions, please contact Alva E. Smith at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar (HES)

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

97043793476



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

December 5, 1994

President
ECC Foreign Language Institute
1-1 Nakazaki-Nishi
2 chome, Kita-ku
Osaka 530 Japan 06-362-0578

RE: MUR 4150

Dear Sir or Madam:

The Federal Election Commission received a complaint which indicates that ECC Foreign Language Institute, 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 4150. 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 ECC Foreign Language Institute 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.

97043793477

If you have any questions, please contact Alva E. Smith at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar (A28)

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

97043793478



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 5, 1994

Masanori Kobayashi, President
Royal Hawaiian Country Club Incorporation
770 Aulua Road
Kailua, HI 96734

RE: MUR 4150

Dear Mr. Kobayashi:

The Federal Election Commission received a complaint which indicates that Royal Hawaiian Country Club and 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 4150. 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 Royal Hawaiian Country Club and 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.

97043793479

If you have any questions, please contact Alva E. Smith at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar (f2s)

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

9704379348C



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 5, 1994

President
Y.Y. Valley Corporation
c/o Royal Hawaiian Group
P.O. Box 356
Kailua, HI 96734

RE: MUR 4150

Dear Sir or Madam:

The Federal Election Commission received a complaint which indicates that Y.Y. Valley Corporation 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 4150. 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 Y.Y. Valley Corporation 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.

97043793481

If you have any questions, please contact Alva E. Smith at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar (f28)

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

97043793482



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 5, 1994

Hirofumi Ohnishi
c/o ECC Foreign Language Institute
1-1 Nakazaki-Nishi
2 chome, Kita-ku
Osaka 530 Japan 06-362-0578

RE: MUR 4150

Dear Mr. Ohnishi:

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 4150. 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.

97043793483

If you have any questions, please contact Alva E. Smith at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar (428)

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

97043793484



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 5, 1994

Eiji Sakemoto
c/o ECC Foreign Language Institute
1-1 Nakazaki-Nishi
2 chome, Kita-ku
Osaka 530 Japan 06-362-0578

RE: MUR 4150

Dear Mr. Sakemoto:

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 4150. 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.

97043793485

If you have any questions, please contact Alva E. Smith at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar (428)

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

97043793486



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 5, 1994

Kenji Sakemoto
c/o ECC Foreign Language Institute
1-1 Nakazaki-Nishi
2 chome, Kita-ku
Osaka 530 Japan 06-362-0578

RE: MUR 4150

Dear Mr. Sakemoto:

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 4150. 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.

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97043793487

If you have any questions, please contact Alva E. Smith at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar (HES)

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

97043793488



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 5, 1994

Isamu Yamaguchi
c/o ECC Foreign Language Institute
1-1 Nakazaki-Nishi
2 chome, Kita-ku
Osaka 530 Japan 06-362-0578

RE: MUR 4150

Dear Mr. Yamaguchi:

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 4150. 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.

97043793489

If you have any questions, please contact Alva E. Smith at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar (H28)

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

9704379349C



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

December 5, 1994

Katsumi Yamaguchi
c/o ECC Foreign Language Institute
1-1 Nakazaki-Nishi
2 chome, Kita-ku
Osaka 530 Japan 06-362-0578

RE: MUR 4150

Dear Mr. Yamaguchi:

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 4150. 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.

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97043793491

If you have any questions, please contact Alva E. Smith at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar (428)

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

97043793492



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 5, 1994

George Hong
c/o Friends for Fasi
100 N. Beretania Street, No. 203
Honolulu, HI 96817

RE: MUR 4150

Dear Mr. Hong:

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 4150. 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.

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97043793493

If you have any questions, please contact Alva E. Smith at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar (T28)

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

97043793494



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 5, 1994

Yoshinori "Ken" Hayashida
c/o Y.Y. Valley Corporation
Royal Hawaiian Group
P.O. Box 356
Kailua, HI 96734

RE: MUR 4150

Dear Mr. Hayashida:

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 4150. 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.

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97043793495

If you have any questions, please contact Alva E. Smith at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar (HES)

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

97043793496



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

December 5, 1994

Charles Fasi
c/o Friends for Fasi
100 N. Beretania Street, No. 203
Honolulu, HI 96817

RE: MUR 4150

Dear Mr. Fasi:

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 4150. 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.

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97043793497

If you have any questions, please contact Alva E. Smith at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar (f28)

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

97043793498



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 5, 1994

Mitsunori Inoue
c/o Royal Hawaiian Country Club Incorporation
770 Aulua Road
Kailua, HI 96734

RE: MUR 4150

Dear Mr. Inoue:

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 4150. 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.

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9704379349

If you have any questions, please contact Alva E. Smith at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar (tes)

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

97043793350C

CHARLES F. FASI
THE IMAGE SPECIALIST PHOTOGRAPHERS
P. O. BOX 27356 HONOLULU, HAWAII 96827
(808) 521-1032

RECEIVED
FEDERAL ELECTION
COMMISSION OFFICE
MAIL ROOM
DEC 14 9 46 AM '94
RECEIVED
FEDERAL ELECTION
COMMISSION OFFICE
MAIL ROOM
DEC 14 9 32 AM '94

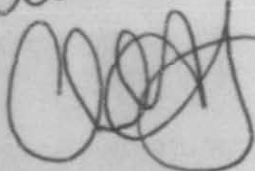
12/8/94

TO WHOM IT MAY CONCERN.

I HAVE NO KNOWLEDGE OR INFORMATION OTHER
THAN WHAT HAS BEEN PREVIOUSLY MADE PUBLIC
THROUGH THE NEWS MEDIA REGARDING MUR 4150.

I WAS NOT AWARE OF ANYTHING INVOLVED IN THIS
CASE BEFORE IT WAS MADE PUBLIC. PLEASE BE
AWARE THAT THE NAME "CHARLES F. FASI" ALSO
BELONGS TO MY SON, AN UNCLE, AND POSSIBLY
ONE OF MY COUSINS.

CALL ME IF YOU ARE IN NEED OF FURTHER
ASSISTANCE.

Alvin,




TEN YEARS OF
EXCELLENT SERVICE
SINCE 1985



97043793501

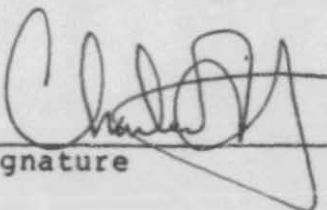
STATEMENT OF DESIGNATION OF COUNSEL

MUR 4150
NAME OF COUNSEL: myself
ADDRESS: P.O. Box 27356
Hono lili 96827
TELEPHONE: 808-521-1032

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
DEC 14 9 32 AM '94

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.

12/8/95
Date


Signature

RESPONDENT'S NAME: CHARLES F. FASI
ADDRESS: P.O. Box 27356
Hono lili 96827
HOME PHONE: 595-6142
BUSINESS PHONE: 521-1032

808 area code

97043793502

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

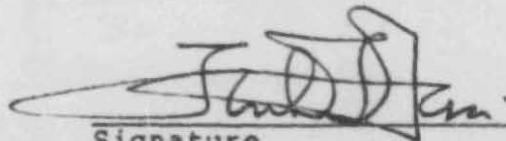
Dec 19 9 43 AM '94

MUR 4150
NAME OF COUNSEL: David F. Fasi, Esq.
ADDRESS: 2054 Makiki Street
Hon., HI. 96822
TELEPHONE: (808) 521-4242

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
Dec 19 10 09 AM '94

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.

12/13/94
Date


Signature

RESPONDENT'S NAME: Frank F. Fasi
ADDRESS: % Friends For Fasi
100 N. Beretania St. #203
Hon., HI. 96817
HOME PHONE: (808) 946-6281
BUSINESS PHONE: (808) 521-1031

97043793503

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

HONG IWAI HULBERT & KAWANO

ATTORNEYS AT LAW
SUITE 2200, PAUAAHI TOWER
BISHOP SQUARE
1001 BISHOP STREET
HONOLULU, HAWAII 96813

Dec 19 11 28 AM '94

TELEPHONE
(808) 524-4900

FAX
(808) 528-5473

GEORGE S. W. HONG
DONALD K. IWAI
NEIL F. HULBERT
CAROL LEE HONG
JEFFREY C. WILK
ROY K. KAWANO
HARLAN Y. KIMURA
JOHN H. DONEGAN

December 13, 1994

Via Facsimile Transmission (202) 219 3923

Federal Election Commission
999 E Street, NW
Washington, DC 20463

Attention: Ms. Alva E. Smith

Gentlemen:

Re: MUR 4150

I refer you to my telephone conversation this date with
Ms. Alva E. Smith.

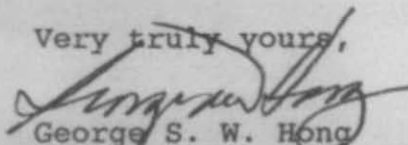
I am in receipt of your letter of December 5, 1994, in the
above-entitled matter, together with enclosures. Please be
advised that your letter was forwarded to me only late last
week from Friends for Fasi to whom it had been addressed. I
respectfully request an extension of time to January 31, 1995,
in which to respond to the complaint.

This request for extension is prompted by the following:

1. I recently experienced eye surgery and have had difficulty in reading, and I would very much like to review certain material prior to responding.
2. I propose to obtain representation by local counsel, who has advised me that he is not available until after the holidays.
3. The late delivery of the documents to my office as above described.

Mr. Locricchio has resorted to the use of your agency to further his own designs in certain matters before the Federal District Court in Honolulu. I feel compelled to respond to the complaint. Your granting me of the requested extension would be most gratefully appreciated.

Very truly yours,


George S. W. Hong

GSWH:mmm

Dec 19 12 45 PM '94

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

97043793504



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 20, 1994

George S. W. Hong
Hong Iwai Hulbert & Kawano
1001 Bishop Street, Suite 2200
Honolulu, HI 96813

RE: MUR 4150

Dear Mr. Hong:

This is in response to your letter dated December 13, 1994, requesting an extension until January 31, 1995 to respond to the complaint.

Considering the Federal Election Commission's responsibilities to act expeditiously in the conduct of investigations, the Office of the General Counsel cannot grant your full request, but can only agree to a 30 day extension. Accordingly, the response is due by close of business on January 26, 1995.

If you have any questions, please contact Alva E. Smith at (202) 219-3500.

Sincerely,

Mary L. Taksar (YES)
Mary L. Taksar, Attorney
Central Enforcement Docket

97043793505

DAVID F. FASI, Esq.
2054 Makiki Street
Honolulu, Hawaii 96822
(808) 521-1031

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

Dec 21 12 17 PM '94

December 14, 1994

General Counsel's Office
Mary L. Taskar
Central Enforcement Docket
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Dear Ms. Taskar,

This is in response to the complaint filed with the Federal Election Commission you have numbered MUR 4150.

In his letter of October 31, 1994, to Mr. D. L. McDonald, Mr. Anthony Locricchio, Esq., alleges a violation of federal election law because the Friends For Fasi campaign committee accepted foreign contributions in 1987. Mr. Locricchio acknowledges, however, that the checks were returned in 1988 by the Friends For Fasi campaign. The complaint goes on to state that a \$10,000.00 (Ten Thousand Dollars) check given as an honorarium to Mr. Frank Fasi was somehow illegal, even though the check has never been cashed and is currently worthless. The complaint also alleges, through a sworn affidavit of one Mr. Robert Carter, that the \$22,000.00 (Twenty-Two Thousand Dollars) in checks from other foreign contributors which Friends For Fasi had returned was somehow returned in cash to Friends For Fasi.

Regarding the foreign contributions, it should be noted that Mr. Fasi was the first person in Hawaii to "blow the whistle" on foreign contributions, contrary to Mr. Locricchio's statements to the Hawaii press that he was responsible for bringing the matter to the public's attention. After reading an article that the F.E.C. law against foreign contributions applied to state and local election campaigns, as well as federal election campaigns, Mr. Fasi instructed his attorneys to research the matter. At Mr. Fasi's attorneys' recommendation, an effort was made to return all campaign contributions that could be ascertained as coming from foreigners. This was done. As you now are fully aware, it has been a longstanding belief in Hawaii that foreign contributions were legal. In fact, other Hawaii politicians, most notably former Governor John Waihee and Governor Ben Cayetano, have maintained that foreign contributions are in fact legal and did not return their foreign contributions until a few months ago when the F.E.C. so ordered.

97043793506

It is important to note that the only "punishment" handed down by the F.E.C. to the dozens of Hawaii politicians who accepted foreign contributions was a requirement that the contributions be returned. Friends For Fasi did this six years ago on its own volition.

The allegation regarding the \$10,000.00 (Ten Thousand Dollars) check made out to Charles Fasi and the letter from Mr. Isamu Yamaguchi to then-Mayor Fasi is also without merit. First, and foremost, the check was never cashed. No money was ever received by Mr. Fasi. Mr. Fasi had helped out the E.C.C. Foreign Language Schools for sixteen years, posing with the annual winners of the school's English-speaking contest. After learning that E.C.C. Schools were not allowed to give contributions to Mr. Fasi's campaign, Mr. Yamaguchi implored Mr. Fasi to accept a "token of friendship", an honorarium. In order not to offend his gracious Japanese friend, Mr. Fasi accepted a check made out to Charles Fasi. Mr. Fasi had no intention of cashing the check, and he still possesses the now worthless, original check in his correspondence files. Second, such a gift, or "token of friendship" if you will, even if it were cashed does not violate any federal or state laws that I am aware of. Perhaps Mr. Locricchio could state which federal law has been broken.

Finally, there is the affidavit of Mr. Robert Carter stating that he was told by Mr. Masanori Kobayashi, then-President of Royal Hawaiian Country Club, that foreign funds were given to Friends For Fasi in cash after the foreign contributions were returned by Friends For Fasi. Mr. Carter states that Mr. Mitsumori Inoue, the then-accountant for Royal Hawaiian Country Club and Y. Y. Valley Corporation, confirmed this story. I have been told that both Mr. Inoue and Mr. Kobayashi have vehemently denied this allegation. And Friends For Fasi also vehemently denies ever receiving a cash contribution from any foreigners.

Why would Mr. Carter sign such an affidavit? I can't say for sure. You should be aware, however, that Mr. Carter was a named defendant in a RICO action filed by Mr. Locricchio against Frank Fasi, and Y. Y. Valley Corporation and its owners. Royal Hawaiian Country Club had been paying Mr. Carter's legal fees until some months ago when it refused further payment. Mr. Carter was then faced with paying out of his own pocket over \$100,000.00 (One Hundred Thousand Dollars) to defend himself in the RICO case. Mr. Locricchio has publicly stated that he entered into an agreement with Mr. Carter, where by Mr. Locricchio would drop Mr. Carter from the case in exchange for this affidavit and other considerations. The affidavit seems to have been prepared in Mr. Locricchio's office, with his wife, Barbara Locricchio notarizing the worthless affidavit, which is full of hearsay.

97043793507

You also now have the very reason, in my opinion, that Mr. Locricchio filed this complaint. Why else would he try to initiate a complaint about foreign contributions which were returned over six years ago? Or about an uncashed \$10,000.00 (Ten Thousand Dollars) honorarium check which is currently worthless? The answer lies in his RICO action. He has already lost every one of his cases on the State level relating to Royal Hawaiian Country Club and Y. Y. Valley Corporation, and he has appealed to the Hawaii State Supreme Court. Mr. Locricchio is now litigating in federal court a case which is the oldest on Hawaii's federal docket. In his complaint before you, Mr. Locricchio has not one piece of hard evidence to back up his claims (similar to his RICO case). He is frustrated beyond belief and has resorted to attempting to enlist both your staff and the staff of the Hawaii Campaign Spending Commission to do his discovery for him.

We respectfully request that you dismiss this complaint outright. It is clear from Mr. Locricchio's own complaint that no federal laws have been broken, and it is abundantly clear that he has absolutely no hard evidence to back up his preposterous claims. It is time to send a message to Mr. Locricchio that the F.E.C. will not be a party to his personal vendetta against the Honorable Frank Fasi, and will not use its scarce resources to conduct discovery on Mr. Locricchio's behalf for his RICO action.

Warm personal regards.

Sincerely,



DAVID F. FASI, Esq.
Attorney for FRIENDS FOR FASI and
FRANK FASI

97043793508

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

LAW OFFICES

DAVIS & LEVIN

DEC 27 10 09 AM '94

10 MARIN STREET

MERCHANT SQUARE

HONOLULU, HAWAII 96817

MARK S. DAVIS*

STANLEY E. LEVIN*

MICHAEL H. LIVINGSTON*

THOMAS R. GRANDE*

*A LAW CORPORATION

TELEPHONE (808) 524-7800

FAX (808) 545-7802

COMPUERVE 73767,1511

CABLE JUSTICE

NEIGHBOR ISLANDS

MAUI: 877-7800

KAUAI: 245-8100

HAWAII: 328-3200

December 20, 1994

Mary L. Taksar, Esq.
Central Enforcement Docket
Federal Election Commission
Washington, D.C. 20463

Re: MUR 4150

Dear Ms. Taksar:

Enclosed please find the "Statement of Designation of Counsel" executed by Masanori Kobayashi, naming our firm as his counsel in connection with MUR 4150.

Please note that your letter of December 5, 1994, enclosing a copy of the Complaint in MUR 4150, was sent to the wrong address for Mr. Kobayashi. Mr. Kobayashi has not been the President of Royal Hawaiian Country Club for a number of years, and does not receive mail at the Aulua Road address for RHCC. All future communications with respect to MUR 4150 should be directed to my attention at this law firm.

Please note that Mr. Kobayashi did not receive your letter of December 5, 1994 until December 14, 1994, after it had been forwarded to him from RHCC on December 12, 1994. I have enclosed a photo copy of the transmittal envelope from RHCC.

The Letter of Complaint from Mr. Locricchio that gave rise to MUR 4150 does not even purport to state a claim against Mr. Kobayashi for violation of the Federal Election Campaign Act of 1971. Indeed, the first sentence of Mr. Locricchio's Letter of Complaint references alleged violations of federal campaign spending laws "by Frank F. Fasi ex-Mayor of Honolulu and two foreign contributors." Mr. Kobayashi is clearly not one of the two foreign contributors referenced by Mr. Locricchio. Put simply, there is nothing whatsoever in Mr. Locricchio's Letter of Complaint - and certainly not a shred of competent, cognizable evidence - to suggest that Mr. Kobayashi committed a violation of the Federal Election Campaign Act of 1971. In light of the fact that Mr. Locricchio's Letter of Complaint contains neither a claim against Mr. Kobayashi or any factual allegations that would support a claim against Mr. Kobayashi, we believe that Mr. Kobayashi was improperly identified as a respondent. We therefore respectfully request that

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DAVIS & LEVIN

Mary L. Taksar, Esq.
December 20, 1994
Page 2

Mr. Kobayashi be dismissed immediately from further proceedings involving MUR 4150.

9704379351C
In the event that the Office of General Counsel concludes that it is necessary and proper to make an initial report to the Commission with respect to Mr. Kobayashi, we believe that this report should recommend that the Commission find no reason to believe that the Complaint sets forth a possible violation of the Act by Mr. Kobayashi and, accordingly, that the Commission close the file in the matter. As you should be aware, Mr. Locricchio previously submitted a Complaint against Mr. Kobayashi that gave rise to Consolidated MUR 2892. Based on its investigation in connection with MUR 2892, the Federal Election Commission found that the allegations against Mr. Kobayashi were "not substantiated/not worth pursuing." Mr. Locricchio's Letter of Complaint on which MUR 4150 is based contains no new or different factual allegations against Mr. Kobayashi beyond those contained in MUR 2892. Indeed, Mr. Locricchio's Letter of Complaint is nothing more than an attempt to resurrect MUR 2892. Mr. Locricchio bases this attempt solely on the Affidavit of Robert Carter, attached to his Letter of Complaint. Mr. Carter's Affidavit was generated as part of a settlement agreement between Mr. Locricchio's clients and Robert Carter, in which Mr. Locricchio's clients released RICO claims against Carter involving allegations of bribery, robbery, and extortion, and damages claims of over \$50,000,000. Every allegation in Mr. Carter's Affidavit that is relevant to MUR 4150 is naked hearsay. Mr. Carter has not been deposed or otherwise cross-examined with respect to the allegations set forth in his Affidavit. Mr. Locricchio has not provided any evidence to support the hearsay representations contained in Mr. Carter's Affidavit.

Even if the Office of General Counsel considers the patently incompetent hearsay allegations contained in Mr. Carter's Affidavit, which it should not, they do not support a claim that Mr. Kobayashi violated the Federal Election Campaign Act of 1971. Specifically, there is no allegation or factual basis for an allegation that Mr. Kobayashi authorized, participated in, made, or ratified any cash payment to Mr. Fasi. And, as a preliminary matter, there is clearly no cognizable or competent evidence that any cash payment was ever made.

In short, Mr. Locricchio's Letter of Complaint and attached exhibits provide no competent, cognizable evidence whatsoever that a cash payment was ever made to Mr. Fasi by RHCC or anyone associated with RHCC. Moreover, Mr. Locricchio's Letter of Complaint does not even contain an unsupported allegation that Mr. Kobayashi participated, directly or indirectly, in making the alleged cash payment. Mr. Locricchio has invited the Federal Election Commission to embark on a witch hunt based solely on

LAW OFFICES

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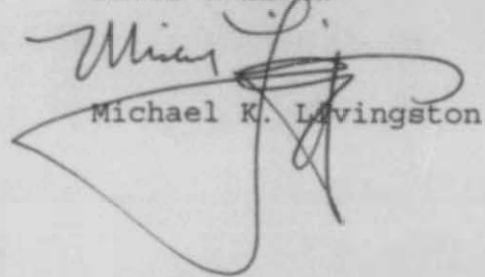
Mary L. Taksar, Esq.
December 20, 1994
Page 3

inherently suspect and utterly uncorroborated hearsay. He has also invited the Commission, through its attorneys, to use the threat of criminal prosecution against Mr. Kobayashi for the purpose of gaining an advantage in a civil matter. We respectfully submit that the Commission should decline Mr. Locricchio's invitations. Yet even if the Commission decides to investigate Mr. Locricchio's baseless allegations, it is clear that Mr. Kobayashi should not remain as a respondent or target of that investigation.

Thank you for your consideration.

Sincerely,

DAVIS & LEVIN


Michael K. Livingston

MKL:pmr
Enclosures

97043793511

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
Dec 27 10 10 AM '94

MUR 4150
NAME OF COUNSEL: DAVIS & LEVIN
ADDRESS: Michael K. Livingston, Esq.
10 Marin Street
Honolulu, Hawaii 96817
TELEPHONE: (808) 524-7500

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.

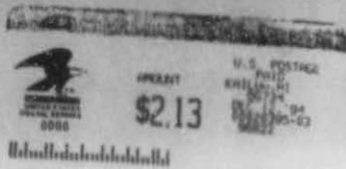
12-19-94
Date

Masanori Kobayashi
Signature

RESPONDENT'S NAME: Masanori Kobayashi
ADDRESS: 1525 Wilder #703
Honolulu, Hawaii 96822
HOME PHONE: (808) 946-6020
BUSINESS PHONE: (808) 847-3981

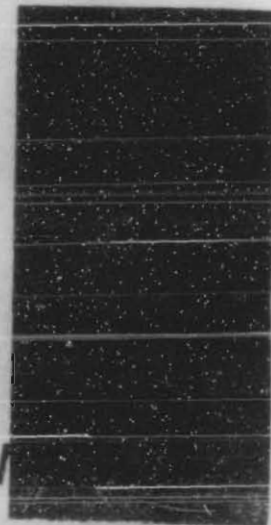
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97043793513



750 ASS

MR. MASANORI KOBAYASHI
1525 WILDER AVE.
#703
HONOLULU, HI 96822



Royal Hawaiian Count

Law Office of
William W. Milks
Attorney at Law

Grosvenor Center Suite 1800
733 Bishop Street
Honolulu Hawaii 96813
Tel: (808) 526-3923
Fax: (808) 523-2088

December 20, 1994

Mary L. Taksar, Esq.
Central Enforcement Docket
Federal Election Commission
Washington, D.C. 20463

Subject: Docket MUR 4150

Dear Ms. Taksar:

I am an attorney for Y. Y. Valley Corporation ("YYVC"), I have received from the staff of YYVC the initiating documents in a matter recently commenced by your Commission (Docket MUR 4150).

The presiding officer of YYVC is in Japan and is anticipated to return to Hawaii sometime the last week in December, 1994.

I request an extension of time until January 15, 1995, to allow me time to discuss this matter with Mr. Takeoka, president, YYVC, and to prepare a response to your inquiries.

For your information, previous complaints regarding the same matter were filed with the Commission, and were presumably resolved by conciliation agreements dated earlier this year. Substantial amounts of money had already been paid in furtherance of those conciliation agreements. My initial impression is that if matters as described in Docket MUR 4150 are to be pursued by the Commission, that the conciliation agreements be set aside and monies be refunded to my client.

I would appreciate your discussing this particular point with your colleague, Mark Allen, Esq., of the Commission, to ensure there be no misunderstandings as to (a) the scope of this investigation, (b) the scope of the prior investigations, and (c) how best to resolve any possible overlaps of the proceedings.

Dec 27 10 13 AM '94

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COUNSEL

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Mary L. Taksar, Esq.
Central Enforcement Docket
Federal Election Commission
December 20, 1994
Page 2

If I could have your written response prior to January 15, 1995, it not only would be appreciated but it could also expedite and make more efficient the entire investigatory phases of the present proceeding.

Very truly yours,



William W. Milks
Counsel for Y. Y. Valley
Corporation

WWM:akg

cc: Kazuhiko Takeoka

97043793515



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 9, 1995

William W. Milks, Esq.
Grosvenor Center, Makai Tower
733 Bishop Street, Suite 1800
Honolulu, HI 96813

RE: MUR 4150
Y.Y. Valley Corporation

Dear Mr. Milks:

This is in response to your letter dated December 20, 1995, requesting an extension until January 15, 1995, to respond to the complaint filed in the above-noted matter. After considering the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on January 15, 1995.

If you have any questions, please contact Alva E. Smith at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

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RECEIVED
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COMMISSION
OFFICE OF GENERAL
COUNSEL

DEC 27 10 23 AM '94

Mitsunori Inoue
1420 Victoria Street #1404
Honolulu, Hawaii 96822

December 19, 1994

Alva E. Smith
Federal Election Commission
999 E Street Northwest
Washington, DC. 20463

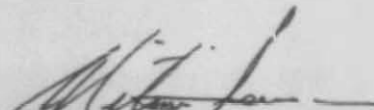
Dear Ms. Smith:

I would like to ask for an extension in responding to a complaint that you received, (reference number MUR 4150). As I have already discussed with you over the phone, I had not received the letter and documents until a few days ago. The documents were sent to my former workplace and subsequently forwarded to me.

In addition, my legal council is out of town and will not be back until mid-January. For these reasons, I would like to ask for an extension until the end of January to respond to the complaint that was filed.

Thank you for your consideration in this matter. Please feel free to contact me at my residence if there are further questions or problems. My phone number is (808) 524-0382.

Sincerely Yours,


Mitsunori Inoue

MI:csi

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 29, 1994

Mitsunori Inoue
1420 Victoria Street, #1404
Honolulu, HI 96822

RE: MUR 4150

Dear Mr. Inoue:

This is in response to your letter dated December 19, 1994, requesting an extension until January 30, 1995, to respond to the complaint filed in the above-noted matter. After considering the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on January 30, 1995.

If you have any questions, please contact Alva E. Smith at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

97043793518



ROYAL HAWAIIAN C.C.

ROYAL HAWAIIAN COUNTRY CLUB, INC.

December 21, 1994

Alva E. Smith, Esq.
Federal Election Commission
Office of General Election Counsel
999 E. Street, N.W.
Washington, D.C. 20463

Re: MUR 4150

Dear Ms. Smith:

On December 8, 1994 the Y.Y. Valley Corporation ("YYVC") received your letter dated December 5, 1994 with its enclosures, including the complaint against YYVC and others.

YYVC hereby requests an extension of 60 days from the date of this letter to demonstrate that no action should be taken against YYVC. An extension of that length of time is necessary because (1) YYVC has not yet been able to retain attorneys to represent it in this matter, and (2) most, if not all, of the factual evidence to support YYVC must be obtained from persons who reside in Japan or persons who no longer are associated with YYVC.

Please note that your office sent three copies of your letter and enclosures to Yoshinori "Ken" Hayashida, Masanori Kobayashi, and Mitsunori Inoue, in care of YYVC. Those individuals no longer are associated with YYVC and its subsidiary, the Royal Hawaiian Country Club ("RHCC"); therefore, please send their materials to them directly. Neither YYVC nor RHCC will be responsible for assuring that those individuals receive any of the Federal Election Commission's materials sent to them in care of the corporations.

Very truly yours,

Y.Y. Valley Corporation

BY Kazuhisa Okuda

ITS Director Secretary Treasurer

KO:cg

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
DEC 28 10 00 AM '94

97043793519

ECC Foreign Language Institute
General Headquarters
2-1-1 Nakazaki-nishi, Kita-ku
Osaka 530, Japan

JAN 3 12 44 PM '95

December 25, 1994

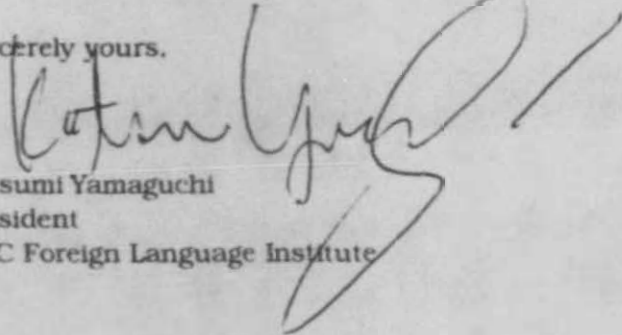
Miss Mary L. Taksar
Attorney
Central Enforcement Docket
Federal Election Commission
Washington, D. C. 20463

Dear Miss Taksar:

This is to respond to the letter about 'MUR 4150' dated December 5, 1994, which we received on December 13. Mr. Isamu Yamaguchi, ex-President of ECC, passed away in March 1993 and I would like to inform you that it is difficult for me, Katsumi Yamaguchi, current President of ECC, to describe precisely what took place regarding such matters.

However, I believe that the US\$10,000 dollar-check was meant as a sign of thank-you to Mr. Fast; he signed certificates and spoke to the Mayor of Honolulu All Japan ECC Oratorical Contest winners for the past twenty four years. I would like to add that Mr. Yamaguchi, the founder of the ECC Save-the-Earth-Campaign, contributed to various institutions and people who suffered from natural disasters all over the world. I have enclosed the history of the ECC Save-the-Earth-Campaign for your information.

Sincerely yours,


Katsumi Yamaguchi
President
ECC Foreign Language Institute

CC: Alva E. Smith

Enclosure: The ECC Save-the-Earth-Campaign Information

9704379352C

Think How Fortunate We Are

Could we imagine today's Japan at the end of World War II? Today, Japan enjoys not only a democratic system of government but also one of the world's highest levels of prosperity. As we think back on that devastated land of ours at the end of the war and on our present affluence, we cannot help but feel obliged to do something for those who are suffering in other parts of the world today. Japan is what it is today because of the generosity of the United States of America and the immeasurable amount of material assistance she gave us following the war. Today, Japan, both its people and its government, must heed the call to help all those who need our help all over the world.

We must continuously strive to solve the three great human tragedies of war, poverty, and illness.

War, poverty, and illness are the three greatest human tragedies. In this day of advanced technology, it would seem quite possible to create a paradise on this earth free from these tragedies, if everyone in the world put aside just 1% of his or her annual income. In order to prevent wars and bring about world peace, it is essential to try to solve the two tragedies of poverty and illness simultaneously.

We, as private citizens, must try to make our continuous efforts in order to attain happiness for the human race.

97043793521

We will do our best to support war refugees

In Bosnia-Herzegovina, where they say "the greatest refugee crisis in postwar Europe" is happening, fighting has continued between ethnic groups for two years, producing a large number of victims and refugees. At least 50 percent of the over 3,000,000 refugees are children under 15 years old. Many suffer from malnutrition, while women and the aged live in underground shelters with very little food. In today's Bosnia-Herzegovina, food, clothes, medicine, vaccine, etc. are urgently needed.

In Cambodia, 200 to 250 people are hurt each month by land-mines that have been buried over the past 20 years. About half of the population are children under 16 years old and they suffer from various medical problems such as diarrhea (a leading cause of children's death), intestinal diseases, infection of the respiratory organs, malaria, tuberculosis, etc. HIV carriers and AIDS patients are also increasing rapidly.

In Somalia, about 7 million people, which is 80 percent of the total population, are seriously in need of food. In central and southern Somalia, in particular, one million children are suffering from malnutrition and are facing death.

In addition to the above areas, it is said there is fighting going on in as many as 50 areas of the world. It is quite unknown how long such fighting will go on, wasting lives, time and money. However we at ECC will keep extending our support to people in need through the Save-the-Earth Campaign, '94.

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*Group "Chernobyl-Chubu" and ECC believe that
the best way to assist the victims of the Chernobyl nuclear
accident is by providing assistance to medical doctors.*

We began, in 1991, conducting a campaign to help the victims of the nuclear power plant accident in the Republic of Ukraine. We were very impressed when we read in Nagoya's *Chubu Shimbun* about the practical support activities of Group "Chernobyl-Chubu," and we want to extend our heartfelt thanks to them.

ECC began a campaign to assist medical doctors when a UN report disclosed that there were 4.8 million Chernobyl victims in the Chernobyl district and its neighboring republics including the Ukraine. When we learned of the wonderful activities of Group "Chernobyl-Chubu," represented by Ms. Michiko Hasegawa, we came to believe that it would be best if ECC were to lend its support to Group "Chernobyl-Chubu" as one of its associated members. Group "Chernobyl-Chubu" was able to invite three medical doctors from the Republic of Ukraine to come to Japan for their research work on June 16th, 1992. We believe that this was the first step in medical training that is most effective in treating the victims there. We will continue our support activities by way of providing funds for medical training and equipment, and for milk and other daily necessities.

We will continue our campaign praying that the Chernobyl victims will soon be able to recover their strength.

97043793523

ECC Major Donations to Charitable Causes
(over the past 26 years)

Group	Total Donation to Date
(Since 1969)	
The Fund for Welfare Culture, Asahi Newspaper, Osaka	¥15,536,600
(Since 1970)	
Hiroshima A-bomb Victims.....	¥ 6,300,000
East Pakistan Disaster Organization.....	¥ 500,000
(Since 1974)	
Ioshoen Orphanage.....	¥ 1,610,838
included(meat about 20kg+vegetables about 450kg Total: ¥115,528)	
Osaka Cancer Society.....	¥ 1,800,000
Thalidomide Association.....	¥ 1,700,000
Japan Light House Association.....	¥ 1,950,000
(1976)	
Turkey Earthquake Victims.....	¥ 1,000,000
clothes: 6,000 items	
(1978)	
Izu Oshima Earthquake Victims.....	clothes: 5,413 items
Pacific Rehabilitation Hospital, Honolulu	
Through Mayor Frank F. Fasi.....	¥ 2,140,000
(1980)	
The People of the Republic of Zambia	
For use by Zambian students to ride to school 100 bicycles...	¥ 3,000,000
(Since 1981)	
The People of the Republic of Zambia.....	¥14,695,500
Japan Committee for UNICEF.....	¥64,683,083
Brazil.....	¥ 200,000
(Since 1982)	
To the families and relatives of Taiwanese who were forcibly	
drafted into the Japanese Imperial Army and either killed	
or injured in action during World War II.....	¥ 2,600,114
Caritas Japan.....	¥ 3,400,114
Nagasaki Flood Victims' Fund.....	¥ 500,000
included(televisions to Kindergartens ¥200,000)	
Japanese Committee to support the MANABIKA of Bangladesh.....	¥ 4,772,000
clothes: 2,000 items	
(Since 1983)	
The Defense of Green Earth Foundation.....	¥61,644,026
Osaka Prefectural Greening Organization.....	¥ 1,900,000
Bagio Citizens Relief Fund (Philippines).....	¥ 2,200,000
clothes: 5,000 items	
Miyakejima Volcanic Eruption Victims.....	¥ 980,000
included (worth of food ¥480,000)	
Pacific Rehabilitation Hospital, Honolulu	
Through Mayor Eileen Anderson	¥ 2,240,000
(Since 1984)	
Pacific Rehabilitation Hospital, Honolulu	
At the direct request of the hospital.....	¥ 2,240,000
(1985)	
The People of Ethiopia	¥ 2,456,000
Mexico Earthquake Victims.....	¥ 1,000,000
(Since 1986)	
Pacific Rehabilitation Hospital, Honolulu	
Through Mayor Frank F. Fasi.....	¥ 2,240,000
The People of the Republic of Zambia	
To the National Trust Fund for Disabled Children	
and Youth Education in Zambia.....	¥ 525,000

Group

Total Donation
to Date

JOICEP (Japan Organization for International Cooperation in Family Planning, Inc.)	¥17,716,058
Mihara Volcanic Eruption Victims	¥ 1,000,000
El Salvador Earthquake Victims	¥ 1,000,000
(Since 1987)	
The Research Institute for Microbial Diseases, Osaka University	¥38,418,558
Association of SAHEL	¥ 2,100,000
Osaka Prefectural Welfare Center for the Blind	¥ 400,000
Voluntary Organization for Saving Misa's Life	¥ 500,000
Chilean Earthquake Victims	¥ 1,000,000
Association to Aid the Refugees	¥ 3,500,000
Osaka Hansen Kyouryokukai	¥ 13,000
(Since 1988)	
The Vocational Aid Center of Part-time Job Placement Organizations	¥ 1,000,000
Kobe Yusei-en	¥ 400,000
NICCO (A Private Organization for Promoting International Cooperation)	¥ 500,000
Bangladesh Flood Victims	¥ 5,000,000
Nakatsu Gakuen, a Cooperation for Social Welfare	¥ 515,528
included(meat about 20kg vegetables about 450kg Total)	¥115,528)
Nishinomiya City Reforestation Fund	¥ 300,000
Nihon-sekijujisha (the Red Cross Society in Japan)	¥ 60,000
Armenian Earthquake Victims	¥ 4,000,000
The People of the Republic of Zambia	
Donation of a television camera and its accessories to Zambia National Television	¥ 4,000,000
(Since 1989)	
Armenian Earthquake Victims	¥ 6,297,500
Institute for Virus Research, Kyoto University	¥28,000,000
San Francisco Earthquake Victims	¥ 500,000
Osaka Suijo Rimpō-kan (an orphanage)	¥ 100,000
Todomatsu-en (A Cooperation for Social Welfare)	¥ 615,528
included(meat about 20kg vegetables about 450kg Total)	¥115,528)
kibo-no-sono (A Cooperation for Social Welfare)	¥ 500,000
Hifumi-en (A Cooperation for Social Welfare)	¥ 1,115,528
included(meat about 20kg vegetables about 450kg Total)	¥115,528)
(Since 1990)	
Voluntary Organization for Saving Miku's life	¥ 500,000
Assistance to those suffering from the Chernobyl nuclear power plant accident	¥ 2,000,000
Assistance to Iranian Earthquake Victims	¥ 2,000,000
Assistance to Earthquake Victims in the Philippines	¥ 1,000,000
24-hour Telethon (Love Saves the Earth)	¥ 1,000,000
Red Feather Community Fund (Akaihane)	¥ 12,500
Association to Assist Ken-ichi Kouyama	¥ 2,500,000
Saint Dominica Mission (Manila)	¥ 500,000
Kenya Youth Friendship Club	¥ 500,000
Association to Assist Fukushima (a blind and deaf person from Fukushima who attends Tokyo Prefectural University Graduate School hoping to be a teacher in the future)	¥ 1,700,000
(Since 1991)	
A Zambian scholar at the University of Birmingham who studies physically handicapped Zambian Children	¥ 195,000
The 1st Food Relief Programs to the Republics of Vladivostok	¥ 6,195,930
The 2nd Food Relief Programs to the Republics of Khabarovsk	¥ 3,245,489
Hematology and Oncology, Osaka University Medical School (The Research Institute for Microbial Diseases, Osaka University) (Leukemia research)	¥16,000,000

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Group

Total Donation
to Date

Japan Clothes Relief Center.....	clothes: 400 items
The 3rd Food Relief Program(Food and 54,000 syringes to Moscow).....	¥ 9,473,469
Japan-Russia Association	¥ 502,000
(Since 1992)	
To help salvage the central part of the Chernobyl nuclear reactor..	¥ 7,000,000
Yuki Kudo (who sends children's books to orphans in Thailand and Bangladesh).....	¥ 500,000
Unzen Relief Headquarters.....	¥ 1,000,000
Support of Kazuya Hashikawa (a child to be sent to England for heart surgery).....	¥ 500,000
American Red Cross (Relief Fund for Los Angeles Flood Victims).....	¥ 3,000,000
A voluntary organization to support Chika (who is to undergo a liver-transplant operation in Australia).....	¥ 200,000
10-dollar Campaign (10-dollar campaign among Japanese Americans in the United States for work to promote U.S.A. Japan friendship).....	¥ 1,333,500
The 4th Relief Fund for Food and Medicine (112,600 syringes to Moscow and St. Petersburg).....	¥ 1,351,772
The 5th Relief Fund for Food and Medicine.....	¥ 3,000,000
Fund for Educational and Research Activities at Osaka University, through the Osaka University Committee.....	¥ 500,000
Kyoto Light House for improving the enviroment for the Blind.....	¥ 100,000
(Since 1993)	
Nakata Atsuhito Memorial Fundation.....	¥ 1,000,000
Masato Kudo (for an orphanage in Spain).....	¥ 81,000
Japan Red Cross	
¥ For earthquake victims in Hokkaido.....	¥ 1,000,000
¥ For flood victims in Kagoshima.....	¥ 1,000,000
¥ For earthquake victims in India.....	¥ 1,000,000
The Republic of Zambia (for the families of national soccer team members who were killed in the airplane accident).....	¥ 500,000
Nami-no-kai (for a leukemia patient, Nami).....	¥ 3,220,776
SESCO Association to provide schools for the world's children (for children in the Republic of Ghana)	¥ 100,000
(Since 1994)	
Japan Red Cross	
¥ For earthquake victims in L.A.....	¥ 500,000
¥ For earthquake victims in Indonesia.....	¥ 100,000
¥ For earthquake victims in Colombia.....	¥ 300,000
Seibi-fukushi-center.....	¥ 900,000
Tennou-fukushikai.....	¥ 100,000
The Medical Center for Adult Diseases, Osaka Department of Cardiology.....	¥ 2,000,000
Green Program 21.....	¥ 300,000
UNHCR (for Refugees of Rwanda).....	¥ 1,000,000

TOTAL ¥402,276,411

(as of August 31, 1994)

97043793526

LAW OFFICES
DAVIS & LEVIN
10 MARIN STREET
MERCHANT SQUARE
HONOLULU, HAWAII 96817

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

JAN 4 12 16 PM '95

MARK S. DAVIS*
STANLEY E. LEVIN*
MICHAEL R. LIVINGSTON*
THOMAS R. GRANDE*
*A LAW CORPORATION

TELEPHONE (808) 524-7500
FAX (808) 545-7502
COMPUSEVE 73767.1511
CABLE JUSTICE
NEIGHBOR ISLANDS
MAUI: 577-7500
KAUAI: 245-8100
HAWAII: 328-3200

December 29, 1994

Mary L. Taksar, Attorney
Central Enforcement Docket
Federal Election Commission
Washington, D.C. 20463

Re: Yoshinori "Ken" Hayashida
Your File: MUR 4150

Dear Ms. Taksar:

Enclosed please find the "Statement of Designation of Counsel" executed by Yoshinori "Ken" Hayashida, naming our firm as his counsel in connection with MUR 4150.

Please note that your letter of December 5, 1994, enclosing a copy of Mr. Locricchio's Supplemental Complaint to the Hawaii State Campaign Spending Commission (dated December 5, 1994), was sent to the wrong address for Mr. Hayashida. Mr. Hayashida has not been associated with the Y.Y. Valley Corporation for a number of years, and does not receive mail at the Post Office Box address to which your letter was sent. All future communications with respect to MUR 4150 should be directed to my attention at this law firm.

Please note that Mr. Hayashida did not receive your letter of December 5, 1994 until December 15, 1994, after it had been forwarded to him from the Royal Hawaiian Country Club on December 12, 1994. I have enclosed a photocopy of the forwarding envelope from the Royal Hawaiian Country Club.

As you may be aware, our firm also represents Masanori Kobayashi in connection with MUR 4150. We also represent both Mr. Kobayashi and Mr. Hayashida in connection with their defense to a civil RICO lawsuit filed against them and others by the Complainant in MUR 4150, Anthony Locricchio. This civil RICO lawsuit is scheduled to go to trial in Hawaii's Federal District Court in mid-March, 1995. Without question, Mr. Locricchio's Letters of Complaint that have given rise to MUR 4150 were made for the purpose of gaining an advantage in that lawsuit.

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DAVIS & LEVIN

Mary L. Taksar
December 29, 1994
Page 2

I am somewhat confused by the fact that the Letter of Complaint from Mr. Locricchio that was enclosed with your letter to Mr. Hayashida was a letter dated December 5, 1994, addressed to Mr. Robert Y. Watada, Chairman of the State of Hawaii Campaign Spending Commission. By contrast, the Letter of Complaint enclosed with your letter to Mr. Kobayashi was a letter dated October 31, 1994, addressed Mr. D.L. McDonald and Mr. Lawrence M. Nobel of the Federal Election Commission. The two Letters of Complaint are quite different. I will respond to Mr. Locricchio's allegations as set forth in his letter of December 5, 1994, to Mr. Watada of the Hawaii Campaign Spending Commission, because this was the letter enclosed with your letter to Mr. Hayashida.

Mr. Locricchio's Letter of Complaint to Mr. Watada is styled as a "supplementary complaint" which purports to add an "addendum" to "name the following individuals and corporations who were instrumental in the illegal contributions referred to in our first complaint." One of the individuals named is Mr. Hayashida. Mr. Locricchio's Letter of Complaint contains a single paragraph purporting to describe Mr. Hayashida's involvement in the allegedly illegal contributions referred to in Mr. Locricchio's first complaint. It is critical to note that the entire factual basis for Mr. Locricchio's "supplemental complaint" against Mr. Hayashida is the affidavit that Mr. Hayashida submitted to the Federal Election Commission. It could not be more obvious, therefore, that Mr. Locricchio's Letter of Complaint to the Hawaii Campaign Spending Commission contains nothing that was not known to the Federal Election Commission when it made its determination in connection with consolidated MUR 2892 that the allegations against Mr. Hayashida were "not substantiated/not worth pursuing."

In short, to the extent that Mr. Locricchio's Letter of Complaint even states a claim against Mr. Hayashida for violation of the Federal Election Campaign Act of 1971, it is a claim that has already been fully investigated and resolved by the Commission as consolidated MUR 2892. Mr. Locricchio's Letter of Complaint on which MUR 4150 is based contains no new or different factual allegations against Mr. Hayashida beyond those contained in MUR 2892. Mr. Locricchio's Letter of Complaint is an attempt to resurrect MUR 2892 in order to gain an advantage in a civil lawsuit scheduled to go to trial in Hawaii in March of 1995. There is no need, and certainly no factual basis, for the Commission to revisit its prior determination that the allegations against Mr. Hayashida are "not substantiated/not worth pursuing."

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LAW OFFICES

DAVIS & LEVIN

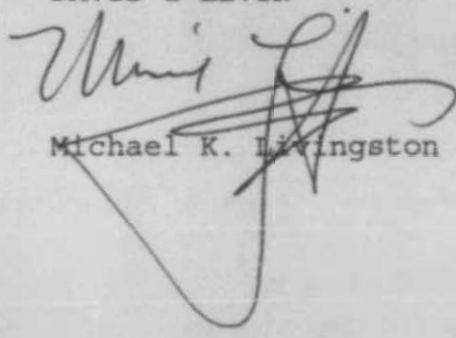
Mary L. Taksar
December 29, 1994
Page 3

For the reasons set forth above, we respectfully submit that the Commission should summarily dismiss this warmed over Complaint against Mr. Hayashida, or, in the alternative, recommend to the Commission that it find no reason to believe that the Complaint sets forth a possible violation of the Federal Election Campaign Act of 1971 by Mr. Hayashida.

Thank you for your consideration.

Sincerely,

DAVIS & LEVIN


Michael K. Livingston

MKL:pm
Enclosure

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STATEMENT OF DESIGNATION OF COUNSEL

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FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

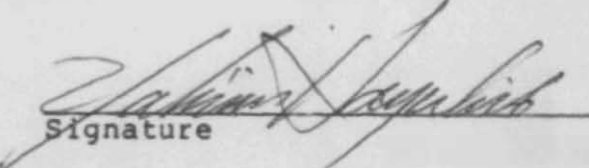
JAN 4 12 16 PM '95

MUR 4150
NAME OF COUNSEL: Davis & Levin
ADDRESS: 10 Marin Street
Honolulu, Hawaii 96817

TELEPHONE: (808) 524-7500

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.

12-29-94
Date


Signature

RESPONDENT'S NAME: Yoshinori "Ken" Hayashida
ADDRESS: 712 Paoo Street
Honolulu, Hawaii 96825

HOME PHONE: (808) 396-4808
BUSINESS PHONE: (808) 521-4711

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Law Office of
William W. Milks
Attorney at Law

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MAIL ROOM

JAN 4 11 18 AM '95

Grosvenor Center Suite 1800
733 Bishop Street
Honolulu Hawaii 96813
Tel: (808) 526-3923
Fax: (808) 523-2088

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OFFICE OF GENERAL
COUNSEL

JAN 4 12 25 PM '95

December 28, 1994

Federal Election Commission
Washington, D.C. 20463

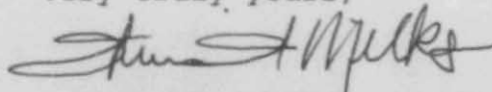
Attn: Ms. Alva E. Smith

Subject: MUR 4150

Gentlemen:

Enclosed, pursuant to your telephone request of
December 27, 1994, is the executed original of the Statement of
Designation of Counsel.

Very truly yours,



William W. Milks
Counsel for Y. Y. Valley
Corporation

WWM:akg
Enclosure

cc: Kazuhiko Takeoka

97043793531

STATEMENT OF DESIGNATION OF COUNSEL

MUR 4150

NAME OF COUNSEL: William W. Milks

ADDRESS: Grosvenor Center, Makai Tower

733 Bishop Street, Suite 1800

Honolulu, Hawaii 96813

TELEPHONE: (808) 526-3923 Fax: (808) 523-2088

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OFFICE OF GENERAL
COUNSEL
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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.

28/DEC/94
Date

Koo Tshooka
Signature

RESPONDENT'S NAME: Y. Y. Valley Corporation

ADDRESS: P. O. Box 356

Kailua, Hawaii 96734

HOME PHONE: --

BUSINESS PHONE: (808) 262-2139

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Mitsunori Inoue
1420 Victoria Street, Apt. 1404
Honolulu, Hawaii 96822

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COUNSEL

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Alva E. Smith
Federal Election Commission
999 E Street Northwest
Washington, DC 20463

Dear Ms. Smith:

Re: MUR 4150

In reference to our telephone conversation of December 29, 1994, I would like to confirm my request for the extension until January 30, 1995 which I did not indicate in my last correspondence to you dated December 19, 1994.

I also like to express my million of thanks to you for your kind and cordial assistance on the captioned matter.

Aloha and Mahalo, (Thank you very much)



Mitsunori Inoue

MI:mi

9704379333

LAW OFFICES
DAVIS & LEVIN

10 MARIN STREET
MERCHANT SQUARE
HONOLULU, HAWAII 96817

MARK S. DAVIS*

STANLEY E. LEVIN*

MICHAEL R. LIVINGSTON*

THOMAS R. GRANDE*

*A LAW CORPORATION

TELEPHONE (808) 524-7800

FAX (808) 545-7802

COMPUERVE 73767.1511

CABLE JUSTICE

NEIGHBOR ISLANDS

MAUI 877-7500

KAUAI 245-6100

HAWAII 320-3200

January 12, 1995

Mary L. Taksar, Attorney
Central Enforcement Docket
Federal Election Commission
Washington, D.C. 20463

Re: Yoshinori "Ken" Hayashida
Your File: MUR 4150

Dear Ms. Taksar:

This letter is a follow up to my telephone conversation with Ms. Alva Smith of your office on January 5, 1995. Ms. Smith advised me that your office has sent a Second Notice of Complaint regarding MUR 4150 to Mr. Hayashida at a different address and that the First Notice of Complaint transmitted to Mr. Hayashida mistakenly contained Mr. Locricchio's Supplemental Complaint to the Hawaiian State Campaign Spending Commission rather than Mr. Locricchio's letter of October 31, 1994 addressed to Messrs. McDonald and Nobel of the Federal Election Commission. Mr. Hayashida has not yet received the Second Notice of Complaint transmitted by your office. I am, however, familiar with Mr. Locricchio's letter of October 31, 1994 to the Federal Election Commission, as it was enclosed with the Notice of Complaint regarding MUR 4150 that you sent to Masanori Kobayashi on December 5, 1994. As you are aware, our firm also represents Mr. Kobayashi in connection with MUR 4150. The purpose of this letter is to respond on behalf of Mr. Hayashida to the allegations contained in Mr. Locricchio's letter of October 31, 1994 to the Federal Election Commission, as I now understand that this letter (and not Mr. Locricchio's letter to the Hawaii State Campaign Spending Commission) is the basis for the inclusion of Mr. Hayashida in the Complaint designated MUR 4150.

At the outset, I want to reiterate that Mr. Locricchio's letter of October 31, 1994 to the Federal Election Commission was made for the purpose of gaining an advantage in a Civil RICO lawsuit filed against Mr. Hayashida and others by Mr. Locricchio. It is patently obvious that Mr. Locricchio is an extremely biased complainant, and his letter of complaint and the allegations therein should be considered in this light.

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DAVIS & LEVIN

Mary L. Taksar
January 12, 1995
Page 2

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The letter of complaint from Mr. Locricchio that gave rise to MUR 4150 does not even purport to state a claim against Mr. Hayashida for violation of the Federal Election Campaign Act of 1971. Indeed, the first sentence of Mr. Locricchio's letter of complaint references alleged violations of federal campaign spending laws "by Frank F. Fasi ex-Mayor of Honolulu and two foreign contributors." Mr. Hayashida is clearly not one of the two foreign contributors referenced by Mr. Locricchio. Put simply, there is nothing whatsoever in Mr. Locricchio's letter of complaint - and certainly not a shred of competent, cognizable evidence - to suggest that Mr. Hayashida committed a violation of the Federal Election Campaign Act of 1971. In light of the fact that Mr. Locricchio's letter of complaint contains neither a claim against Mr. Hayashida nor any factual allegations that would support a claim against Mr. Hayashida, we believe that Mr. Hayashida was improperly identified as a respondent. We therefore respectfully request that Mr. Hayashida be dismissed immediately from further proceedings involving MUR 4150.

In the event that the Office of General Counsel concludes that it is necessary and proper to make an initial report to the Commission with respect to Mr. Hayashida, we believe that this report should recommend that the Commission find no reason to believe that the Complaint sets forth a possible violation of the Act by Mr. Hayashida and, accordingly, that the Commission close the file in the matter. As you should be aware, Mr. Locricchio previously submitted a Complaint against Mr. Hayashida that gave rise to Consolidated MUR 2892. Based on its investigation in connection with MUR 2892, the Federal Election Commission found that the allegations against Mr. Hayashida were "not substantiated/not worth pursuing." Mr. Locricchio's letter of complaint on which MUR 4150 is based contains no new or different factual allegations against Mr. Hayashida beyond those contained in MUR 2892. Indeed, Mr. Locricchio's letter of complaint is nothing more than an attempt to resurrect MUR 2892. Mr. Locricchio bases this attempt solely on the Affidavit of Robert Carter, attached to his letter of complaint. Mr. Carter's Affidavit was generated as part of a settlement agreement between Mr. Locricchio's clients and Robert Carter, in which Mr. Locricchio's clients released RICO claims against Carter involving allegations of bribery, robbery, and extortion, and damages claims of over \$50,000,000. Every allegation in Mr. Carter's Affidavit that is relevant to MUR 4150 is naked hearsay. Mr. Carter has not been deposed or otherwise cross-examined with respect to the allegations set forth in his Affidavit. Mr. Locricchio has not provided any evidence to support the hearsay representations contained in Mr. Carter's Affidavit.

Even if the Office of General Counsel considers the

DAVIS & LEVIN

Mary L. Taksar
January 12, 1995
Page 3

patently incompetent hearsay allegations contained in Mr. Carter's Affidavit, which it should not, these allegations do not support a claim that Mr. Hayashida violated the Federal Election Campaign Act of 1971. Specifically, there is no allegation or factual basis for an allegation that Mr. Hayashida authorized, participated in, made, or ratified any cash payment to Mr. Fasi. And, as a preliminary matter, there is clearly no cognizable or competent evidence that any cash payment was ever made.

In short, Mr. Locricchio's letter of complaint and attached exhibits provide no competent, cognizable evidence whatsoever that a cash payment was ever made to Mr. Fasi by RHCC or anyone associated with RHCC. Moreover, Mr. Locricchio's letter of complaint does not even contain an unsupported allegation that Mr. Hayashida participated, directly or indirectly, in making the alleged cash payment. Mr. Locricchio has invited the Federal Election Commission to embark on a witch hunt based solely on inherently suspect and utterly uncorroborated hearsay. He has also invited the Commission, through its attorneys, to use the threat of criminal prosecution against Mr. Hayashida for the purpose of gaining an advantage in a civil matter. We respectfully submit that the Commission should decline Mr. Locricchio's invitations. Yet even if the Commission decides to investigate Mr. Locricchio's baseless allegations, it is clear that Mr. Hayashida should not remain as a respondent or target of that investigation.

Thank you for your consideration.

Sincerely,

DAVIS & LEVIN

Michael K. Livingston

MKL:pm

97043793536

Law Office of
William W. Milks
Attorney at Law

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JAN 23 9 21 AM '95

Grosvenor Center Suite 1800
733 Bishop Street
Honolulu Hawaii 96813
Tel: (808) 526-3923
Fax: (808) 523-2088

January 17, 1995

VIA FAX: (202) 219-3923

Mary L. Taksar, Esq.
Central Enforcement Docket
Federal Election Commission
Washington, D.C. 20463

Subject: MUR 4150

Dear Ms. Taksar:

I have written previously (refer, correspondence dated December 20, 1994), regarding the above-referenced matter.

Y. Y. Valley Corporation ("YYVC") requests that no further action be taken by the Federal Election Commission ("FEC") in this matter. Several reasons, briefly summarized herein, justify terminating the investigation.

First, this matter was previously investigated and resolved by "Conciliation Agreement." Both YYVC and its subsidiary, Royal Hawaiian Country Club, Inc. ("RHCC") jointly agreed with the FEC that \$23,000.00 would be paid and the investigation would no longer be pursued by the FEC. Approximately \$20,000.00 has already been paid by YYVC and RHCC, with the remaining \$3,000.00 soon to be paid. To re-investigate would appear to be a breach of an agreement.

Secondly, both YYVC and RHCC are under new ownership and management. Of the factual allegations in the recently-filed complaint, a "new" element is that certain parties other than YYVC or RHCC had an intent to circumvent the law. The element of intent does not involve YYVC, and was not expressly excluded from the earlier investigatory proceeding. To investigate the same general matters is unfair.

Thirdly, the October 31, 1994 letter raising allegations of a possible "new" matter involves checks dated in September 1988. These transactions are more than six years old. Statutes of limitations may be applicable. Administrative expediency dictates that such matters be concluded within 3-5 years and certainly not be commenced after six years. The claims are stale and should be dismissed.

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Mary L. Taksar, Esq.
Central Enforcement Docket
Federal Election Commission
January 17, 1995
Page 2

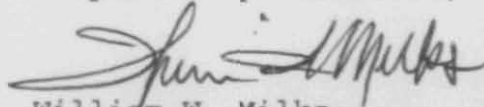
Fourthly, YYVC has new ownership and management in place. For a new management to now be called upon to defend itself against allegations of events allegedly occurring more than six years ago is highly prejudicial to YYVC.

Lastly, YYVC was prepared to strenuously argue in the early proceedings and will most definite raise as a defense in this investigation if it proceeds any further, is the Commission's lack of jurisdiction. The FEC's scope of authority is limited to matters involving federal offices candidacies, and is not so pervasive in scope as to encompass candidates for municipal, county and state offices.

Based on the foregoing, and for other good causes which later may need to be demonstrated, YYVC contends no good cause exists to investigate RHCC and YYVC.

It is respectfully suggested that the investigation cease and that the complaint be dismissed.

Respectfully submitted,



William W. Milks
Counsel for Y. Y. Valley
Corporation

WWM:akg

cc: Kazuhiko Takeoka

97043793538

HONG IWAI HULBERT & KAWANO

ATTORNEYS AT LAW
SUITE 2200, PAUAI TOWER
BISHOP SQUARE
1001 BISHOP STREET
HONOLULU, HAWAII 96813

TELEPHONE
(808) 524-4900

GEORGE S. W. HONG
DONALD K. IWAI
NEIL F. HULBERT
CAROL LEE HONG
JEFFREY C. WILK
ROY K. KAWANO
HARLAN Y. KIMURA
JOHN H. DONEGAN

January 23, 1995

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OFFICE OF GENERAL
COUNSEL
1 JAN 26 12 48 PM '95
(808) 524-5473

Federal Election Commission
999 E Street, NW
Washington, DC 20463

Attention: Ms. Alva E. Smith

Gentlemen:

Re. MUR 4150

This writing is in response to the complaint dated October 31, 1994, addressed to Mr. D. L. McDonald, Chairman of the Federal Election Commission, submitted by Anthony Locricchio and Victoria S. Creed pursuant to which the above-entitled matter was generated.

The complainants have taken great liberties in making allegations of facts -- much of which are unfounded but cleverly interspersed with actual data -- and have taken even greater liberties in stating speculative conclusions. One would expect Mr. Locricchio, as a trained lawyer, to be more careful in such regard, but his style and method are recognized and abhorred by many in the legal community in Honolulu. Mr. Locricchio has his own selfish agenda in pursuing this matter with your agency. While prima facie, it should be of legitimate concern to you, please be aware that the complaint filed with you is an obvious attempt to enhance a civil action initiated by him in the United States District Court in Honolulu, Hawaii, without any regard for the good names and reputations of people who may be innocent bystanders, but who are, nevertheless, included in his irresponsible effort. I was not a mere bystander in this matter, but his allegations and conclusions have made me appear in a much more unfavorable light than is justified or warranted by the actual facts.

In order that you may better understand my response hereinafter to the two counts contained in the complaint, I think it would be helpful if I could offer you some background on the structure and operations of the Friends for Fasi fund raising activities.

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Federal Election Commission
Page 2
January 23, 1995

1. My participation in any organized fund raising activity for Friends for Fasi terminated during the early part of 1993, and I have not since been so involved.

2. I am unable to recall when I first assumed checking-writing authority, but it would appear to be sometime in 1985 until shortly after my disassociation. There were three authorized signatories, any two of which were required on each check. In many instances blank checks were signed by any one of us with the last of the two signatories being responsible for the propriety of the disbursement when supported with proper vouchers. Excepting on one occasion hereinafter discussed, I do not recall ever having directed the payment of funds from the campaign fund. Most of the disbursements as indicated on the respective invoices were for normal and usual operating expenses of a political candidate, such as rent and salaries for the maintenance and operation of the campaign headquarters. I am not aware as to who determined the propriety of the payment, but if the voucher indicated what would be normal and usual expenses, I signed the check.

3. The organization of the fund raising activity was extremely loose. My activities were strictly as a volunteer, and I received no compensation as attorney or for any other activity. While I had the ostensible responsibility for coordinating the activities of the various fund raising committees as were from time to time organized for each campaign, I soon learned that the activity became self-operational with reasonable success and with minimal participation on my part. We would assign various members of the committee to solicit funds from named persons and organizations and set goals, but beyond that, the individuals were free to exercise their discretion as to whomever else would be solicited. To the extent that I assumed the responsibility to solicit from named persons, I did so; however, in only very few isolated instances would I expand my activities to others. Indeed, while the information was available to me, I truly did not know -- nor was concerned -- as to from whom funds were being solicited as long as solicitation was done within the Campaign Spending Laws of the State of Hawaii, i.e., the observance of the \$2,000 limitation (including imputations), reporting and record keeping. All records were prepared and maintained by staff in which I had no participation. My principal concern was the bottom line of the amounts contributed, and I had no need or disposition to examine the names of respective donors.

9704379354C

Federal Election Commission

Page 3

January 23, 1995

4. Up to the summer of 1988, I was not aware of the prohibition against contributions by foreign nationals as set forth in 2 U.S.C. § 441e. It was at such time that Mayor Fasi happened to relate to me that he had read an article in the Wall Street Journal to the effect that foreign nationals were prohibited from making contributions in the United States. Shortly thereafter Mayor Fasi held a press conference in which he revealed the existence of the prohibition as contained in the Act. My initial reaction from a cursory examination of the Act and citations was that the prohibitions applied only as to federal elections (of which I am still not completely dissuaded). In a lawyer-like manner I considered the alternatives and ramifications, and I thought the most practical and prudent course of action was to return to all foreign nationals any and all contributions. I recall suggesting to Ms. Linda Wong that she assemble the names of all foreign contributors as best as could be gleaned from home addresses and actual knowledge and to promptly arrange for the return of all such contributions. This was accomplished on or about September 1, 1988.

5. While not necessarily relevant to the complaint, but because of innuendos and unsupported conclusions presented by the complainants, I should like to explain my and my law firm's relationships with Y. Y. Valley Corporation and/or Royal Hawaiian Country Club, Inc. (herein "Y.Y."). I first met the principals of Y.Y. in the spring of 1988, and we began legal representation shortly thereafter. I had not been aware of any political contributions made by the officers and/or directors of Y.Y. to the Fasi campaign. It was only after the Mayor's press conference revealing the provisions of the Act that one of the principals advised me that political contributions in the amount of \$2,000 each by some 10 or 12 persons had been made during 1984. While I had heard of the golf course development by Y.Y., excepting on one fleeting occasion I had not met any of the principals until mid-1988. To the best of my knowledge, no solicitation was made nor received from Y.Y. for the 1988 election.

(a) Contrary to the complainants' allegation that the return of funds to the Y.Y. people were part of a cover up, the return was prompted by Mr. Fasi's press conference as above described, and on or about September 1, 1988, funds were returned to known foreign contributors, of which the principals of Y.Y. and the contributors named in Count One were only a few. While not now available to me, the foregoing should be ably demonstrated by the records of the Fasi campaign. The

97043793541

Federal Election Commission
Page 4
January 23, 1995

return of the contributions was not, as alleged by the complainants, an attempt to cover up but was, in fact, dictated by prudent and practical considerations as above described.

(b) As to Y.Y., three of the returned contributions, each in the amount of \$2,000, were dated October 17, 1988, to Royal Hawaiian Country Club, a Hawaii corporation; Masanori Kobayashi, a resident alien; and Yoshinori Hayashida, a resident alien, respectively. I recall that my initial cursory examination of the Act exempted non-citizens with permanent residence in the United States, and I believe it was for such reason that the three later dated checks were not concurrently returned with those known foreign nationals on or about September 1, 1988. After some further research, it was realized that Y.Y. would fall within the purview of the definition of a foreign national even though a Hawaii corporation. At this point it was determined that it would be prudent to return the additional three checks, which were respectively dated October 17, 1988.

(c) While this law firm had handled some of the MURs as to Y.Y. and its principals, I am not that familiar with the proceedings, as a partner no longer with the firm was handling the matter. I would remind you that according to my understanding you have reached settlements with all of the principals concerned.

6. Neither I nor this firm represented Mayor Fasi before your agency. He has had separate counsel, and I am unaware of the disposition of the matter.

I would like to directly respond to the two counts contained in the complaint.

A. Count One.

1. I did not solicit nor was I in any manner involved in the contributions made by the ECC Foreign Language School (herein "ECC") and/or its principals. The first occasion I had to learn of ECC was when it was determined to return all contributions made by foreign nationals as above described. I have never met any of the principals named nor have I ever engaged in any conversation with them.

2. I had never heard about nor seen the "smoking gun letter" until it first appeared in the morning newspaper in Honolulu during September or October of 1994. I absolutely

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Federal Election Commission
Page 5
January 23, 1995

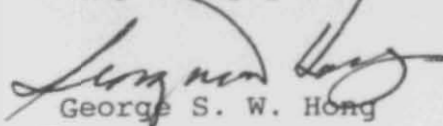
deny any knowledge of whatever transpired between Mr. Fasi and ECC, which gave rise to the transaction described in said letter.

B. Count Two.

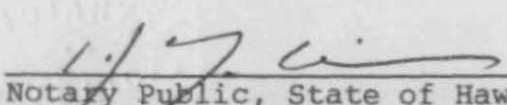
1. To the best of my knowledge, the checks returned to Y.Y. and its principals were not returned "then forwarded back to the Fasi Campaign" as alleged.

Please accept the statements made herein as having been made under oath to the best of my recollection and knowledge, and I have caused the jurat of a notary public to be affixed in so declaring.

Very truly yours,


George S. W. Hong

Subscribed and sworn to before
me this 23rd day of January,
1995.


Notary Public, State of Hawaii

My Commission Expires: 7/23/96

GSWH:mm

STATEMENT OF DESIGNATION OF COUNSEL

MUR 4150

NAME OF COUNSEL: Benjamin B. Cassiday, III, Esq.

ADDRESS: Grosvenor Center, Mauka Tower

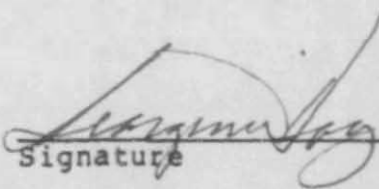
737 Bishop St., Suite 2440

Honolulu, HI 96813

TELEPHONE: (808) 523 2300

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.

Jan 23, 1995
Date


Signature

RESPONDENT'S NAME: George S. W. Hong

ADDRESS: Pauahi Tower, Suite 2200

1001 Bishop Street

Honolulu, HI 96813

HOME PHONE: (808) 734 0357

BUSINESS PHONE: (808) 524 4900

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COUNSEL
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97043793544

Mitsunori Inoue
1420 Victoria St., Apt. 1404
Honolulu Hawaii 96822

FEB 3 1 56 PM '95

January 28 1995

Mary L. Taksar, Attorney
Central Enforcement Docket
Federal Election Commission
999 E Street Northwest
Washington DC. 20463

Dear Ms. Mary L. Taksar:

Re: MUR 4150

In response to your letter dated December 5 1994 in regards to the captioned matter, there is no my name appeared on the complain submitted by Anthony P. Locricchio dated October 31, 1994. I found there is my name on "Exhibit D (Affidavit of Robert D.L. Carter)" on which I like to response as followings:

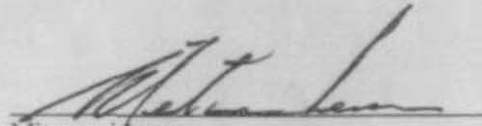
No. 6 (page 1): I handled bank deposit for only Royal Hawaiian Country Club account, not Y. Y. Valley accounts which handled by only Mr. Yoshinori Hayashida.

No. 7 and No. 8 (page 2): This was the first time I learned that Mr. Kobayashi mentioned this fact from this affidavit. So that I've never discussed with Robert Carter on this matter.

No. 9 through No. 11 (page 2) These were published on Honolulu's daily paper where I and Robert Carter found the fact.

If you have any questions, please feel free to contact me.

Sincerely,


Mitsunori Inoue

97043793545

WEIL, GOTSHAL & MANGES

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

1615 L STREET, N.W.

WASHINGTON, D.C. 20036-5610

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(202) 857-0940

TELEX: ITT 440045

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BRUSSELS
BUDAPEST
LONDON
PRAGUE
WARSAW

BRUCE H. TURNBULL
DIRECT LINE (202) 682-7070

February 3, 1995

VIA HAND DELIVERY

Alva E. Smith, Esq.
Office of General Counsel
Federal Election Commission
999 E Street, N.W. - Room 657
Washington, D.C. 20463

Re: MUR 4150 -- Designation of Counsel Forms

Dear Ms. Smith:

Enclosed are two Designation of Counsel forms authorizing Weil, Gotshal & Manges to represent Eiji Sakemoto and Hirofumi Ohnishi in Matter Under Review ("MUR") 4150 before the Federal Election Commission (the "Commission"). We have also enclosed a copy of these materials and would appreciate your stamping the copy in acknowledgment of receipt and returning it to us in the enclosed self-addressed, stamped envelope.

We anticipate shortly receiving and submitting Designation of Counsel forms for the ECC Foreign Language Institute as well as the two other individuals, Kenji Sakemoto and Katsumi Yamaguchi, contacted by the Commission in connection with MUR 4150. At that time, we would like to submit for your consideration in this matter a letter in response to the Commission's inquiries to all of the respondents. We would appreciate, however, your advising us if time constraints require us to submit this letter on behalf of Messrs. Sakemoto and Ohnishi before that time.

If you have any questions, please contact me at the number above or my colleague, Elizabeth A. Noonan, at (202) 682-7288. Thank you for your assistance.

Sincerely,

Bruce H. Turnbull

Bruce H. Turnbull

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
FEB 3 3 49 PM '95

97043793546

STATEMENT OF DESIGNATION OF COUNSEL

MUR 4150
NAME OF COUNSEL: Bruce H. Turnbull
Elizabeth A. Noonan
ADDRESS: Weil, Gotshal & Manges
1615 L Street, N.W.
Washington, D.C. 20036
TELEPHONE: 202/682-7000

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.

Feb. 1, 1995
Date

Hirofumi Ohnishi
Signature

RESPONDENT'S NAME: Hirofumi Ohnishi
ADDRESS: 13-1 Ayukawa 1-chome,
Ibaraki City, Osaka
JAPAN
HOME PHONE: 0726-32-7252
BUSINESS PHONE: 06-362-1018

97043793547

STATEMENT OF DESIGNATION OF COUNSEL

MUR 4150
NAME OF COUNSEL: Bruce H. Turnbull
Elizabeth A. Noonan
ADDRESS: Weil, Gotshal & Manges
1615 L Street, N.W.
Washington, D.C. 20036
TELEPHONE: 202/682-7000

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.

Feb. 1, 1995
Date

Eiji Sakemoto
Signature

RESPONDENT'S NAME: Eiji Sakemoto
ADDRESS: 4-15-31 Higashi Toyonaka-cho
Toyonaka City, Osaka
JAPAN
HOME PHONE: 06-854-4890
BUSINESS PHONE: 06-362-0569

97043793548

WEIL, GOTSHAL & MANGES

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

767 FIFTH AVENUE
NEW YORK, N.Y. 10153
(212) 310-8000
FAX: (212) 310-8007
CABLE: WEGOMA
TELEX: ITT 424281
ITT 423144

NCNB PLAZA
901 MAIN STREET
SUITE 4100
DALLAS, TEXAS 75202
(214) 746-7700
FAX: (214) 746-7777

BRUCE H. TURNBULL
DIRECT LINE (202) 682-7070

1615 L STREET, N.W.
WASHINGTON, D.C. 20036
(202) 682-7000
FAX: (202) 657-0939
(202) 657-0940
TELEX: ITT 440045

700 LOUISIANA
SUITE 1600
HOUSTON, TEXAS 77002
(713) 546-5000
FAX: (713) 224-9511
TELEX: ITT 4620144

701 BRICKELL AVENUE
MIAMI, FLORIDA 33131
(305) 577-3100
FAX: (305) 374-7159

50 STRATTON STREET
LONDON W1X 5FL
4471 495-3131
FAX: 4471-629-7900

February 6, 1995

VIA HAND DELIVERY

Alva E. Smith, Esq.
Office of General Counsel
Federal Election Commission
999 E Street, N.W. - Room 657
Washington, D.C. 20463

Re: MUR 4150 -- Designation of Counsel Forms

Dear Ms. Smith:

Enclosed are two facsimile versions of the Designation of Counsel forms authorizing Weil, Gotshal & Manges to represent Kenji Sakemoto and Katsumi Yamaguchi in Matter Under Review ("MUR") 4150 before the Federal Election Commission. As discussed, we will submit the original forms once we have received them.

Additionally, we have also enclosed a copy of these materials and would appreciate your stamping the copy in acknowledgment of receipt and returning it to us in the enclosed self-addressed, stamped envelope.

If you have any questions, please contact me at the number above or my colleague, Elizabeth A. Noonan, at (202) 682-7288. Thank you for your assistance.

Sincerely,

Bruce H. Turnbull
Bruce H. Turnbull

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COMMISSION
OFFICE OF GENERAL
COUNSEL
FEB 7 10 25 AM '95

97043793549

STATEMENT OF DESIGNATION OF COUNSEL

MUR 4150
NAME OF COUNSEL: Bruce H. Turnbull
Elizabeth A. Noonan
ADDRESS: Weil, Gotshal & Manges
1615 L Street, N.W.
Washington, D.C. 20036
TELEPHONE: 202/682-7000

FEB 8 3 03 PM '95

RECEIVED
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COMMISSION
OFFICE OF GENERAL
COUNSEL

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.

Feb. 6, 1995
Date

Kenji Sakemoto
Signature

RESPONDENT'S NAME: Kenji Sakemoto
ADDRESS: CCL Education Research Center
6-12-10 Midorigaoka
Heguri-cho Ikoma-gun, Nara, JAPAN
HOME PHONE: 07454-5-0793
BUSINESS PHONE: 06-475-9399

9704379355C

STATEMENT OF DESIGNATION OF COUNSEL

MUR 4150 Bruce H. Turnbull
NAME OF COUNSEL: Elizabeth A. Noonan
ADDRESS: Weil, Gotshal & Manges
1615 L Street, N.W.
Washington, D.C. 20036
TELEPHONE: 202/682-7000

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
FEB 8 3 03 PM '95

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.

Feb. 6, 1995
Date

Katsumi Yamaguchi
Signature

RESPONDENT'S NAME: Katsumi Yamaguchi
ADDRESS: 4-1-20 Nukui, Minami-cho
Koganei-City
Tokyo, JAPAN
HOME PHONE: 0423-85-8764
BUSINESS PHONE: 03-5330-1590

97043793551

WEIL, GOTSHAL & MANGES

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

1615 L STREET, N.W.

WASHINGTON, D.C. 20036

(202) 682-7000

FAX: (202) 857-0939

(202) 857-0940

TELEX: ITT 440045

767 FIFTH AVENUE
NEW YORK, N.Y. 10153

(212) 310-8000

FAX: (212) 310-8007

CABLE: WEGOMA

TELEX: ITT 424281

ITT 423144

NCNB PLAZA

901 MAIN STREET

SUITE 4100

DALLAS, TEXAS 75202

(214) 746-7700

FAX: (214) 746-7777

BRUCE H. TURNBULL

DIRECT LINE (202) 682-7070

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SUITE 1600

HOUSTON, TEXAS 77002

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TELEX: ITT 4620144

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MIAMI, FLORIDA 33131

(305) 577-3100

FAX: (305) 374-7159

50 STRATTON STREET

LONDON W1X 5FL

4471-495-3131

FAX: 4471-629-7900

February 7, 1995

VIA HAND DELIVERY

Alva E. Smith, Esq.
Office of General Counsel
Federal Election Commission
999 E Street, N.W. - Room 657
Washington, D.C. 20463

Re: ECC Foreign Language Institute, Hirofumi Ohnishi,
Eiji Sakemoto, Kenji Sakemoto & Katsumi Yamaguchi
(MUR 4150)

Dear Ms. Smith:

As you know, we have been retained to represent the ECC Foreign Language Institute (the "Institute") and Hirofumi Ohnishi, Eiji Sakemoto, Kenji Sakemoto and Katsumi Yamaguchi, in the above referenced matter under review by the Federal Election Commission ("FEC" or "Commission"). We have attached a faxed copy of the Designation of Counsel form for the Institute; we will forward to you the original as soon as we receive it. This letter is intended to provide an initial response to the inquiries made by the FEC in connection with MUR 4150 and is a supplement to the initial response provided by the Institute in its December 25, 1994, letter.

We note at the outset that the contributions in question are alleged to have been made by the Institute and the four individuals some seven years ago. In addition, as indicated in Katsumi Yamaguchi's letter of December 25, 1994, Isamu Yamaguchi, the former head of the Institute who may have had some knowledge concerning the Institute's alleged contribution, passed away in March 1993.

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OFFICE OF GENERAL
COUNSEL
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February 7, 1995
Page 2

As a result, it is our understanding that no one at the Institute nor any of the four individuals is aware of the facts or circumstances surrounding the alleged contributions to the Fasi campaign, nor are they familiar with the Federal Election Campaign Act. Further, based on our understanding, none of the individuals are aware of having signed any of the campaign contribution checks referenced in the complaint. In addition, given the passage of time and the short period in which to respond to the FEC's inquiry, our clients have been unable to locate any information that may shed some light on the matter.

These factors notwithstanding, the Institute and the four individual respondents wish to cooperate with the FEC and to reach an expeditious and mutually satisfactory resolution of these matters. We would hope that such a result could be achieved by a Commission decision not to take any further action. If not, however, at an appropriate point, we would appreciate an opportunity to meet with you to discuss how best to proceed in reaching such a conclusion.

While we recognize that this letter is being submitted after the 15-day deadline, we request that the Commission accept it for the same reasons noted above -- our clients' lack of knowledge concerning the allegations and U.S. legal procedures and the length of time that has elapsed since the alleged incidents. Moreover, as you know, the Osaka area has suffered great disruption over the past few weeks, contributing to the delay in responding.

If you should have any questions, please feel free to contact me at the number above or my colleague Elizabeth Noonan at (202) 682-7288.

Sincerely,

Bruce H. Turnbull

Bruce H. Turnbull

97043793553

STATEMENT OF DESIGNATION OF COUNSEL

MUR 4150 Bruce H. Turnbull
NAME OF COUNSEL: Elizabeth A. Noonan
ADDRESS: Weil, Gotshal & Manges
1615 L Street, N. W.
Washington, D.C. 20036
TELEPHONE: 202/682-7000

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COMMISSION
OFFICE OF GENERAL
COUNSEL

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.

Feb. 6, 1995
Date

Eiji Sakamoto
Signature
Title: Representative Director of ECC

RESPONDENT'S NAME: ECC Foreign Language Institute
ADDRESS: 3-35 Nakasaki Nishi 2-chome
Kita-ku, Osaka
JAPAN
HOME PHONE: 06-854-4890
BUSINESS PHONE: 06-362-0569

97043793554

WEIL, GOTSHAL & MANGES

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

1615 L STREET, N.W.
WASHINGTON, D.C. 20036-5610

(202) 682-7000

FAX: (202) 857-0939

(202) 357-0940

TELEX: ITT 440045

DALLAS
HOUSTON
MENLO PARK
(SILICON VALLEY)
MIAMI
NEW YORK

BRUSSELS

BUDAPEST

LONDON

PRAGUE

WARSAW

FEB 8 3 03 PM '95

RECEIVED
FEDERAL ELECTION
COMMISSION
GENERAL

BRUCE H. TURNBULL
DIRECT LINE (202) 682-7070

February 8, 1995

VIA HAND DELIVERY

Alva E. Smith, Esq.
Office of General Counsel
Federal Election Commission
999 E Street, N.W. - Room 657
Washington, D.C. 20463

Re: MUR 4150 -- Designation of Counsel Forms

Dear Ms. Smith:

As indicated in our previous correspondence, we enclose the original Designation of Counsel forms authorizing Weil, Gotshal & Manges to represent the ECC Foreign Language Institute, Kenji Sakemoto and Katsumi Yamaguchi in Matter Under Review ("MUR") 4150 before the Federal Election Commission.

Additionally, we have also enclosed a copy of these materials and would appreciate your stamping the copy in acknowledgment of receipt and returning it to us in the enclosed self-addressed, stamped envelope.

If you have any questions, please contact me at the number above or my colleague, Elizabeth A. Noonan, at (202) 682-7288. Thank you for your assistance.

Sincerely,

Bruce H. Turnbull

Bruce H. Turnbull

97043793555

ANTHONY P. LOCICCHIO

ATTORNEY AT LAW

903 MAUNAWILI CIRCLE
KAILUA, HAWAII 96734
(808) 261-7733 / 261-8372
FAX: 263-4128

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COMMISSION
SECRETARIAT

Apr 26 11 29 AM '95

MUR 4150

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COMMISSION
OFFICE OF GENERAL
COUNSEL

Apr 26 11 40 AM '95

April 20, 1995

Mr. D. L. McDonald
Chairman of the Federal Election Commission
Mr. Lawrence M. Noble, General Counsel
999 E Street N. W.
Washington, D. C. 20463

Re: Senator James Aki Violation of Campaign Spending Laws -
Contribution from Y.Y. Valley Corporation/Royal Hawaiian
Country Club, Inc.

Dear Messrs. McDonald and Noble:

This additional formal notarized complaint is hereby filed by the undersigned parties. Because of the nature of the complaint it should be handled jointly with our prior filed complaint naming former Mayor Frank Fasi, Y. Y. Valley Corporation, Yasuo Yasuda and Yoshinori "Ken" Hayashida.

This complaint adds to that list Senator James Aki, and again names Yoshinori "Ken" Hayashida for violations of Federal Law and in that knowingly false fraudulent Affidavits were filed omitting the \$10,000.00 Senator Aki Campaign contribution using foreign funds.

Summary Complaint

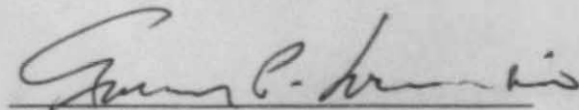
Federal Campaign Spending Laws require (1) no foreign funds of campaign contributions which were made to Senator Aki; (2) Campaign Contributions are limited to a maximum contribution of \$2,000.00, the \$7,000.00 amount on 4/17/85 and the \$3,000.00 amount issued on 4/3/85 along with three others indicate a total of \$10,600.00 in campaign contributions, far in excess of State limits; (3) The contributions appear to be a bribe to pay for Senator Aki vote (and the votes Aki controlled on House Bill No. 1063 which allowed the contributors agricultural land to be reclassified as land that would allow golf course use when prior to the passage of that Law golf courses were a specifically prohibited use. The narrow passage of that Law in the State Senate increased the value of Royal Hawaiian land by many millions of dollars overnight. The check numbers for the Aki checks written on the golf course company account are indicated in discovery documents as check numbers 003, 006, 107, 277, and 569.

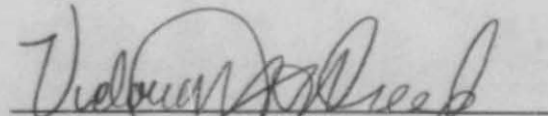
97043793556

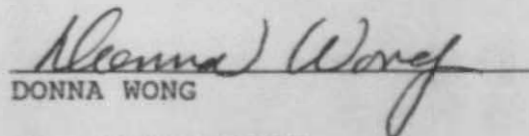
Attachments:

- A. Copy of confidential document acquired in discovery showing monies paid to Aki by Royal Hawaiian Country Club hereto as Exhibit 26.
- B. Copy of list showing check numbers of the two checks and others made out for Senator Aki votes hereto as Exhibit 132.
- C. Copy of Sworn Affidavit of Yoshinori "Ken" Hayashida sent to the Federal Election Commission showing omission of Aki Contribution.

Hereby submitted,

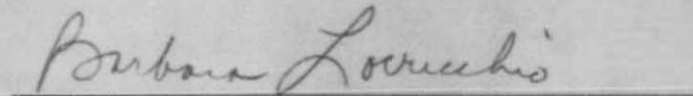

ANTHONY P. LOCRICCHIO, ESQ.


VICTORIA S. CREED


DONNA WONG

cc: Attachments

Subscribed and sworn to before me on
this 20th day of April, 1995
Anthony P. Locricchio, Victoria S. Creed
and Donna Wong, in my presence did affix
their signatures to the foregoing
complaint.


NOTARY PUBLIC, STATE OF HAWAII

My Commission expires 3-26 1998 NP/62



97043793557

The following records are issued by ROYAL HAWAIIAN COUNTRY CLUB, CHECKS

Date	Name of Payee	Amount	Check #
3/22/85	F.O. James Aki	250.00	003
3/22	F.O. Richard Wong	250.00	004
3/22	F.O. Cam Cavasso	50.00	005
4/3	Mr. James Aki	3,000.00	006
4/9	F.O. Joe Kuroda	175.00	102
4/17	Mr. James Aki	7,000.00	107
5/2	F.O. Frank Fasi	1,000.00	111
5/3	F.O. Ann Kobayashi	125.00	115
9/28	F.O. Calvin Say	400.00	187
3/13/86	F.O. James Aki	100.00	277
3/13	F.O. Richard Wong	250.00	278
3/13	F.O. Harvey Tajiri	300.00	279
6/24	F.O. Kevin/Joe Kuroda	140.00	343
3/25/87	F.O. James Aki	250.00	569
4/21	F.O. Ann Kobayashi	100.00	596
6/8	F.O. David Kahanu	250.00	639
8/25	F.O. Frank Fasi	2,000.00	716
2/9/88	F.O. David Kahanu	750.00	910

16,390

EXHIBIT 132

A 990160

97043793558

HONG IWAI HULBERT & KAWANO

ATTORNEYS AT LAW
SUITE 2200, PAUAMI TOWER
BISHOP SQUARE
1001 BISHOP STREET
HONOLULU, HAWAII 96813

GEORGE S. W. HONG
DONALD K. IWAI
NEIL F. HULBERT
CAROL LEE HONG
JEFFREY C. WILK
ROY K. KAWANO
HARLAN Y. KIMURA

TELEPHONE
(808) 524-4900

FAX
(808) 525-3473

September 12, 1991

Mark Allen, Esq.
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Allen:

Re: MUR 2892
Yoshinori "Ken" Hayashida

Enclosed herewith is Yoshinori "Ken" Hayashida's First
Supplemental Response to Interrogatories.

Very truly yours,

HONG IWAI HULBERT & KAWANO

By Neil F. Hulbert
Neil F. Hulbert

NFH:et

Enclosure

cc: Y. Y. Valley Corporation

EXHIBIT 126

A 390001

97043793559

NEIL F. HULBERT #1143-0
HONG IWAI HULBERT & KAWANO
Suite 2200, Pauahi Tower
Bishop Square
1001 Bishop Street
Honolulu, HI 96813
Tel. No. 524-4900

Attorney for Respondent

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
YOSHINORI "KEN" HAYASHIDA,) MUR 2892
_____)

YOSHINORI "KEN" HAYASHIDA'S FIRST SUPPLEMENTAL
RESPONSE TO INTERROGATORIES

Comes now Yoshinori "Ken" Hayashida, and in supplement
of his answers to the Federal Election Commission, states as
follows:

Yoshinori "Ken" Hayashida hereby objects to each and
every one of the interrogatories on the grounds that the Federal
Election Commission does not have jurisdiction over state and
local elections. Notwithstanding that objection, Yoshinori "Ken"
Hayashida responds as follows with respect to the matters not
described in the Complaint in this proceeding.

emt/3089/89.006/ansof Ken

A 990002

97043793560

4. List all contributions (date, amount, recipient) made by you from this account to federal, state and local elections.

I believe the following is a list of all contributions from 1/1/86 to the present not identified in my prior answers to interrogatories. The funds came from either the Royal Hawaiian Country Club, Inc. or Y. Y. Valley Corporation bank accounts. In five instances, the funds were returned by the candidate as indicated.

CAMPAIGN CONTRIBUTIONS

<u>DATE</u>	<u>PAYEE/RECEPIENT</u>	<u>AMOUNT</u>	
3/13/86	F.O. James Aki	100.00	
3/13/86	F.O. Richard Wong	250.00	
3/13/86	F.O. Harvey Tajiri	300.00	
6/24/86	F.O. Kevin/Joe Kuroda	140.00	
7/15/86	F.O. Andy Anderson	20,000.00	
10/27/86	F.O. John Waihee	2,000.00	
	F.O. John Waihee	2,000.00	
	F.O. John Waihee	2,000.00	
	F.O. John Waihee	2,000.00	
10/28/86	K.I. Consultant (J. Waihee)	2,000.00	
1987	F.O. John Waihee	1,000.00	returned
1987	F.O. John Waihee	1,000.00	returned
3/25/87	F.O. James Aki	250.00	
4/21/87	F.O. Ann Kobayashi	100.00	
6/8/87	F.O. David Kahanu	250.00	returned
1988	F.O. David Kahanu	250.00	
1988	Doo for Congress Comm.	1,000.00	returned
1988	Doo for Congress Comm.	1,000.00	returned
2/9/88	F.O. David Kahanu	750.00	
4/28/88	Unknown	3,000.00	

A 990003

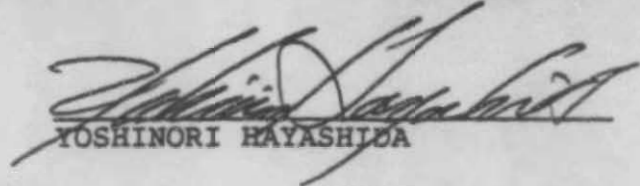
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STATE OF HAWAII

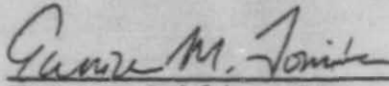
CITY AND COUNTY OF HONOLULU

)
) SS:
)

YOSHINORI HAYASHIDA, being first duly sworn, upon oath
deposes and says: that the foregoing answers to the foregoing
interrogatories are true to the best of his knowledge and belief.


YOSHINORI HAYASHIDA

Subscribed and sworn to before me
this 12th day of September, 1991.


Notary Public, State of Hawaii

My Commission Expires: 4/28/95

97043793562

A 990004



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 3, 1995

Anthony P. Locricchio, Esq.
903 Mauniwili Circle
Kailua, HI 96734

RE: MUR 4150

Dear Mr. Locricchio:

This letter acknowledges receipt on April 26, 1995, of the amendment to the complaint you filed on November 28, 1995. The respondent(s) will be sent a copy of the amendment. You will be notified as soon as the Federal Election Commission takes final action on your complaint.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

97043793563



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 3, 1995

Angeline Caporoz, Treasurer
Friends of James Aki
84-339 Ikuone Place
Waianae, HI 96792

RE: MUR 4150

Dear Ms. Caporoz:

On April 26, 1995, the Federal Election Commission received an amendment to a complaint which indicates that Friends of James Aki ("Committee") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the amendment and original complaint is enclosed. We have numbered this matter MUR 4150. 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.

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

97043793564

Friends of James Aki
Page 2

If you have any questions, please contact Alva E. Smith at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

97043793565



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 3, 1995

The Honorable James Aki
The State Senate
State Capitol
Room 306
Honolulu, HI 96813

RE: MUR 4150

Dear Senator Aki:

On April 26, 1995, the Federal Election Commission received an amendment to a complaint which indicates that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the amendment and original complaint is enclosed. We have numbered this matter MUR 4150. 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.

97043793566

Senator Aki
Page 2

If you have any questions, please contact Alva E. Smith at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

970437933567



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 3, 1995

Michael K. Livingston, Esq.
Davis & Levin
10 Marin Street
Merchant Square
Honolulu, HI 96817

RE: MUR 4150
Yoshinori "Ken" Hayashida

Dear Mr. Livingston:

On December 5, 1994, your client was notified that the Federal Election Commission received a complaint from Anthony P. Locricchio alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. At that time your client was given a copy of the complaint and informed that a response to the complaint should be submitted within 15 days of receipt of the notification.

On April 26, 1995, the Commission received additional information from the complainant pertaining to the allegations in the complaint. Enclosed is a copy of this additional information. As this new information is considered an amendment to the original complaint, you are hereby afforded an additional 15 days in which to respond to the allegations.

If you have any questions, please contact Alva E. Smith at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosure

97043793568



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 3, 1995

William W. Milks, Esq.
Grosvenor Center, Suite 1800
733 Bishop Street
Honolulu, HI 96813

RE: MUR 4150
Y. Y. Valley Corporation
Royal Hawaiian County Club

Dear Milks:

On December 5, 1994, your clients were notified that the Federal Election Commission received a complaint from Anthony P. Locricchio alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. At that time your clients were given a copy of the complaint and informed that a response to the complaint should be submitted within 15 days of receipt of the notification.

On April 26, 1995, the Commission received additional information from the complainant pertaining to the allegations in the complaint. Enclosed is a copy of this additional information. As this new information is considered an amendment to the original complaint, you are hereby afforded an additional 15 days in which to respond to the allegations.

If you have any questions, please contact Alva E. Smith at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosure

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

97043793569

NORMAN MIZUGUCHI
PRESIDENT
MIKE MCCARTNEY
VICE PRESIDENT
ROSALYN BAKER
MAJORITY LEADER
LES IHARA, JR.
MAJORITY FLOOR LEADER
BRIAN TANIGUCHI
MAJORITY WHIP
CALVIN KAWAMOTO
MAJORITY CAUCUS LEADER
MARY GEORGE
MINORITY LEADER
MICHAEL M. F. LIU
MINORITY FLOOR LEADER

The Senate
The Eighteenth Legislature
of the
State of Hawaii

STATE CAPITOL
HONOLULU, HAWAII 96813



May 10, 1995

MUR 4150

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COMMISSION
OFFICE OF GENERAL
COUNSEL
MAY 15 10 23 AM '95

FIRST DISTRICT
MALAMA SOLOMON
SECOND DISTRICT
RICHARD M. MATSUURA
THIRD DISTRICT
ANDREW LEVIN
FOURTH DISTRICT
ROSALYN BAKER
FIFTH DISTRICT
JOE TANAKA
SIXTH DISTRICT
AVERY CHUMBLEY
SEVENTH DISTRICT
LEHUA FERNANDES SALLING
EIGHTH DISTRICT
DONNA R. IKEDA
NINTH DISTRICT
MATT MATSUNAGA
TENTH DISTRICT
LES IHARA, JR.
ELEVENTH DISTRICT
BRIAN TANIGUCHI
TWELFTH DISTRICT
CAROL FUKUNAGA
THIRTEENTH DISTRICT
ROD TAM
FOURTEENTH DISTRICT
MILTON HOLT
FIFTEENTH DISTRICT
NORMAN MIZUGUCHI
SIXTEENTH DISTRICT
REY GRAUSTY
SEVENTEENTH DISTRICT
DAVID KIE
EIGHTEENTH DISTRICT
RANDY IWASE
NINETEENTH DISTRICT
CALVIN KAWAMOTO
TWENTIETH DISTRICT
BRIAN KANNO
TWENTY-FIRST DISTRICT
JAMES AKI
TWENTY-SECOND DISTRICT
ROBERT BUNDA
TWENTY-THIRD DISTRICT
MIKE MCCARTNEY
TWENTY-FOURTH DISTRICT
MICHAEL M. F. LIU
TWENTY-FIFTH DISTRICT
MARY GEORGE
CHIEF CLERK
T. DAVID WOO, JR.

Ms. Mary L. Taksar
Attorney
Central Enforcement Docket
Federal Election Commission
Washington, D.C. 20463

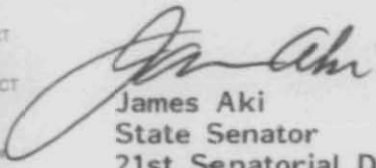
Dear Ms. Taksar:

This letter is in reply to your communication dated May 3, 1995.

I am requesting that no action be taken against me. I did not receive \$10,000.00 as campaign contribution from Mr. Yoshinori "Ken" Hayashida. I do not know the individual mentioned.

I respectfully ask that no further action be taken against me.

Sincerely,


James Aki
State Senator
21st Senatorial District

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MAY 15 9 13 AM '95

LAW OFFICES
DAVIS & LEVIN

10 MARIN STREET
MERCHANT SQUARE
HONOLULU, HAWAII 96817

MARK S. DAVIS*
STANLEY E. LEVIN*
MICHAEL K. LIVINGSTON*
THOMAS R. GRANDE*
*A LAW CORPORATION

TELEPHONE (808) 524-7800
FAX (808) 545-7802
COMPUERVE 73767.1511
CABLE JUSTICE
NEIGHBOR ISLANDS
MAUI: 877-7500
KAUAI: 245-6100
HAWAII: 325-3200

May 15, 1995

Mary L. Taksar, Attorney
Central Enforcement Docket
Federal Election Commission
Washington, D.C. 20463

Re: Yoshinori "Ken" Hayashida
Amendment to Original Complaint
Your File: MUR 4150

Dear Ms. Taksar:

Thank you for your letter dated May 3, 1995, received by our office on May 8, 1995, informing us of the Commission's receipt of additional information from the Complainants pertaining to the allegations in the Complaint captioned MUR 4150. Enclosed with your letter was a copy of the April 20, 1995 letter from Anthony P. Locricchio, Victoria S. Creed, and Donna Wong ("Complainants") to Mr. D.L. McDonald and Mr. Lawrence M. Noble of the Federal Election Commission, together with exhibits thereto. Your file should contain my letters dated December 29, 1994, and January 12, 1995, responding on behalf of Mr. Hayashida to prior notifications from your office regarding MUR 4150. Please treat this letter as a supplement to Mr. Hayashida's prior responses, as well as a response to the Complaint as amended.

As I understand the April 20, 1995 letter from the Complainants, it makes two allegations with respect to Mr. Hayashida. First, it alleges that Mr. Hayashida filed "knowingly false fraudulent affidavits" with the Commission. Second, it alleges illegal campaign contributions made to Senator Aki. These allegations shall be addressed serially below.

The Complainants' allegation that Mr. Hayashida filed a "knowingly false fraudulent affidavit" with the Commission is utter nonsense. The Complainants refer to Mr. Hayashida's response to Interrogatory No. 4, filed with the Commission in MUR 2892, a copy of which is attached as an exhibit to the Complainants' April 20, 1995 letter. The Complainants allege that the list of campaign contributions

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Mary L. Taksar

May 15, 1995

Page 2

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set forth by Mr. Hayashida in response to Interrogatory No. 4 is "knowingly false" and "fraudulent" because it does not list certain alleged campaign contributions made to Senator Aki in 1985. The fact is, however, that Mr. Hayashida's interrogatory response listing campaign contributions was submitted pursuant to instructions from the Commission that "[u]nless otherwise indicated, the discovery request shall refer to the time period from 1/1/86 to present." Indeed, Mr. Hayashida's interrogatory response is by its own terms expressly limited, in accordance with these instructions, to the period "from 1/1/86 to the present." I have enclosed a copy of Mr. Hayashida's interrogatory response for your convenient reference.

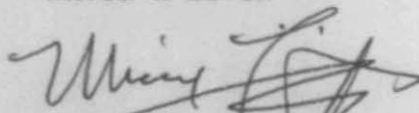
With respect to the Complainants' allegations concerning allegedly improper and illegal campaign contributions to Senator Aki made in 1985, Mr. Hayashida's position is that these claims are time barred under 2 USC § 455. It has been more than 10 years since the allegedly improper campaign contributions were made, and it is beyond question that the applicable period of limitations expired long ago. Furthermore, Mr. Hayashida respectfully submits that the Federal Election Commission does not have jurisdiction over state and local elections.

Finally, Mr. Hayashida reiterates that the Complaints underlying MUR 4150 are nothing more than an attempt by Mr. Locricchio to gain an advantage in a lawsuit that is presently pending in the United States District Court here in Hawaii. Furthermore, the Commission should take note of the Complainants' reckless or knowing disregard for truth in connection with their accusation that Mr. Hayashida filed "knowingly false fraudulent affidavits" with the Commission in making its determination as to whether to proceed further with respect to MUR 4150.

Thank you for your consideration.

Sincerely,

DAVIS & LEVIN



Michael K. Livingston

MKL:pm

Law Office of
William W. Milks
Attorney at Law

Grosvenor Center Suite 1800
733 Bishop Street
Honolulu Hawaii 96813
Tel: (808) 526-3923
Fax: (808) 523-2088

May 18, 1995

Mary L. Taksar, Esq.
Central Enforcement Docket
Federal Election Commission
Washington, D.C. 20463

Subject: MUR 4150
Y. Y. Valley Corporation
Royal Hawaiian Country Club

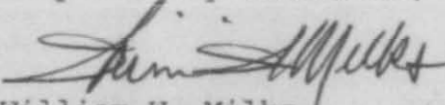
Dear Ms. Taksar:

Thank you for your May 3, 1995 correspondence received by this office on May 10, 1995, providing both Royal Hawaiian Country Club ("RHCC") and Y. Y. Valley Corporation ("YYVC") the opportunity to respond to the supplemental pleadings of Complainants Anthony P. Locricchio, Victoria Creed and Donna Wong.

My clients have had the opportunity to review the supplemental pleadings and have concluded that no additional pertinent information germane to the pending complaint has been provided which merits additional comments by either RHCC or YYVC. Also, the supplemental pleading is unsupported by several essential facts. As two examples, it is alleged that (a) the monies paid to the senator are a bribe, and (b) Senator Aki had the power to control voting at the State legislature. There is no factual support for either a bribe being made or a single senator controlling the legislature.

RHCC and YYVC maintain that all of these matters are res judicata, being resolved by the Conciliation Agreement signed by Mr. Takeoka on June 6, 1994. Any new allegations are stale, unsupported by evidence and otherwise without any merit whatsoever. The new complaint, as amended and supplemented, should be summarily dismissed.

Respectfully submitted,


William W. Milks
Counsel for Y. Y. Valley
Corporation

WWM:akg
cc: Kazuhiko Takeoka

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COUNSEL
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COMMISSION
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MAY 22 9 27 AM '95

97043793573

FRIENDS OF JAMES AKI
84-339 Ikuone Place
Waianae, Hawaii 96792

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COMMISSION
OFFICE OF GENERAL
COUNSEL
MAY 31 9 10 AM '95

May 15, 1995

Ms. Mary L. Taksar
Attorney
Central Enforcement Docket
Federal Election Commission
Washington, D.C. 20463

Dear Ms. Taksar:

This letter is in reply to your communication dated May 3, 1995, in reference to MUR 4150.

As Campaign Treasurer during that period, I did not receive any campaign contribution from Mr. Yoshinori "Ken Hayashida" for \$10,000.00.

I am asking that no action be taken against me or the Committee on the Friends of James Aki.

Sincerely,


Angeline Caporaz
Treasurer
Friends of James Aki

Enc:

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COMMISSION
OFFICE OF THE
SECRETARY
JUN 12 12 37 PM '95

ANTHONY P. LOCRICCHIO

ATTORNEY AT LAW
903 MAUNAWILI CIRCLE
KAILUA, HAWAII 96734
(808) 261-7733 / 261-8372
FAX: 263-4128

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

JUN 12 11 35 AM '95

Mr. D. L. McDonald
Chairman, Federal Election Commission
Mr. Lawrence M. Noble
General Counsel
999 E Street N. W.
Washington, D. C. 20463

June 8, 1995

MUR 4150

In Re: Campaign Contributions From Foreign Nationals To
Frank Fasi, Mayor of Honolulu

Gentlemen:

We have obtained new evidence of intentional violation of Federal and State Campaign Spending Laws by Frank F. Fasi Ex-Mayor of Honolulu and at least two foreign contributors.

Enclosed please find copy of the Frank F. Fasi Charitable Foundation Form 990-PF Return of Private Foundation which shows contributions to that Foundation by E.C.C. Foreign Language Institute, (based in Osaka Japan) and The International Supreme Master Ching Hai Mediation Associations (based in the Republic of China). We contend a third contributor to the Foundation, GMP Associates, Inc. is run by or employs former principals or employees of Y. Y. Valley Corporation, which is a Foreign Corporation.

We believe these "contributions" are nothing more than illegal campaign contributions masquerading under the guise of charitable contributions, and thus violate Federal and State Campaign Spending laws prohibiting contributions by foreign contributors of more than the maximum amount allowed by law. As can readily be determined each of the contributions clearly exceeds \$2,000.00.

Our office has depositions that tie certain foreign nationals to GMP Associates, Inc. If you require copies of these depositions please inform us and we will forward them to your office.

Hereby submitted,

Anthony P. Locricchio
ANTHONY P. LOCRICCHIO, ESQ.

Victoria S. Creed
VICTORIA S. CREED

Donna Wong
DONNA WONG

Subscribed and sworn to before me this 8th day of June 1995
Anthony P. Locricchio, Victoria S. Creed and Donna Wong, in my presence did affix their signatures to the foregoing complaint.

Barbara Locricchio
NOTARY PUBLIC, STATE OF HAWAII

My commission expires: 3-26-98



97043793575

Return of Private FoundationSection 4947(a)(1) Nonexempt Charitable Trust
Treated as a Private Foundation

OMB No. 1545-0062

1993

Note: The organization may be able to use a copy of this return to satisfy state reporting requirements.

For calendar year 1993, or tax year beginning

7/1, 1993, and ending

6/30, 1994

Use the IRS
label.Otherwise,
please print
or type.See Specific
Instructions.

Name of organization

THE FRANK F. FASI CHARITABLE FOUNDATION

Number, street, and room (or P.O. box number)

2054 MAKIKI STREET

City or town, state, and ZIP code

HONOLULU, HI 96822

A Employer identification number

99-0300719

B State registration number (see instruction F)

C If exemption application is pending, check here ☐D 1. Foreign organizations, check here ☐2. Organizations meeting the 85% test, check here and attach computation ☐E If private foundation status terminated under section 507(b)(1)(A), check here ☐F If the foundation is in a 60-month termination under section 507(b)(1)(B), check here ☐G If address changed, check here ☒

H Check type of organization:

☒ Section 501(c)(3) exempt private foundation☐ Section 4947(a)(1) nonexempt charitable trust☐ Other taxable private foundation

I Fair market value of all assets at end of year (from Part II, col. (c), line 16)

74,801.

J Accounting method: ☒ Cash ☐ Accrual☐ Other (specify)

(Part I, column (d) must be on cash basis.)

Part IAnalysis of Revenue and Expenses
(The total of amounts in columns (b), (c), and (d) may not necessarily equal the amounts in column (a).)

(a) Revenue and expenses per books

(b) Net investment income

(c) Adjusted net income

(d) Disbursements for charitable purposes (cash basis only)

1 Contributions, gifts, grants, etc., received (attach schedule)

79,000.

STATEMENT 1

2 Contributions from split-interest trusts

3 Interest on savings and temporary cash investments

26.

26.

STATEMENT 2

4 Dividends and interest from securities

5a Gross rents

b (Net rental income or (loss))

6 Net gain or (loss) from sale of assets not on line 10

7 Capital gain net income (from Part IV, line 2)

0.

8 Net short-term capital gain

9 Income modifications

10a Gross sales less returns and allowances

b Less: Cost of goods sold

c Gross profit or (loss)

11 Other income

12 Total (add lines 1 through 11)

79,026.

26.

13 Compensation of officers, directors, trustees, etc.

0.

0.

0.

0.

14 Other employee salaries and wages

15 Pension plans, employee benefits

16a Legal fees

b Accounting fees

c Other professional fees

17 Interest

18 Taxes

19 Depreciation and depletion

20 Occupancy

21 Travel, conferences, and meetings

22 Printing and publications

23 Other expenses STATEMENT 3

37.

37.

24 Total operating and administrative expenses (add lines 13 through 23)

37.

0.

0.

37.

25 Contributions, gifts, grants paid

5,200.

5,200.

26 Total expenses and disbursements (add lines 24 and 25)

5,237.

0.

0.

5,237.

27a Excess of revenue over expenses and disbursements (line 12 minus line 26)

73,789.

b Net investment income (if negative, enter "-0-")

26.

c Adjusted net income (if negative, enter "-0-")

0.

Please attach check or money order here.

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Part II Balance Sheets

Attached schedule contains amounts in the description column should be for end-of-year amounts only.

		Beginning of year	End of year	
		(a) Book Value	(b) Book Value	(c) Fair Market Value
Assets	1 Cash - non-interest-bearing		73,763.	73,763.
	2 Savings and temporary cash investments	1,012.	1,038.	1,038.
	3 Accounts receivable ▶ less: allowance for doubtful accounts ▶			
	4 Pledges receivable ▶ less: allowance for doubtful accounts ▶			
	5 Grants receivable			
	6 Receivables due from officers, directors, trustees, and other disqualified persons			
	7 Other notes and loans receivable ▶ less: allowance for doubtful accounts ▶			
	8 Inventories for sale or use			
	9 Prepaid expenses and deferred charges			
	10a Investments - U.S. and state government obligations			
	b Investments - corporate stock			
	c Investments - corporate bonds			
	11 Investments - land, buildings, and equipment: basis ▶ less: accumulated depreciation ▶			
	12 Investments - mortgage loans			
	13 Investments - other			
14 Land, buildings, and equipment: basis ▶ less: accumulated depreciation ▶				
15 Other assets (describe ▶				
16 Total assets (to be completed by all filers)	1,012.	74,801.	74,801.	
Liabilities	17 Accounts payable and accrued expenses			
	18 Grants payable			
	19 Support and revenue designated for future periods			
	20 Loans from officers, directors, trustees, and other disqualified persons			
	21 Mortgages and other notes payable			
22 Other liabilities (describe ▶				
23 Total liabilities (add lines 17 through 22)	0.	0.		
Fund Balances or Net Assets	Organizations that use fund accounting, check here ▶ ☐ and complete lines 24 through 27 and lines 31 and 32.			
	24a Current unrestricted fund			
	b Current restricted fund			
	25 Land, buildings, and equipment fund			
	26 Endowment fund			
	27 Other funds (describe ▶			
	Organizations not using fund accounting, check here ▶ ☒ and complete lines 28 through 32.			
	28 Capital stock or trust principal	1,012.	74,801.	
	29 Paid-in capital or capital surplus	0.	0.	
	30 Retained earnings or accumulated income	0.	0.	
31 Total net assets or fund balances	1,012.	74,801.		
32 Total liabilities and net assets/fund balances	1,012.	74,801.		

Part III Analysis of Changes in Net Assets or Fund Balances

1 Total net assets or fund balances at beginning of year - Part II, column (a), line 31 (must agree with end-of-year figure reported on prior year's return)	1	1,012.
2 Enter amount from Part I, line 27a	2	73,789.
3 Other increases not included in line 2 (itemize) ▶	3	0.
4 Add lines 1, 2, and 3	4	74,801.
5 Decreases not included in line 2 (itemize) ▶	5	0.
6 Total net assets or fund balances at end of year (line 4 minus line 5) - Part II, column (b), line 31	6	74,801.

Part IV Capital Gains and Losses from Investment Income(a) List and describe the kind(s) of property sold, e.g., real estate,
2-story brick warehouse; or common stock, 200 shs. MLC Co.(b) How acquired
P - Purchase
D - Donation(c) Date acquired
(mo., day, yr.)(d) Date sold
(mo., day, yr.)

1			

(a) Gross sales price minus expense of sale	(f) Depreciation allowed (or allowable)	(g) Cost or other basis	(h) Gain or (loss) (e) plus (f) minus (g)

Complete only for assets showing gain in column (h) and owned by the foundation on 12/31/69

(i) F.M.V. as of 12/31/69	(j) Adjusted basis as of 12/31/69	(k) Excess of col. (i) over col. (j), if any	(l) Losses (from col. (h)) Gains (excess of col. (h) gain over col. (k), but not less than "-0-")

2 Capital gain net income or (net capital loss) (If gain, also enter in Part I, line 7 If (loss), enter "-0-" in Part I, line 7)	2	0.
3 Net short-term capital gain or (loss) as defined in sections 1222(5) and (6): If gain, also enter in Part I, line 8, column (c). If (loss), enter "-0-" in Part I, line 8	3	0.

Part V Qualification Under Section 4940(e) for Reduced Tax on Net Investment Income

(For optional use by domestic private foundations subject to the section 4940(a) tax on net investment income.)

If section 4940(d)(2) applies, leave this part blank.

Was the organization liable for the section 4942 tax on the distributable amount of any year in the base period? ☐ Yes ☒ No

If "Yes," the organization does not qualify under section 4940(e). Do not complete this part.

1 Enter the appropriate amount in each column for each year; see instructions before making any entries.

(a) Base period years Calendar year (or tax year beginning in)	(b) Adjusted qualifying distributions	(c) Net value of noncharitable-use assets	(d) Distribution ratio (col. (b) divided by col. (c))
1992		985	.0000000
1991			
1990			
1989			
1988			

2 Total of line 1, column (d)	2	-
3 Average distribution ratio for the 5-year base period - divide the total on line 2 by 5, or by the number of years the foundation has been in existence if less than 5 years	3	-
4 Enter the net value of noncharitable-use assets for 1993 from Part X, line 5	4	32,535
5 Multiply line 4 by line 3	5	-
6 Enter 1% of net investment income (1% of Part I, line 27b)	6	-
7 Add lines 5 and 6	7	-
8 Enter qualifying distributions from Part XII, line 4	8	5,237

If line 8 is equal to or greater than line 7, check the box in Part VI, line 1b, and complete that part using a 1% tax rate.
See the Part VI instructions.

Part VI Excise Tax on Investment Income (Section 4940(a), 4940(b), 4940(e), or 4948 - see instructions)

1a Exempt operating foundations described in section 4940(d)(2), check here ☐ and enter "N/A" on line 1. Give date of ruling letter _____ (attach copy of ruling letter if necessary-see instructions)			
b Domestic organizations that meet the section 4940(e) requirements in Part V, check here ☐ and enter 1% of Part I, line 27b		1	1.
c All other domestic organizations enter 2% of line 27b. Exempt foreign organizations enter 4% of line 27b			
2 Tax under section 511 (domestic section 4947(a)(1) trusts and taxable foundations only. Others enter "-0-")		2	0.
3 Add lines 1 and 2		3	1.
4 Tax under subtitle A (domestic section 4947(a)(1) trusts and taxable foundations only. Others enter "-0-")		4	0.
5 Tax on investment income (line 3 minus line 4 (but not less than "-0-"))		5	1.
6 Credits/Payments:			
a 1993 estimated tax payments and 1992 overpayment credited to 1993	8a		
b Exempt foreign organizations - tax withheld at source	8b		
c Tax paid with application for extension of time to file (Form 2758)	8c	10.	
d Backup withholding erroneously withheld	8d		
7 Total credits and payments (add lines 8a through d)	7		10.
8 Enter any PENALTY for underpayment of estimated tax. Check here ☐ if Form 2220 is attached	8		
9 TAX DUE. If the total of lines 5 and 8 is more than line 7, enter AMOUNT OWED	9		
10 OVERPAYMENT. If line 7 is more than the total of lines 5 and 8, enter the AMOUNT OVERPAID	10		9.
11 Enter the amount of line 10 to be: Credited to 1994 estimated tax ☐ 9. Refunded ☐	11		

Part VII Statements Regarding Activities

File Form 4720 if the answer is "No" to question 10b, 11b, or 14b or "Yes" to question 10c, 12b, 13a, 13b, or 14a(2), unless an exception applies.

	Yes	No
1a During the tax year, did the organization attempt to influence any national, state, or local legislation or did it participate or intervene in any political campaign?		X
b Did it spend more than \$100 during the year (either directly or indirectly) for political purposes (see instructions for definition)? If the answer is "Yes" to 1a or 1b, attach a detailed description of the activities and copies of any materials published or distributed by the organization in connection with the activities.		X
c Did the organization file Form 1120-POL, U.S. Income Tax Return for Certain Political Organizations, for this year?		X
2 Has the organization engaged in any activities that have not previously been reported to the IRS? If "Yes," attach a detailed description of the activities.		X
3 Has the organization made any changes, not previously reported to the IRS, in its governing instrument, articles of incorporation, or bylaws, or other similar instruments? If "Yes," attach a conformed copy of the changes		X
4a Did the organization have unrelated business gross income of \$1,000 or more during the year?		X
b If "Yes," has it filed a tax return on Form 990-T, Exempt Organization Business Income Tax Return, for this year?		N/A
5 Was there a liquidation, termination, dissolution, or substantial contraction during the year? If "Yes," attach the statement required by General Instruction T.		X
6 Are the requirements of section 508(e) (relating to sections 4941 through 4945) satisfied either: • By language written into the governing instrument, or • By state legislation that effectively amends the governing instrument so that no mandatory directions that conflict with the state law remain in the governing instrument?	6	X
7 Did the organization have at least \$5,000 in assets at any time during the year? If "Yes," complete Part II, column (c), and Part XV.	7	X
8a Enter the states to which the foundation reports or with which it is registered ☐ <u>HAWAII</u>		
b If the answer is "Yes" to line 7, has the organization furnished a copy of Form 990-PF to the Attorney General (or his or her designate) of each state as required by General Instruction G? If "No," attach explanation	8b	X
9 Is the organization claiming status as a private operating foundation within the meaning of section 4942(j)(3) or 4942(j)(5) for calendar year 1993 or taxable year beginning in 1993 (see instructions for Part XIV)? If "Yes," complete Part XIV	9	X
10 Self-dealing (section 4941):		
a During the year did the organization (either directly or indirectly):		
(1) Engage in the sale or exchange, or leasing of property with a disqualified person?	10a(1)	X
(2) Borrow money from, lend money to, or otherwise extend credit to (or accept it from) a disqualified person?	10a(2)	X
(3) Furnish goods, services, or facilities to (or accept them from) a disqualified person?	10a(3)	X
(4) Pay compensation to or pay or reimburse the expenses of a disqualified person?	10a(4)	X
(5) Transfer any income or assets to a disqualified person (or make any of either available for the benefit or use of a disqualified person)?	10a(5)	X
(6) Agree to pay money or property to a government official? (Exception: Check "No" if the organization agreed to make a grant to or to employ the official for a period after he or she terminates government service, if he or she is terminating within 90 days.)	10a(6)	X

Part VII Statements Regarding Activities (continued)

	Yes	No
10b If the answer is "Yes" to any of questions 10a(1) through (6), were the acts engaged in excepted acts as described in Regulations sections 53.4941(d)-3 and 4, or Notice 93-41, 1993-27 I.R.B. 137		N/A
c Did the organization engage in a prior year in any of the acts described in 10a, other than excepted acts, that were acts of self-dealing not corrected by the first day of the tax year beginning in 1993?		X
11 Taxes on failure to distribute income (section 4942) (does not apply for years the organization was a private operating foundation as defined in section 4942(j)(3) or 4942(j)(5)):		
a At the end of tax year 1993, did the organization have any undistributed income (lines 6d and 6e, Part XIII) for tax year(s) beginning before 1993? If "Yes," list the years		X
b If 11a is "Yes," is the organization applying the provisions of section 4942(a)(2) (relating to incorrect valuation of assets) to the undistributed income for ALL such years? (If "Yes," attach statement.)		N/A
c If the provisions of section 4942(a)(2) are being applied to ANY of the years listed in 11a, list the years here.		
12 Taxes on excess business holdings (section 4943):		
a Did the organization hold more than a 2% direct or indirect interest in any business enterprise at any time during the year?		X
b If "Yes," did it have excess business holdings in 1993 as a result of (1) any purchase by the organization or disqualified persons after May 26, 1969; (2) the lapse of the 5-year period for longer period approved by the Commissioner under section 4943(c)(7) to dispose of holdings acquired by gift or bequest; or (3) the lapse of the 10-, 15-, or 20-year first phase holding period? (Use Schedule C, Form 4720, to determine if the organization had excess business holdings in 1993.)		N/A
13 Taxes on investments that jeopardize charitable purposes (section 4944):		
a Did the organization invest during the year any amount in a manner that would jeopardize its charitable purposes?		X
b Did the organization make any investment in a prior year (but after December 31, 1969) that could jeopardize its charitable purpose that had not been removed from jeopardy on the first day of the tax year beginning in 1993?		X
14 Taxes on taxable expenditures (section 4945) and political expenditures (section 4955):		
a During the year did the organization pay or incur any amount to:		
(1) Carry on propaganda, or otherwise attempt to influence legislation (section 4945(e))?		X
(2) Influence the outcome of any specific public election (see section 4955); or to carry on, directly or indirectly, any voter registration drive?		X
(3) Provide a grant to an individual for travel, study, or other similar purposes?		X
(4) Provide a grant to an organization, other than a charitable, etc., organization described in section 509(a)(1), (2), or (3), or section 4940(d)(2)?		X
(5) Provide for any purpose other than religious, charitable, scientific, literary, or educational purposes, or for the prevention of cruelty to children or animals?		X
b If the answer is "Yes" to any of questions 14a(1) through (5), were all such transactions excepted transactions as described in Regulations section 53.4945 or Notice 93-41, 1993-27 I.R.B. 137		N/A
c If the answer is "Yes" to question 14a(4), does the organization claim exemption from the tax because it maintained expenditure responsibility for the grant?		N/A
If "Yes," attach the statement required by Regulations section 53.4945-5(d).		
15 Did any persons become substantial contributors during the tax year?		X
If "Yes" attach a schedule listing their names and addresses.		
16 During this tax year, did the organization maintain any part of its accounting/tax records on a computerized system?		X
17a Did anyone request to see either the organization's annual return or its exemption application (or both)?		X
b If "Yes," did the organization comply pursuant to the instructions? (See General Instruction Q.)		N/A
18 The books are in care of DAVID F. FASI Telephone no. (808) 521-1031		
Located at 100 N BERETANIA STREET, #203, HONOLULU, HAWAII ZIP code 96817		
19 Section 4947(a)(1) charitable trusts filing Form 990-PF in lieu of Form 1041, U.S. Fiduciary Income Tax Return. - Check here ☐		
and enter the amount of tax-exempt interest received or accrued during the year 19		N/A

Part VIII Information About Officers, Directors, Trustees, Foundation Managers, Highly Paid Employees, and Contractors

1 List all officers, directors, trustees, foundation managers and their compensation:

(a) Name and address	(b) Title, and average hours per week devoted to position	(c) Contributions to employee benefit plans and deferred compensation	(d) Expense account, other allowances	(e) Compensation (If not paid, enter -0-)
DAVID F. FASI - 2054 MAKIKI ST., HON., HI 96822	TRUSTEE .50	0.	0.	0.
JOYCE FASI - 2054 MAKIKI ST., HON., HI 96822	TRUSTEE .50	0.	0.	0.
FRANK F. FASI JR - 91-999 LA'AULU STREET, EWA BEACH, HI 96706	TRUSTEE .50	0.	0.	0.

Part VIII Information About Officers, Directors, Trustees, etc. (continued)**2** Compensation of five highest paid employees (other than those included on line 1). If none, enter "NONE."

(a) Name and address of each employee paid more than \$30,000	(b) Title and average hours per week devoted to position	(c) Contributions to employee benefit plans and deferred compensation	(d) Expense account, other allowances	(e) Compensation
NONE				

Total number of other employees paid over \$30,000

0

3 Five highest paid persons for professional services. If none, enter "NONE."

(a) Name and address of each person paid more than \$30,000	(b) Type of service	(c) Compensation
NONE		

Total number of others receiving over \$30,000 for professional services

0

Part IX-A Summary of Direct Charitable Activities

List the foundation's four largest direct charitable activities during the tax year. Include relevant statistical information such as the number of organizations and other beneficiaries served, conferences convened, research papers produced, etc.

Expenses

1	NONE	

Part IX-B Summary of Program-Related Investments

Describe any program-related investments made by the foundation during the tax year.

Amount

1	NONE	

0.

Part X Minimum Investment Return (All domestic foundations must complete this part. Foreign foundations, see instructions.)

1	Fair market value of assets not used (or held for use) directly in carrying out charitable, etc., purposes:	
a	Average monthly fair market value of securities	1a
b	Average of monthly cash balances	1b 33,051.
c	Fair market value of all other assets	1c
d	Total (add lines 1a, b, and c)	1d 33,051.
e	Reduction claimed for blockage or other factors (attach detailed explanation) ▶	1e
2	Acquisition indebtedness applicable to line 1 assets	2
3	Line 1d minus line 2	3 33,051.
4	Cash deemed held for charitable activities - Enter 1 1/2% of line 3 (for greater amount, see instructions)	4 496.
5	Net value of noncharitable-use assets - Line 3 minus line 4. (Enter in Part V, line 4.)	5 32,555.
6	Minimum investment return. (Enter 5% of line 5.)	6 1,628.

Part XI Distributable Amount (see instructions) (Section 4942(j)(3) and (j)(5) private operating foundations and certain foreign organizations check here ☐ and do not complete this part.)

1	Minimum investment return from Part X, line 6	1 1,628.
2a	Tax on investment income for 1993 from Part VI, line 5	2a 1.
b	Income tax under subtitle A, for 1993	2b
c	Line 2a plus line 2b	2c 1.
3	Distributable amount before adjustments (line 1 minus line 2c)	3 1,627.
4a	Recoveries of amounts treated as qualifying distributions	4a 0.
b	Income distributions from section 4947(a)(2) trusts	4b 0.
c	Line 4a plus line 4b	4c 0.
5	Line 3 plus line 4c	5 1,627.
6	Deduction from distributable amount	6
7	Distributable amount as adjusted (line 5 minus line 6). (Also enter in Part XIII, line 1.)	7 1,627.

Part XII Qualifying Distributions (see instructions)

1	Amounts paid (including administrative expenses) to accomplish charitable, etc., purposes:	
a	Expenses, contributions, gifts, etc. - total from Part I, column (d), line 26	1a 5,237.
b	Program-related investments - total of lines 1-3 of Part IX-B	1b 0.
2	Amounts paid to acquire assets used (or held for use) directly in carrying out charitable, etc., purposes	2
3	Amounts set aside for specific charitable projects that satisfy the:	
a	Suitability test (prior IRS approval required)	3a
b	Cash distribution test (attach the required schedule)	3b
4	Qualifying distributions (add lines 1a through 3b). (Enter in Part V, line 8, and Part XIII, line 4.)	4 5,237.
5	Organizations that qualify under section 4940(e) for the reduced rate of tax on net investment income - enter 1% of Part I, line 27b	5 0.
6	Adjusted qualifying distributions (line 4 minus line 5)	6 5,237.

Note: The amount on line 6 will be used in Part V, column (b), in subsequent years when calculating whether the foundation qualifies for the section 4940(e) reduction of tax in those years.

Part XIII Undistributed income (see instructions)

	(a) Corpus	(b) Years prior to 1992	(c) 1992	(d) 1993
1 Distributable amount for 1993 from Part XI, line 7				1,627.
2 Undistributed income, if any, as of the end of 1992:				
a Enter amount for 1992 only			49.	
b Total for prior years: 19__, 19__, 19__		0.		
3 Excess distributions carryover, if any, to 1993:				
a From 1988				
b From 1989				
c From 1990				
d From 1991				
e From 1992				
f Total of lines 3a through e	0.			
4 Qualifying distributions for 1993 from Part XII, line 4: \$ 5,237.				
a Applied to 1992, but not more than line 2a			49.	
b Applied to undistributed income of prior years (Election required - see instructions)		0.		
c Treated as distributions out of corpus (Election required - see instructions)	0.			
d Applied to 1993 distributable amount				1,627.
e Remaining amount distributed out of corpus	3,561.			
5 Excess distributions carryover applied to 1993 (If an amount appears in column (d), the same amount must be shown in column (a).)	0.			0.
6 Enter the net total of each column as indicated below:				
a Corpus. Add lines 3f, 4c, and 4e. Subtract line 5	3,561.			
b Prior years' undistributed income (line 2b minus line 4b)		0.		
c Enter the amount of prior years' undistributed income for which a notice of deficiency has been issued, or on which the section 4942(a) tax has been previously assessed		0.		
d Subtract line 6c from line 6b. Taxable amount - see instructions		0.		
e Undistributed income for 1992 (line 2a minus line 4a). Taxable amount - see instr.			0.	
f Undistributed income for 1993 (line 1 minus lines 4d and 5). This amount must be distributed in 1994				0.
7 Amounts treated as distributions out of corpus to satisfy requirements imposed by section 170(b)(1)(E) or 4942(g)(3)	0.			
8 Excess distributions carryover from 1988 not applied on line 5 or line 7	0.			
9 Excess distributions carryover to 1994 (line 6a minus lines 7 and 8)	3,561.			
10 Analysis of line 9:				
a Excess from 1989				
b Excess from 1990				
c Excess from 1991				
d Excess from 1992				
e Excess from 1993	3,561.			

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Part XIV Private Operating Foundations (See instructions and Part VII, question 2)

N/A

1 a If the foundation has received a ruling or determination letter that it is a private operating foundation, and the ruling is effective for 1993, enter the date of the ruling ▶

b Check box to indicate whether the organization is a private operating foundation described in section

☐ 4942(j)(3) or ☐ 4942(j)(5).

2 a Enter the lesser of the adjusted net income from Part I or the minimum investment return from Part X (for 1991 through 1993; previously Part IX)

Tax year

Prior 3 years

(a) 1993

(b) 1992

(c) 1991

(d) 1990

(e) Total

b 85% of line 2a

c Qualifying distributions from Part XII, line 4 (for 1991 through 1993; previously Part XIII, line 5)

d Amounts included in line 2c not used directly for active conduct of exempt activities

e Qualifying distributions made directly for active conduct of exempt activities (line 2c minus line 2d)

3 Complete 3a, b, or c for the alternative test relied on:

a "Assets" alternative test - enter:

(1) Value of all assets

(2) Value of assets qualifying under section 4942(j)(3)(B)(i)

b "Endowment" alternative test - Enter 2/3 of minimum investment return shown in Part X, line 6, (for 1991 through 1993; previously Part IX, line 6)

c "Support" alternative test - enter:

(1) Total support other than gross investment income (interest, dividends, rents, payments on securities loans (section 512(a)(5)), or royalties)

(2) Support from general public and 5 or more exempt organizations as provided in section 4942(j)(3)(B)(iii)

(3) Largest amount of support from an exempt organization

(4) Gross investment income

Part XV Supplementary Information (Complete this part only if the organization had \$5,000 or more in assets at any time during the year)

1 Information Regarding Foundation Managers:

a List any managers of the foundation who have contributed more than 2% of the total contributions received by the foundation before the close of any tax year (but only if they have contributed more than \$5,000). (See section 507(d)(2).)

NONE

b List any managers of the foundation who own 10% or more of the stock of a corporation (or an equally large portion of the ownership of a partnership or other entity) of which the foundation has a 10% or greater interest.

NONE

2 Information Regarding Contribution, Grant, Gift, Loan, Scholarship, etc., Programs:

Check here ☐ if the organization only makes contributions to preselected charitable organizations and does not accept unsolicited requests for funds. If the organization makes gifts, grants, etc., to individuals or organizations under other conditions, complete items 2a, b, c, and d.

a The name, address, and telephone number of the person to whom applications should be addressed:

b The form in which applications should be submitted and information and materials they should include:

c Any submission deadlines:

d Any restrictions or limitations on awards, such as by geographical areas, charitable fields, kinds or institutions, or other factors:

Part XV Supplementary Information (continued)

3 Grants and Contributions Paid During the Year or Approved for Future Payment

Recipient Name and address (home or business)	If recipient is an individual, show any relationship to any foundation manager or substantial contributor	Foundation status of recipient	Purpose of grant or contribution	Amount
a Paid during the year				
AMERICAN RED CROSS, 4155 DIAMOND HEAD RD, HONOLULU, HAWAII 96816		CHARITABLE	CHARITABLE	2,500.
PUNAHOU SCHOOL, 1601 PUNAHOU ST., HONOLULU, HAWAII 96822		CHARITABLE	CHARITABLE	1,000.
IOLANI SCHOOL, 563 KAMOKU STREET, HONOLULU, HAWAII 96826		CHARITABLE	CHARITABLE	500.
HAWAII BAPTIST ACADEMY, 2429 PALI HWY, HONOLULU, HAWAII 96817		CHARITABLE	CHARITABLE	100.
THE SALVATION ARMY, 2950 MANOA ROAD, HONOLULU, HAWAII 96822		CHARITABLE	CHARITABLE	100.
TRUSTEES OF TRINITY COLLEGE, 300 SUMMIT STREET, HARTFORD, CT 06106-3100		CHARITABLE	CHARITABLE	1,000.
Total				5,200.
b Approved for future payment				
NONE				
Total				0.

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Part XVII

Information Regarding Transfers To and Transactions and Relationships With Noncharitable Exempt Organizations

- | | | | |
|--|--|-------|----|
| 1 Did the organization directly or indirectly engage in any of the following with any other organization described in section 501(c) of the Code (other than section 501(c)(3) organizations) or in section 527, relating to political organizations? | | Yes | No |
| a Transfers from the reporting organization to a noncharitable exempt organization of: | | | |
| (1) Cash | | 1a(1) | X |
| (2) Other assets | | a(2) | X |
| b Other Transactions: | | | |
| (1) Sales of assets to a noncharitable exempt organization | | b(1) | X |
| (2) Purchases of assets from a noncharitable exempt organization | | b(2) | X |
| (3) Rental of facilities or equipment | | b(3) | X |
| (4) Reimbursement arrangements | | b(4) | X |
| (5) Loans or loan guarantees | | b(5) | X |
| (6) Performance of services or membership or fundraising solicitations | | b(6) | X |
| c Sharing of facilities, equipment, mailing lists or other assets, or paid employees | | c | X |
| d If the answer to any of the above is "Yes," complete the following schedule. Column (b) should always show the fair market value of the goods, other assets, or services given by the reporting organization. If the organization received less than fair market value in any transaction or sharing arrangement, show in column (d) the value of the goods, other assets, or services received. | | | |

	Yes	No
1a(1)		X
a(2)		X
b(1)		X
b(2)		X
b(3)		X
b(4)		X
b(5)		X
b(6)		X
c		X

[illegible]

- 2a** Is the organization directly or indirectly affiliated with, or related to, one or more tax-exempt organizations described in section 501(c) of the Code (other than section 501(c)(3)) or in section 527? ☐ Yes ☒ No
- b** If "Yes," complete the following schedule.

(a) Name of organization	(b) Type of organization	(c) Description of relationship
	N/A	

Part XVIII

Public Inspection

- 1 Enter the date the notice of availability of the annual return appeared in a newspaper ▶ 05/15/95
- 2 Enter the name of the newspaper ▶ MIDWEEK
- 3 Check here ▶ ☒ to indicate that you have attached a copy of the newspaper notice as required by the instructions. (If the notice is not attached, the return will be considered incomplete.)

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than taxpayer or fiduciary) is based on all information of which preparer has any knowledge.

Please Sign Here	Signature of officer or trustee		Date	Title
	Preparer's signature	Date	Check if self-employed ☒	Preparer's social security no. 576 40 2802
Paid Preparer's Use Only	Firm's name (or yours if self-employed) and address FRANCIS H. MAKIYA, CPA 1150 S. KING STREET, SUITE 605 HONOLULU, HAWAII			E.I. No. 99 0210090 ZIP code 96814

FORM 990-PF

CONTRIBUTIONS OF \$5000 OR MORE

STATEMENT 1

CONTRIBUTOR'S NAME

CONTRIBUTOR'S ADDRESS

ECC FOREIGN LANGUAGE
INSTITUTE1-1 NAKAZAKI-NISHI, 2-CHOME,
KITA-KU, OSAKA 530 JAPAN

PROPERTY DESCRIPTION

DATE OF GIFT

FAIR MARKET VALUE

AMOUNT OF GIFT

CASH

01/12/94

20,000.

CONTRIBUTOR'S NAME

CONTRIBUTOR'S ADDRESS

THE INTERNATIONAL SUPREME
MASTER CHING HAI MEDITATION
ASSOCIATIONSP.O. BOX 9, HSIHU SHIANG, MIAOLI
HSIEN, TAIWAN, REPUBLIC OF CHINA

PROPERTY DESCRIPTION

DATE OF GIFT

FAIR MARKET VALUE

AMOUNT OF GIFT

CASH

01/12/94

45,000.

CONTRIBUTOR'S NAME

CONTRIBUTOR'S ADDRESS

GMP ASSOCIATES, INC.

841 BISHOP STREET, SUITE 1501,
HONOLULU, HAWAII 96813

PROPERTY DESCRIPTION

DATE OF GIFT

FAIR MARKET VALUE

AMOUNT OF GIFT

CASH

04/04/94

10,000.

FORM 990-PF INTEREST ON SAVINGS AND TEMPORARY CASH INVESTMENTS

STATEMENT 2

SOURCE

AMOUNT

SAVINGS

26.

TOTAL TO FORM 990-PF, PART I, LINE 3, COLUMN A

26.

FORM 990-PF

OTHER EXPENSES

STATEMENT 3

DESCRIPTION	(A) EXPENSES PER BOOKS	(B) NET INVEST- MENT INCOME	(C) ADJUSTED NET INCOME	(D) CHARITABLE PURPOSES
LICENSE	20.	0.	0.	20.
OFFICE	17.	0.	0.	17.
TO FORM 990-PF, PG 1, LN 23	37.			37.

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1 Legal Notices

NOTICE

Pursuant to Section 6104(d) of the Internal Revenue Code of 1986, notice is hereby tendered that the 1993 Annual Return of the Frank F. Fasi Foundation is available for inspection at the principal office of the Foundation at Suite 203, 100 N. Beretania Street, Honolulu, Hawaii (Telephone # 521-1031) during regular business hours by any person who may so request within 180 days from the date of publication of this notice.
David F. Fasi,
Trustee
Frank F. Fasi
Foundation
MidWeek 5/15/95

Application for Extension of Time To File
Certain Excise, Income, Information, and Other Returns

GMB No. 1545-0148

Expires 5-31-95

File a separate application for each return.

Please type or print. File the original and one copy by the due date for filing your return. See instructions on back.

Name THE FRANK F. FASI CHARITABLE FOUNDATION	Employer identification number 99-0300719
Number and street (or P.O. box no. if mail is not delivered to street address) 1001 Bishop Street, Paahani Tower	Apt. or suite no. 2200
City, town or post office, state, and ZIP code. For a foreign address, see instructions. HONOLULU HAWAII 96813	

Note: Corporate income tax return filers must use Form 7004 to request an extension of time to file. Partnerships, REMICs, and trusts (except those filing Form 990-T) must use Form 8736 to request an extension of time to file.

- 1 An extension of time until FEBRUARY 15, 19 95, is requested to file (check only one):
- | | | | | |
|---|--|--|------------------------------------|------------------------------------|
| ☐ Form 706GS(D) | ☐ Form 990-T (401(a) or 408(a) trust) | ☐ Form 1042-S | ☐ Form 6069 | ☐ Form 8831 |
| ☐ Form 706GS(T) | ☐ Form 990-T (trust other than above) | ☐ Form 1120-ND (4951 taxes) | ☐ Form 8612 | |
| ☐ Form 990 or 990-EZ | ☐ Form 1041 (estate) (see instructions) | ☐ Form 3520-A | ☐ Form 8613 | |
| ☐ Form 990-BL | ☐ Form 1041-A | ☐ Form 4720 | ☐ Form 8725 | |
| ☒ Form 990-PF | ☐ Form 1042 | ☐ Form 5227 | ☐ Form 8804 | |
- If the organization does not have an office or place of business in the United States, check this box. ☐ - N/A
- 2a For calendar year 19 94, or other tax year beginning JULY 1, 1993 and ending JUNE 30, 1994
- b If this tax year is for less than 12 months, check reason: ☐ Initial return ☐ Final return ☐ Change in accounting period - N/A
- 3 Has an extension of time to file been previously granted for this tax year? ☐ Yes ☒ No
- 4 State in detail why you need the extension. Additional time is still required to compile the data necessary to complete the return.

- 5a If this form is for Form 706GS(D), 706GS(T), 990-BL, 990-PF, 990-T, 1041 (estate), 1042, 1120-ND, 4720, 6069, 8612, 8613, 8725, 8804, or 8831, enter the tentative tax, less any nonrefundable credits. See instructions. \$ 10
- b If this form is for Form 990-PF, 990-T, 1041 (estate), 1042, or 8804, enter any refundable credits and estimated tax payments made. Include any prior year overpayment allowed as a credit. \$ -
- c Balance due. Subtract line 5b from line 5a. Include your payment with this form, or deposit with FTD coupon if required. See instructions. \$ 10

Signature and Verification

Under penalties of perjury, I declare that I have examined this form, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete; and that I am authorized to prepare this form.

Signature [Signature] Title CPT Date 11/9/94

FILE ORIGINAL AND ONE COPY. The IRS will show below whether or not your application is approved and will return the copy.

Notice to Applicant—To Be Completed by the IRS

- ☐ We HAVE approved your application. Please attach this form to your return.
- ☐ We HAVE NOT approved your application. However, we have granted a 10-day grace period from the later of the date shown below or the due date of your return (including any prior extensions). This grace period is considered to be a valid extension of time for elections otherwise required to be made on a timely return. Please attach this form to your return.
- ☐ We HAVE NOT approved your application. After considering the reasons stated in item 4, we cannot grant your request for an extension of time to file. We are not granting the 10-day grace period.
- ☐ We cannot consider your application because it was filed after the due date of the return for which an extension was requested.
- ☐ Other: _____

Director _____ By: _____ Date _____

If you want a copy of this form to be returned to an address other than that shown above, please enter the address to which the copy should be sent.

Please Type or Print	Name FRANCIS H. MAKIYA, CPA
	Number and street (or P.O. box no. if mail is not delivered to street address) 1150 S. KING STREET, SUITE 605
	City, town or post office, state, and ZIP code. For a foreign address, see instructions. HONOLULU, HAWAII 96814
	Apt. or suite no.

2758

(Rev. July 1993)

Department of the Treasury
Internal Revenue ServiceApplication for Extension of Time To File
Certificate for Excise, Income, Information, and Other ReturnsOMB No. 1545-0148
Expires 5-31-95

File a separate application for each return.

Please type or
print. File the
original and one
copy by the due
date for filing
your return. See
instructions on
back.

Name

The Frank E. Fori Charitable Foundation

Employer identification number

99-0300719

Number and street (or P.O. box no. if mail is not delivered to street address)

1001 Bishop St. Panama City

Apt. or suite no.

Ste. 200

City, town or post office, state, and ZIP code. For a foreign address, see instructions.

Hon HI 96814

Note: Corporate income tax return filers must use Form 7004 to request an extension of time to file. Partnerships, REMICs, and trusts (except those filing Form 990-T) must use Form 8736 to request an extension of time to file.

1 An extension of time until May 15, 1995, is requested to file (check only one):

- ☐ Form 706GS(D) ☐ Form 990-T (402(a) or 408(a) trust) ☐ Form 1042-S ☐ Form 8069 ☐ Form 8831
- ☐ Form 706GS(T) ☐ Form 990-T (trust other than above) ☐ Form 1120-ND (4951 taxes) ☐ Form 8612
- ☐ Form 990 or 990-EZ ☐ Form 1041 (estate) (see instructions) ☐ Form 3520-A ☐ Form 8613
- ☐ Form 990-BL ☐ Form 1041-A ☐ Form 4720 ☐ Form 8725
- ☒ Form 990-PF ☐ Form 1042 ☐ Form 5227 ☐ Form 8804

If the organization does not have an office or place of business in the United States, check this box ☐ N/A

2a For calendar year 1993, or other tax year beginning July 1, 1993, and ending June 30, 1994

b If this tax year is for less than 12 months, check reason: ☐ Initial return ☐ Final return ☐ Change in accounting period N/A3 Has an extension of time to file been previously granted for this tax year? ☒ Yes ☐ No

4 State in detail why you need the extension. Organization is in the process of getting delinquent data required for the tax return.

5a If this form is for Form 706GS(D), 706GS(T), 990-BL, 990-PF, 990-T, 1041 (estate), 1042, 1120-ND, 4720, 8069, 8612, 8613, 8725, 8804, or 8831, enter the tentative tax, less any nonrefundable credits. See instructions. \$ 10

b If this form is for Form 990-PF, 990-T, 1041 (estate), 1042, or 8804, enter any refundable credits and estimated tax payments made. Include any prior year overpayment allowed as a credit. \$ 10

c Balance due. Subtract line 5b from line 5a. Include your payment with this form, or deposit with FTD coupon if required. See instructions. \$ -

Signature and Verification

Under penalties of perjury, I declare that I have examined this form, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete; and that I am authorized to prepare this form.

Signature

Francis Makrya CPA

Title

Date

7/14/95

FILE ORIGINAL AND ONE COPY. The IRS will show below whether or not your application is approved and will return the copy.

Notice to Applicant—To Be Completed by the IRS

- ☐ We HAVE approved your application. Please attach this form to your return.
- ☐ We HAVE NOT approved your application. However, we have granted a 10-day grace period from the later of the date shown below or the due date of your return (including any prior extensions). This grace period is considered to be a valid extension of time for elections otherwise required to be made on a timely return. Please attach this form to your return.
- ☐ We HAVE NOT approved your application. After considering the reasons stated in item 4, we cannot grant your request for an extension of time to file. We are not granting the 10-day grace period.
- ☐ We cannot consider your application because it was filed after the due date of the return for which an extension was requested.
- ☐ Other:

EXTENSION TO FILE
APPROVED TO

FEB 22 1995

MAR 8 1995

MAY 15 1995

FRESNO, CA
SERVICE

Director

By:

Theron C. Polivka, Director
Fresno Service Center

Date

8956204252

If you want a copy of this form to be returned to an address other than that shown above, please enter the address to which the copy should be sent.

Please
Type
or
Print

Name

Francis Makrya CPA

Number and street (or P.O. box no. if mail is not delivered to street address)

1001 S. King St. Ste 605

Apt. or suite no.

City, town or post office, state, and ZIP code. For a foreign address, see instructions.

Hon HI 96814

97043793592



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 19, 1995

Anthony P. Locricchio, Esq.
903 Maunawili Circle
Kailua, HI 96734

RE: MUR 4150

Dear Locricchio:

This letter acknowledges receipt on June 12, 1995, of the amendment to the complaint you filed on June 8, 1995. The respondent(s) will be sent a copy of the amendment. You will be notified as soon as the Federal Election Commission takes final action on your complaint.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

97043793593



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 19, 1995

Wagdy Guirguis, President
GMP Associates, Inc.
841 Bishop Street, Suite 1501
Honolulu, HI 96813

RE: MUR 4150

Dear Mr. Guirguis:

The Federal Election Commission received an amendment to a complaint which indicates that GMP Associates, Inc. may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the amendment and original complaint is enclosed. We have numbered this matter MUR 4150. 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 GMP Associates, Inc. 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.

97043793594

GMP Associates, Inc.
Page 2

If you have any questions, please contact Alva E. Smith at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

9704379355



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 19, 1995

President
International Supreme Master
Ching Hai Meditation Associations
P.O. Box 9, Hsihu Shiang
Maioli Hsien
Taiwan, Republic of China

RE: MUR 4150

Dear Sir or Madam:

The Federal Election Commission received an amendment to a complaint which indicates that the International Supreme Master Shing Hai Meditation Associations ("International Supreme Master") may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the amendment and original complaint is enclosed. We have numbered this matter MUR 4150. 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 International Supreme Master 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.

97043793596

International Supreme Master
Page 2

If you have any questions, please contact Alva E. Smith at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

97043793597



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 19, 1995

David F. Fasi, Trustee
Frank F. Fasi Charitable Foundation
2045 Makiki Street
Honolulu, HI 96822

RE: MUR 4150

Dear Mr. Fasi:

The Federal Election Commission received an amendment to a complaint which indicates that the Frank F. Fasi Charitable Foundation (the "Foundation") may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the amendment and original complaint is enclosed. We have numbered this matter MUR 4150. 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 Foundation 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.

97043793598

Frank F. Fasi Charitable Foundation
Page 2

If you have any questions, please contact Alva E. Smith at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

97043793599



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 19, 1995

Bruce H. Turnbull, Esq.
Elizabeth A. Noonan, Esq.
Weil, Gotshal & Manges
1615 L Street, N.W.
Washington, D.C. 20036

RE: MUR 4150
ECC Foreign Language Institute

Dear Mr. Trunbull and Ms. Noonan:

On December 5, 1994, your client was notified that the Federal Election Commission received a complaint from Anthony P. Locricchio alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. At that time your client was given a copy of the complaint and informed that a response to the complaint should be submitted within 15 days of receipt of the notification.

On June 12, 1995, the Commission received additional information from the complainant pertaining to the allegations in the complaint. Enclosed is a copy of this additional information. As this new information is considered an amendment to the original complaint, you are hereby afforded an additional 15 days in which to respond to the allegations.

If you have any questions, please contact Alva E. Smith at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosure

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

9704379360C



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 19, 1995

David F. Fasi, Esq.
2054 Makiki Street
Honolulu, HI 76822

RE: MUR 4150
Treasurer
Friends for Fasi

Dear Mr. Fasi:

On December 5, 1994, your clients were notified that the Federal Election Commission received a complaint from Anthony P. Locricchio alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. At that time your clients were given a copy of the complaint and informed that a response to the complaint should be submitted within 15 days of receipt of the notification.

On June 12, 1995, the Commission received additional information from the complainant pertaining to the allegations in the complaint. Enclosed is a copy of this additional information. As this new information is considered an amendment to the original complaint, you are hereby afforded an additional 15 days in which to respond to the allegations.

If you have any questions, please contact Alva E. Smith at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosure

97043793601

WEIL, GOTSHAL & MANGES

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

1615 L STREET, N.W.

WASHINGTON, D.C. 20036-5610

(202) 682-7000

FAX: (202) 857-0939

(202) 857-0940

TELETYPE: 440046

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FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

AUG 4 4 02 PM '95

DALLAS
HOUSTON
MENLO PARK
(SILICON VALLEY)
MIAMI
NEW YORK

BRUSSELS
BUDAPEST
LONDON
PRAGUE
WARSAW

WRITER'S DIRECT LINE

(202) 682-7288

August 4, 1995

Alva E. Smith, Esq.
Office of General Counsel
Federal Election Commission
999 E Street, N.W. - Room 657
Washington, D.C. 20463

Re: MUR 4150 -- Response to Additional Information

Dear Ms. Smith:

This letter is submitted on behalf of our client the ECC Foreign Language Institute (the "Institute") in response to the additional information submitted in connection with MUR 4150 and forwarded to our office by the Federal Election Commission ("FEC" or the "Commission") by letter dated July 19, 1995. The documents forwarded with the Commission's July 19 letter allege that donations reported by the Frank F. Fasi Charitable Foundation ("Foundation") in its 1993 tax return, including a donation by the Institute, were actually campaign contributions.

As a result of these additional allegations, our client has reviewed its files and assembled a series of correspondence between the Institute and Frank Fasi's office, which indicates that the contribution apparently made by the Institute to the Foundation in January 1994 was solicited as and intended by the Institute as a charitable donation.¹

According to these materials, in November 1993, Linda Wong, Mr. Fasi's Chief of Staff, contacted the Institute concerning a visit to the Mayor's office by graduates of the ECC Business College. In addition, this letter solicited a contribution from the Institute for Mr. Fasi's recently organized

1. These letters are included as Attachment A.

97043793602

Alva E. Smith, Esq.
August 4, 1995
Page 2

charitable organization.² In the solicitation letter, Ms. Wong indicated that the Foundation was to "be used to help the community."

The Mayor's office clearly and affirmatively represented to our client that the Foundation was a community service organization -- not a political organization or one related to Mr. Fasi's mayoral campaign. Indeed, the ECC saw its donation as an opportunity to support Mr. Fasi in a charitable endeavor and, as indicated by our client, to demonstrate its appreciation for his on-going support of the Institute's oratorical contest.³

Further, neither this initial letter nor any of the other correspondence from Mr. Fasi's office or the Institute even suggests that the requested donation was a contribution to Mr. Fasi's political campaign. Moreover, notwithstanding his allegations, the complainant submitted no documentation that suggests that the reported donation by the Institute was in actuality a campaign contribution. Indeed, the alleged new evidence submitted by the complainant himself is the Foundation's 1993 tax filing -- a return for a charitable organization. The return only lends support to our client's impression that any donation to the Foundation was submitted to a charitable institution.

Ultimately, the correspondence provided by our client relating to the apparent donation to the Foundation supports only the notion that the Institute was requested and intended to make a charitable donation to the Foundation and not a campaign contribution.

2. See Letter from Linda Wong, Office of the Mayor, City and County of Honolulu, to Hirofumi Ohnishi, ECC General Headquarters (Nov. 3, 1993) (attached).

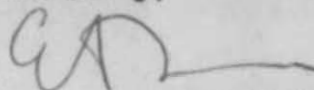
3. See Letter from Hirofumi Ohnishi, ECC Foreign Language Institute, to Linda Wong, Office of the Mayor, City and County of Honolulu (Dec. 9, 1993) (attached). See also Letter from Katsumi Yamaguchi, ECC Foreign Language Institute, to Mary L. Taksar, FEC, (Dec. 25, 1994) (Institute response to inquiry under MUR 4150 from FEC).

97043793603

Alva E. Smith, Esq.
August 4, 1995
Page 3

If you have any questions, please do not hesitate to contact Bruce Turnbull at (202) 682-7070 or Elizabeth Noonan at (202) 682-7288.

Sincerely,



Bruce H. Turnbull
Elizabeth A. Noonan

97043793604

OFFICE OF THE MAYOR
CITY AND COUNTY OF HONOLULU

HONOLULU, HAWAII 96813-4954 CODE 008-523-4141

FRANK F. FASI
MAYOR



November 3, 1993

Mr. Hirofumi Ohnishi
Vice-President of ECC
ECC General Headquarters
1-1, Nakazakinishi 2-chome
Kita-ku, Osaka 530
Japan

Dear Mr. Ohnishi:

Thank you for your letter of October 18, 1993, informing Mayor Fasi of the visit of your first graduation tour of the ECC Business College to Hawaii. He would be pleased to meet with the group in his office on December 16, at 11:00 a.m..

The late Mr. Isamu Yamaguchi was a great man who did a lot of good things for the people of Japan and the world. Mayor Fasi was privileged to have his friendship and support.

Mayor Fasi has recently established the Frank F. Fasi Charitable Foundation which will be used to help the community. We are now in the process of raising funds for the foundation and would like to know whether ECC Foreign Language Institute and the ECC Business College could get together and make a one time contribution of \$50,000 (U.S. Dollars). We would appreciate any help you can give us in our fundraising efforts.

Please call me at (808) 523-4288 or Fax me at (808) 527-5552 if you have any questions or need more information.

We look forward to meeting your representatives on December 16, 1993.

Sincerely,

Linda Wong
Linda Wong
Mayor's Chief of Staff

97043793605

Hirofumi Ohnishi
Vice President of ECC
1-1, Nakazakinishi 2-chome
Kita-ku, Osaka 530
JAPAN
Fax: (816)359-1596

December 9, 1993

Ms. Linda Wong
Mayor's Chief of staff
Office of the Mayor
City and County of Honolulu
Honolulu, Hawaii 96813

Dear Ms. Wong:

Thank you for your letter of November 3, 1993. I was very happy to hear that Mayor Fasi will be able to meet our first graduation tour group from ECC Business College to Hawaii. I am sure that meeting Mayor Fasi will be the highlight of the trip.

We were very happy to hear of the establishment of the Frank F. Fasi Charitable Foundation. However, as you know we are having a very difficult time in Japan right now. The recession seems to be getting worse instead of better and many companies have cutback on staff as well as money for educational programs for their staff. As a result, ECC has also been effected by this situation. However, because of the long relationship we have had with Mayor Fasi, we would like to further his project as much as possible. Therefore, although it is impossible at this time to donate 50,000 dollars, we have decided to make a donation of 20,000 dollars. I hope that you will understand our situation and accept this donation on our part as a token of our continuing friendship and esteem for, and commitment to Mayor Fasi.

Please let me know the name of the Foundation's bank, branch, and account and account number so that we can transfer the money to the account.

With all my very best for a Merry Christmas and a happy and prosperous New Year for all of us.

Sincerely yours,

Hirofumi Ohnishi
Hirofumi Ohnishi
Vice President of ECC

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OFFICE OF THE MAYOR
CITY AND COUNTY OF HONOLULU

HONOLULU HAWAII 96813 AREA CODE 808 • 808-4141

FRANK P. FASI
MAYOR



December 30, 1993

Mr. Hirofumi Ohnishi
Vice President of ECC
1-1, Nakasakinishi 2-chome
Kita-ku, Osaka 530
Japan

Dear Mr. Ohnishi:

Thank you for your letter of December 9, 1993, and your support of the Frank P. Fasi Foundation. The following is information that you will need:

The account is under The Frank P. Fasi Charitable Foundation at the main branch of the Bank of Hawaii. The Account Number is 0001-031902.

If you plan to wire the funds, please send it to the Main Branch of Bank of Hawaii, Route # 121301028, for the Frank P. Fasi Charitable Foundation.

Mayor Fasi enjoyed meeting with your students from ECC Business College. I hope that they enjoyed the Christmas decorations at City Hall.

Thank you again for your continued support. If there is anything we can do for you, please call me at (808) 523-4288.

Sincerely,

Linda Wong

Linda Wong
Mayor's Chief of Staff

97043793607

ECC

ECC FOREIGN LANGUAGE INSTITUTE

1-1 NAKAZAKI-NISHI 2CHOMEI, KITA-KU, OSAKA 536 JAPAN TEL: (06)362-0571 FAX: (06)362-0585

February 16, 1994

Ms. Linda Wong
Mayor's Chief of Staff
Office of the Mayor
City and County of Honolulu
Honolulu, Hawaii 96813

Dear Ms. Wong:

Thank you for your letter of 30 December 1993. I was very happy to hear that Mayor Fasi enjoyed meeting our first graduation tour group from ECC Business College to Hawaii. They also enjoyed meeting him.

I am writing to confirm that you have received our 20,000 U.S. dollar donation to the Frank P. Fasi Charitable Foundation. We remitted our donation per your instructions on 11 January 1994. Would you be kind enough to let us know if you received it safely. If you have not, we will begin to trace it from our end.

Please give our very best to Mayor Fasi.

Sincerely yours,

Hirofumi Ohnishi

Hirofumi Ohnishi
Vice President
ECC Foreign Language
Institute

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95-07-31:10:58

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LAW OFFICE

70088

P. 7/ 7

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P. 80

OFFICE OF THE MAYOR
CITY AND COUNTY OF HONOLULU

HONOLULU HAWAII 96813-6 AREA CODE 808-535-6141

FRANK F. FAZI
MAYOR



February 24, 1994

Mr. Hirofumi Ohnishi
Vice President of ECC
1-1, Nakazakinishi 2-chome
Kita-ku, Osaka 530
Japan

Dear Mr. Ohnishi:

Thank you for the support you have given to the Frank F. Fazi Charitable Foundation. We received your donation and appreciate the friendship that comes with it.

I always enjoy meeting with your students who visit our islands and look forward to a long and continuing relationship with you and the ECC Foreign Language Institute.

Warm personal regards.

Sincerely,

FFF:lw

97043793609

VERNER LIPPERT
BERNHARD McPHERSON & HAND
[CHARTERED]

901 - 15TH STREET, N.W.
WASHINGTON, D.C. 20005-2301
(202) 371-6000
FAX: (202) 371-6279

WRITER'S DIRECT DIAL
(202) 371-6147

August 7, 1995

Hand Delivery

Federal Election Commission
Office of the General Counsel
999 E Street, N.W.
Washington, D.C. 20463

Attn: Mary L. Taksar, Esq.

Re: MUR 4150

Dear Ms. Taksar:

On behalf of GMP Associates, Inc. we ask that the Federal Election Commission (the "Commission") take no further action against GMP Associates, Inc. We further move to dismiss the amended complaint filed by Mr. Locricchio insofar as it alleges that GMP Associates, Inc. violated provisions of the Federal Election Campaign Act of 1971, as amended ("FECA").

Mr. Locricchio's amended complaint appears to allege that GMP Associates, Inc. (1) is a "foreign national"; (2) made a campaign contribution to, or on behalf of, Frank Fasi; and (3) in so doing, violated FECA's prohibition against campaign contributions by foreign nationals. However, as discussed below, GMP Associates, Inc. is not a "foreign national" and did not make a campaign contribution. Therefore, the amended complaint fails to allege any violation of FECA by GMP Associates, Inc. and should be dismissed.

GMP Associates, Inc. is Not a "Foreign National"

FECA provides that it is unlawful for a foreign national to make any contributions in connection with an election to any political office. 2 U.S.C. § 441e(a). "Foreign national" includes a "foreign principal" (as defined by 22 U.S.C. § 611(b)). See 2 U.S.C. § 441e; 11 C.F.R. § 110.4, which includes a corporation that is organized under the laws of or having its

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OFFICE OF GENERAL
COUNSEL
AUG 7 4 36 PM '95

HOUSTON, TEXAS OFFICE
2600 TEXAS COMMERCE TOWER
600 TRADE
HOUSTON, TEXAS 77002
(713) 237-9034
FAX: (713) 237-1216

AUSTIN, TEXAS OFFICE
SAN JACINTO CENTER
98 SAN JACINTO BLVD, SUITE 1400
AUSTIN, TEXAS 78701
(512) 703-0000
FAX: (512) 703-0003

HONOLULU, HAWAII OFFICE
HONOLULU TRADE BUILDING
925 NUUANU AVE, SUITE 400
HONOLULU, HAWAII 96817
(808) 566-0999
FAX: (808) 566-0995

McLEAN, VIRGINIA OFFICE
8280 GREENWAY DRIVE
SUITE 501
McLEAN, VIRGINIA 22102
(703) 749-6000
FAX: (703) 749-6027

97043793610

principal place of business in a foreign country. 22 U.S.C. § 611(b). Commission regulations further prohibit a foreign national from directly or indirectly participating in the decisionmaking process of any organization with regard to its election-related activities. 11 C.F.R. § 110.4(a)(3).

The complaint's allegations concerning GMP Associates, Inc. do not meet any of these tests of a "foreign national." GMP Associates, Inc. is a domestic corporation, incorporated under the laws of Ohio,^{1/} which has its principal place of business in the State of Hawaii, and, on the date the alleged "contribution" was made, its stock was wholly owned by United States citizens. These citizens were Peter B. Melnyk, Wagdy A. Guirguis and Lee Mansfield. Accordingly, GMP Associates, Inc. is not a "foreign national" for purposes of FECA.^{2/} Since GMP Associates, Inc. is not a "foreign national", the amended complaint fails to allege a violation of FECA by GMP Associates, Inc. Therefore, the complaint against GMP Associates, Inc. should be dismissed on this basis, and the Commission should take no further action against GMP Associates, Inc.

GMP Associates, Inc. Did Not Make a Campaign Contribution

Further, GMP Associates, Inc. did not make a campaign contribution to, or on behalf of, Frank Fasi. The amended complaint alleges only that GMP Associates, Inc. made a contribution to a charitable foundation, the Frank F. Fasi Charitable Foundation (the "Fasi Foundation"). GMP Associates, Inc. has no knowledge that would suggest that its contribution to the Fasi Foundation was a masked contribution to any political committee. In fact, the amended complaint shows that the Fasi Foundation, in turn, made contributions to the American Red Cross, the Punahou School, the Iolani School, the Hawaii Baptist Academy, the Salvation Army, and the Trustees of Trinity College. There is no evidence of any kind indicating that the Fasi Foundation made contributions to any political committee. Thus,

1/ A copy of the Certificate of Incorporation of GMP Associates, Inc., is attached hereto.

2/ Although GMP Associates, Inc., from time to time may employ certain "foreign nationals", those individuals are not in positions in which they may directly or indirectly participate in making any decisions concerning the making of contributions or expenditures by GMP Associates, Inc., in connection with any elections.

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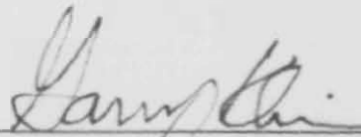
Federal Election Commission
August 7, 1995
Page 3

the amended complaint does not even allege that GMP Associates, Inc. made a contribution either directly or indirectly to any political campaign.

Wherefore, we respectfully request that the Commission take no further action against GMP Associates, Inc. We further request that the amended complaint be dismissed insofar as it alleges violations of the Federal Election Campaign Act by GMP Associates, Inc.

Respectfully submitted,

VERNER, LIIPFERT, BERNHARD,
McPHERSON and HAND, Chartered



by: Gary J. Klein
Attorneys for GMP Associates, Inc.

97043793612

AUG 8 12 12 PM '95

2024-1215

3v *MD KD*
Date 12-20-76
502

490930

ARTICLES OF INCORPORATION

OF

PROFESSIONAL

GMP ASSOCIATES, INC.

The undersigned, a majority of whom are citizens of the United States, desiring to form a professional association for profit, under Sections 1785.01 et seq. of the Revised Code of Ohio, do hereby certify:

FIRST. The name of said association shall be,

GMP ASSOCIATES, INC.

SECOND. The place in Ohio where its principal office is to be located is CLEVELAND, CUYAHOGA County.

THIRD. The purposes for which it is formed are:

1. To engage in the practice of engineering.
2. To engage in any lawful act or activity for which corporations may be formed under sections 1701.01 to 1701.99, inclusive of the Ohio Revised Code.

FOURTH. The number of shares which the association is authorized to have outstanding is FIVE HUNDRED SHARES OF COMMON STOCK WITHOUT PAR VALUE.

FIFTH. The amount of states capital with which the corporation shall begin business is FIVE HUNDRED DOLLARS (\$ 500.00).

SIXTH. Redemption. The corporation, through its Board of Directors, shall have the right and power to repurchase any of its outstanding shares at such price and upon such terms as may be agreed upon between the corporation and selling shareholder or shareholders.

IN WITNESS WHEREOF, We have hereunto subscribed our names, this 16 day of DECEMBER, 1976.

97043493613

EO 12812-1216

(cont. from page one)

X *W. A. Edrington* P. E.
WAGY A. EDINGTON

97043793614

Prescribed by: Sherrou Brown
Secretar of State
C-128

Charter No. 490930
Approved: S. H. H.
Date: 6/15/89
Fee: \$85.00

CERTIFICATE
OF
AMENDED ARTICLES OF INCORPORATION
OF

GMP Associates, Inc.

Wagdy Adeeb Guirguis who is Chairman of the Board, President,
Vice President (check one) and Peter Bryan Melnyk
who is Secretary, Assistant Secretary (check one) of the above named
corporation for profit with its principal location at 11625 Clifton Blvd.,
Cleveland, Ohio

Ohio do hereby certify that:

X a meeting of the shareholders of said corporation entitling them to vote
on the proposal to adopt Amended Articles as contained in the fol-
lowing resolution was duly called and held on the 15th
day of June, 1989, at which meeting a quorum of such
shareholders was present in person or by proxy, and that by the affirma-
tive vote of the shareholders entitled under the articles to exercise
100 % of the voting power of the corporation on such proposal,

in a writing signed by all of the shareholders entitled to notice of a
meeting for such purpose,

the following resolution was adopted:

RESOLVED, that the following Amended Articles of Incorporation be
and the same are hereby adopted to supersede and take place of the existing
Articles of Incorporation and all amendments thereto:

AMENDED ARTICLES OF INCORPORATION

The undersigned, a majority of which are citizens of the United States
desiring to form a corporation for profit under Sec. 1701.01 et Seq.
of the Revised Code of Ohio do hereby certify

FIRST: The name of the corporation is GMP Associates, Inc.

SECOND: The place in the State of Ohio where its principal office is
located in the City of Cleveland, Ohio County.

THIRD: The purposes of the corporation are as follows:

- 1) To engage in the practice of Engineering
- 2) To engage in any lawful act or activity for which corporations
be formed under Sections 1701.01 to 1701.98 and other applicable
sections of the Ohio Revised Code.

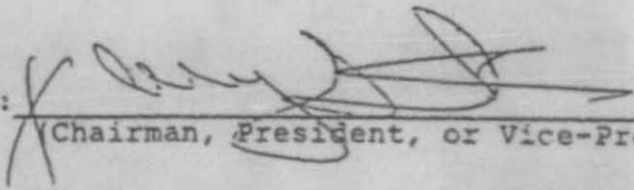
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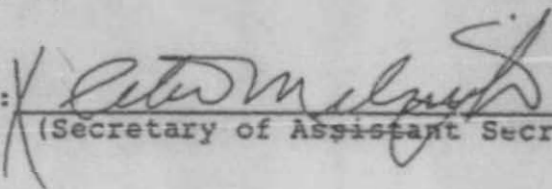
G0655-0410

FOURTH: The Corporation shall be authorized to issue 1000 shares of Common No Par Stock.

~~FLEET~~ These Amended Articles of Incorporation take the place of and supersede the existing Articles of Incorporation as heretofore amended.

IN WITNESS WHEREOF, the above named officers, acting for and on behalf of the corporation, have hereunto subscribed their names and caused the seal of said corporation to be hereunto affixed this 15th day of June, 1989.

By: 
(Chairman, President, or Vice-Pres.)

By: 
(Secretary or Assistant Secretary)

NOTE: Ohio law does not permit one officer to sign in two capacities. Two separate signatures are required, even if this necessitates the election of a second officer before the filing can be made.

97043793616

Prescribed by: Sherrod Brown
Secretary of State
C-128

Charter No. 490930

Approved: SKG

Date: 10/30/89

Fee: 185.00

G0655-0409

CERTIFICATE
OF
AMENDED ARTICLES OF INCORPORATION
OF

GMP Associates, Inc.

Wagdy Adeeb Guirguis who is Chairman of the Board, President,
Vice President (check one) and Peter Bryan Melnyk
who is Secretary, Assistant Secretary (check one) of the above named
corporation for profit with its principal location at 11625 Clifton Blvd.,
Cleveland, Ohio
Ohio do hereby certify that:

X a meeting of the ~~shareholders~~ of said corporation entitling them to vote
on the proposal to adopt Amended Articles as contained in the fol-
lowing resolution was duly called and held on the 15th
day of June, 1989, at which meeting a quorum of such
~~shareholders~~ was present in person or by proxy, and that by the affirma-
tive vote of the shareholders entitled under the articles to exercise
100 % of the voting power of the corporation on such proposal,

in a writing signed by all of the ~~shareholders~~ entitled to notice of a
meeting for such purpose,

the following resolution was adopted:

RESOLVED, that the following Amended Articles of Incorporation be
and the same are hereby adopted to supersede and take place of the existing
Articles of Incorporation and all amendments thereto:

AMENDED ARTICLES OF INCORPORATION

The undersigned, a majority of which are citizens of the United States:
desiring to form a corporation for profit under Sec. 1701.01 et Seq.
of the Revised Code of Ohio do hereby certify

FIRST: The name of the corporation is GMP Associates, Inc.

SECOND: The place in the State of Ohio where its principal office is
located in the City of Cleveland, Ohio County.

THIRD: The purposes of the corporation are as follows:

- 1) To engage in the practice of Engineering
- 2) To engage in any lawful act or activity for which corporations may
be formed under Sections 1701.01 to 1701.98 and other applicable
sections of the Ohio Revised Code.

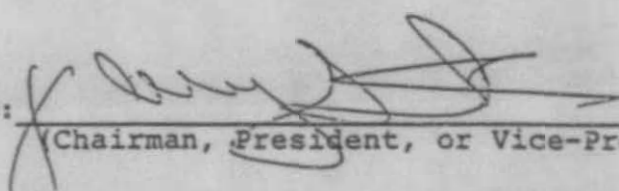
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G0655-0410

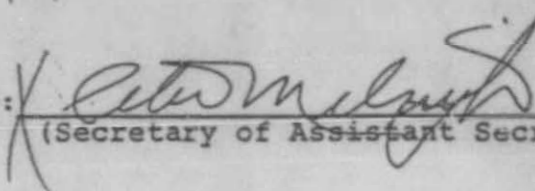
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IN WITNESS WHEREOF, the above named officers, acting for and on behalf of the corporation, have hereunto subscribed their names and caused the seal of said corporation to be hereunto affixed this 15th day of June, 1989.

By: 

(Chairman, President, or Vice-Pres.)

By: 

(Secretary or Assistant Secretary)

NOTE: Ohio law does not permit one officer to sign in two capacities. Two separate signatures are required, even if this necessitates the election of a second officer before the filing can be made.

970439793618

The International Supreme Master Ching Hai
Meditation Associations

清海無上師國際禪定學會

總部 地址：羅爾摩沙苗圃西湖郵政九號信箱
電話：886-37-922870 傳真：886-37-922822

September 12, 1995

Ms. Mary L. Taksar, Attorney
Central Enforcement Docket
Federal Election Commission
Washington D.C. 20463
U.S.A.

RE: MUR 4150

Dear Ms. Taksar,

We have just received your document on September 8, and we feel deeply sorry that a pure goodwill ends up in such a complicated situation.

We are a spiritual practice international organization. We often give helps to those who need disregard of races, religions and districts. During the past years, we had given contributions and assistance to disasters and misfortunes in many countries such as U.S.A., the Philippines, Korea, Japan, Mainland China, Vietnam, Thailand, Malaysia, Russia, Cambodia, Taiwan, Rwanda, France, England, Holland, Belgium, Pakistan, Nepal, Greece, Ivory Coast, Benin, etc. (Please refer to the Amendments). Especially in U.S.A., we had helped in different aspects and places, they were: Mid-West Floods, South California fire disaster, the homeless, the AIDS research, the leper patients, veteran soldiers... etc. (Please refer to the Amendments).

Our means of relief are mostly sending necessities directly to the victims. Sometimes, due to medium limitation, we would through some reputable international assistance organizations such as Red Cross, Medecins Sans Frontieres... etc., or we would send fund through local governments for relief. We would ask for receipt and letter for the recognition of the receipt of our remittance, and we would then print it on our association's global magazine as a kind of notification. Regarding the recipient's actual management of the fund, if there is any imperfection or falsehood, it is out of our control.

Page 1/2

Headquarters

Add: P. O. BOX 9 Hsi Hu Miao Li, Formosa R.O.C.
Fax: 886-37-922822 Tel: 886-37-922870

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

SEP 18 3 20 PM '95

97043793619

The International Supreme Master Ching Hai
Meditation Associations

清海無上師國際禪定學會

總部 地址：羅爾摩沙苗栗西湖郵政九號信箱
電話：886-37-922870 傳真：886-37-922822

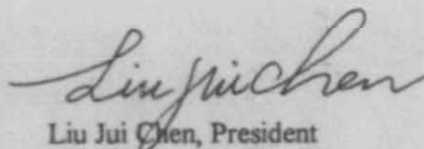
Central Enforcement Docket
Federal Election Commission

Page 2/2

Like in the case in Hawaii, we had given several contributions: the Pearl Harbour Memorial Hall, families with mental retarded children, the social needs (which is the contribution mentioned in your letter about the amount of US\$45,000.00, please refer to the Amendments), the leper patients on Molokai Island, please refer to our amendments and you will have a clearer picture.

We will try our best to cooperate with you and to fulfill your request for the explanation, we will first fax this letter and the amendment, and follow by express mail. We hope that it would be of help to you in the investigation of this case.

Yours sincerely,



Liu Jui Chen, President

The International Supreme Master Ching Hai Meditation Associations

Enclosure: Amendments

Headquarters

Add: P. O. BOX 9 Hsi Hu Miao Li, Formosa R.O.C.
Fax: 886-37-922822 Tel: 886-37-922870

9704379362C

JOHN WAIHEE
GOVERNOR OF HAWAII



JOHN C. LEWIN, M.D.
DIRECTOR OF HEALTH

STATE OF HAWAII
DEPARTMENT OF HEALTH

P. O. BOX 3378
HONOLULU, HAWAII 96801

December 28, 1993

In reply, please refer to:
File:

Supreme Master Ching Hai
The Supreme Master Ching Hai
Mediation Association
No. 39 Dongsanhu, Sanhu Village,
Hsihu Shiang, Maialoli Hsien
Taiwan, R.O.C.

Dear Supreme Master Ching Hai:

It is with great pleasure and appreciation, that I as the Director of Health accept \$60,000 for the provision of respite services to Hawaii families with members who are developmentally disabled. These funds will allow the Hawaii State Department of Health through its Developmentally Disabilities Division to extend services to 60 families. Your contribution will bring joy and relief to these families and assist them in remaining as family units.

Sincerely,

A handwritten signature in dark ink, appearing to read "John C. Lewin", written over the typed name.

JOHN C. LEWIN, M.D.
Director of Health

97043793621

Friends of Pearl Harbor

December 20, 1993

The International Supreme Master Ching Hai
Meditation Associations
C/O Mayor Frank F. Fasi
City and County of Honolulu
Honolulu Hale
530 South King Street
Honolulu, Hawaii 96813

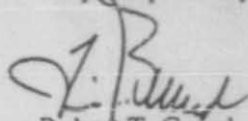
Dear Sir:

On behalf of the Friends of Pearl Harbor, Ltd., Please accept my sincere appreciation for your very generous contribution of \$55,000.00 which will greatly assist our efforts to complete the construction of the Pearl Harbor Memorial.

The Pearl Harbor Memorial Fountain is a beautiful and lasting memorial to the twelve vessels sunk during the attack on Pearl Harbor, December 7, 1941, and a tribute to the gallant men and women of Americas Sea Services who fought so bravely that historic December morning.

Again, my sincerest appreciation for your Generosity.

Very Respectfully,



Robert T. Guard
President
Friends of Pearl Harbor, Ltd.

97043793622

FRANK F. FASI CHARITABLE FOUNDATION
1001 Bishop Street, Pauahi Tower 2200
Honolulu, Hawaii 96813

January 20, 1994

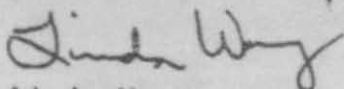
The International Supreme Master Ching Hai
Meditation Associations
P. O. Box 9
Hsi Hu Miao Li
Taiwan R.O.C.

Dear Representatives of Supreme Master Ching Hai:

This is to acknowledge the receipt of US\$45,000 that was deposited in the account of The Frank F. Fasi Charitable Foundation. The money will be used to help those in need in Hawaii.

Thank you for your generous gift. We appreciate your continued support of the people in Hawaii.

Sincerely,



Linda Wong
Trustee
Frank F. Fasi Foundation

97043793623

JOHN WAIHEE
GOVERNOR OF HAWAII



JOHN C. LEWIN, M.D.
DIRECTOR OF HEALTH

STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HAWAII 96801

In reply, please refer to:
File:

December 28, 1993

The Supreme Master Ching Hai
7 Doris Drive, Suite #3
No. Chelmsford, Massachusetts
01867

Dear Master Ching Hai:

The Hawaii Department of Health at Kalaupapa Settlement
has received your check in the amount of \$40,000.00.

This is truly a wonderful gift to the patient community
at Kalaupapa.

Your kindness and generosity is greatly appreciated!

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Michael E. McCarten".

Michael E. McCarten/Administrator
Kalaupapa Settlement

MEM:bj

97043793624



DEPARTMENT OF VETERANS AFFAIRS
Jerry L. Pettis Memorial VA Medical Center
11201 Benton Street
Loma Linda CA 92357

May 4, 1995

In Reply Refer To: 605/135

Supreme Master Ching Hai
P.O. Box 9
Tsihu, Miaoli
Taiwan, Republic of China

Dear Supreme Master Ching Hai:

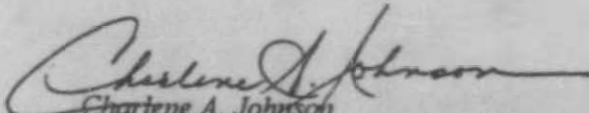
We extend our sincere appreciation for your generous donation of \$100,000.00 to the Interagency Committee for Homeless Veterans. Our Medical Center is a key sponsor of this committee. Their mission is to identify, and assist the homeless veterans, and their families in our community. Their vision is to break the "cycle - of homelessness" which often requires monetary resources to support the compassionate efforts of the staff members.

It is certainly, our pleasure and grateful desire to be a good steward of your enlightened compassion and support to our veterans. I would like to offer occasional progress reports to you of the activities and programs your generosity has created.

I would also like to take this opportunity to thank Mr. Thomas Ngo of the Los Angeles Meditation Center, for sharing your books with me. In light of reading these books, my understanding and appreciation for your gift is magnified. We are humbled by your concern and interest for the suffering of our veterans and their children so far from you.

Thank you again, for Caring!

Sincerely,


Charlene A. Johnson
Director of Community Resources

Enclosure:

CC: Thomas T. Ngo

97043793625



5900 WILSHIRE BOULEVARD
LOS ANGELES, CA 90036-5032
TEL (213) 857-5900
FAX (213) 857-5920

BOARD OF DIRECTORS

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Elizabeth Taylor

Founding Co-Chair
Chairman of the Board
Mehdi Krim, Ph.D.

President

Mervin F. Silberman, M.D., M.P.H.

In Memoriam

Sheldon W. Applebaum
Peter Seibert, Esq.

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Quantum Entanglement

Van, Gilbert D. Luskot
Suzuki Van Boon

NATIONAL COUNCIL

[illegible]

NEW YORK OFFICE
733 THIRD AVENUE
NEW YORK, NY 10017-1294
TEL (212) 682-7400 • FAX (212) 682-7912

PUBLIC POLICY OFFICE
1828 L STREET, N.W., SUITE 902
WASHINGTON, D.C. 20036-5104
TEL (202) 534-4600 • FAX (202) 534-4600

December 28th 1993

Supreme Master Ching Hai
P.O. Box 5662
El Monte, CA 91734

Dear Supreme Master Ching Hai,

I did not want another moment to pass before writing to thank you for your gift of \$15,000.00 to the American Foundation for AIDS Research. Your contribution places you in the ranks of AmFAR's most generous supporters, and is a tremendous boost to us in our efforts to fill the unmet needs in the battle against AIDS.

Once again, on behalf of the entire Board and staff, I thank you for your caring commitment to the fight against AIDS and HIV disease.

Sincerely,

Mervyn F. Silverman, M.D., M.P.H.
President



AMERICAN
CANCER
SOCIETY

SAN GABRIEL/POMONA VALLEYS UNIT of the California Division, Inc.

December 30, 1993

Supreme Master, Ching Hai
P.O. Box 5662
El Monte CA 91734

Dear Supreme Master:

We were most grateful to receive your very generous gift of \$15,000 to the American Cancer Society and wish to thank you, most sincerely, for your kindness. We want you to know how your gift will be used.

A large portion of it will be allocated towards promising research which is being done in large institutions across the nation. The key to finding a cure lies in research into its causes.

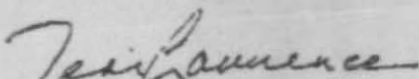
Additionally, the American Cancer is trying to educate the public and professionals in detection of cancer in its early stages and thus speed the treatment of existing diseases. We are encouraged, for example, that 90 percent of breast cancer is curable if detected early.

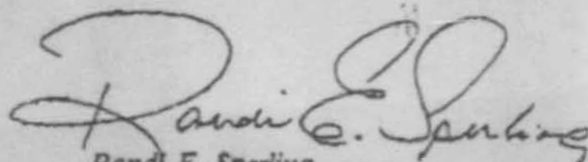
Lastly, we have ongoing programs throughout the year to assist families, and cancer patients themselves by providing free transportation to and from medical treatments, equipment, support counseling and friendly words of encouragement.

We are, again, grateful that you chose to help us in the battle against cancer and pledge to you that we will put your gift to good use against this dreaded disease.

Warmest best wishes to you.

Very truly yours,


Teri Lawrence
Unit President


Randi E. Sperling
Income Development Director

Enclosures

50 NORTH HILL AVENUE, PASADENA, CALIFORNIA 91106 • (818) 795-7774
P.O. BOX 60787, PASADENA, CALIFORNIA 91116

97043793627



City of Hope

Supporting
NATIONAL MEDICAL CENTER
AND BECKMAN RESEARCH INSTITUTE

January 13, 1994

Dr. Sanford M. Shapiro
President
Chief Executive Officer

Via Facsimile (213) 227-5123

Supreme Master Ching Hai
Meditation Society

Dear Supreme Master Ching Hai:

Our Vice President, Tonny van der Leeden, has shared with me a copy of his letter to you. I also want to express to you our deepest appreciation for your \$5,000 gift to the City of Hope.

I join with Mr. van der Leeden in welcoming you at any time to visit our campus. I think you would enjoy the experience.

Again, I reiterate our gratitude to you and I hope that we will meet personally in the not-too-distant future.

Sincerely,

Dr. Sanford M. Shapiro
President and Chief Executive Officer

SMS:bk

CELEBRATING
"THE SPIRIT OF LIFE"

200 WEST 8TH STREET, LOS ANGELES, CALIFORNIA 90014 (213) 626-4811
A National Cancer Institute Designated Clinical Cancer Research Center

97043793628

Kenneth Norris Jr. Comprehensive Cancer Center
Office of Development
(213) 342-1088
FAX (213) 342-3350

December 30, 1993

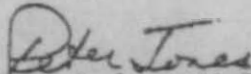
Supreme Master Ching Hal
Post Office Box 5662
El Monte, California 91734

Dear Sirs:

On behalf of the Kenneth Norris Jr. Comprehensive Cancer Center at the University of Southern California, it is my pleasure to thank you for your recent gift of \$5,000 benefiting Aids Research led by Dr. Alexandra Levine.

To all of us, your gift is a gift of hope. Your contribution enables us to continue our fight against Aids -- to understand the causes and to find the cures. On behalf of everyone at the Norris, I extend my warmest thanks for your support.

Sincerely,


Peter A. Jones, Ph.D., D.Sc.
Director

cc: Dr. Levine

University of Southern California
1420 San Pablo Street, PMB #C100, Los Angeles, California 90033

1101 0 07



TO : The International Supreme Master Ching Hai
Meditation Association

FROM : Pharmaciens Sans Frontières
Bertrand Chenin
Administrator, head of mission

Nairobi, the 14th of July

Dear Master Ching Hai,

I would like to apologize to you for having forgotten to inform your association that we received on 25th of June 1994 the 20,000.00 USD grant for the Rwandese refugees. In fact too much work is the origin of this lack of communication. I was on the spot during 18 days making an assesment on the humanitarian zone protected by the French troops and the report on the situation there is in process to be translated in english for you.

The needs are tremendously urgent for that zone but not only here, we have now set up three teams ready to receive medicines and medical material;

- one team is in KABALE, Uganda in charge of the northern camps in Rwanda and Uganda
- one team is in BUJUMBURA, Burundi in charge of the southern camps in Rwanda and in Zaire
- one other team is in KIGALI, Rwanda in charge of the orphanages of the main town.

One large consignment of drugs has already been sent to KABALE in order to maintain a good situation in N'GARAMA camp which is situated north-east to BYUMBA. We are working hand in hand on that spot with Medecins Du Monde (MDM).

In fact we are trying to work on both zones, FPR and French Humanitarian Zone, without any political distinction because the needs are very serious everywhere.

We are very happy and grateful for the grant you gave us in relation to the Rwandese situation, and we are going to give you a complete report on the proper consumption of your grant. Please wait for the report we are currently translating.

Bertrand Chenin
PSF Administrator



Giving Hope To A World Of Need

World Headquarters
Catholic Relief Services-USA
P.O. Box 10000
Baltimore, Maryland 21201-0000
A U.S. Agency of the United States Conference of Catholic Bishops

July 20, 1994

International Supreme Master Ching Hai
Mediation Association
P O Box Hsi Hu Miao Li
Formosa R. O. C.

(Originally in English)

Dear Madane,

Thank you for your most generous gift of \$10,000.00d on July 15, 1994 in support of Catholic Relief Services' programs in Rwanda. Your gift enables us to continue helping the people displaced by this terrible war.

To date, CRS has taken immediate action in supplying the displaced in southern Rwanda with both food and non food assistance. CRS has also sent a representative to Northern Rwanda and is in the planning stages of a similar response around Kiyombe and Mukarange. The estimated number of displaced Rwandans in the South is 500,000 and in the North, more than 300,000 have been displaced.

CRS weekly is sending convoys of 405 trucks into three Southern Diocese of Kabgayi, Butare and Gikongoro, food and non-food items. These have included 10,000 blankets, 400 cartons of sheeting, sugar, oil and nutritional biscuits.

CRS is organizing means of transport for the medicines donated by Caritas Germany.

CRS/Rwanda employees are currently situated in both Kabgayi and in Bujumbura.

As you may already know, the situation is changing daily and therefore much information is outdated by the time it reaches the news. CRS will continue to provide updated material as available.

Thank you again for your support and your concern for these poor Rwandan people. God bless you.

Sincerely,

Joseph S. Curtin
Joseph S. Curtin
Director, Special Donors

The Overseas Relief and Development Agency of the United States Conference of Catholic Bishops

Catholic Relief Services are not permitted to provide or receive any goods or services in exchange for or in return for any goods or services. This is a U.S. Agency of the United States Conference of Catholic Bishops. The full name of the agency is Catholic Relief Services, Inc. It is a non-profit organization. This is a U.S. Agency of the United States Conference of Catholic Bishops. The full name of the agency is Catholic Relief Services, Inc. It is a non-profit organization.



United Kingdom & Ireland
274 Banbury Road Oxford OX2 7DZ
Tel: (0865) 311311
Fax: (0865) 31.....
Telex: 83610 OXFAM G
Direct Tel: (0865) 31.....

The International Supreme Master Ching Hai
Meditation Associations

Fax : 010 886 37 922 822

8 August 1994

Dear Supreme Master Ching Hai,

This is to thank you for your generous donation of \$10,000 towards our general Rwanda appeal. We were delighted to hear the news. I apologise sincerely for the delay in acknowledging your contribution.

Your support is much appreciated by us, and we will endeavour to send you reports to let you know how your money is being used.

Our regional programme continues to grow very greatly in response to the continuing crisis. We have spent US\$15,000,000 so far. Our largest programme is in Goma in Zaire, where - at the invitation of UNHCR - we are, the lead agency in water distribution. In extremely difficult circumstances we are now distributing over 1,500,000 litres every day - about 5 litres for 300,000 people. Our aim is to deliver 15 litres to 800,000 people daily.

At the moment we are trying to find funding for a new emergency programme in Uvira and Bukavu in Zaire, where we fear that there will shortly be another massive exodus of Rwandans - on the scale of Goma. To prepare for this, we are pre-positioning emergency water equipment. The cost of this operation is approximately US\$350,000.

If you could contribute to this programme, or if you would like more information, please do not hesitate to contact me for more information. Whatever your response to this suggestion, thank you very much indeed for your generous contribution of US\$10,000.

Best wishes

Humphrey Pring

Humphrey Pring
Emergencies Funding Coordinator

FOUNDED IN 1942. Oxfam works with poor people regardless of race or religion in their struggle against hunger, disease, exploitation and poverty in Africa, Asia, Latin America and the Middle East through relief, development, research overseas and public education at home.

Honorary Officers: Mary Cherry Chair; Michael Gibbs Vice Chair; John Richards Hon Treasurer; Kate Kirkland Hon Secretary.
Director: David Bryer.

Registered as a charity No 202918

A company limited by guarantee. Registered Office 274 Banbury Road, Oxford OX2 7DZ. Registered in London No 612172. VAT Registration No GE 348 4542 32

97043793632

Kingdom of Cambodia

Nation, Religions, King

Date: January 25, 1995

To: The Supreme Master Ching Hai

We are deeply touched by your compassion and love for the needy people of Cambodia. Your efficient response to the donation of 3000 tons of rice delivered in Cambodia in time, will help many unfortunate families who suffered from the flood and drought.

Our Government and the people of Cambodia are very grateful and appreciative for your kind assistance.

Thank You



Minister
Special Representative
To First Prime Minister and Second Prime Minister

97043793633



COMMONWEALTH of VIRGINIA

Office of the Governor

George Allen
Governor

July 24, 1995

Mr. Suma Ching Hai
Suma Ching Hai International Association
Post Office Box 9
Hai Hu, Miao Li, Formosa
Republic of China

Dear Mr. Hai:

Thank for your letter of support and for your concerns.

Your efforts and contributions to assist Virginians affected by the terrible flooding are appreciated. The floods have subsided, but the devastation they left in their wake remains. We are thankful that the loss of life was minimized during the floods.

The recovery from the disaster has just begun and your generous contribution is a welcomed gift by the people of Virginia as they struggle to clean up their homes and their places of business.

While the floods have damaged property, they have not harmed our sense of community spirit. There are many Virginians who are donating their time and resources to assist their neighbors. Indeed, as evidenced by your support, assistance is coming from around the world.

Thank you again for your care and generosity.

With warm regards, I remain,

Sincerely,

George Allen

GA:wpc

97043793634

Mar 5 11 40 AM '97

In the Matter of

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)
)
)

ENFORCEMENT PRIORITY

SENSITIVE

GENERAL COUNSEL'S REPORT

MAR 11 1997

EXECUTIVE SESSION

I. INTRODUCTION

The cases listed below have been identified as either stale or of low priority based upon evaluation under the Enforcement Priority System (EPS). This report is submitted to recommend that the Commission no longer pursue these cases.

II. CASES RECOMMENDED FOR CLOSURE.

A. Cases Not Warranting Further Action Relative to Other Cases Pending Before the Commission

EPS was created to identify pending cases which, due to the length of their pendency in inactive status or the lower priority of the issues raised in the matters relative to others presently pending before the Commission, do not warrant further expenditure of resources. Central Enforcement Docket (CED) evaluates each incoming matter using Commission-approved criteria which results in a numerical rating of each case.

Closing such cases permits the Commission to focus its limited resources on more important cases presently pending before it. Based upon this review, we have identified 25 cases which do

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not warrant further action relative to other pending matters.¹ Attachment 1 to this report contains summaries of each case, the EPS rating, and the factors leading to assignment of a low priority and recommendation not to further pursue the matter.

B. Stale Cases

Effective enforcement relies upon the timely pursuit of complaints and referrals to ensure compliance with the law. Investigations concerning activity more remote in time usually require a greater commitment of resources, primarily due to the fact that the evidence of such activity becomes more remote and consequently more difficult to develop. Focusing investigative efforts on more recent and more significant activity also has a more positive effect on the electoral process and the regulated community.

¹ These cases are: MUR 4332 (*Bill Thomas Campaign Committee*); MUR 4347 (*Anonymous Respondent*); MUR 4354 (*Brian Steel for Congress*); MUR 4367 (*Philipstown Republicans*); MUR 4371 (*Employment Group*); MUR 4373 (*Cannon for Congress*); MUR 4374 (*Mark Stodola for Congress Primary Committee*); MUR 4375 (*Westchester County Conservative Party*); MUR 4377 (*Braxton for Congress*); MUR 4379 (*Teamsters Local Union No. 135*); MUR 4383 (*Pauken for Congress*); MUR 4384 (*Willie Colon for U.S. Congress*); MUR 4388 (*Bill Witt for Senate and Congress*); MUR 4390 (*Kolbe 96*); MUR 4391 (*Pat Roberts for Congress Committee*); MUR 4393 (*Cecil J. Banks*); MUR 4397 (*AFL-CIO*); MUR 4405 (*Katz for Congress Committee*); MUR 4411 (*First Evangelical Presbyterian Church*); MUR 4414 (*Turietta-Koury for Congress Committee*); MUR 4418 (*Bell Atlantic*); MUR 4421 (*Butler for Mayor*); MUR 4448 (*Friends for Jim Rapp*); Pre-MUR 334 (*Kinnamon for Congress*); and Pre-MUR 335 (*Davis for Congress*).

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We have identified cases which have remained on the Central Enforcement Docket for a sufficient period of time to render them stale 12 are not worthy of further action, and merit closure.⁴

We recommend that the Commission exercise its prosecutorial discretion and direct closure of the cases listed below, effective April 1, 1997. Closing these cases as of this date will permit CED and the Legal Review Team the necessary time to prepare closing letters and case files for the public record.

⁴ These cases are: MUR 4139 (*Enid 94*); MUR 4150 (*Frank Fast*); MUR 4257 (*DSCC*); MUR 4258 (*NRSC*); MUR 4260 (*Packwood & Auto Dealers*); MUR 4261 (*NRA Institute for Legis.*); MUR 4262 (*Oregon Republican Party*); MUR 4265 (*NRSC; Sen. Phil Gramm*); MUR 4272 (*Bishop for Congress*); MUR 4279 (*Russ Berrie Co.*); MUR 4284 (*United We Stand America*); and Pre-MUR 322 (*Royal Hawaiian Country Club*).

III. RECOMMENDATIONS.

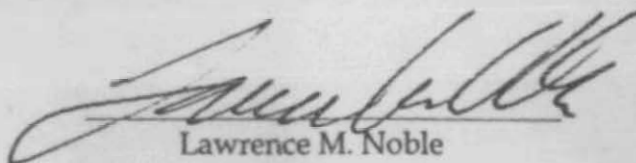
A. Decline to open a MUR, close the file effective April 1, 1997, and approve the appropriate letters in the following matters:

1. Pre-MUR 322
2. Pre-MUR 334
3. Pre-MUR 335.

B. Take no action, close the file effective April 1, 1997, and approve the appropriate letters in the following matters:

- | | | |
|--------------|--------------|--------------|
| 1. MUR 4139 | 13. MUR 4347 | 25. MUR 4390 |
| 2. MUR 4150 | 14. MUR 4354 | 26. MUR 4391 |
| 3. MUR 4257 | 15. MUR 4367 | 27. MUR 4393 |
| 4. MUR 4258 | 16. MUR 4371 | 28. MUR 4397 |
| 5. MUR 4260 | 17. MUR 4373 | 29. MUR 4405 |
| 6. MUR 4261 | 18. MUR 4374 | 30. MUR 4411 |
| 7. MUR 4262 | 19. MUR 4375 | 31. MUR 4414 |
| 8. MUR 4265 | 20. MUR 4377 | 32. MUR 4418 |
| 9. MUR 4272 | 21. MUR 4379 | 33. MUR 4421 |
| 10. MUR 4279 | 22. MUR 4383 | 34. MUR 4448 |
| 11. MUR 4284 | 23. MUR 4384 | |
| 12. MUR 4332 | 24. MUR 4388 | |

3/5/97
Date


Lawrence M. Noble
General Counsel

97043793638

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) Agenda Document: #X97-16
Enforcement Priority)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on March 11, 1997, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions with respect to the above-captioned matter:

A. Decline to open a MUR, close the file effective April 1, 1997, and approve the appropriate letters in the following matters:

1. Pre-MUR 322;
2. Pre-Mur 334;
3. Pre-MUR 335.

B. Take no action, close the file effective April 1, 1997, and approve the appropriate letters in the following matters:

- | | |
|--------------|---------------|
| 1. MUR 4139; | 10. MUR 4279; |
| 2. MUR 4150; | 11. MUR 4284; |
| 3. MUR 4257; | 12. MUR 4332; |
| 4. MUR 4258; | 13. MUR 4347; |
| 5. MUR 4260; | 14. MUR 4354; |
| 6. MUR 4261; | 15. MUR 4367; |
| 7. MUR 4262; | 16. MUR 4371; |
| 8. MUR 4265; | 17. MUR 4373; |
| 9. MUR 4272; | 18. MUR 4374; |

(continued)

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Federal Election Commission
Certification: Enforcement Priority
March 11, 1997

Page 2

19. MUR 4375;	27. MUR 4393;
20. MUR 4377;	28. MUR 4397;
21. MUR 4379;	29. MUR 4405;
22. MUR 4383;	30. MUR 4411;
23. MUR 4384;	31. MUR 4414;
24. MUR 4388;	32. MUR 4418;
25. MUR 4390;	33. MUR 4421;
26. MUR 4391;	34. MUR 4448.

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

Attest:

3-12-97
Date

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

97043793640



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

APR 01 1997

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Anthony P. Locricchio, Esq.
903 Maunawili Circle
Kailua, HI 96734

RE: MUR 4150

Dear Mr. Locricchio:

On December 5, 1994, the Federal Election Commission received your complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act").

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no action in the matter. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on April 1, 1997. This matter will become part of the public record within 30 days.

The Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437(g)(a)(8).

Sincerely,

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

97043793641



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 1, 1997

David F. Fasi, Trustee
Frank F. Fasi Charitable Foundation
2045 Makiki Street
Honolulu, HI 96822

RE: MUR 4150

Dear Mr. Fasi:

On July 19, 1995, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no action against the Frank F. Fasi Charitable Foundation. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on April 1, 1997.

The confidentiality provisions of 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 prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact Alva E. Smith at (202) 219-3400.

Sincerely,

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

97043793642



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 1, 1997

Liu Jui Chen, President
International Supreme Master Ching Hai
Meditation Associations
P.O. Box 9, Hsi Hu Miao Li
Fomosa, Republic of China

RE: MUR 4150
International Supreme Master Shing Hai Meditation Associations

Dear Mr. Chen:

On July 19, 1995, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no action against the International Supreme Master Shing Hai Meditation Associations. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on April 1, 1997.

The confidentiality provisions of 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 prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact Alva E. Smith at (202) 219-3400.

Sincerely,

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

97043793643



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 1, 1997

Gary J. Klein, Esq.
VERNER, LIIPFERT, BERNHARD, MCPHERSON, AND HAND
901 - 15th Street, N.W.
Washington, D.C. 20005-2301

RE: MUR 4150
GMP Associates, Inc.

Dear Mr. Klein:

On July 19, 1995, the Federal Election Commission notified your client, GMP Associates, Inc., of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no action against your client. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on April 1, 1997.

The confidentiality provisions of 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 prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact Alva E. Smith at (202) 219-3400.

Sincerely,

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 1, 1997

The Honorable James Aki
The State Senate
State Capitol, Room 306
Honolulu, HI 96813

RE: MUR 4150

Dear Mr. Aki:

On May 3, 1995, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no action against you. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on April 1, 1997.

The confidentiality provisions of 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 prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact Alva E. Smith at (202) 219-3400.

Sincerely,

A handwritten signature in dark ink, appearing to read "F. Andrew Turley", is positioned above the typed name.

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 1, 1997

Angeline Caporoz, Treasurer
Friends of James Aki
84-339 Ikuone Place
Waianae, HI 96792

RE: MUR 4150

Dear Ms. Caporoz:

On May 3, 1995, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no action against Friends of James Aki and you, as treasurer. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on April 1, 1997.

The confidentiality provisions of 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 prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact Alva E. Smith at (202) 219-3400.

Sincerely,

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

97043793646



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 1, 1997

Mitsunori Inoue
1420 Victoria Street #1404
Honolulu, HI 96822

RE: MUR 4150

Dear Mr. Inoue:

On December 5, 1994, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no action against you. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on April 1, 1997.

The confidentiality provisions of 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 prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact Alva E. Smith at (202) 219-3400.

Sincerely,

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Celebrating the Commission's 20th Anniversary

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 1, 1997

Isamu Yamaguchi
c/o ECC Foreign Language Institute
1-1 Nakazaki-Nishi
2 chome, Kita-ku
Osaka 530 Japan 06-362-0578

RE: MUR 4150

Dear Mr Yamaguchi:

On December 5, 1994, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no action against you. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on April 1, 1997.

The confidentiality provisions of 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 prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact Alva E. Smith at (202) 219-3400 in the United States.

Sincerely,

F. Andrew Turley
Supervisory Attorney

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

97043793648



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 1, 1997

David F. Fasi, Esq.
2054 Makiki Street
Honolulu, HI 96822

RE: MUR 4150
Frank F. Fasi, Friends for Fasi, and Treasurer

Dear Mr. Fasi:

On December 5, 1994, the Federal Election Commission notified your clients, Frank F. Fasi, Friends for Fasi, and Treasurer, of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no action against your clients. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on April 1, 1997.

The confidentiality provisions of 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 prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact Alva E. Smith at (202) 219-3400.

Sincerely,

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Celebrating the Commission's 20th Anniversary

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 1, 1997

William W. Milks, Esq.
Grosvenor Center, Makai Tower
733 Bishop St., Suite 1800
Honolulu, HI 96813

RE: MUR 4150
Y.Y. Valley Corporation
Royal Hawaiian Country Club

Dear Mr. Milks:

On December 5, 1994, the Federal Election Commission notified your clients, Y.Y. Valley Corporation and Royal Hawaiian County Club, of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no action against your clients. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on April 1, 1997.

The confidentiality provisions of 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 prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact Alva E. Smith at (202) 219-3400.

Sincerely,

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 1, 1997

Benjamin B. Cassiday, III, Esq.
Grosvenor Center, Mauka Tower
737 Bishop St., Suite 2440
Honolulu, HI 96813

RE: MUR 4150
George S. W. Hong

Dear Mr. Cassiday:

On December 5, 1994, the Federal Election Commission notified your client, George S.W. Hong, of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no action against your client. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on April 1, 1997.

The confidentiality provisions of 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 prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact Alva E. Smith at (202) 219-3400.

Sincerely,

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
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97043793651



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 1, 1997

Charles F. Fasi
P.O. Box 27356
Honolulu, HI 96827

RE: MUR 4150

Dear Mr. Fasi:

On December 5, 1994, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no action against you. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on April 1, 1997.

The confidentiality provisions of 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 prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact Alva E. Smith at (202) 219-3400.

Sincerely,

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

97043793652



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 1, 1997

Michael K. Livingston, Esq.
DAVIS & LEVIN
10 Marin Street
Honolulu, HI 96817

RE: MUR 4150
Yoshinori "Ken" Hayashida
Masanori Kobayashi

Dear Mr. Livingston:

On December 5, 1994, the Federal Election Commission notified your clients, Yoshinori "Ken" Hayashida and Masanori Kobayashi, of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no action against your clients. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on April 1, 1997.

The confidentiality provisions of 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 prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact Alva E. Smith at (202) 219-3400.

Sincerely,

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

97043793653



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 1, 1997

Bruce H. Turnbull, Esq.
Elizabeth A. Noonan
WEIL, GOTSHAL & MANGES
1615 L Street, N.W.
Washington, D.C. 20036

RE: MUR 4150

ECC Foreign Language Institute, Katsumi Yamaguchi, Kenji Sakemoto, Eiji Sakemoto, and Hirofumi Ohnishi

Dear Mr. Turnbull and Ms. Noonan:

On December 5, 1994, the Federal Election Commission notified your clients, ECC Foreign Language Institute, Katsumi Yamaguchi, Kenji Sakemoto, Eiji Sakemoto, and Hirofumi Ohnishi, of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no action against your clients. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on April 1, 1997.

The confidentiality provisions of 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 prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact Alva E. Smith at (202) 219-3400.

Sincerely,

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

97043793654



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 4150

DATE FILMED 4-25-97 CAMERA NO. 1

CAMERAMAN Jm D

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