



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 4200

DATE FILMED 11-7-96 CAMERA NO. 4

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 11, 1995

MEMORADUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: ROBERT J. COSTA
ASSISTANT STAFF DIRECTOR
AUDIT DIVISION

MUR 4200

SUBJECT: HERSCHENSOHN FOR U. S. SENATE 1992 - REFERRALS TO
THE OFFICE OF GENERAL COUNSEL

On April 3, 1995, the Commissioners approved the final audit report on Herschensohn for U. S. Senate 1992. Two of the findings in the report, Finding II A - Apparent Excessive Contributions and Finding II D - 48 Hour Notification of Contributions, exceed the threshold for referral to your office.

Attached is a copy of the report along with a schedule of the excessive contributions (See Attachment A) and a list of the contributors for whom 48 hour notices were not filed (See Attachment B).

Should you have any questions regarding these matters, please contact Ray Lisi or Sam Owusu at 219-3720.

Attachments as stated

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

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REPORT OF THE AUDIT DIVISION
ON
HERSCHENSOHN FOR U.S. SENATE 1992

I. Background

A. Overview

This report is based on an audit of Herschensohn for U.S. Senate 1992 ("the Committee"), undertaken by the Audit Division of the Federal Election Commission in accordance with the provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The audit was conducted pursuant to Section 438(b) of Title 2 of the United States Code which states, in part, that the Commission may conduct audits and field investigations of any political committee required to file a report under section 434 of this title. Prior to conducting any audit under this subsection, the Commission shall perform an internal review of reports filed by selected committees to determine if the reports filed by a particular committee meet the threshold requirements for substantial compliance with the Act.

The audit covered the period from May 6, 1991, the date of the Committee's first recorded transaction, through December 31, 1992. The Committee reported a beginning cash balance of \$0; total receipts for the period of \$7,872,379 total disbursements for the period of \$7,859,077; and an ending cash balance of \$56,187 ^{1/}

B. Campaign Organization

The Committee registered with the Secretary of the Senate on April 26, 1991, as the principal campaign committee for Bruce Herschensohn, Republican candidate for the U.S. Senate from the state of California. The Committee maintained its headquarters in Irvine, California.

^{1/} These amounts represent calendar year to date totals reported on disclosure report summary pages. The amounts do not foot due to mathematical errors on the Committee's disclosure reports. The amounts as disclosed by report period total \$7,915,263 for receipts and \$7,859,077 for disbursements; and an ending cash balance of \$56,186.

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The audit indicated that the Committee was financed primarily through contributions from individuals (\$6,812,908), contributions from Political Party Committees (\$20,678), contributions from Other Political Committees (\$627,159), and loans from the candidate (\$300,000).

This report is based on documents and workpapers which support each of its factual statements. They form part of the record upon which the Commission based its decisions on matters in the report and were available to the Commissioners and appropriate staff for review.

C. Key Personnel

The Treasurer of the Committee during the period covered by the audit was Ms. Betty Presley.

D. Scope

The audit included testing of the following general categories:

1. The receipt of contributions or loans in excess of the statutory limitations (see Finding II.A.);
2. the receipt of contributions from prohibited sources, such as those from corporations or labor organizations;
3. proper disclosure of contributions from individuals, political committees and other entities, to include the itemization of contributions when required, as well as, the completeness and accuracy of the information disclosed (see Finding II.B.);
4. proper disclosure of disbursements including the itemization of disbursements when required, as well as, the completeness and accuracy of the information disclosed (see Finding II.C.);
5. proper disclosure of campaign debts and obligations;
6. the accuracy of total reported receipts, disbursements and cash balances as compared to bank records;
7. adequate recordkeeping for campaign transactions; and
8. other audit procedures that were deemed necessary in the situation.

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Unless specifically discussed below, no material non-compliance was detected. It should be noted that the Commission may pursue any of the matters discussed in this report in an enforcement action.

II. Audit Findings and Recommendations

A. Apparent Excessive Contributions

Section 441a(a)(1)(A) of Title 2 of the United States Code states that no person shall make contributions to any candidate and his or her authorized political committees with respect to any election for Federal office, which in the aggregate exceed \$1,000.

Section 110.1(k) of Title 11 of the Code of Federal Regulations states, in part, that any contribution made by more than one person, except for a contribution made by a partnership, shall include the signature of each contributor on the check, money order, or other negotiable instrument or in a separate writing.

If a contribution made by more than one person does not indicate the amount to be attributed to each contributor, the contribution shall be attributed equally to each contributor.

A contribution shall be considered to be reattributed to another contributor if the treasurer of the recipient political committee asks the contributor whether the contribution is intended to be a joint contribution by more than one person, and informs the contributor that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution and within sixty days from the date of the treasurer's receipt of the contribution, the contributors provide the treasurer with a written reattribution of the contribution, which is signed by each contributor, and which indicates the amount to be attributed to each contributor if equal attribution is not intended.

Section 103.3(b)(3) of Title 11 of the Code of Federal Regulations states, in part, that contributions which on their face exceed the contribution limitations set forth in 11 CFR 110.1 or 110.2, and contributions which do not appear to be excessive on their face, but which exceed the contribution limitations set forth in 11 CFR 110.1 and 110.2 when aggregated with other contributions from the same contributor, may be either deposited into a campaign depository under 11 CFR 103.3(a) or returned to the contributor. If any such contributions are deposited, the treasurer may request redesignation or reattribution of the contribution by the contributor in accordance with 11 CFR 110.1(b), 110.1(k) or 110.2(b), as appropriate. If a redesignation or reattribution is not obtained, the treasurer shall, within sixty days of the treasurer's receipt of the contribution, refund the contribution to the contributor.

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Sections 110.1(1)(2)(3) and (5) of Title 11 of the Code of Federal Regulations state that if a political committee receives a written redesignation of a contribution to a different election, the treasurer shall retain the written redesignation provided by the contributor, as required by 11 CFR 110.1(b)(5) or 110.2(b)(5), as appropriate.

If a political committee receives a written reattribution of a contribution to a different contributor, the treasurer shall retain the written reattribution signed by each contributor, as required by 11 CFR 110.1(k).

If a political committee does not retain the written records concerning redesignation or reattribution required under 11 CFR 110.1(1)(1), (2), (3) or (5), the redesignation or reattribution shall not be effective and the original designation or attribution shall control.

Section 103.3(b)(4) of Title 11 of the Code of Federal Regulations states, in part, that any contribution which appears to be illegal and which is deposited into a campaign depository shall not be used for any disbursements by the political committee until the contribution has been determined to be legal. The political committee must either establish a separate account in a campaign depository for such contributions or maintain sufficient funds to make such refunds.

The Committee's receipt records consisted of copies of contributor checks in deposit order and two computerized data bases. One data base was maintained by the Committee for contributions received at Committee headquarters. The other data base was maintained by a direct mail firm and contained contributions solicited through a direct mail program. During the audit field work the two data bases were merged.

The Audit staff's testing of the merged data and copies of contributor checks maintained by the Committee and the direct mail firm identified 200 contributors who exceeded their contribution limitations by a total of \$130,964. The Audit staff could find no evidence that the Committee had taken any action regarding \$42,399 of this amount. With regard to the remaining \$88,565, the Committee attempted to either reattribute and/or redesignate the contributions by contacting the contributors by letter or refunding the excessive portions of the contributions to the contributor. Refunds totaling \$22,700 were identified by the Audit staff, however, at the time of fieldwork, for the majority of the refunds the only record available was the Committee's check register.

The Audit staff reviewed copies of the letters sent to and/or returned by the contributors and determined that the majority of the responses were not receipt dated by the Committee nor did the Committee retain the return envelopes. Therefore the

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Audit staff was unable to determine whether the reattribution/redesignation letters were received timely as required under 11 CFR §110.1(b)(5) and 110.1(k)(3). A review of the check register was also performed to determine whether the refunds were made timely. In the absence of evidence of a timely reattribution/redesignation or refund, the excessive contributions were considered untimely resolved.

In the interim audit report the Audit Staff recommended that the Committee take the following action:

- ° Refund to the contributors the \$42,399 for which the Committee had taken no action and present evidence of the refunds (copies of the front and back of the negotiated refund checks);
- ° if funds are not available to make such refunds, disclose the required information relative to the excessive contributions as debts owed by the Committee on Schedule D;
- ° the Committee should also provide copies of the negotiated refund checks (front and back) for the \$22,700 in excessive contributions which were previously refunded.

In response to the interim audit report, regarding the \$42,399 in unresolved excessive contributions, the Committee disclosed \$31,908 as debts owed to the contributors. In addition seven copies of cancelled refund checks were provided for an additional \$3,780 in refunds, however all of the refunds were made untimely. The Committee also provided documentation to verify that a \$300 contribution attributed to an individual was actually a partnership contribution which should have been allocated to other partners. The Audit staff did not accept documentation provided by the Committee to support reattributions of three contributions totalling \$1,511 because the documentation did not provide evidence of a timely reattribution/redesignation. Finally \$4,900 in excessive contributions were not disclosed as debts nor were copies of refund checks provided.

Regarding the \$22,700 previously refunded, the Committee provided copies of cancelled refund checks for \$21,750 and voided \$950 in refund checks. The amounts of the refund checks which were voided were reported on Schedules D as debts owed to the contributors.

B. Itemization of Contributions

Section 434(b)(3) of Title 2 of the United States Code states that each report, filed by a committee, shall disclose the identification of each person (other than a political committee) who makes a contribution to the reporting committee during the reporting period, whose contribution or contributions have an

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aggregate amount or value in excess of \$200 within the calendar year, or any lesser amount if the reporting committee should so elect, together with the date and amount of any such contribution.

Section 431(13) of Title 2 of the United States Code defines identification in the case of any individual, as the name, the mailing address, and the occupation of such individual, as well as the name of his or her employer.

The Audit staff's testing of a sample of the Committee's contributions identified material problems regarding the itemization of contributor information.

An analysis of the sample errors indicated that the errors were the result of the Committee's direct mail firm maintaining contributions on a separate receipts data base which were not properly aggregated with the contributions on the Committee's receipts data base.

Committee officials were informed by the Audit staff of the itemization problems and stated that amended reports would be filed.

In the interim audit report the Audit staff recommended that the Committee file comprehensive amendments for calendar years 1991 and 1992 to correct the itemization errors noted above.

In response to the interim report, the Committee filed a comprehensive amendment which corrected the itemization errors.

C. Disclosure of Disbursements Information

Section 434(b)(5) of Title 2 of the United States Code requires a political committee to disclose the name and address of each person to whom an expenditure in an aggregate amount or value in excess of \$200 within the calendar year is made by the reporting committee to meet a candidate or Committee operating expense, together with the date, amount and purpose of such operating expenditure.

Section 104.3(b)(3)(i)(A) of Title 11 of the Code of Federal Regulations states that "purpose" means a brief statement or description of why the disbursement was made. Examples of statements or descriptions which meet the requirements of 11 CFR 104.3(b)(3) include the following: dinner expenses, media, salary, polling, travel, party fees, phone banks, travel expenses, travel expense reimbursement and catering costs. However, statements or descriptions such as advance, election day expenses, other expenses, expenses, expense reimbursement, miscellaneous, outside services, get-out-the-vote and voter registration would not meet the requirements of 11 CFR 104.3(b)(3) for reporting the purpose of an expenditure.

The Audit staff tested a sample of Committee

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disbursements and found that a material number contained inadequate purposes. In most cases a purpose was included on the disclosure reports; however, vague descriptions such as "election event," "event cost," and "Hq and support" were used. At the exit conference, the Audit staff provided Committee representatives with examples of the inadequate purposes.

In the interim audit report, the Audit staff recommended that the Committee file amended Schedules B to correct/clarify the purposes of the disbursements.

In response to the audit report, the Committee filed a comprehensive amendment which materially corrected the disclosure errors.

D. 48 Hour Notification of Contributions

Section 104.5(f) of Title 11 of the Code of Federal Regulations states, in part, if any contribution of \$1,000 or more is received by any authorized committee of a Senate candidate after the 20th day, but more than 48 hours before 12:01 a.m. of the day of the election the principal campaign committee of that candidate shall notify the Secretary of the Senate, within 48 hours of receipt of the contribution. The notification shall be in writing and shall include the name of the candidate and office sought, the identification of the contributor and the date of receipt and amount of the contribution. The notification shall be in addition to the reporting of these contributions on the post-election report.

The California Senate Republican primary elections were held on June 2, 1992, and the General election was held on November 3, 1992. Therefore, the Committee was required to notify the Secretary of the Senate of any contributions of \$1,000 or more received from May 14, 1992 through May 30, 1992 and from October 15, 1992 through October 31, 1992, within 48 hours of receipt.

The Audit staff reviewed the Committee's receipt records and determined that the Committee did not file the required notices for 23 contributions totaling \$32,500 received for the Primary and General elections. Of this amount, five contributions, totaling \$6,500, were received between May 14, 1992 and May 30, 1992; and 18 contributions totaling \$26,000 were received between October 15, 1992 and October 31, 1992.

Committee representatives were provided a schedule of the contributions subject to the 48 hour notice at the exit conference.

In the interim audit report the Audit staff recommended that the Committee provide evidence which demonstrates that it complied with 11 CFR 104.5(f) or any other comments or explanation regarding the failure to file the required notices.

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In response to the interim audit report, the Committee provided documentation to verify that one contribution had been timely reported. In addition the Committee provided a copy of a page of a memorandum addressed to the Office of the Secretary of the Senate which listed three additional contributions, however according to documentation on file at the Secretary's Office, it does not appear that the page was received. The Committee provided no explanation as to why the remaining contributions were not timely reported.

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HERSCHENSON FOR U. S. SENATE 1992
HERSCHENSON FOR U. S. SENATE 1992
SCHEDULE OF EXCESSIVE CONTRIBUTIONS

ATTACHMENT A

KEY TO LETTER: REA - CONTRIBUTION(S) REATTRIBUTED TO ANOTHER CONTRIBUTOR
RED - CONTRIBUTION REDESIGNATED TO ANOTHER ELECTION
REF - CONTRIBUTION REFUNDED
X - LETTER INSUFFICIENT TO RESOLVE EXCESSIVE AMOUNT

KEY TO COMMENTS: NO CC - NO CANCELED CHECK REVIEWED FOR REFUNDS MADE JULY 93 AND AFTER

NOTE: ALL CONTRIBUTIONS LISTED AS RESOLVED ARE CONSIDERED UNTIMELY RESOLVED
BECAUSE LETTERS RETURNED TO THE COMMITTEE ARE UNDATED. A NEGATIVE AMOUNT
IN COLUMN D REPRESENTS A TIMELY RESOLUTION.

ID#	CONTRIBUTOR'S NAME	DEP DATE	AMOUNT	RESOLVED		UNRESOLVD EX AMT	REFUND		LETTER	COMMENTS
				P/G	EX AMT		AMOUNT	EX AMT		
1	*****									
2	ADAM0006 ADAMS MORGAN, Jr.	06/21/91	100.00	F						
3	ADAM0006 ADAMS MORGAN, Jr.	02/12/92	200.00	F						
4	ADAM0006 ADAMS MORGAN, Jr.	05/07/92	1,000.00	F		500.00				
5	ADAM0006 ADAMS MORGAN, Jr.	10/28/92	200.00	G						
6	ADAM0006 ADAMS MORGAN, Jr.	10/27/92	800.00	G						
7	ADAM0000 ADAMS, THOMAS R.	01/31/92	100.00	F						
8	ADAM0000 ADAMS, THOMAS R.	03/31/92	500.00	F						
9	ADAM0000 ADAMS, THOMAS R.	05/13/92	250.00	F						
10	ADAM0000 ADAMS, THOMAS R.	05/13/92	100.00	F						
11	ADAM0000 ADAMS, THOMAS R.	05/21/92	1,000.00	F	850.00	100.00	850.00			NO CC #3055
12	49033677 AKEMANN, CHARLES A	04/15/91	100.00	F						
13	49033677 AKEMANN, CHARLES A	09/05/91	50.00	F						
14	49033677 AKEMANN, CHARLES A	09/23/91	75.00	F						
15	49033677 AKEMANN, CHARLES A	03/03/92	100.00	F						
16	49033677 AKEMANN, CHARLES A	03/16/92	100.00	F						
17	49033677 AKEMANN, CHARLES A	04/01/92	100.00	F						
18	49033677 AKEMANN, CHARLES A	05/12/92	100.00	F						
19	49033677 AKEMANN, CHARLES A	06/12/92	400.00	G						
20	49033677 AKEMANN, CHARLES A	08/25/92	400.00	G						
21	49033677 AKEMANN, CHARLES A	09/30/92	200.00	G						
22	49033677 AKEMANN, CHARLES A	03/05/93	50.00	G						
23	ALLE0028 ALLEN, ELEANOR	09/25/92	200.00	G						REDA/RED
24	ALLE0028 ALLEN, ELEANOR	11/03/92	2,500.00	G	1,700.00					
25	ANDE0031 ANDELIN, DAVID RAY	12/31/91	100.00	F						
26	ANDE0031 ANDELIN, DAVID RAY	01/27/92	75.00	F						
27	ANDE0031 ANDELIN, DAVID RAY	02/18/92	35.00	F						
28	ANDE0031 ANDELIN, DAVID RAY	03/31/92	100.00	F						
29	ANDE0031 ANDELIN, DAVID RAY	04/29/92	150.00	F						
30	ANDE0031 ANDELIN, DAVID RAY	05/19/92	100.00	F						
31	ANDE0031 ANDELIN, DAVID RAY	05/21/92	250.00	F						
32	ANDE0031 ANDELIN, DAVID RAY	06/25/92	150.00	G						
33	ANDE0031 ANDELIN, DAVID RAY	07/24/92	200.00	G						
34	ANDE0031 ANDELIN, DAVID RAY	07/31/92	150.00	G						
35	ANDE0031 ANDELIN, DAVID RAY	08/25/92	460.00	G						
36	ANDE0031 ANDELIN, DAVID RAY	09/15/92	100.00	G						
37	ANDE0031 ANDELIN, DAVID RAY	09/22/92	90.00	G						
38	ANDE0031 ANDELIN, DAVID RAY	12/04/92	190.00	G						340.00
39	49080291 ANDERSON, RICHARD	11/19/91	1,000.00	G						
40	49080291 ANDERSON, RICHARD	09/30/92	3,000.00	G						
41	49080291 ANDERSON, RICHARD	10/05/92	500.00	G	3,000.00					REDA/RED
42	49030977 ARNOTT, DARYL	07/24/91	100.00	F						
43	49030977 ARNOTT, DARYL	10/16/91	250.00	F						
44	49030977 ARNOTT, DARYL	01/24/92	150.00	F						
45	49030977 ARNOTT, DARYL	01/22/92	75.00	F						
46	49030977 ARNOTT, DARYL	03/15/92	100.00	F						
47	49030977 ARNOTT, DARYL	04/21/92	150.00	F						
48	49030977 ARNOTT, DARYL	05/13/92	75.00	F						
49	49030977 ARNOTT, DARYL	05/13/92	100.00	F						

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HERSCHELSOHN FOR U. S. SENATE 1992									
50	49030977	ARNOTT, DARYL	06/01/92	100.00	P				100.00
51	49030977	ARNOTT, DARYL	07/06/92	75.00	D				
52	49030977	ARNOTT, DARYL	08/06/92	150.00	G				
53	49030977	ARNOTT, DARYL	10/14/92	100.00	G				
54	49030977	ARNOTT, DARYL	10/14/92	75.00	G				
55	ASSE0000	ASSEMI, FARID (ASSEMI INVE08/01/91		10.00	P				
56	ASSE0000	ASSEMI, FARID (ASSEMI INVE11/25/91		250.00	P				
57	ASSE0000	ASSEMI, FARID (ASSEMI INVE05/29/92		250.00	P				
58	ASSE0000	ASSEMI, FARID (ASSEMI INVE05/29/92		750.00	P				260.00
59	ASSE0000	ASSEMI, FARID (ASSEMI INVE10/15/92		500.00	G				
60	49030020	ATKINSON, GEORGE E. JR.	08/01/91	500.00	P				
61	49030020	ATKINSON, GEORGE E. JR.	02/05/92	100.00	P				
62	49030020	ATKINSON, GEORGE E. JR.	03/26/92	150.00	P				
63	49030020	ATKINSON, GEORGE E. JR.	04/29/92	500.00	P				250.00
64	49030020	ATKINSON, GEORGE E. JR.	05/21/92	100.00	G				
65	49030020	ATKINSON, GEORGE E. JR.	07/26/92	100.00	G				
66	49030020	ATKINSON, GEORGE E. JR.	09/23/92	1,000.00	G				
67	49030020	ATKINSON, GEORGE E. JR.	10/08/92	250.00	G				
68	49030020	ATKINSON, GEORGE E. JR.	10/13/92	100.00	G	500.00	50.00	500.00	RED
69	BAKS0000	BAKSHI, ELI	12/02/91	500.00	P				
70	BAKS0000	BAKSHI, ELI	05/13/92	1,000.00	G				RED
71	BAKS0000	BAKSHI, ELI	12/21/92	100.00	G				100.00
72	49053900	BARAKAT, JOHN C	12/31/91	50.00	P				
73	49053900	BARAKAT, JOHN C	03/31/92	100.00	P				
74	49053900	BARAKAT, JOHN C	04/30/92	150.00	P				
75	49053900	BARAKAT, JOHN C	05/21/92	500.00	P				
76	49053900	BARAKAT, JOHN C	06/30/92	200.00	G				
77	49053900	BARAKAT, JOHN C	08/04/92	150.00	G				
78	49053900	BARAKAT, JOHN C	08/20/92	150.00	G				
79	49053900	BARAKAT, JOHN C	09/21/92	1,000.00	G				
80	49053900	BARAKAT, JOHN C	10/15/92	200.00	G				
81	49053900	BARAKAT, JOHN C	10/27/92	150.00	G				
82	49053900	BARAKAT, JOHN C	11/23/92	150.00	G	500.00	500.00		RED
83	BARK0000	BARKER, CHOICE E.	03/31/90	150.00	P				
84	BARK0000	BARKER, CHOICE E.	12/31/91	50.00	P				
85	BARK0000	BARKER, CHOICE E.	04/22/92	75.00	P				
86	BARK0000	BARKER, CHOICE E.	05/02/92	50.00	P				
87	BARK0000	BARKER, CHOICE E.	05/18/92	100.00	P				
88	BARK0000	BARKER, CHOICE E.	07/29/92	100.00	G				
89	BARK0000	BARKER, CHOICE E.	08/20/92	100.00	G				
90	BARK0000	BARKER, CHOICE E.	09/02/92	100.00	G				
91	BARK0000	BARKER, CHOICE E.	09/30/92	100.00	G				
92	BARK0000	BARKER, CHOICE E.	10/20/92	200.00	G				
93	BARK0000	BARKER, CHOICE E.	10/21/92	200.00	G				
94	BARK0000	BARKER, CHOICE E.	10/23/92	200.00	G				
95	BARK0000	BARKER, CHOICE E.	11/23/92	100.00	G				100.00
96	BARR0000	BARR, JOHN H.	05/01/91	1,000.00	P				
97	BARR0000	BARR, JOHN H.	08/20/92	2,000.00	G	1,000.00			RED
98	BEND0000	BENDER, SALLY	08/08/91	500.00	P				
99	BEND0000	BENDER, SALLY	08/06/92	300.00	G				
100	BEND0000	BENDER, SALLY	10/02/92	500.00	G				
101	BEND0000	BENDER, SALLY	10/20/92	200.00	G				
102	BEND0000	BENDER, SALLY	10/22/92	500.00	G				300.00
103	49080743	BENDETTI, JOHN F.	12/03/91	1,000.00	P				
104	49080743	BENDETTI, JOHN F.	09/08/92	50.00	G				

HERSCHELSOHN FOR U. S. SENATE 1992

105	49080743	BENDETTI, JOHN P.	09/23/92	25.00	G			
106	49080743	BENDETTI, JOHN P.	10/02/92	1,000.00	G			
107	49080743	BENDETTI, JOHN P.	10/20/92	50.00	G	125.00		REA
108	49080754	BENDETTI, ROBERT D.	12/05/91	1,000.00	F			
109	49080754	BENDETTI, ROBERT D.	10/02/92	1,000.00	G			
110	49080754	BENDETTI, ROBERT D.	10/29/92	500.00	G	500.00	500.00	REA/REF NO CC #3056
111	BEN00012	BENNETT, JEFFREY P.	08/27/92	2,000.00	G	1,000.00		REA
112	BEN00006	BENSON, MINA BRALY	07/31/92	250.00	G			
113	BEN00006	BENSON, MINA BRALY	08/12/92	250.00	G			
114	BEN00006	BENSON, MINA BRALY	11/03/92	500.00	G			
115	BEN00006	BENSON, MINA BRALY	11/23/92	100.00	G		100.00	
116	BERG0021	BERGER, A. ALAN	10/29/92	2,000.00	G	1,000.00		RED
117	BERG0014	BERG, RUTH A.	10/29/92	900.00	G		900.00	
118	BERG0014	BERG, RUTH A.	10/29/92	1,000.00	G			
119	BESS00000	BESSMAN, ALICE	07/03/91	500.00	F			
120	BESS00000	BESSMAN, ALICE	10/18/91	500.00	F			
121	BESS00000	BESSMAN, ALICE	05/19/92	250.00	F	250.00	250.00	REF
122	BESS00000	BESSMAN, ALICE	09/20/92	200.00	G			
123	BETT0001	BETTERAVIA FARMS	09/14/92	150.00	G	200.00	150.00	RED
124	BETT0001	BETTERAVIA FARMS	10/17/92	200.00	G			
125	BETT0001	BETTERAVIA FARMS	10/24/92	1,000.00	G			
126	BIAG00000	BIAGGINI, BENJAMIN F.	09/09/92	1,000.00	G			
127	BIAG00000	BIAGGINI, BENJAMIN F.	10/26/92	1,000.00	G	1,000.00		REA
128	BIRD00001	BIRD, BOB DEE	11/12/91	1,000.00	F	500.00	500.00	REF
129	BIRD00001	BIRD, BOB DEE	05/13/92	500.00	F			
130	BLAT0001	BLATTY, JULIE	08/20/92	500.00	G			
131	BLAT0001	BLATTY, JULIE	10/29/92	1,000.00	G	500.00		REA
132	BONZ00000	BONZER, LARRY W.	07/15/91	500.00	F			
133	BONZ00000	BONZER, LARRY W.	08/21/91	100.00	F	100.00		RED
134	BONZ00000	BONZER, LARRY W.	10/04/91	500.00	F			
135	BONZ00000	BONZER, LARRY W.	07/24/92	100.00	G			
136	BONZ00000	BONZER, LARRY W.	08/19/92	150.00	G			
137	BOON00003	BOONE, PAT	08/23/92	200.00	G			
138	BOON00003	BOONE, PAT	09/15/92	500.00	G			
139	BOON00003	BOONE, PAT	10/13/92	200.00	G			
140	BOON00003	BOONE, PAT	10/22/92	200.00	G	100.00		RED
141	49072802	BRADBURY, SUSAN	09/06/91	500.00	F			
142	49072802	BRADBURY, SUSAN	09/10/92	200.00	F			
143	49072802	BRADBURY, SUSAN	08/13/92	300.00	G			
144	49072802	BRADBURY, SUSAN	09/16/92	300.00	G			
145	49072802	BRADBURY, SUSAN	10/09/92	500.00	G			
146	49072802	BRADBURY, SUSAN	10/20/92	100.00	G			
147	49072802	BRADBURY, SUSAN	10/25/92	500.00	G			
148	49072802	BRADBURY, SUSAN	12/08/92	500.00	G	1,000.00	500.00	REF/REF NO CC #3056
149	BRAI00002	BRAIN, DIXIE L.	09/23/91	100.00	F			
150	BRAI00002	BRAIN, DIXIE L.	10/08/92	1,000.00	G			
151	BRAI00002	BRAIN, DIXIE L.	11/01/92	100.00	G	100.00		RED
152	49039847	BRENNAN, ANDREW J.	11/19/91	100.00	F			
153	49039847	BRENNAN, ANDREW J.	12/31/91	200.00	F			
154	49039847	BRENNAN, ANDREW J.	01/17/92	150.00	F			
155	49039847	BRENNAN, ANDREW J.	01/31/92	100.00	F			
156	49039847	BRENNAN, ANDREW J.	04/21/92	200.00	F			
157	49039847	BRENNAN, ANDREW J.	05/13/92	250.00	F			
158	49039847	BRENNAN, ANDREW J.	06/13/92	150.00	G			
159	49039847	BRENNAN, ANDREW J.	08/25/92	150.00	G			

		PERSONNEL FOR U. S. SENATE 1992					
215	49065487	COLEMAN, RICHARD	09/15/92	400.00	G		
216	49065487	CONTARDO, MARCUS	08/12/92	300.00	G		
217	49065487	CONTARDO, MARCUS	09/23/92	200.00	G		
218	49065487	CONTARDO, MARCUS	10/13/92	500.00	G		
219	49065487	CONTARDO, MARCUS	10/15/92	250.00	G		
220	49065487	CONTARDO, MARCUS	10/27/92	500.00	G		
221	49065487	CONTARDO, MARCUS	11/18/92	30.00	G	750.00	30.00
222	000P0001	COOPER, GERSHON N.	07/24/91	1,000.00	F		REF
223	000P0001	COOPER, GERSHON N.	11/11/91	1,000.00	F	1,000.00	
224	000P0001	COOPER, GERSHON N.	09/30/92	2,000.00	G	1,000.00	1,000.00 REF
225	CRAI0002	CRAIG, NORMA CAMPBELL	08/29/91	500.00	F		1,000.00 REF
226	CRAI0002	CRAIG, NORMA CAMPBELL	05/19/92	100.00	F	100.00	1,000.00 REF
227	CRAI0002	CRAIG, NORMA CAMPBELL	08/13/91	500.00	F		
228	CRAI0002	CRAIG, NORMA CAMPBELL	10/17/92	100.00	G		
229	CURK0000	CURRIWAN, EDWARD	05/31/91	1,000.00	F		
230	CURK0000	CURRIWAN, EDWARD	06/22/92	35.00	G		35.00
231	CURK0000	CURRIWAN, EDWARD	07/31/92	1,000.00	G		
232	C.T.0000	C.T. HELLNUTH	09/29/92	500.00	G		500.00
233	C.T.0000	C.T. HELLNUTH	11/17/92	1,000.00	G		
234	DAND0002	DANDL, JOHN EDWARD	05/21/92	250.00	F		250.00
235	DAND0002	DANDL, JOHN EDWARD	10/08/92	300.00	G		
236	DAND0002	DANDL, JOHN EDWARD	10/15/92	700.00	G		
237	DAND0002	DANDL, JOHN EDWARD	10/16/92	1,000.00	F		
238	DEM0001	DEMETRESCU, M.C.	12/31/91	15.00	F		
239	DEM0001	DEMETRESCU, M.C.	06/22/92	15.00	G		
240	DEM0001	DEMETRESCU, M.C.	09/30/92	1,000.00	G		
241	DEM0001	DEMETRESCU, M.C.	10/27/92	15.00	G		15.00
242	49001777	DEMKO JR., P. DANIEL	10/08/92	500.00	G		
243	49001777	DEMKO JR., P. DANIEL	11/03/92	1,000.00	G	500.00	
244	49074112	DENEEN, LAWRENCE J.	09/14/92	1,000.00	G		REF
245	49074112	DENEEN, LAWRENCE J.	10/20/92	1,000.00	G	1,000.00	REF
246	49072693	DICKSON, EDNA M.	06/17/91	1,000.00	F		
247	49072693	DICKSON, EDNA M.	01/31/92	150.00	F		
248	49072693	DICKSON, EDNA M.	01/31/92	150.00	F	300.00	REF
249	49072693	DICKSON, EDNA M.	05/21/92	300.00	G		
250	49072693	DICKSON, EDNA M.	08/10/92	300.00	G		
251	49072693	DICKSON, EDNA M.	08/27/92	300.00	G		
252	49072693	DICKSON, EDNA M.	10/08/92	300.00	G		
253	49072693	DICKSON, EDNA M.	10/20/92	1,000.00	G	500.00	
254	DON 0002	DON KEITH AND SONS	11/03/92	1,000.00	G		
255	DON 0002	DON KEITH AND SONS	11/03/92	1,000.00	G		
256	BROW0000	BROWN, HELENA	06/12/91	1,000.00	F		1,000.00
257	BROW0000	BROWN, HELENA	02/24/92	80.00	F		
258	BROW0000	BROWN, HELENA	08/10/92	1,000.00	G		100.00
259	49039215	DUNCAN, SOPHIA	10/07/91	30.00	F		
260	49039215	DUNCAN, SOPHIA	02/12/92	50.00	F		
261	49039215	DUNCAN, SOPHIA	05/18/92	30.00	F		
262	49039215	DUNCAN, SOPHIA	06/20/92	50.00	G		
263	49039215	DUNCAN, SOPHIA	08/27/92	100.00	G		
264	49039215	DUNCAN, SOPHIA	11/03/92	1,500.00	G	500.00	150.00
265	DUR0000	DURST, MICHAEL A.	11/19/91	100.00	F		REF
266	DUR0000	DURST, MICHAEL A.	08/17/92	50.00	G		
267	DUR0000	DURST, MICHAEL A.	10/08/92	1,000.00	G		50.00
268	EAGL0002	EAGLE, JOHN M.	09/08/92	1,000.00	G		
269	EAGL0002	EAGLE, JOHN M.	10/31/92	600.00	G	600.00	REF

MEMORANDUM FOR U. S. SENATE 1992

160	4903904	BRENNAN, ANDREW J.	10/12/92	500.00	0		
161	4903904	BRENNAN, ANDREW J.	10/14/92	150.00	0		
162	4903904	BRENNAN, ANDREW J.	10/27/92	150.00	0		
163	4903904	BRENNAN, ANDREW J.	11/20/92	150.00	0	250.00	
164	BRENNAN JR., EDWARD J.	09/22/92	500.00	0			
165	BRENNAN JR., EDWARD J.	10/21/92	1,000.00	0	500.00		RED
166	BRENNAN JR., EDWARD J.	10/22/92	250.00	0			
167	BUNNELL, CYNTHIA	01/10/92	500.00	0			
168	BUNNELL, CYNTHIA	01/10/92	100.00	0			
169	BUNNELL, CYNTHIA	01/23/92	1,000.00	0			
170	BUNNELL, CYNTHIA	10/23/92	75.00	0	25.00		
171	CHUNG, H. CHUNG	10/23/92	2,000.00	0	1,000.00		RED
172	CHURCH, JOHN M.	05/03/92	2,000.00	0			
173	CHURCH, JOHN M.	05/06/92	1,000.00	0	2,000.00		
174	BURSTEIN, KING	06/14/91	500.00	0			
175	BURSTEIN, KING	10/23/91	200.00	0			
176	BURSTEIN, KING	01/10/92	200.00	0			
177	BURSTEIN, KING	05/13/92	150.00	0	50.00		RED
178	BURSTEIN, KING	09/03/92	850.00	0			
179	CAGE, VERNA M.	05/06/92	500.00	0			
180	CAGE, VERNA M.	09/04/92	1,000.00	0			
181	CAGE, VERNA M.	09/06/91	500.00	0			
182	CAGE, VERNA M.	10/20/92	100.00	0	100.00		
183	CARLSON, JAMES M.	09/14/92	1,000.00	0			
184	CARLSON, JAMES M.	11/03/92	1,000.00	0			
185	CARLSON, JAMES M.	11/03/92	300.00	0	1,300.00		RED
186	CARSON, VIRGINIA KIP	06/18/91	1,000.00	0			
187	CARSON, VIRGINIA KIP	04/22/92	36.00	0	36.00		
188	CARSON, VIRGINIA KIP	10/16/92	100.00	0			
189	CASTRO, MARGOT	12/02/91	500.00	0			
190	CASTRO, MARGOT	04/20/92	500.00	0			
191	CASTRO, MARGOT	05/29/92	250.00	0	250.00		
192	CASTRO, MARGOT	07/22/92	250.00	0			
193	CASTRO, MARGOT	07/31/92	250.00	0			
194	CASTRO, MARGOT	09/03/92	100.00	0			
195	CHAMBERLAIN, PARK	09/01/92	1,000.00	0			
196	CHAMBERLAIN, PARK	10/20/92	1,000.00	0	1,000.00	1,000.00	RED RED
197	CHANGARIS, JAMES G.	04/30/92	100.00	0	100.00		RED
198	CHANGARIS, JAMES G.	05/27/92	1,000.00	0			
199	CHANGARIS, JAMES G.	10/23/92	1,900.00	0	900.00		RED
200	CHANG, AMY	10/24/92	2,000.00	0	1,000.00		RED
201	CHRISTIANSEN, RALPH H.	10/29/91	500.00	0			
202	CHRISTIANSEN, RALPH H.	04/23/92	200.00	0			
203	CHRISTIANSEN, RALPH H.	04/23/92	200.00	0			
204	CHRISTIANSEN, RALPH H.	09/14/92	350.00	0			
205	CHRISTIANSEN, RALPH H.	11/03/92	1,250.00	0	600.00		RED
206	CHUNG, BURK H.	10/29/92	2,000.00	0	1,000.00		RED
207	CLARK, HELEN M.	10/17/91	1,000.00	0			
208	CLARK, HELEN M.	05/13/92	500.00	0	500.00		
209	CLARK, HELEN M.	06/22/92	1,000.00	0			
210	CLARK, HELEN M.	09/14/92					
211	CLARK, HELEN M.	12/08/92					
212	COLLAMAN, RICHARD	11/12/91					
213	COLLAMAN, RICHARD	05/13/92					
214	COLLAMAN, RICHARD	05/13/92					

HERSCHENSOHN FOR U. S. SENATE 1992

325	FULL0000	FULLER, WINSTON R.	06/25/92	200.00	G			
326	FULL0000	FULLER, WINSTON R.	07/24/92	200.00	G			
327	FULL0000	FULLER, WINSTON R.	08/07/92	400.00	G			
328	FULL0000	FULLER, WINSTON R.	08/25/92	600.00	G			
329	FULL0000	FULLER, WINSTON R.	09/08/92	500.00	G			
330	FULL0000	FULLER, WINSTON R.	09/28/92	100.00	G			
331	FULL0000	FULLER, WINSTON R.	12/08/92	200.00	G	1,200.00		REAZ/RED
332	GAMH0000	GAMH, CHARLENE	10/23/91	200.00	F			
333	GAMH0000	GAMH, CHARLENE	04/20/92	200.00	F			
334	GAMH0000	GAMH, CHARLENE	05/13/92	200.00	F			
335	GAMH0000	GAMH, CHARLENE	07/31/92	1,000.00	G			
336	GAMH0000	GAMH, CHARLENE	08/14/92	35.00	G			
337	GAMH0000	GAMH, CHARLENE	10/20/92	100.00	G	100.00	35.00	RED
338	GAMH0000	GANFIELD, A. BOARDMAN	09/06/91	100.00	F			
339	GAMH0000	GANFIELD, A. BOARDMAN	03/25/92	500.00	F			
340	GAMH0000	GANFIELD, A. BOARDMAN	05/13/92	100.00	F			
341	GAMH0000	GANFIELD, A. BOARDMAN	06/30/92	250.00	G			
342	GAMH0000	GANFIELD, A. BOARDMAN	08/07/92	500.00	G			
343	GAMH0000	GANFIELD, A. BOARDMAN	08/25/92	500.00	G			
344	GAMH0000	GANFIELD, A. BOARDMAN	03/26/93	200.00	G	450.00	450.00	RED
345	GARD0004	GARDNER, VITA M.	05/13/92	250.00	F			
346	GARD0004	GARDNER, VITA M.	05/13/92	250.00	F			
347	GARD0004	GARDNER, VITA M.	10/08/92	1,000.00	G			
348	GARD0004	GARDNER, VITA M.	10/27/92	40.00	G		40.00	
349	GARR0001	GARRISI, JOSEPH A.	06/07/91	500.00	F			
350	GARR0001	GARRISI, JOSEPH A.	10/31/91	500.00	F			
351	GARR0001	GARRISI, JOSEPH A.	03/18/92	100.00	F		100.00	
352	GARR0001	GARRISI, JOSEPH A.	10/17/92	500.00	G			
353	GARR0001	GARRISI, JOSEPH A.	12/08/92	500.00	G			
354	GLEN0002	GLENN, ROBERT	06/18/92	1,000.00	G			
355	GLEN0002	GLENN, ROBERT	10/27/92	1,000.00	G	1,000.00		RED
356	GRIM0004	GRIMES, PETEET MARTYN	10/29/92	2,000.00	G		1,000.00	
357	49070257	GRIMES, THOMAS D.	09/10/92	50.00	G			
358	49070257	GRIMES, THOMAS D.	10/29/92	1,950.00	G	1,000.00		RED
359	GROS0004	GROSS, H. D.	10/29/91	500.00	F			
360	GROS0004	GROSS, H. D.	02/07/92	100.00	F			
361	GROS0004	GROSS, H. D.	05/27/92	200.00	F			
362	GROS0004	GROSS, H. D.	09/14/92	300.00	G			
363	GROS0004	GROSS, H. D.	10/22/92	500.00	G			
364	GROS0004	GROSS, H. D.	12/08/92	500.00	G			
365	GROS0004	GROSS, H. D.	03/26/93	200.00	G		500.00	
366	GUEV0000	GUEVARA, BEN G.	10/27/92	2,000.00	G	1,000.00		RED
367	HALE0006	HALE, G.W.	08/01/91	20.00	F			
368	HALE0006	HALE, G.W.	10/07/92	20.00	G			
369	HALE0006	HALE, G.W.	10/15/92	1,000.00	G		20.00	
370	HAUS0000	HAUSCHILD, NANCY L.	10/20/92	250.00	G			
371	HAUS0000	HAUSCHILD, NANCY L.	11/03/92	1,750.00	G	1,000.00		RED
372	HERL0000	HERLICK, STANFORD D.	10/16/91	500.00	F			
373	HERL0000	HERLICK, STANFORD D.	02/13/92	100.00	F			
374	HERL0000	HERLICK, STANFORD D.	03/19/92	100.00	F			
375	HERL0000	HERLICK, STANFORD D.	04/23/92	200.00	F			
376	HERL0000	HERLICK, STANFORD D.	04/24/92	150.00	F			
377	HERL0000	HERLICK, STANFORD D.	05/21/92	250.00	F	300.00		
378	HERL0000	HERLICK, STANFORD D.	07/14/92	300.00	G		300.00	RED
379	HERL0000	HERLICK, STANFORD D.	08/12/92	300.00	G			RED

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HERSCHELSOHN FOR U. S. SENATE 1992

270	49009782	EASTVOLD, DONALD W	05/21/91	100.00	P				
271	49009782	EASTVOLD, DONALD W	06/27/91	25.00	P				
272	49009782	EASTVOLD, DONALD W	08/07/91	100.00	P				
273	49009782	EASTVOLD, DONALD W	09/09/91	100.00	P				
274	49009782	EASTVOLD, DONALD W	10/16/91	100.00	P				
275	49009782	EASTVOLD, DONALD W	11/01/91	100.00	P				
276	49009782	EASTVOLD, DONALD W	11/05/91	250.00	P				
277	49009782	EASTVOLD, DONALD W	11/19/91	100.00	P				
278	49009782	EASTVOLD, DONALD W	01/23/92	100.00	P				
279	49009782	EASTVOLD, DONALD W	03/23/92	150.00	P				
280	49009782	EASTVOLD, DONALD W	04/08/92	100.00	P			225.00	
281	49009782	EASTVOLD, DONALD W	06/23/92	100.00	G				
282	49009782	EASTVOLD, DONALD W	07/27/92	100.00	G				
283	49009782	EASTVOLD, DONALD W	08/31/92	100.00	G				
284	49009782	EASTVOLD, DONALD W	11/25/92	100.00	G				
285	49009782	EASTVOLD, DONALD W	03/09/93	50.00	G				
286	49052487	EWING, WAYNE	07/25/91	25.00	P				
287	49052487	EWING, WAYNE	12/05/91	100.00	P				
288	49052487	EWING, WAYNE	03/31/92	100.00	P				
289	49052487	EWING, WAYNE	04/15/92	500.00	P				
290	49052487	EWING, WAYNE	05/09/92	500.00	P				
291	49052487	EWING, WAYNE	05/13/92	1,000.00	P	25.00	1,200.00	25.00	REF
292	49052487	EWING, WAYNE	08/10/92	1,000.00	G				CR 2102
293	FER00001	FERGUSON, E. E.	09/09/91	100.00	P				
294	FER00001	FERGUSON, E. E.	01/09/92	100.00	P				
295	FER00001	FERGUSON, E. E.	02/05/92	100.00	P				
296	FER00001	FERGUSON, E. E.	03/23/92	100.00	P				
297	FER00001	FERGUSON, E. E.	05/13/92	100.00	P				
298	FER00001	FERGUSON, E. E.	07/20/92	100.00	G				
299	FER00001	FERGUSON, E. E.	09/04/92	500.00	G				
300	FER00001	FERGUSON, E. E.	09/09/92	500.00	G			100.00	
301	49052065	FERGUSON, SUBII	10/03/91	100.00	P				
302	49052065	FERGUSON, SUBII	05/07/92	100.00	P				
303	49052065	FERGUSON, SUBII	06/19/92	100.00	G				
304	49052065	FERGUSON, SUBII	08/07/92	200.00	G				
305	49052065	FERGUSON, SUBII	09/06/92	200.00	G				
306	49052065	FERGUSON, SUBII	09/16/92	200.00	G				
307	49052065	FERGUSON, SUBII	10/15/92	200.00	G				
308	49052065	FERGUSON, SUBII	10/31/92	500.00	G	100.00	100.00		REF
309	FLU0000	FLUOR, MARJORIE	12/09/91	250.00	P				
310	FLU0000	FLUOR, MARJORIE	04/21/92	250.00	P				
311	FLU0000	FLUOR, MARJORIE	05/13/92	750.00	P			250.00	
312	FLU0000	FLUOR, MARJORIE	08/19/92	50.00	G				
313	FLU0000	FLUOR, MARJORIE	10/09/92	1,000.00	G			50.00	
314	FON00001	FOND, GRACE MURK	11/02/92	1,250.00	G	250.00			REF
315	FON00001	FOND, GRACE MURK	11/06/92	100.00	G			100.00	
316	FRE00008	FREED, JOSEPH	09/08/92	250.00	G				
317	FRE00008	FREED, JOSEPH	10/20/92	500.00	G				
318	FRE00008	FREED, JOSEPH	10/29/92	500.00	G			250.00	
319	FUL00000	FULLER, WINSTON R.	05/21/91	250.00	P				
320	FUL00000	FULLER, WINSTON R.	09/30/91	250.00	P				
321	FUL00000	FULLER, WINSTON R.	02/02/92	250.00	P				
322	FUL00000	FULLER, WINSTON R.	03/18/92	250.00	P				
323	FUL00000	FULLER, WINSTON R.	05/19/92	250.00	P				
324	FUL00000	FULLER, WINSTON R.	05/21/92	250.00	P				REQ/REF

HERSCHELSOHN FOR U. S. SENATE 1992									
380	HERL0000	HERLICK, STANFORD D.	09/01/92	500.00	G				
381	HERL0000	HERLICK, STANFORD D.	10/15/92	200.00	G	100.00			RED
382	HERN0001	HERNANDEZ, ARMANDO C.	06/25/91	500.00	F				
383	HERN0001	HERNANDEZ, ARMANDO C.	10/15/91	500.00	F				
384	HERN0001	HERNANDEZ, ARMANDO C.	10/20/91	100.00	F				
385	HERN0001	HERNANDEZ, ARMANDO C.	02/07/92	100.00	F		200.00		
386	HERN0001	HERNANDEZ, ARMANDO C.	06/23/92	100.00	G				
387	HERN0001	HERNANDEZ, ARMANDO C.	10/16/92	100.00	G				
388	HERN0001	HERNANDEZ, ARMANDO C.	12/08/92	100.00	G				
389	49030350	HINZ, ROLAND S.	09/01/92	1,000.00	G				
390	49030350	HINZ, ROLAND S.	10/29/92	1,000.00	G	1,000.00		1,000.00	RED CL #1065
391	49030350	HINZ, ROLAND S.	11/02/92	1,000.00	G	1,000.00			RED
392	HUANG0000	HUANG, CHANG JEN	08/18/92	1,000.00	G				
393	HUANG0000	HUANG, CHANG JEN	09/01/92	100.00	G		100.00		
394	HUNT0005	ROY A. HUNTER	09/30/91	500.00	F				
395	HUNT0005	ROY A. HUNTER	11/21/91	30.00	F				
396	HUNT0005	ROY A. HUNTER	04/20/92	500.00	F				
397	HUNT0005	ROY A. HUNTER	05/06/92	100.00	F		100.00		
398	HUNT0005	ROY A. HUNTER	07/29/92	30.00	G				
399	HUNT0005	ROY A. HUNTER	10/02/92	200.00	G				
400	HUNT0005	ROY A. HUNTER	10/26/92	100.00	G				
401	HUNT0000	HUNTER, HILDRETH BROWN	05/21/91	1,000.00	F				
402	HUNT0000	HUNTER, HILDRETH BROWN	10/15/91	500.00	F	500.00		500.00	CL 2102
403	HUNT0000	HUNTER, HILDRETH BROWN	05/13/92	500.00	G				
404	HUNT0000	HUNTER, HILDRETH BROWN	08/07/92	500.00	G				
405	HUNT0000	HUNTER, HILDRETH BROWN	09/30/92	200.00	G				
406	HUNT0000	HUNTER, HILDRETH BROWN	10/15/92	475.00	G	475.00		475.00	CL 2541
407	HUNT0006	HUNTER, WALTER B.	09/30/91	200.00	F				
408	HUNT0006	HUNTER, WALTER B.	03/25/92	500.00	F				
409	HUNT0006	HUNTER, WALTER B.	08/12/92	1,000.00	G				
410	HUNT0006	HUNTER, WALTER B.	10/20/92	1,000.00	G		1,000.00		
411	49062930	HUTCHINSON, GAIL B.	09/06/91	500.00	F				
412	49062930	HUTCHINSON, GAIL B.	03/26/92	200.00	F				
413	49062930	HUTCHINSON, GAIL B.	05/13/92	600.00	F	500.00	300.00		RED
414	49062930	HUTCHINSON, GAIL B.	05/13/92	500.00	F				
415	49062930	HUTCHINSON, GAIL B.	10/20/92	200.00	G				
416	49062930	HUTCHINSON, GAIL B.	10/31/92	300.00	G				
417	49081191	INNES, DAVID C.	10/08/92	15.00	G				
418	49081191	INNES, DAVID C.	11/02/92	1,250.00	G	265.00			RED
419	49006329	INSKEEP, SUSAN A	07/17/91	100.00	F				
420	49006329	INSKEEP, SUSAN A	11/19/91	100.00	F				
421	49006329	INSKEEP, SUSAN A	12/30/91	100.00	F				
422	49006329	INSKEEP, SUSAN A	01/30/92	100.00	F				
423	49006329	INSKEEP, SUSAN A	04/16/92	100.00	F				
424	49006329	INSKEEP, SUSAN A	04/27/92	100.00	F				
425	49006329	INSKEEP, SUSAN A	05/21/92	300.00	F				
426	49006329	INSKEEP, SUSAN A	07/02/92	100.00	G				
427	49006329	INSKEEP, SUSAN A	08/07/92	500.00	G				
428	49006329	INSKEEP, SUSAN A	09/28/92	100.00	G				
429	49006329	INSKEEP, SUSAN A	10/13/92	400.00	G		100.00		
430	IRED0000	IREDALE, NANCY L.	05/27/92	500.00	F				
431	IRED0000	IREDALE, NANCY L.	09/29/92	1,000.00	G				
432	IRED0000	IREDALE, NANCY L.	10/27/92	500.00	G		500.00		
433	JANG0000	JANG, SMITH MOY	11/02/92	1,250.00	G	250.00			RED
434	49074476	JASTROW, ROBERT	05/12/92	500.00	F				

HILSCHENSOHN FOR U. S. SENATE 1992

435	49014476	JASTROW, ROBERT	09/15/92	500.00	G			
436	49014476	JASTROW, ROBERT	10/02/92	1,000.00	G	500.00		REF
437	49017429	JOHNSON, C.B. (CHARLES)	04/01/92	10.00	F			
438	49017429	JOHNSON, C.B. (CHARLES)	09/23/92	2,000.00	G	1,000.00		REF
439	49063488	JOHNSON, JACK D.	06/29/91	250.00	F			
440	49063488	JOHNSON, JACK D.	03/31/92	1,000.00	F			
441	49063488	JOHNSON, JACK D.	05/02/92	750.00	F	1,000.00		REF
442	49063488	JOHNSON, JACK D.	10/16/92	1,000.00	G			
443	49063488	JOHNSON, JACK D.	10/28/92	100.00	G	100.00		100.00 REF
444	49008622	JOHNSON, WILLIAM	06/25/91	100.00	F			NO CC #3066
445	49008622	JOHNSON, WILLIAM	09/23/91	100.00	F			
446	49008622	JOHNSON, WILLIAM	06/30/92	500.00	G			
447	49008622	JOHNSON, WILLIAM	09/04/92	500.00	G			
448	49008622	JOHNSON, WILLIAM	09/29/92	250.00	G			
449	49008622	JOHNSON, WILLIAM	09/30/92	500.00	G			
450	49008622	JOHNSON, WILLIAM	10/15/92	200.00	G	950.00		REF
451	WARD0004	KARD	01/22/92	625.00	F			
452	KAUF0008	KARD	01/22/92	625.00	F	250.00		625.00 NO CC UKR 3075
453	KASH0002	KASHIAN, EDWARD M.	11/25/91	125.00	F			
454	KASH0002	KASHIAN, EDWARD M.	05/02/92	1,000.00	F		105.00	
455	49050737	KAVALICH, GERALDINE E.	11/08/91	100.00	F			
456	49050737	KAVALICH, GERALDINE E.	07/06/92	250.00	G			
457	49050737	KAVALICH, GERALDINE E.	08/25/92	1,000.00	G	250.00		REF
458	KEIT0008	KEITH, ROBERT K.	10/08/92	105.00	G			
459	KEIT0008	KEITH, ROBERT K.	11/03/92	1,000.00	G		105.00	
460	KEIT0008	KEITH, ROBERT K.	11/03/92	1,000.00	F			
461	KENT0005	KENT, MARILYN	04/06/92	50.00	F			
462	KENT0005	KENT, MARILYN	05/06/92	75.00	F			
463	KENT0005	KENT, MARILYN	05/19/92	50.00	F			
464	KENT0005	KENT, MARILYN	08/11/92	25.00	G			
465	KENT0005	KENT, MARILYN	10/23/92	1,000.00	G			
466	KENT0005	KENT, MARILYN	12/07/92	100.00	G		105.00	
467	KEYS0000	KEYSTON, DAVID H.	12/31/91	100.00	F			
468	KEYS0000	KEYSTON, DAVID H.	05/06/92	150.00	F			
469	KEYS0000	KEYSTON, DAVID H.	08/18/92	200.00	G			
470	KEYS0000	KEYSTON, DAVID H.	10/13/92	200.00	G			
471	KEYS0000	KEYSTON, DAVID H.	10/20/92	1,000.00	G			
472	KEYS0000	KEYSTON, DAVID H.	10/25/92	600.00	G			
473	KEYS0000	KEYSTON, DAVID H.	11/27/92	(500.00)	G	100.00		REF
474	KEYS0000	KEYSTON, DAVID H.	12/02/92	(400.00)	G			REF
475	LAMB0005	LAMB, JAMES N.	09/09/92	1,000.00	G			
476	LAMB0005	LAMB, JAMES N.	10/20/92	500.00	G	500.00		REF
477	LARS0020	LARSON, ALBERT T.	10/29/92	2,000.00	G	1,000.00		REF
478	49010293	LAWRENCE, J W	07/03/91	200.00	F			
479	49010293	LAWRENCE, J W	12/16/91	50.00	F			
480	49010293	LAWRENCE, J W	02/03/92	100.00	F			
481	49010293	LAWRENCE, J W	03/16/92	100.00	F			
482	49010293	LAWRENCE, J W	05/21/92	150.00	F			
483	49010293	LAWRENCE, J W	07/08/92	150.00	G			
484	49010293	LAWRENCE, J W	08/10/92	100.00	G			
485	49010293	LAWRENCE, J W	09/01/92	225.00	G			
486	49010293	LAWRENCE, J W	10/13/92	200.00	G			
487	49010293	LAWRENCE, J W	10/27/92	150.00	G			
488	49010293	LAWRENCE, J W	11/23/92	150.00	G			
489	49010293	LAWRENCE, J W	02/01/93	100.00	G			

		HERSCHEMANN FOR U. S. SENATE 1992				
490	49010000	LAWRENCE, J W	03/22/93	150.00	G	225.00
491	LEAV0001	LEAVITT, RICHARD B.	09/25/92	750.00	G	
492	LEAV0001	LEAVITT, RICHARD B.	11/03/92	1,000.00	G	750.00
493	LEHR0000	LEHRMAN, LEWIS	10/29/92	2,000.00	G	1,000.00
494	LENN0001	LENNON, FRED A.	06/28/91	1,000.00	F	
495	LENN0001	LENNON, FRED A.	10/08/91	1,000.00	F	1,000.00
496	49062954	LISSNER, ALICE R.	11/12/91	500.00	F	
497	49062954	LISSNER, ALICE R.	03/10/92	500.00	F	
498	49062954	LISSNER, ALICE R.	05/13/92	500.00	F	500.00
499	49062954	LISSNER, ALICE R.	07/29/92	100.00	G	
500	LIU 0001	LIU, YU SHENG VICTOR	10/29/92	2,000.00	G	1,000.00
501	49072660	LOGAN, VI	06/10/91	1,000.00	F	
502	49072660	LOGAN, VI	08/18/92	2,000.00	G	1,000.00
503	49074544	MACE, ELEANOR	09/11/92	500.00	G	
504	49074544	MACE, ELEANOR	10/13/92	250.00	G	
505	49074544	MACE, ELEANOR	10/20/92	250.00	G	
506	49074544	MACE, ELEANOR	11/17/92	500.00	G	500.00
507	MACP0000	MACPHERSON, JOE D.	05/16/91	1,000.00	F	
508	MACP0000	MACPHERSON, JOE D.	09/06/91	500.00	F	
509	MACP0000	MACPHERSON, JOE D.	05/13/92	1,000.00	F	
510	MACP0000	MACPHERSON, JOE D.	05/13/92	1,000.00	F	2,500.00
511	MADD0001	MADDOCK, THOMAS S.	08/25/92	1,000.00	G	
512	MADD0001	MADDOCK, THOMAS S.	10/02/92	500.00	G	500.00
513	MADD0001	MADDOCK, THOMAS S.	10/23/92	500.00	G	500.00
514	MARK0013	MARKULIS, ANITA C.	10/29/92	2,000.00	G	1,000.00
515	MARK0017	MARKULIS, JOHN G.	10/29/92	2,000.00	F	1,000.00
516	49013523	MARTINDALE, HARRY T.	06/18/91	200.00	F	
517	49013523	MARTINDALE, HARRY T.	08/07/91	100.00	F	
518	49013523	MARTINDALE, HARRY T.	10/04/91	200.00	F	
519	49013523	MARTINDALE, HARRY T.	10/16/91	200.00	F	
520	49013523	MARTINDALE, HARRY T.	12/02/91	100.00	F	
521	49013523	MARTINDALE, HARRY T.	02/05/92	200.00	F	
522	49013523	MARTINDALE, HARRY T.	03/10/92	300.00	F	
523	49013523	MARTINDALE, HARRY T.	05/13/92	100.00	F	
524	49013523	MARTINDALE, HARRY T.	05/13/92	200.00	F	500.00
525	49013523	MARTINDALE, HARRY T.	07/06/92	200.00	G	
526	49013523	MARTINDALE, HARRY T.	07/31/92	500.00	G	
527	49013523	MARTINDALE, HARRY T.	08/12/92	500.00	G	200.00
528	49012625	MCCALLA, DONALD D.	08/18/92	500.00	G	
529	49012625	MCCALLA, DONALD D.	09/30/92	1,000.00	G	500.00
530	MCCR0004	MCCARTHY, KATHLEEN	11/02/92	1,500.00	G	1,500.00
531	49030403	MCCROSKEY, WILLIAM E.	05/31/91	200.00	F	
532	49030403	MCCROSKEY, WILLIAM E.	10/16/91	100.00	F	
533	49030403	MCCROSKEY, WILLIAM E.	03/19/92	200.00	F	
534	49030403	MCCROSKEY, WILLIAM E.	04/26/92	100.00	F	
535	49030403	MCCROSKEY, WILLIAM E.	05/13/92	100.00	F	
536	49030403	MCCROSKEY, WILLIAM E.	07/06/92	100.00	G	
537	49030403	MCCROSKEY, WILLIAM E.	08/04/92	100.00	G	
538	49030403	MCCROSKEY, WILLIAM E.	08/07/92	300.00	G	
539	49030403	MCCROSKEY, WILLIAM E.	09/01/92	300.00	G	
540	49030403	MCCROSKEY, WILLIAM E.	10/02/92	500.00	G	
541	49030403	MCCROSKEY, WILLIAM E.	10/13/92	300.00	G	
542	49030403	MCCROSKEY, WILLIAM E.	10/20/92	300.00	G	
543	49030403	MCCROSKEY, WILLIAM E.	10/26/92	100.00	G	100.00
544	MCD00000	MCDONALD, RICHARD A.	09/25/91	500.00	F	200.00

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1,500.00 RED

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545 MCD00000 McDONALD, RICHARD A. 12/12/91 400.00 F
 546 MCD00000 McDONALD, RICHARD A. 05/13/92 600.00 F 500.00
 547 MCD00000 McDONALD, RICHARD A. 10/29/92 1,000.00 G
 548 49030488 MCGAUGHEY, EMMETT C. 05/28/91 500.00 F
 549 49030488 MCGAUGHEY, EMMETT C. 10/08/91 500.00 F
 550 49030488 MCGAUGHEY, EMMETT C. 04/14/92 500.00 F 500.00 500.00 RED REF NO CC #3068
 551 49030488 MCGAUGHEY, EMMETT C. 05/13/92 150.00 G
 552 MC 60000 MCGAUGHEY, EMMETT C. 09/01/92 500.00 G
 553 MC 00000 MCHILLAN, SUSAN CARPENTER 07/15/91 100.00 F
 554 MC 00000 MCHILLAN, SUSAN CARPENTER 05/05/92 1,000.00 F
 555 MC 00000 MCHILLAN, SUSAN CARPENTER 05/27/92 1,000.00 F 1,100.00
 556 MC 00000 MCHILLAN, SUSAN CARPENTER 07/31/92 1,000.00 G
 557 MCNE0001 MCNEAL, LOUELLA 07/24/91 500.00 F
 558 MCNE0001 MCNEAL, LOUELLA 10/18/91 1,000.00 F
 559 MCNE0001 MCNEAL, LOUELLA 03/30/92 500.00 F 500.00 500.00 FEE FEE CC #3070
 560 MCNE0001 MCNEAL, LOUELLA 05/13/92 500.00 G
 561 MCNE0001 MCNEAL, LOUELLA 10/13/92 100.00 G
 562 MCNE0001 MCNEAL, LOUELLA 11/23/92 100.00 G
 563 49063264 MCQUEEN, MALCOLM M. 10/31/91 500.00 F
 564 49063264 MCQUEEN, MALCOLM M. 05/08/92 250.00 F
 565 49063264 MCQUEEN, MALCOLM M. 08/25/92 500.00 G
 566 49063264 MCQUEEN, MALCOLM M. 09/15/92 250.00 G
 567 49063264 MCQUEEN, MALCOLM M. 09/17/92 250.00 G
 568 49063264 MCQUEEN, MALCOLM M. 10/22/92 500.00 G
 569 49063264 MCQUEEN, MALCOLM M. 10/24/92 100.00 G 350.00 250.00 RED
 570 MILL0073 MILLER, S. L. 11/06/92 1,000.00 G
 571 MILL0073 MILLER, S. L. 11/06/92 100.00 G 100.00
 572 49047188 MILLIKEN, W. D. 10/31/91 100.00 F
 573 49047188 MILLIKEN, W. D. 01/29/92 100.00 F
 574 49047188 MILLIKEN, W. D. 02/13/92 100.00 F
 575 49047188 MILLIKEN, W. D. 03/17/92 100.00 F
 576 49047188 MILLIKEN, W. D. 04/23/92 150.00 F
 577 49047188 MILLIKEN, W. D. 05/21/92 150.00 F
 578 49047188 MILLIKEN, W. D. 06/23/92 150.00 G
 579 49047188 MILLIKEN, W. D. 08/04/92 150.00 G
 580 49047188 MILLIKEN, W. D. 08/25/92 225.00 G
 581 49047188 MILLIKEN, W. D. 09/25/92 1,000.00 G
 582 49047188 MILLIKEN, W. D. 10/13/92 150.00 G
 583 49047188 MILLIKEN, W. D. 10/22/92 200.00 G 075.00 075.00 FEE NO CC # 3071
 584 49050280 MITCHELL, JOHN H. 11/23/91 100.00 F
 585 49050280 MITCHELL, JOHN H. 03/05/92 75.00 F
 586 49050280 MITCHELL, JOHN H. 04/15/92 100.00 F
 587 49050280 MITCHELL, JOHN H. 04/27/92 200.00 F
 588 49050280 MITCHELL, JOHN H. 05/12/92 200.00 F
 589 49050280 MITCHELL, JOHN H. 05/27/92 400.00 F 75.00
 590 49050280 MITCHELL, JOHN H. 07/01/92 100.00 G
 591 49050280 MITCHELL, JOHN H. 08/10/92 100.00 G
 592 49050280 MITCHELL, JOHN H. 09/04/92 200.00 G
 593 49050280 MITCHELL, JOHN H. 10/21/92 100.00 G
 594 49050280 MITCHELL, JOHN H. 10/27/92 100.00 G
 595 49050280 MITCHELL, JOHN H. 12/03/92 100.00 G
 596 49050280 MITCHELL, JOHN H. 03/11/93 100.00 G
 597 MITT0001 MITTS, THOMAS F. 11/25/91 250.00 F
 598 MITT0001 MITTS, THOMAS F. 11/03/92 500.00 G
 599 MITT0001 MITTS, THOMAS F. 11/06/92 100.00 G

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600	MITT0001	MITTS, THOMAS F.	12/03/92	500.00	G		
601	MITT0001	MITTS, THOMAS F.	01/12/93	500.00	G	600.00	
602	MORR0007	MORRIS, ANTHONY M.	02/07/92	50.00	F		
603	MORR0007	MORRIS, ANTHONY M.	03/19/92	50.00	F		
604	MORR0007	MORRIS, ANTHONY M.	05/12/92	75.00	F		
605	MORR0007	MORRIS, ANTHONY M.	05/13/92	50.00	F		
606	MORR0007	MORRIS, ANTHONY M.	08/11/92	75.00	G		
607	MORR0007	MORRIS, ANTHONY M.	09/09/92	100.00	G		
608	MORR0007	MORRIS, ANTHONY M.	10/13/92	200.00	G		
609	MORR0007	MORRIS, ANTHONY M.	10/15/92	400.00	G		
610	MORR0007	MORRIS, ANTHONY M.	10/28/92	200.00	G		
611	MORR0007	MORRIS, ANTHONY M.	12/04/92	150.00	G	125.00	
612	MUTH0000	MUTH, MARY	06/25/91	1,000.00	F		
613	MUTH0000	MUTH, MARY	05/13/92	1,000.00	F	1,000.00	
614	MUTH0000	MUTH, MARY	07/31/92	1,000.00	G		
615	49030534	MYERS, MARJORIE W.	08/25/92	1,000.00	G		
616	49030534	MYERS, MARJORIE W.	10/16/91	1,000.00	F	1,000.00	NO CC #3072
617	49030534	MYERS, MARJORIE W.	10/24/92	1,000.00	F		
618	49030534	MYERS, MARJORIE W.	10/24/92	1,000.00	G	1,000.00	NO CC #3072
619	NEL50012	NELSON, ELEANOR K.	06/28/91	50.00	F		
620	NEL50012	NELSON, ELEANOR K.	10/02/91	50.00	F		
621	NEL50012	NELSON, ELEANOR K.	12/05/91	1,000.00	F		
622	NEL50012	NELSON, ELEANOR K.	05/07/92	25.00	F	125.00	
623	NEL50012	NELSON, ELEANOR K.	12/04/92	30.00	G		
624	NETH0001	NETHERCUTT, J. B.	08/13/91	1,000.00	F		
625	NETH0001	NETHERCUTT, J. B.	10/30/91	1,000.00	F	1,000.00	FED
626	NETH0002	NETHERCUTT, DOROTHY	09/06/91	100.00	F		
627	NETH0002	NETHERCUTT, DOROTHY	10/07/91	150.00	F		
628	NETH0002	NETHERCUTT, DOROTHY	03/25/92	200.00	F		
629	NETH0002	NETHERCUTT, DOROTHY	04/27/92	500.00	F		
630	NETH0002	NETHERCUTT, DOROTHY	04/28/92	20.00	F		
631	NETH0002	NETHERCUTT, DOROTHY	05/20/92	100.00	F	70.00	
632	NETH0002	NETHERCUTT, DOROTHY	11/30/92	200.00	G		
633	NEWL0000	NEWLAND, THOMAS A.	09/01/92	1,000.00	G		
634	NEWL0000	NEWLAND, THOMAS A.	10/27/92	200.00	G	200.00	FED
635	OL500000	OLSON, RICHARD M.	10/23/91	100.00	F		
636	OL500000	OLSON, RICHARD M.	03/25/92	250.00	F		
637	OL500000	OLSON, RICHARD M.	05/13/92	250.00	F		
638	OL500000	OLSON, RICHARD M.	06/30/92	500.00	G		
639	OL500000	OLSON, RICHARD M.	08/25/92	500.00	G		
640	OL500000	OLSON, RICHARD M.	10/08/92	125.00	G		
641	OL500000	OLSON, RICHARD M.	10/19/92	100.00	G		
642	OL500000	OLSON, RICHARD M.	11/23/92	100.00	G	225.00	100.00 FED
643	OLTM0000	OLTMAN, JOYCE ARLENE	10/27/92	1,000.00	F		
644	OLTM0000	OLTMAN, JOYCE ARLENE	11/03/92	1,000.00	G		
645	OLTM0000	OLTMAN, JOYCE ARLENE	12/02/91	100.00	F	100.00	NO CC # 3101
646	OSBE0000	OSBERG, GRACE V.	06/19/91	250.00	F		
647	OSBE0000	OSBERG, GRACE V.	07/10/91	200.00	F		
648	OSBE0000	OSBERG, GRACE V.	07/25/91	100.00	F		
649	OSBE0000	OSBERG, GRACE V.	08/21/91	100.00	F		
650	OSBE0000	OSBERG, GRACE V.	09/26/91	100.00	F		
651	OSBE0000	OSBERG, GRACE V.	10/29/91	100.00	F		
652	OSBE0000	OSBERG, GRACE V.	12/05/91	100.00	F		
653	OSBE0000	OSBERG, GRACE V.	05/06/92	(50.00)	F		
654	OSBE0000	OSBERG, GRACE V.	05/06/92	100.00	F		

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		HERSCHENSOHN FOR U. S. SENATE 1992							
655	OSBE0000	OSBERG, GRACE V.	05/13/92	100.00	F				
656	OSBE0000	OSBERG, GRACE V.	05/13/92	100.00	F		200.00		
657	OSBE0000	OSBERG, GRACE V.	03/21/92	250.00	G				
658	OSBE0000	OSBERG, GRACE V.	09/08/92	100.00	G				
659	OSBE0000	OSBERG, GRACE V.	09/25/92	100.00	G				
660	OSBE0000	OSBERG, GRACE V.	10/13/92	50.00	G				
661	OSBE0000	OSBERG, GRACE V.	10/22/92	200.00	G				
662	OWEN0000	OWEN, GREGORY L.	06/18/91	100.00	F				
663	OWEN0000	OWEN, GREGORY L.	03/30/92	150.00	F				
664	OWEN0000	OWEN, GREGORY L.	04/24/92	500.00	F				
665	OWEN0000	OWEN, GREGORY L.	10/14/92	1,250.00	G		250.00		RED
666	PALM0010	PALMISANO, REBECCA	10/16/92	2,000.00	G		1,000.00		RED
667	PANC0001	PANCHASARF, PAUL SOMPHOL	10/27/92	2,000.00	G		1,000.00		RED
668	PEAT0000	PEAT JR., JOHN M.	01/10/92	100.00	F				
669	PEAT0000	PEAT JR., JOHN M.	03/31/92	1,000.00	F		100.00		
670	PEAT0000	PEAT JR., JOHN M.	06/19/92	100.00	G				
671	49070462	PERKINS, DOROTHY N.	09/04/92	100.00	G		100.00		
672	49070462	PERKINS, DOROTHY N.	11/03/92	1,900.00	G		900.00		RED
673	49038738	PERKINS, NEALE A.	09/20/91	50.00	F				
674	49038738	PERKINS, NEALE A.	11/25/91	50.00	F				
675	49038738	PERKINS, NEALE A.	02/12/92	250.00	F				
676	49038738	PERKINS, NEALE A.	05/27/92	1,000.00	F		500.00		
677	PRAT0000	PRATT, CLIFF W.	03/08/91	1,000.00	F				
678	PRAT0000	PRATT, CLIFF W.	12/31/91	100.00	F				
679	PRAT0000	PRATT, CLIFF W.	02/12/92	100.00	F				
680	PRAT0000	PRATT, CLIFF W.	05/19/92	100.00	F		100.00	200.00	RED
681	PRAT0000	PRATT, CLIFF W.	10/23/92	250.00	G				
682	PRAT0000	PRATT, CLIFF W.	12/02/92	100.00	G				
683	49081945	PROTHERO JR., RAYMOND H.	06/25/91	500.00	F				
684	49081945	PROTHERO JR., RAYMOND H.	03/31/92	900.00	F				
685	49081945	PROTHERO JR., RAYMOND H.	04/29/92	500.00	F		900.00		RED
686	49081945	PROTHERO JR., RAYMOND H.	10/02/92	500.00	G				
687	RAOUL000	RAOUL-DUVAL, MICHAEL	09/29/92	2,000.00	G		1,000.00		RED
688	RICK0002	RICKARD, JOHN T.	10/16/92	2,000.00	G		1,000.00		RED
689	ROBE0001	ROBERTS JR. TRUST, DUANE	04/15/92	100.00	F				
690	ROBE0001	ROBERTS JR. TRUST, DUANE	05/27/92	1,000.00	F		100.00		
691	ROBE0001	ROBERTS JR. TRUST, DUANE	10/20/92	1,000.00	G				
692	ROBE0004	ROBERTS, GARY D.	08/29/91	500.00	F				
693	ROBE0004	ROBERTS, GARY D.	10/21/91	100.00	F				
694	ROBE0004	ROBERTS, GARY D.	12/06/91	500.00	F		100.00		
695	ROBE0004	ROBERTS, GARY D.	10/20/92	1,000.00	G				
696	ROBE0004	ROBE, LESLIE	06/01/92	500.00	F				
697	ROBE0004	ROBE, LESLIE	10/20/92	1,000.00	G				
698	ROBE0004	ROBE, LESLIE	10/22/92	500.00	G		500.00		
699	ROZA0000	ROZAR, RICK L.	07/20/92	2,000.00	G		1,000.00	1,000.00	RED REF NO CC #3074
700	ROZA0000	ROZAR, RICK L.	09/08/92	1,000.00	G		1,000.00	1,000.00	RED NO CC #3074
701	ROZA0000	ROZAR, RICK L.	10/29/92	500.00	F				
702	RUS00002	RUSSELL, DANIEL F.	12/30/91	2,000.00	G		1,000.00		RED
703	SCHN0004	SCHNEIDER, GEORGE W.	10/21/91	100.00	F				
704	SCHN0004	SCHNEIDER, GEORGE W.	05/19/92	1,000.00	F		100.00		
705	SCHN0004	SCHNEIDER, GEORGE W.	09/01/92	250.00	G				
706	SCOT0000	SCOTT, WARREN A.	10/04/91	250.00	F				
707	SCOT0000	SCOTT, WARREN A.	10/14/91	1,000.00	F		250.00	250.00	RED NO CC #3075
708	49063141	SEKLEMIAN, GRACE	08/21/91	300.00	F				
709	49063141	SEKLEMIAN, GRACE	05/13/92	250.00	F				

		HERSCHELSOHN FOR U. S. DEPT. 1992							
710	49063141	SEKLEMIAN, GRACE	08/05/92	550.00	G				
711	49063141	SEKLEMIAN, GRACE	10/02/92	500.00	G				
712	49063141	SEKLEMIAN, GRACE	10/15/92	1,000.00	G	1,050.00		REA/RED	
713	SHAN0002	SHANNON, C.R. (RANCH ACCT)	05/22/92	100.00	F				
714	SHAN0002	SHANNON, C.R. (RANCH ACCT)	05/26/92	2,000.00	F	100.00	1,000.00	100.00	REF
715	SHAN0002	SHANNON, C.R. (RANCH ACCT)	11/03/92	1,000.00	G				UK 2442
716	49072601	SHEPPARD, MARGARET A.	11/12/91	1,000.00	F				PARTNERSHIP CR
717	49072601	SHEPPARD, MARGARET A.	08/21/92	2,000.00	G	1,000.00		REA	
718	SHU 0000	SHU, F.M.S.	11/02/92	1,250.00	G	250.00		250.00	REF
719	49030974	SIMPSON, WILLIAM A.	12/31/91	100.00	F				NO CC #3075
720	49030974	SIMPSON, WILLIAM A.	01/27/92	100.00	F				
721	49030974	SIMPSON, WILLIAM A.	03/25/92	100.00	F				
722	49030974	SIMPSON, WILLIAM A.	04/23/92	150.00	F				
723	49030974	SIMPSON, WILLIAM A.	05/06/92	200.00	F				
724	49030974	SIMPSON, WILLIAM A.	05/19/92	150.00	F				
725	49030974	SIMPSON, WILLIAM A.	06/23/92	150.00	G				
726	49030974	SIMPSON, WILLIAM A.	07/24/92	200.00	G				
727	49030974	SIMPSON, WILLIAM A.	08/25/92	225.00	G				
728	49030974	SIMPSON, WILLIAM A.	10/15/92	500.00	G				
729	49030974	SIMPSON, WILLIAM A.	10/20/92	250.00	G				
730	49030974	SIMPSON, WILLIAM A.	10/29/92	150.00	G	125.00	100.00		RED
731	SME00000	SMEAD, L. H.	06/25/91	500.00	F				
732	SME00000	SMEAD, L. H.	06/02/92	1,000.00	F		500.00		
733	SMIL0003	SMILAND LAND COMPANY	11/03/92	2,000.00	G				
734	SMIL0003	SMILAND LAND COMPANY	11/03/92	2,000.00	G				
735	SMIL0003	SMILAND LAND COMPANY	11/03/92	1,000.00	G		9,000.00		PARTNERSHIP CR
736	SMIL0003	SMILAND LAND COMPANY	07/01/91	1,000.00	F				
737	SNYD0000	SNYDER, ESTHER L.	06/12/91	1,000.00	F				
738	SNYD0000	SNYDER, ESTHER L.	06/29/91	1,000.00	F	1,000.00			RED
739	SNYD0004	SNYDER, GERALDINE H.	06/29/91	100.00	F				
740	SNYD0004	SNYDER, GERALDINE H.	05/12/92	100.00	F				
741	SNYD0004	SNYDER, GERALDINE H.	05/12/92	90.00	F				
742	SNYD0004	SNYDER, GERALDINE H.	09/03/92	100.00	G				
743	SNYD0004	SNYDER, GERALDINE H.	10/20/92	1,000.00	G		100.00		
744	SFAN0007	SFANDS, SUSAN	09/30/92	1,000.00	G				
745	SFAN0007	SFANDS, SUSAN	10/24/92	100.00	G	100.00			RED
746	4903523	SPRINKEL, REED	05/01/91	1,000.00	F				
747	4903523	SPRINKEL, REED	03/31/92	1,000.00	G				
748	4903523	SPRINKEL, REED	12/11/92	500.00	G	500.00			RED/REF
749	STAN0002	STANS, MAURICE H.	05/06/92	500.00	F				NO CC #3077
750	STAN0002	STANS, MAURICE H.	09/21/91	250.00	F				
751	STAN0002	STANS, MAURICE H.	10/04/91	250.00	F				
752	STAN0002	STANS, MAURICE H.	05/13/92	100.00	G				
753	STAN0002	STANS, MAURICE H.	08/17/92	500.00	G				
754	STAN0002	STANS, MAURICE H.	09/09/92	250.00	G				
755	STAN0002	STANS, MAURICE H.	09/21/92	100.00	G				
756	STAN0002	STANS, MAURICE H.	10/29/92	100.00	G		50.00		
757	STAR0000	STARKMAN, ISAAC	07/03/91	1,000.00	F				
758	STAR0000	STARKMAN, ISAAC	11/03/92	3,000.00	G	2,000.00			RED/RED
759	49081431	SULLIVAN, J.D.	07/10/92	1,000.00	G				
760	49081431	SULLIVAN, J.D.	08/18/92	100.00	G	100.00			RED/RED
761	49081431	SULLIVAN, J.D.	10/08/92	450.00	G	450.00			RED/RED
762	49081431	SULLIVAN, J.D.	10/14/92	200.00	G	200.00		200.00	RED/RED
763	TATH0000	TATHAM, WILLIAM R.	11/25/91	250.00	F				NO CC #3078
764	TATH0000	TATHAM, WILLIAM R.	06/02/92	1,000.00	F		250.00		

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765	TAYLOR	CRITTENDEN F.	08/12/92	500.00	G				
766	TAYLOR	CRITTENDEN F.	08/12/92	100.00	G				
767	TAYLOR	CRITTENDEN F.	09/08/92	500.00	G				
768	TAYLOR	CRITTENDEN F.	10/27/92	100.00	G	100.00	100.00	RED	
769	TAYLOR	RUTH M.	08/07/91	100.00	F				
770	TAYLOR	RUTH M.	09/06/91	1,000.00	F				
771	TAYLOR	RUTH M.	06/23/92	100.00	G		100.00		
772	TAYLOR	RUTH M.	07/31/92	500.00	G				
773	TAYLOR	RUTH M.	08/25/92	100.00	G				
774	TAYLOR	RUTH M.	09/30/92	50.00	G				
775	TAYLOR	RUTH M.	10/27/92	100.00	G				
776	TAYLOR	RUTH M.	11/23/92	100.00	G				
777	THOMAS	JON C.	11/14/91	625.00	F				
778	THOMAS	JON C.	05/29/92	500.00	F	125.00	125.00	RED	NO CC #1072
779	THOMAS	MICHAEL	11/14/91	625.00	F				
780	THOMAS	MICHAEL	05/29/92	500.00	F	125.00	125.00	RED	NO CC #1080
781	49017453	THOMPSON, BRUCE	08/05/91	25.00	F				
782	49017453	THOMPSON, BRUCE	09/30/91	100.00	F				
783	49017453	THOMPSON, BRUCE	12/07/91	25.00	F				
784	49017453	THOMPSON, BRUCE	03/20/92	10.00	F				
785	49017453	THOMPSON, BRUCE	05/01/92	100.00	F				
786	49017453	THOMPSON, BRUCE	06/09/92	100.00	G				
787	49017453	THOMPSON, BRUCE	06/24/92	100.00	G				
788	49017453	THOMPSON, BRUCE	08/17/92	500.00	G				
789	49017453	THOMPSON, BRUCE	09/03/92	250.00	G				
790	49017453	THOMPSON, BRUCE	10/27/92	50.00	G				
791	49017453	THOMPSON, BRUCE	03/22/93	100.00	G		100.00		
792	TRINK	PAUL	04/16/92	2,000.00	F	1,000.00	1,000.00		
793	VAN	ELLEN J.	09/06/91	250.00	F				
794	VAN	ELLEN J.	10/30/91	1,000.00	F	250.00	250.00	RED	NO CC #1082
795	VERNO	DEAN S.	11/04/91	100.00	F				
796	VERNO	DEAN S.	05/13/92	1,000.00	F		100.00		
797	49063194	VERNON, GLORIA	03/30/92	150.00	F				
798	49063194	VERNON, GLORIA	05/08/92	200.00	F				
799	49063194	VERNON, GLORIA	05/13/92	1,000.00	F	350.00	350.00	RED	NO CC #1083
800	49063194	VERNON, GLORIA	10/21/92	100.00	G				
801	VIGUE	RICHARD A	06/01/92	500.00	F				
802	VIGUE	RICHARD A	09/29/92	1,000.00	G				
803	VIGUE	RICHARD A	11/01/92	500.00	G	500.00		RED	
804	WAGG	OLGA L.	08/31/92	100.00	G				
805	WAGG	OLGA L.	09/30/92	300.00	G				
806	WAGG	OLGA L.	10/07/92	100.00	G				
807	WAGG	OLGA L.	10/12/92	500.00	G				
808	WAGG	OLGA L.	10/14/92	100.00	G				
809	WAGG	OLGA L.	10/15/92	500.00	G		600.00		
810	WALL	JOHN C.	03/18/92	500.00	F				
811	WALL	JOHN C.	05/22/92	1,000.00	F	500.00	500.00	RED	NO CC #1084
812	WALL	JOHN C.	11/03/92	1,250.00	G	250.00	250.00	RED	NO CC #1084
813	WALL	RANDALL	11/06/92	2,000.00	G	1,000.00		RED	
814	WALS	LEO M.	09/27/92	2,000.00	G	1,000.00		RED	
815	ED	WARMINGTON, ED	05/31/91	100.00	F				
816	ED	WARMINGTON, ED	06/20/91	250.00	F				
817	ED	WARMINGTON, ED	10/15/91	1,000.00	F				
818	ED	WARMINGTON, ED	12/31/91	100.00	F				
819	ED	WARMINGTON, ED	02/03/92	100.00	F				

LINE	ED	W0000	WASHINGTON, ED	03/23/92	100.00 F				
821	ED	W0000	WASHINGTON, ED	04/28/92	150.00 F				
822	ED	W0000	WASHINGTON, ED	05/13/92	500.00 F	500.00	800.00		RED
823	ED	W0000	WASHINGTON, ED	07/06/92	150.00 B				
824	ED	W0000	WASHINGTON, ED	07/30/92	150.00 G				
825	ED	W0000	WASHINGTON, ED	08/20/92	100.00 B				
826	ED	W0000	WASHINGTON, ED	09/22/92	100.00 B				
827	ED	W0000	WASHINGTON, ED	10/22/92	150.00 B				
828	49074793		WATTERS, MARCELLA V.	10/07/91	100.00 F				
829	49074793		WATTERS, MARCELLA V.	04/28/92	150.00 F				
830	49074793		WATTERS, MARCELLA V.	05/18/92	150.00 F				
831	49074793		WATTERS, MARCELLA V.	06/23/92	150.00 B				
832	49074793		WATTERS, MARCELLA V.	09/15/92	200.00 B				
833	49074793		WATTERS, MARCELLA V.	09/30/92	200.00 G				
834	49074793		WATTERS, MARCELLA V.	10/20/92	500.00 G				
835	49074793		WATTERS, MARCELLA V.	10/25/92	500.00 G				
836	49074793		WATTERS, MARCELLA V.	10/27/92	500.00 B	200.00	150.00		RED
837	49074794		WECKERLY, HUGH	09/15/92	500.00 B				
838	49074794		WECKERLY, HUGH	09/23/92	500.00 B				
839	49074794		WECKERLY, HUGH	10/02/92	500.00 B	500.00			RED
840	49074794		WECKERLY, HUGH	10/31/92	500.00 F				
841	JERK0002		WEINTRAUB FAMILY TRUST	02/21/91	1,000.00 F				
842	JERK0002		WEINTRAUB FAMILY TRUST	10/29/92	1,000.00 G				
843	JERK0002		WEINTRAUB FAMILY TRUST	10/29/92	1,000.00 B		1,000.00		
844	WE150000		WEISBL, PETER J.	06/12/91	250.00 F				
845	WE150000		WEISBL, PETER J.	08/10/91	100.00 F				
846	WE150000		WEISBL, PETER J.	09/30/91	200.00 F				
847	WE150000		WEISBL, PETER J.	11/14/91	100.00 F				
848	WE150000		WEISBL, PETER J.	04/21/92	500.00 F				
849	WE150000		WEISBL, PETER J.	05/19/92	500.00 F		250.00		
850	WE150000		WEISBL, PETER J.	06/30/92	200.00 G				
851	WE150000		WEISBL, PETER J.	08/18/92	200.00 B				
852	WE150000		WEISBL, PETER J.	08/20/92	100.00 G				
853	WE150000		WEISBL, PETER J.	10/13/92	200.00 G				
854	WE150000		WEISBL, PETER J.	10/15/92	250.00 G				
855	WEL10001		WELTON, ERIC	12/10/91	1,000.00 F				
856	WEL10001		WELTON, ERIC	12/10/91	1,000.00 F	1,000.00			RED
857	WENH0000		WERNER, BENJAMIN H.	02/08/92	250.00 B				
858	WENH0000		WERNER, BENJAMIN H.	10/20/92	500.00 G				
859	WENH0000		WERNER, BENJAMIN H.	10/22/92	500.00 B		250.00		
860	WET10006		WESTWAY PROPERTIES	09/15/92	250.00 G				
861	WET10006		WESTWAY PROPERTIES	11/01/92	2,000.00 G	1,000.00		250.00 RED FEE	RED 2500 FEE 2500000
862	WET10006		WESTWAY PROPERTIES	11/02/92	1,500.00 G				
863	49044711		WHITE, JERRY	10/21/91	100.00 F				
864	49044711		WHITE, JERRY	02/25/92	100.00 F				
865	49044711		WHITE, JERRY	03/29/92	100.00 F				
866	49044711		WHITE, JERRY	05/23/92	100.00 F				
867	49044711		WHITE, JERRY	09/01/92	500.00 G				
868	49044711		WHITE, JERRY	10/14/92	500.00 B				
869	49044711		WHITE, JERRY	10/25/92	500.00 B	500.00			RED
870	WILL0000		WILLIAMS, HAROLD D.	10/12/92	1,000.00 G				
871	WILL0000		WILLIAMS, HAROLD D.	11/21/92	175.00 G		175.00		
872	49081053		WITBORN, ROYCE	06/21/91	500.00 F				
873	49081053		WITBORN, ROYCE	08/27/91	911.25 F		911.25		RED 1000
874	49081053		WITBORN, ROYCE	10/08/92	225.00 G				

LINE	ACCOUNT	NAME	DATE	AMOUNT	CREDIT	DEBIT
075	4200 1903	WUDDHILL J. R.	06/27/91	500.00	F	
076	4200 1903	WUDDHILL J. R.	10/11/91	500.00	F	
077	4200 1903	WUDDHILL J. R.	03/11/92	500.00	F	500.00
078	4200 1903	WUDDHILL J. R.	02/01/92	1 000.00	G	
079	4200 1903	WUDDHILL J. R.	02/02/92	1 000.00	G	1 000.00
080	WUDDHILL J. R.	WUDDHILL J. R.	06/21/91	100.00	F	
081	WUDDHILL J. R.	WUDDHILL J. R.	08/09/91	100.00	F	
082	WUDDHILL J. R.	WUDDHILL J. R.	05/11/92	150.00	F	
083	WUDDHILL J. R.	WUDDHILL J. R.	05/14/92	100.00	F	
084	WUDDHILL J. R.	WUDDHILL J. R.	08/25/92	475.00	G	
085	WUDDHILL J. R.	WUDDHILL J. R.	10/07/92	50.00	G	
086	WUDDHILL J. R.	WUDDHILL J. R.	10/22/92	250.00	G	
087	WUDDHILL J. R.	WUDDHILL J. R.	12/16/92	100.00	G	75.00
088	WUDDHILL J. R.	WUDDHILL J. R.	09/22/92	500.00	G	
089	WUDDHILL J. R.	WUDDHILL J. R.	10/18/92	1 000.00	G	500.00
090	WYLIE CHARLES R.	WYLIE CHARLES R.	11/27/91	100.00	F	
091	WYLIE CHARLES R.	WYLIE CHARLES R.	01/29/92	50.00	F	
092	WYLIE CHARLES R.	WYLIE CHARLES R.	04/25/92	75.00	F	
093	WYLIE CHARLES R.	WYLIE CHARLES R.	05/13/92	75.00	F	
094	WYLIE CHARLES R.	WYLIE CHARLES R.	06/24/92	75.00	G	
095	WYLIE CHARLES R.	WYLIE CHARLES R.	08/07/92	200.00	G	
096	WYLIE CHARLES R.	WYLIE CHARLES R.	08/25/92	200.00	G	
097	WYLIE CHARLES R.	WYLIE CHARLES R.	08/28/92	150.00	G	
098	WYLIE CHARLES R.	WYLIE CHARLES R.	10/11/92	150.00	G	
099	WYLIE CHARLES R.	WYLIE CHARLES R.	10/22/92	250.00	G	
100	WYLIE CHARLES R.	WYLIE CHARLES R.	10/27/92	150.00	G	175.00
101	ZUMAYA KAREN	ZUMAYA KAREN	11/01/92	4 000.00	G	3 000.00

TOTAL

101 565.00 ~~42,000.00~~ 25 700.00

42,099.98

FILE NAME: EXCEBIV.WK3

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HERSCHESON FOR U.S. SENATE 1992

Schedule of Contributions Requiring 48 Hour Notification
for the Primary and General Elections

Contributor	Contribution Amount	Date of Contribution
Steven M. Merksamer	\$1,000	05/26/92
Mary O. Shannon	\$1,000	05/26/92
Frederick W. Sroka	\$1,000	05/22/92
Rhonda G. Sroka	\$1,000	05/22/92
Women's Pro-Israel PAC	\$2,500	05/26/92
American Bankers Association	\$5,000	10/15/92
BPH Minerals PAC	\$1,000	10/24/92
Ross Borba Jr.	\$1,000	10/15/92
Martha H. Cravens	\$1,000	10/16/92
EBCO Enterprises	\$1,000	10/29/92
J.J. Weintraub Family Trust	\$2,000	10/29/92
Donald M. Koll	\$1,000	10/29/92
Marriott PAC*	\$1,000	10/27/92
Harry A. Merlo*	\$1,000	10/27/92
Jerry Rozar**	\$1,000	10/16/92
Pillsbury & Sutro PAC	\$3,000	10/24/92
Sprint Corp. PAC*	\$2,000	10/27/92
E.E. Trefethen Jr.	\$1,000	10/15/92
Union Bank PAC	\$1,000	10/22/92
Ultra Gro Plant Food Company	\$1,000	10/15/92
Ardis Walters	\$1,000	10/28/92
Harry M. Wong	\$1,000	10/27/92
TOTAL:	\$31,500	

* The Committee apparently reported these contributions to the Secretary of the Senate but the Commission did not receive them.

** Listed on Committee filed report but with different amount.
48 Hour report had \$1,000 but contribution was \$2,000.

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RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

Apr 11 10 16 AM '96

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

FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

MUR 4200

STAFF MEMBER: Abel P. M6ntez

SOURCE: INTERNALLY GENERATED

RESPONDENTS: Herschensohn for U.S. Senate 1992, and Betty Presley, as treasurer
Eleanor Allen
Richard Anderson
Susan Bradbury
John M. Burris
James Carlson
Winston Fuller
Joe MacPherson
Grace Seklemian
Isaac Starkman
Smiland Land Company

**RELEVANT STATUTES/
REGULATIONS:**

2 U.S.C. § 434(a)(6)(A)
2 U.S.C. §§ 441a(a)(1)(A)
11 C.F.R. § 103.3(b)(3) and (4)
11 C.F.R. § 110.1(e)

2 U.S.C. § 438(b)
2 U.S.C. § 441a(f)
11 C.F.R. § 104.5(f)

I. GENERATION OF MATTER

This matter was generated by an audit of Herschensohn for U.S. Senate 1992 ("Committee"), undertaken in accordance with 2 U.S.C. § 438(b). Betty Presley is treasurer of the Committee.¹ The Audit Division's referral materials are attached. Attachment 1.

¹ Bruce Herschensohn lost the 1992 U.S. Senate general election in California with 43 percent of the vote.

II. FACTUAL AND LEGAL ANALYSIS

A. Excessive Contributions

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that no person may make contributions to a candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000.

2 U.S.C. § 441a(a)(1)(A). The Act defines "person" to include individuals and partnerships.

2 U.S.C. § 431(11); 11 C.F.R. § 100.10. Contributions made by a partnership check are attributable to both the partnership and the designated individual partners. 11 C.F.R.

§ 110.1(e); See Explanation and Justification for 11 C.F.R. § 110.1(e), 52 *Fed. Reg.* 764-65 (January 9, 1987). Pursuant to 11 C.F.R. § 110.1(e), a contribution from a partnership shall be attributed to the partnership and to each partner either in direct proportion to the partnership profits or by agreement by the partners.

The Act prohibits candidates and their political committees from knowingly accepting any contributions in excess of the section 441a(a) limitations. 2 U.S.C. § 441a(f). The treasurer of a political committee shall be responsible for examining all contributions received for evidence of illegality and for ascertaining whether a contribution, when aggregated with other contributions from the same contributor, exceeds the contribution limitations. 11 C.F.R. § 103.3(b). Contributions which on their face exceed the contribution limitations of the Act and contributions which do not exceed the limits on their face but which exceed the contribution limits when aggregated with other contributions from the same contributor may either be deposited into a campaign depository or returned to the contributor. 11 C.F.R. § 103.3(b)(3). If the contributions are deposited in a campaign depository, the treasurer may request a redesignation or reattribution of the contribution. *Id.* However, if a redesignation or reattribution is not obtained, the treasurer shall, within sixty (60) days of the treasurer's receipt of the contribution, refund the contribution to the contributor. *Id.*

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The audit referral materials identify contributions totaling \$129,164² from 194 individuals and four partnerships that exceeded the contribution limitations. Of this amount, the audit referral materials identify that the Committee had untimely refunds totaling \$20,250.³ The Committee also made untimely redesignations or reattributions totaling \$65,865.⁴ In addition, the Committee also had unresolved excessive contributions totaling \$43,049⁵ [\$129,164 - (\$20,250 + \$65,865)] from 111 individuals and a partnership.⁶

Of the 194 individuals that made excessive contributions to the Committee, the following nine individuals made contributions in an amount more than twice their contribution limit:⁷

² The referral materials identified \$130,664 in excessive contributions. However, after receiving the referral, the Office of General Counsel reduced the amount by \$1,500 because a contribution from Kathleen McCarthy was found to be refunded in a timely manner. 11 C.F.R. § 103.3(b)(3).

³ This Office notes that the referral lists this amount as \$22,700. This amount has been reduced by \$2,480: \$1,500 for the timely refund made to Kathleen McCarthy, and \$950 in refund checks voided by the Committee. The \$950 in refund checks are unresolved excessive contributions. See footnote 5.

At the time of the audit fieldwork, the Audit Division could not verify whether the refunds were timely because the Committee had only provided its check register. In response to the Interim Audit Report, the Committee provided copies of the negotiated checks. The Committee provided copies of canceled refunds checks for \$20,250; however, the checks showed that the refunds had been made untimely.

⁴ The Committee had attempted to either reattribute or redesignate the contributions by contacting the contributors by letter. In the Interim Audit Report, the audit staff reviewed copies of letters sent to or returned by the contributors and determined that the majority of the responses were not receipt-dated by the Committee nor did the Committee retain the return envelopes. Because the audit staff was unable to determine whether the reattributions or redesignation letters were received timely as required under 11 C.F.R. §§ 110.1(b)(5) and 110.1(k)(3), the Audit Division considered these reattributions or redesignations as untimely. In addition, the Audit Division did not accept documents provided by the Committee that failed to show reattributions of three contributions totaling \$1,511.

⁵ This amount includes \$950 in refund checks that the Committee voided because it discovered that the checks had not been cashed; this was reported as a debt owed to the contributors.

⁶ Of this amount, the Committee disclosed contributions totaling \$31,908 as debts owed to contributors.

⁷ Based on established Commission practice, this Office makes no recommendation concerning the remaining individuals.

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<u>Name</u>	<u>Contribution</u>	<u>Excessive Amount</u>
Eleanor Allen	\$2,700	\$1,700
Richard Anderson	\$4,500	\$3,500
Susan Bradbury	\$2,200	\$1,200
John M. Burris	\$3,000	\$2,000
James Carlson	\$2,300	\$1,300
Winston Fuller	\$2,200	\$1,200
Joe MacPherson	\$3,500	\$2,500
Grace Seklemian	\$2,050	\$1,050
Isaac Starkman	\$3,000	\$2,000.

The excessive contributions also include donations from four partnerships. The audit reveals that on September 22, 1992, the Committee accepted three contributions totaling \$5,000 from a partnership, the Smiland Land Company ("the Partnership"). Attachment 2.⁸ The contributions were drawn on the Partnership's checking account. William M. Smiland, in a September 22, 1992, letter, states:

I enclose the following checks totaling \$5,000 . . .

- (1) a \$2,000 check attributable to the personal account of me and Martha Smiland, my wife;
- (2) a \$2,000 check attributable to the personal account of Robert M. Smiland, my brother, and Linda Smiland, his wife; and
- (3) a \$1,000 check attributable to the personal account of Bronko M. Smiland and Dorothy Smiland, my parents.

Id. In the letter, William M. Smiland informed the Committee that the Smiland Land Company is a California partnership. He states, he and his wife, Martha Smiland, own 40%; Robert M. Smiland and Linda Smiland own 40%; Bronko M. Smiland and Dorothy Smiland own 20%.

The amount attributable to the individual partners fall within the individual contribution limitation. 11 C.F.R. § 110.1(e). It appears that the contributions were intended

⁸ Based on established Commission practice, this Office makes no recommendations concerning the remaining three partnerships.

as contributions from the personal accounts of the individuals. However, because the contributions were drawn on the Partnership's account, the Partnership appears to have made an excessive contribution of \$4,000.

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The Office of General Counsel recommends that the Commission find reason to believe that Eleanor Allen, Richard Anderson, Susan Bradbury, John M. Burris, James Carlson, Winston Fuller, Joe MacPherson, Grace Seklemian, Isaac Starkman, and the Smiland Land Company violated 2 U.S.C. § 441a(a)(1)(A) by making contributions in excess of their individual contribution limitation. Because these individuals contributed in excess of twice the legal limit, i.e., more than \$2,000, this Office would ordinarily take further action against these individuals and the partnership. However, to pursue these individuals and the partnership would place a strain on the Commission's resources. Therefore, in order to narrow the scope of this case involving 1992 activity and to be consistent with the proper ordering of the Commission's resources and priorities, the Office of General Counsel believes that no further action with respect to these individuals and the partnership is appropriate. See *Heckler v. Chaney*, 470 U.S. 821 (1985). If this recommendation is approved, this Office will send admonishment letters to these respondents emphasizing the importance of complying with 2 U.S.C. § 441a(a)(1)(A).

The treasurer did not refund or obtain written redesignations or reattributions of the excessive contribution amount from the individuals within 60 days from the Committee's receipt of the contributions. 11 C.F.R. § 110.1(b)(5)(ii)(A) and (B), and 103.3(b)(3). The Committee also did not establish a separate account for these excessive contributions nor did it maintain sufficient funds to make refunds. 11 C.F.R. § 103.3(b)(4). Therefore, the Office of General Counsel recommends that the Commission find reason to believe that Herschensohn for U.S. Senate, and Betty Presley, as treasurer, violated 2 U.S.C. § 441a(f) by accepting excessive contributions from the individuals and the partnerships.

B. Failure to File 48 Hour Disclosure Notices

The Act requires campaign committees of candidates for federal office to notify in writing either the Secretary of the Senate, the Clerk of the U.S. House of Representatives or the Commission, and the Secretary of State, as appropriate, of each contribution totaling \$1,000 or more, received by any authorized committee of the candidate after the 20th day but more than 48 hours before any election. 2 U.S.C. § 434(a)(6)(A); 11 C.F.R. § 104.5. The Act further requires notification to be made within 48 hours after the receipt of the contribution and to include the name of the candidate and office sought, the date of receipt, the amount of the contribution, and the identification of the contributor. *Id.* The notification of these contributions shall be in addition to all other reporting requirements. 2 U.S.C. § 434(a)(6)(B).

The California Senate Republican primary election was held on June 2, 1992, and the general election was held on November 3, 1992. Pursuant to the Act, the Committee was required to notify the Secretary of the Senate, in writing of all contributions of \$1,000 or more received from May 14, 1992 through May 30, 1992 and from October 15, 1992 through October 31, 1992, within 48 hours of their receipt. An audit review of the Committee's receipt records identified 22 contributions, totaling \$31,500, received during the filing period, that were not reported within 48 hours.⁹

Therefore, the Office of General Counsel recommends that the Commission find reason to believe that Herschensohn for U.S. Senate 1992 and Betty Presley, as treasurer, violated 2 U.S.C. § 434(a)(6)(A) by failing to report 22 campaign contributions of \$1,000 or more, received after the 20th day, but more than 48 hours before the primary/general election, within 48 hours of receipt of the contributions.

⁹ The Committee provided a copy of a page of a memorandum addressed to the Office of the Secretary of the Senate listing three contributions as timely reported. However, according to the documentation on file at the Secretary's Office, it does not appear that the office received the page. Thus, the Audit Division treated the three contributions as untimely reported.

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IV. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

The Office of General Counsel recommends that the Commission offer to enter into conciliation with the Committee prior to a finding of probable cause to believe. Attached for the Commission's approval is a proposed conciliation agreement

IV. RECOMMENDATIONS

1. Find reason to believe that Eleanor Allen, Richard Anderson, Susan Bradbury, John M. Burris, James Carlson, Winston Fuller, Joe MacPherson, Grace Seklemian, Isaac Starkman, and Smiland Land Company violated 2 U.S.C. § 441a(a)(1)(A), but take no further action and close the files as to these respondents;
2. Find reason to believe that Herschensohn for U.S. Senate 1992, and Betty Presley, as treasurer, violated 2 U.S.C. § 441a(f);
3. Find reason to believe that Herschensohn for U.S. Senate 1992, and Betty Presley, as treasurer violated 2 U.S.C. § 434(a)(6)(A);
4. Enter into conciliation prior to a finding of probable cause to believe with Herschensohn for U.S. Senate 1992, and Betty Presley, as treasurer;

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5. Approve the attached Factual and Legal Analyses;
6. Approve the attached conciliation agreement; and
7. Approve the appropriate letters.

Lawrence M. Noble
General Counsel

4/10/96
Date

BY: Kim Bright-Coleman
Kim Bright-Coleman
Associate General Counsel

Attachments:

1. Referral Materials
2. Smiland Land Company Contributions and William M. Smiland letter
3. Proposed Factual and Legal Analyses
4. Proposed Conciliation Agreement for the Herschensohn for U.S. Senate Committee

96043761607

BEFORE THE FEDERAL ELECTION COMMISSION

96043761698

In the Matter of	)	
	)	MUR 4200
Herschensohn for U.S. Senate	)	
1992, and Betty Presley, as	)	
treasurer;	)	
Eleanor Allen;	)	
Richard Anderson;	)	
Susan Bradbury;	)	
John M. Burris;	)	
James Carlson;	)	
Winston Fuller;	)	
Joe MacPherson;	)	
Grace Seklemian;	)	
Isaac Starkman;	)	
Smiland Land Company	)	

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on April 23, 1996, do hereby certify that the Commission decided by a vote of 4-1 to take the following actions in MUR 4200:

1. Find reason to believe that Eleanor Allen, Richard Anderson, Susan Bradbury, John M. Burris, James Carlson, Winston Fuller, Joe MacPherson, Grace Seklemian, Isaac Starkman, and Smiland Land Company violated 2 U.S.C. § 441a(a)(1)(A), but take no further action and close the files as to these respondents;

(continued)

Federal Election Commission
Certification for MUR 4200
April 23, 1996

Page 2

2. Find reason to believe that Herschensohn for U.S. Senate 1992, and Betty Presley, as treasurer, violated 2 U.S.C. § 441a(f);
3. Find reason to believe that Herschensohn for U.S. Senate 1992, and Betty Presley, as treasurer, violated 2 U.S.C. § 434(a)(6)(A);
4. Enter into conciliation prior to a finding of probable cause to believe with Herschensohn for U.S. Senate 1992, and Betty Presley, as treasurer;
5. Approve the Factual and Legal Analyses attached to the General Counsel's April 10, 1996 report;
6. Approve the conciliation agreement attached to the General Counsel's April 10, 1996 report; and
7. Approve the appropriate letters as recommended in the General Counsel's April 10, 1996 report.

Commissioners Elliott, McDonald, McGarry, and Thomas voted affirmatively for the decision; Commissioner Aikens dissented.

Attest:

4-23-96
Date

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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 26, 1996

Betty Presley
Treasurer
Herschensohn for U.S. Senate
1251 E. Dyer Road, #100
Santa Ana, CA 92705

RE: MUR 4200
Herschensohn for U.S. Senate 1992
and Betty Presley, as treasurer

Dear Ms. Presley:

On April 23, 1996, the Federal Election Commission found that there is reason to believe that the Herschensohn for U.S. Senate 1992 Committee ("the Committee") and you, as treasurer, violated 2 U.S.C. §§ 441a(f), 434(a)(6)(A), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath. In the absence of additional information, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

In order to expedite the resolution of this matter, the Commission has also decided to offer to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. Enclosed is a conciliation agreement that the Commission has approved.

If you are interested in expediting the resolution of this matter by pursuing pre-probable cause conciliation and if you agree with the provisions of the enclosed agreement, please sign and return the agreement, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

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

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

96043761700

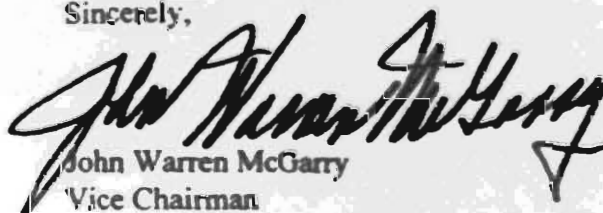
Letter to Betty Presley
Treasurer
Herschensohn for U.S. Senate 1992
Page 2

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Abel P. M6ntez, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,


John Warren McGarry
Vice Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form
Conciliation Agreement

cc: Bruce Herschensohn

96043761701

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Herschensohn for U.S. Senate 1992, MUR: 4200
and Betty Presley, Treasurer

This matter was generated by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). Bruce Herschensohn for U.S. Senate 1992 ("the Committee") registered with the Secretary of the Senate on April 26, 1992, as the principal campaign committee for Bruce Herschensohn, a candidate for the United States Senate from the State of California.

I. EXCESSIVE CONTRIBUTIONS

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that no person may make contributions to a candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A). The Act defines "person" to include individuals and partnerships. 2 U.S.C. § 431(11); 11 C.F.R. § 100.10. Contributions made by a partnership check are attributable to both the partnership and the designated individual partners. See Explanation and Justification for 11 C.F.R. § 110.1(e), 52 *Fed. Reg.* 764-65 (January 9, 1987).

The Act prohibits candidates and their political committees from knowingly accepting any contributions in excess of the Section 441a(a) limitations. 2 U.S.C. § 441a(f). The treasurer of a political committee shall be responsible for examining all contributions received for evidence of illegality and for ascertaining whether a contribution, when aggregated with other contributions from the same contributor, exceeds the contribution limitations. 11 C.F.R. § 103.3(b). Contributions which on their face exceed the contribution limitations of the Act and contributions which do not exceed the limits on their face but which exceed the contribution limits when aggregated with other contributions from the same contributor may either be deposited into a

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campaign depository or returned to the contributor. 11 C.F.R. § 103.3(b)(3). If the contributions are deposited in a campaign depository, the treasurer may request a redesignation or reattribution of the contribution. *Id.* However, if a redesignation or reattribution is not obtained, the treasurer shall, within sixty (60) days of the treasurer's receipt of the contribution, refund the contribution to the contributor. *Id.*

Contributions totaling \$129,164 from 194 individuals and four partnerships that exceeded the contribution limitation imposed on persons. Of this amount, the Committee had untimely refunds totaling \$20,250. The Committee also made untimely redesignations or reattributions totaling \$65,865. In addition, the Committee also had unresolved excessive contributions totaling \$43,049 from 111 individuals and a partnership.

The treasurer did not refund or obtain written resignations or reattributions of the excessive contribution amount from the individuals within 60 days from the Committee's receipt of the contributions. 11 C.F.R. § 110.1(b)(5)(ii)(A) and (B), and 103.3(b)(3). The Committee also did not establish a separate account for these excessive contributions nor did it maintain sufficient funds to make refunds. 11 C.F.R. § 103.3(b)(4). Accordingly, there is reason to believe Herschensohn for U.S. Senate 1992 and Betty Presley, as treasurer, violated 2 U.S.C. § 441a(f) by accepting excessive contributions totaling \$129,164.

III. FAILURE TO FILE 48-HOUR DISCLOSURE NOTICES

The Act requires campaign committees of candidates for federal office to notify in writing either the Secretary of the Senate, the Clerk of the U.S. House of Representatives or the Commission, and the Secretary of State, as appropriate, of each contribution totaling \$1,000 or more, received by any authorized committee of the candidate after the 20th day but more than 48 hours before any election. 2 U.S.C. § 434(a)(6)(A); 11 C.F.R. § 104.5. The Act further requires notification to be made within 48 hours after the receipt of the contribution and to include the name of the candidate and office sought, the date of receipt, the amount of the contribution, and the identification of the contributor. *Id.* The notification of these contributions shall be in addition to all other reporting requirements. 2 U.S.C. § 434(a)(6)(B).

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The California Senate Republican primary election was held on June 2, 1992, and the general election was held on November 3, 1992. Pursuant to the Act, the Committee was required to notify the Secretary of the Senate, in writing of all contributions of \$1,000 or more received from May 14, 1992 through May 30, 1992 and from October 15, 1992 through October 31, 1992, within 48 hours of their receipt. An audit review of the Committee's receipt records identified a failure to file 22 contributions received during the filing period, totaling \$31,500.

Therefore, there is reason to believe that Herschensohn for U.S. Senate 1992 and Betty Presley, as treasurer, violated 2 U.S.C. § 434(a)(6)(A) by failing to report 22 campaign contributions of \$1,000 or more, received after the 20th day, but more than 48 hours before the primary/general election, within 48 hours of receipt of the contributions.

96043761704



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 26, 1996

Isaac Starkman
12711 Ventura Blvd., #150
Studio City, CA 91604

RE: MUR 4200
Isaac Starkman

Dear Mr. Starkman:

On April 23, 1996, the Federal Election Commission ("the Commission") found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act."), by making an excessive contribution to Herschensohn for U.S. Senate 1992 ("the Committee"). However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed its file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). You should take steps to ensure that this activity does not occur in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) remain in effect with respect to all respondents still involved in this matter.

If you have any questions, please contact Abel P. M6ntez, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely,

John Warren McGarry
Vice Chairman

Enclosures
Factual and Legal Analysis

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FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Isaac Starkman

MUR: 4200

This matter was generated by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to Herschensohn for U.S. Senate 1992 ("the Committee").

The Act limits the amount that an individual may contribute to any candidate to \$1,000 with respect to any Federal election. 2 U.S.C. § 441a(a)(1)(A); 11 C.F.R. § 110.1(b)(1).

Isaac Starkman made contributions to the Committee totaling \$3,000, which exceeded his individual contribution limitation by \$2,000.

Therefore, there is reason to believe that Isaac Starkman violated 2 U.S.C. § 441a(a)(1)(A) by making contributions to the Committee in excess of his individual contribution limitation.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 26, 1996

Smiland Land Company
1715 Wayne Ave.
South Pasadena, CA 91030

RE: MUR 4200
Smiland Land Company

Dear Sir or Madam:

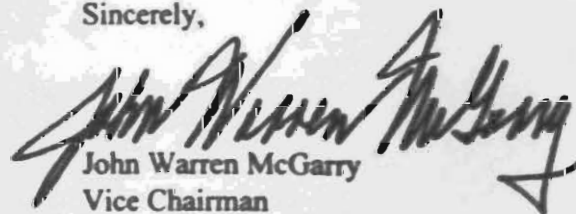
On April 23, 1996, the Federal Election Commission ("the Commission") found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act."), by making an excessive contribution to Herschensohn for U.S. Senate 1992 ("the Committee"). However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed its file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). You should take steps to ensure that this activity does not occur in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) remain in effect with respect to all respondents still involved in this matter.

If you have any questions, please contact Abel P. Montez, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely,


John Warren McGarry
Vice Chairman

Enclosures
Factual and Legal Analysis

96043761707

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Smiland Land Company

MUR: 4200

This matter was generated by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to Herschensohn for U.S. Senate 1992 ("the Committee").

The Act limits the amount that a partnership may contribute to any candidate to \$1,000 with respect to any Federal election. 2 U.S.C. § 441a(a)(1)(A). The Act provides that no person may make contributions to candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A). The Act prohibits candidates and their political committees from knowingly accepting any contributions in excess of the Section 441a(a) limitations. 2 U.S.C. § 441a(f).

The Act defines "person" to include a partnership. 2 U.S.C. § 431(11); 11 C.F.R. § 100.10. The Commission's Regulations provide further requirements regarding contributions by partnerships. Pursuant to 11 C.F.R. § 110.1(e), a contribution by a partnership shall be attributed to the partnership and to each partner either in direct proportion to the partnership profits or by agreement by the partners. Contributions made by a partnership check are attributable to both the partnership and the designated individual partners. See Explanation and Justification for 11 C.F.R. § 110.1(e), 52 Fed. Reg. 764-65 (January 9, 1987).

An audit of the Committee revealed that on September 22, 1992, the Committee accepted three contributions totaling \$5,000 from the Smiland Land Company ("the

96043761708

Partnership"). The contributions were drawn on the Partnership's checking account. Thus, it appears that the Partnership has made an excessive contribution of \$4,000.

Therefore, there is reason to believe that the Smiland Land Company violated 2 U.S.C. § 441a(a)(1)(A) by making contributions to the Committee in excess of its individual contribution limitation.

96043761709



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 26, 1996

Grace Seklemian
2333 Via Acalones
Palos Verdes Estate, CA 90274

RE: MUR 4200
Grace Seklemian

Dear Ms. Seklemian:

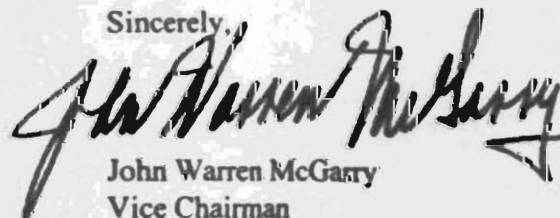
On April 23, 1996, the Federal Election Commission ("the Commission") found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), by making an excessive contribution to Herschensohn for U.S. Senate 1992 ("the Committee"). However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed its file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). You should take steps to ensure that this activity does not occur in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) remain in effect with respect to all respondents still involved in this matter.

If you have any questions, please contact Abel P. Montez, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely,


John Warren McGarry
Vice Chairman

Enclosures
Factual and Legal Analysis

96043761710

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Grace Seklemian

MUR: 4200

This matter was generated by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to Herschensohn for U.S. Senate 1992 ("the Committee").

The Act limits the amount that an individual may contribute to any candidate to \$1,000 with respect to any Federal election. 2 U.S.C. § 441a(a)(1)(A); 11 C.F.R. § 110.1(b)(1).

Grace Seklemian made contributions to the Committee totaling \$2,050, which exceeded her individual contribution limitation by \$1,050.

Therefore, there is reason to believe that Grace Seklemian violated 2 U.S.C. § 441a(a)(1)(A) by making contributions to the Committee in excess of her individual contribution limitation.

96043761711



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 26, 1996

Joe MacPherson
122 St. Regis Place
Santa Ana, CA 92705

RE: MUR 4200
Joe MacPherson

Dear Mr. MacPherson:

On April 23, 1996, the Federal Election Commission ("the Commission") found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act."), by making an excessive contribution to Herschensohn for U.S. Senate 1992 ("the Committee"). However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed its file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). You should take steps to ensure that this activity does not occur in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) remain in effect with respect to all respondents still involved in this matter.

If you have any questions, please contact Abel P. Montez, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely,

A handwritten signature in dark ink, appearing to read "John Warren McGarry".

John Warren McGarry
Vice Chairman

Enclosures
Factual and Legal Analysis

96043761712

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Joe MacPherson

MUR: 4200

This matter was generated by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to Herschensohn for U.S. Senate 1992 ("the Committee").

The Act limits the amount that an individual may contribute to any candidate to \$1,000 with respect to any Federal election. 2 U.S.C. § 441a(a)(1)(A); 11 C.F.R. § 110.1(b)(1).

Joe MacPherson made contributions to the Committee totaling \$3,500, which exceeded his individual contribution limitation by \$2,500.

Therefore, there is reason to believe that Joe MacPherson violated 2 U.S.C. § 441a(a)(1)(A) by making contributions to the Committee in excess of his individual contribution limitation.

96043761713



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 26, 1996

Winston Fuller
211 S. Orange Grove Blvd., #11
Pasadena, CA 91105

RE: MUR 4200
Winston Fuller

Dear Mr. Fuller:

On April 23, 1996, the Federal Election Commission ("the Commission") found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), by making an excessive contribution to Herschensohn for U.S. Senate 1992 ("the Committee"). However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed its file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). You should take steps to ensure that this activity does not occur in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) remain in effect with respect to all respondents still involved in this matter.

If you have any questions, please contact Abel P. Montez, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely,

John Warren McGarry
Vice Chairman

Enclosures
Factual and Legal Analysis

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
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96043761714

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Winston Fuller

MUR: 4200

This matter was generated by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to Herschensohn for U.S. Senate 1992 ("the Committee").

The Act limits the amount that an individual may contribute to any candidate to \$1,000 with respect to any Federal election. 2 U.S.C. § 441a(a)(1)(A); 11 C.F.R. § 110.1(b)(1).

Winston Fuller made contributions to the Committee totaling \$2,200, which exceeded his individual contribution limitation by 1,200.

Therefore, there is reason to believe that Winston Fuller violated 2 U.S.C. § 441a(a)(1)(A) by making contributions to the Committee in excess of his individual contribution limitation.

96043761715



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 26, 1996

James Carlson
5101 Mesa Drive
Oakdale, CA 91105

RE: MUR 4200
James Carlson

Dear Mr. Carlson:

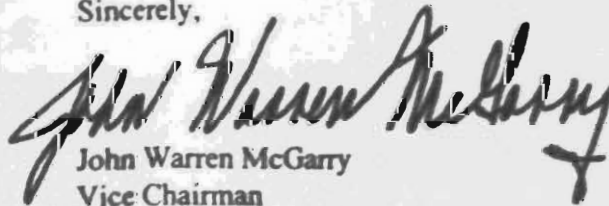
On April 23, 1996, the Federal Election Commission ("the Commission") found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), by making an excessive contribution to Herschensohn for U.S. Senate 1992 ("the Committee"). However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed its file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). You should take steps to ensure that this activity does not occur in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(2)(A) remain in effect with respect to all respondents still involved in this matter.

If you have any questions, please contact Abel P. M6nchez, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely,


John Warren McGarry
Vice Chairman

Enclosures
Factual and Legal Analysis

Celebrating the Commission's 20th Anniversary

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96043761716

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: James Carlson

MUR: 4200

This matter was generated by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to Herschensohn for U.S. Senate 1992 ("the Committee").

The Act limits the amount that an individual may contribute to any candidate to \$1,000 with respect to any Federal election. 2 U.S.C. § 441a(a)(1)(A); 11 C.F.R. § 110.1(b)(1).

James Carlson made contributions to the Committee totaling \$2,300, which exceeded his individual contribution limitation by \$1,300.

Therefore, there is reason to believe that James Carlson violated 2 U.S.C. § 441a(a)(1)(A) by making contributions to the Committee in excess of his individual contribution limitation.

96043761717



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 26, 1996

John M. Burris
745 Brighton St.
Burbank, CA 91506

RE: MUR 4200
John M. Burris

Dear Mr. Burris:

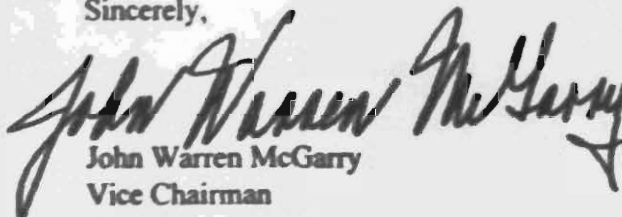
On April 23, 1996, the Federal Election Commission ("the Commission") found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act."), by making an excessive contribution to Herschensohn for U.S. Senate 1992 ("the Committee"). However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed its file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). You should take steps to ensure that this activity does not occur in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) remain in effect with respect to all respondents still involved in this matter.

If you have any questions, please contact Abel P. M6n6tez, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely,


John Warren McGarry
Vice Chairman

Enclosures
Factual and Legal Analysis

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FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENT: John M. Burris

MUR: 4200

This matter was generated by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to Herschensohn for U.S. Senate 1992 ("the Committee").

The Act limits the amount that an individual may contribute to any candidate to \$1,000 with respect to any Federal election. 2 U.S.C. § 441a(a)(1)(A); 11 C.F.R. § 110.1(b)(1).

John M. Burris made contributions to the Committee totaling \$3,000, which exceeded his individual contribution limitation by \$2,000.

Therefore, there is reason to believe that John M. Burris violated 2 U.S.C. § 441a(a)(1)(A) by making contributions to the Committee in excess of his individual contribution limitation.

96043761719



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 26, 1996

Susan Bradbury
2537 Bamboo St.
Newport Beach, CA 92660

RE: MUR 4200
Susan Bradbury

Dear Ms. Bradbury:

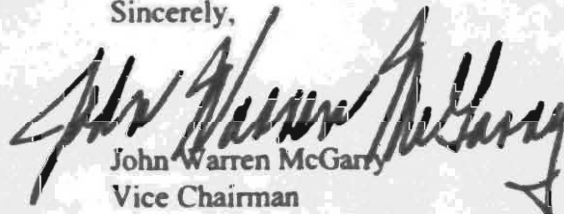
On April 23, 1996, the Federal Election Commission ("the Commission") found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act."), by making an excessive contribution to Herschensohn for U.S. Senate 1992 ("the Committee"). However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed its file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). You should take steps to ensure that this activity does not occur in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) remain in effect with respect to all respondents still involved in this matter.

If you have any questions, please contact Abel P. M6ntez, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely,


John Warren McGarry
Vice Chairman

Enclosures
Factual and Legal Analysis

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96043761720

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Susan Bradbury

MUR: 4200

This matter was generated by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to Herschensohn for U.S. Senate 1992 ("the Committee").

The Act limits the amount that an individual may contribute to any candidate to \$1,000 with respect to any Federal election. 2 U.S.C. § 441a(a)(1)(A); 11 C.F.R. § 110.1(b)(1).

Susan Bradbury made contributions to the Committee totaling \$2,200, which exceeded her individual contribution limitation by \$1,200.

Therefore, there is reason to believe that Susan Bradbury violated 2 U.S.C. § 441a(a)(1)(A) by making contributions to the Committee in excess of her individual contribution limitation.

96043761721



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 26, 1996

Richard Anderson
9866 Lesterford
Downey, CA 90240

RE: MUR 4200
Richard Anderson

Dear Mr. Anderson:

On April 23, 1996, the Federal Election Commission ("the Commission") found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), by making an excessive contribution to Herschensohn for U.S. Senate 1992 ("the Committee"). However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed its file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). You should take steps to ensure that this activity does not occur in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) remain in effect with respect to all respondents still involved in this matter.

If you have any questions, please contact Abel P. Montez, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely,

A handwritten signature in dark ink, appearing to read "John Warren McGarry".

John Warren McGarry
Vice Chairman

Enclosures
Factual and Legal Analysis

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96043761722

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Richard Anderson

MUR: 4200

This matter was generated by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to Herschensohn for U.S. Senate 1992 ("the Committee").

The Act limits the amount that an individual may contribute to any candidate to \$1,000 with respect to any Federal election. 2 U.S.C. § 441a(a)(1)(A); 11 C.F.R. § 110.1(b)(1).

Richard Anderson made contributions to the Committee totaling \$4,500, which exceeded his individual contribution limitation by \$3,500.

Therefore, there is reason to believe that Richard Anderson violated 2 U.S.C. § 441a(a)(1)(A) by making contributions to the Committee in excess of his individual contribution limitation.

96043761723



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 26, 1996

Eleanor Allen
18751 Patrician Dr.
Villa Park, CA 92667

RE: MUR 4200
Eleanor Allen

Dear Ms. Allen:

On April 23, 1996, the Federal Election Commission ("the Commission") found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act."), by making an excessive contribution to Herschensohn for U.S. Senate 1992 ("the Committee"). However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed its file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). You should take steps to ensure that this activity does not occur in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) remain in effect with respect to all respondents still involved in this matter.

If you have any questions, please contact Abel P. Montez, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely,

A handwritten signature in dark ink, appearing to read "John Warren McGarry".

John Warren McGarry
Vice Chairman

Enclosures
Factual and Legal Analysis

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

96043761724

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Eleanor Allen

MUR: 4200

This matter was generated by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to Herschensohn for U.S. Senate 1992 ("the Committee").

The Act limits the amount that an individual may contribute to any candidate to \$1,000 with respect to any Federal election. 2 U.S.C. § 441a(a)(1)(A); 11 C.F.R. § 110.1(b)(1).

Eleanor Allen made contributions to the Committee totaling \$2,700, which exceeded her individual contribution limitation by \$1,700.

Therefore, there is reason to believe that Eleanor Allen violated 2 U.S.C. § 441a(a)(1)(A) by making contributions to the Committee in excess of her individual contribution limitation.

9604361725



Betty Presley & Associates

Campaign Financial Records • Disclosure Reporting • Campaign Fundraising

May 10, 1996

MUR 4200

Mr. Abel Montez
Federal Election Commission
Washington, DC 20463

Dear Mr. Montez,

As we discussed on the phone today, I am requesting a twenty day extension to respond to your audit findings.

I received the letter when I returned from vacation on May 8th. We need to obtain legal counsel concerning this matter, and it will be difficult to respond within this short time frame.

Thank you for your consideration.

Sincerely,

Betty Presley, Treasurer
Herschensohn for US Senate
1251 E. Dyer Road, #100
Santa Ana, CA 92705

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COMMISSION
OFFICE OF GENERAL
COUNSEL

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May, 15, 1996

VIA FACSIMILE & FIRST CLASS MAIL

Betty Presley
Treasurer
Herschensohn for U.S. Senate
1251 E. Dyer Road, #100
Santa Ana, CA 92705

FAXED
5/15/96

RE: MUR 4200
Herschensohn for U.S. Senate 1992
and Betty Presley, as treasurer

Dear Ms. Presley:

This is in response to your letter dated and received May 10, 1996, requesting an extension of time to respond to the violations stated in the Factual and Legal Analysis for Herschensohn for U.S. Senate 1992 and Betty Presley, as treasurer. You have stated that you received the Factual and Legal Analysis on May 8, 1996. The Commission allows you 15 days to submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Therefore, this Office has calculated your response date to be May 23, 1996, which is 15 days from the date you received the Factual and Legal Analysis. Accordingly, your response is due by the close of business on May 23, 1996.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the Designation of Counsel 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.

If you have any questions, please contact me, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Abel P. Montez
Attorney

96043761727



May 13, 1996

Abel P. Montez, Esq.
Federal Election Commission
999 E. Street, N.W.
Washington, D.C. 20463

RE: MUR 4200
Isaac Starkman

Dear Mr. Montez:

I appreciate your commitment not to take further action with respect to the above-referenced matter. Notwithstanding such commitment, I would like to clarify certain aspects of the transactions which resulted in your initial concerns.

My family contributed a total of \$3,000.00 to Bruce Herschensohn's campaign for the U.S. Senate. Of this sum, \$2,000.00 was given from the joint checking account I share with my wife, Carolyn. The funds drawn on that account were equally owned by us; therefore, each of us donated \$1,000.00 which falls within the FEC guidelines. The remaining \$1,000.00 came from my adult son, Guy Starkman.

I do hope this letter helps to answer some of the questions you may have had. Please be assured of my continuing intent to adhere to all Federal Election Commission regulations. Thank you for your thoughtfulness in settling this situation in such an amicable manner.

Sincerely,

Isaac Starkman

IS:rp

May 20 10 24 AM '96

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FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

96043761728

MAY 24 9 48 AM '96

Mr. Abel Montez
Attorney at Law
Federal Election Commission
Washington, DC 20463

Re MUR 4200
Herschensohn for US Senate 1992
Betty Presley, Treasurer

Dear Mr. Montez,

I am the treasurer of the Herschensohn for US Senate 1992 committee, and I am replying to your letter dated April 26, 1996.

I did my very best to control, honestly and accurately, what turned out to be a very large and fast moving campaign. I was not permitted by the committee to be involved in campaign management meetings or decisions, nor to be involved in the fundraising activities for either events or direct mail. In fact, the direct mail, which was a sizable dollar amount in the campaign, was caged and entered at a separate Sacramento operation. This operation was directed by the campaign manager and not in my control. The attempts to merge the direct mail data with my database caused sixty day problems.

The unresolved and untimely sixty day findings were from 198 contributors amounting to \$129,164, which is just a small percentage of the total number of contributors exceeding 152,000 and a monetary total of more than \$7,600,000. The Late Contribution reports of 22 contributions for a total of \$31,500 is just a small percentage of the 338+ contributions that total \$430,000. The FEC auditors favorably commented on my accounting procedures, books, bank reconciliations, etc. I did file the comprehensive amendments as requested by the auditors.

At the present, the bank balance is only \$15,352.52 in Bank of America (Bolsa-Magnolia branch

This election was lost in 1992, and since such a long period of time has elapsed, it makes it impossible to raise any additional funds. The candidate has not run for any other office since this election.

96043761729

I ask for your consideration, understanding, and sympathy regarding this audit.
Whatever mistakes that were made on my part were honest, and I assure you that I
never intentionally violated regulations.

Respectfully Submitted,

Betty Presley

Betty Presley
1251 E. Dyer Road, #100
Santa Ana, CA 92705

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RECEIVED
FEDERAL ELECTION
COMMISSION
SEP 10 4 23 PM '96

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

) MUR 4200

Herschensohn for U.S. Senate 1992, and)
Betty Presley, as treasurer)
)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On April 23, 1996, the Commission found reason to believe that Herschensohn for U.S. Senate 1992, and Betty Presley, as treasurer ("the Respondents") violated 2 U.S.C. §§ 441a(f) and 434(a)(6)(A). On the same date, the Commission approved a recommendation to enter into conciliation with the Respondents prior to a finding of probable cause to believe. The conciliation agreement included a proposed civil penalty

II. DISCUSSION

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Therefore, we recommend that the Commission accept the Respondent's counteroffer, approve the revised conciliation agreement, and close the file in this matter.

III. RECOMMENDATIONS

1. Accept the counteroffer from respondents Herschensohn for U.S. Senate 1992, and Betty Presley, as treasurer;
2. Approve the attached conciliation agreement with respondents Herschensohn for U.S. Senate 1992, and Betty Presley, as treasurer;
3. Approve the appropriate letter; and
4. Close the file.

Lawrence M. Noble
General Counsel

Sept. 18, 1996
Date

Kim Bright-Coleman
BY: Kim Bright-Coleman
Associate General Counsel

Attachments

1. Betty Presley, letter, received on May 24, 1996
2. Betty Presley, letter, received July 22, 1996
3. Proposed conciliation agreement
4. Proposed \$15,352 civil penalty checks

Staff assigned: Abel P. M6ntez

96043761734

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Herschensohn for U.S. Senate 1992
and Betty Presley, as treasurer.

)
)
) MUR 4200
)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 25, 1996, the Commission decided by a vote of 5-0 to take the following actions in MUR 4200:

1. Accept the counteroffer from respondents Herschensohn for U.S. Senate 1992 and Betty Presley, as treasurer, as recommended in the General Counsel's Report dated September 18, 1996.
2. Approve the conciliation agreement with respondents Herschensohn for U.S. Senate 1992 and Betty Presley, as treasurer, as recommended in the General Counsel's Report dated September 18, 1996.

(continued)

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3. Approve the appropriate letter, as recommended in the General Counsel's Report dated September 18, 1996.
4. Close the file.

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

Attest:

9-25-96
Date

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

Received in the Secretariat: Wed., Sept. 18, 1996 4:28 p.m.
Circulated to the Commission: Thurs., Sept. 19, 1996 11:00 a.m.
Deadline for vote: Tues., Sept. 24, 1996 4:00 p.m.

bjr

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 3, 1996

John M. Burris
745 Brighton St.
Burbank, CA 91506

RE: MUR 4200
John M. Burris

Dear Mr. Burris:

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

If you have any questions, please contact me at (202) 219-3690 or (800) 424-9530.

Sincerely,

A handwritten signature in cursive script, reading "Abel P. Mantez".

Abel P. Mantez
Attorney

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

96043761737



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 3, 1996

Isaac Starkman
12711 Ventura Blvd., Suite 400
Studio City, CA 91604

RE: MUR 4200
Isaac Starkman

Dear Mr. Starkman:

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

If you have any questions, please contact me at (202) 219-3690 or (800) 424-9530.

Sincerely,

Abel P. Mantez
Attorney

96043761738



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 3, 1996

Grace Seklemian
2333 Via Acalones
Palos Verdes Estate, CA 90274

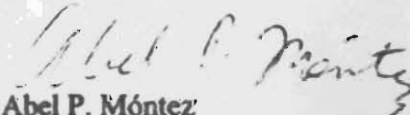
RE: MUR 4200
Grace Seklemian

Dear Ms. Seklemian:

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

If you have any questions, please contact me at (202) 219-3690 or (800) 424-9530.

Sincerely,


Abel P. Montez
Attorney

96043761739



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 3, 1996

Susan Bradbury
2537 Bamboo St.
Newport Beach, CA 92660

RE: MUR 4200
Susan Bradbury

Dear Ms. Bradbury:

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

If you have any questions, please contact me at (202) 219-3690 or (800) 424-9530.

Sincerely,


Abel P. Montez
Attorney

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

9604376174C



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 3, 1996

James Carlson
5101 Mesa Drive
Oakdale, CA 91105

RE: MUR 4200
James Carlson

Dear Mr. Carlson:

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

If you have any questions, please contact me at (202) 219-3690 or (800) 424-9530.

Sincerely,


Abel P. Montez
Attorney

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

96043761741



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 3, 1996

Eleanor Allen
18751 Patrician Dr.
Villa Park, CA 92667

RE: MUR 4200
Eleanor Allen

Dear Ms. Allen:

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

If you have any questions, please contact me at (202) 219-3690 or (800) 424-9530.

Sincerely,


Abel P. Montez
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 3, 1996

Betty Presley
Treasurer
Herschensohn for U.S. Senate
1251 E. Dyer Road, #100
Santa Ana, CA 92705

RE: MUR 4200
Herschensohn for U. S. Senate 1992
and Betty Presley, as treasurer

Dear Ms. Presley:

On September 25, 1996, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your behalf in settlement of violations of 2 U.S.C. §§ 441a(f) and 434(a)(6)(A), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter. Please be advised that the civil penalty in this agreement reflects unusual factors brought forth during the investigation.

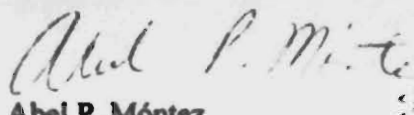
The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any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

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

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Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact me at (202) 219-3690.

Sincerely,



Abel P. Mante
Attorney

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Herschensohn for U.S. Senate) MUR 4200
1992, and Betty Presley as treasurer)
)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Herschensohn for U.S. Senate 1992 and Betty Presley, as treasurer ("Respondents") violated 2 U.S.C. §§ 441a(f) and 434(a)(6)(A).

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

- I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered into pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).
- II. The Respondents had a reasonable opportunity to demonstrate that no action should be taken in this matter.
- III. The Respondents enter voluntarily into this agreement with the Commission.
- IV. The pertinent facts in this matter are as follows:
 1. Bruce Herschensohn was a candidate for the United States Senate in 1992. The Herschensohn for U.S. Senate 1992 ("the Committee") was the principal campaign committee for his candidacy within the meaning of 2 U.S.C. § 431(5).

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2. The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that no person may make contributions to candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A).

3. The Act defines "person" to include individuals and partnerships. 2 U.S.C. § 431(11); 11 C.F.R. § 100.10. Contributions made by a partnership check are attributable to both the partnership and the designated individual partners. 11 C.F.R. 110.1(e).

4. The Act prohibits candidates and their political committees from knowingly accepting any contributions in excess of the Section 441a(a) limitations. 2 U.S.C. § 441a(f).

5. Pursuant to 11 C.F.R. § 103.3(b), the treasurer of a political committee shall be responsible for examining all contributions received for evidence of illegality and for ascertaining whether a contribution, when aggregated with other contributions from the same contributor, exceeds the contribution limitations.

6. Contributions which on their face exceed the contribution limitations of the Act and contributions which do not exceed the limits on their face but which exceed the contribution limits when aggregated with other contributions from the same contributor may either be deposited into a campaign depository or returned to the contributor. 11 C.F.R. § 103.3(b)(3).

7. If the contributions are deposited in a campaign depository, the treasurer may request a redesignation or reattribution of the contribution. *Id.* However, if a redesignation or reattribution is not obtained, the treasurer shall, within sixty (60) days of the treasurer's receipt of the contribution, refund the contribution to the contributor. *Id.*

8. During the 1992 election cycle, the Committee accepted excessive contributions totaling \$129,164 from 194 individuals and four partnerships.

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9. The treasurer did not refund or obtain written resignations or reattributions of the excessive contribution amount from the individuals within 60 days from the Committee's receipt of the contributions. 11 C.F.R. § 110.1(b)(5)(ii)(A) and (B), and 103.3(b)(3). The Committee also did not establish a separate account for these excessive contributions nor did it maintain sufficient funds to make refunds. 11 C.F.R. § 103.3(b)(4).

10. Of the \$129,164 amount in excessive contributions, the Committee had untimely refunds totaling \$20,250 and made untimely redesignations or reattributions totaling \$65,865. In addition, the Committee had unresolved excessive contributions totaling \$43,049.

11. The Act requires principal campaign committees of candidates for Federal office to notify in writing either the Secretary of the Senate, the Clerk of the U.S. House of Representatives or the Commission, and the Secretary of State, as appropriate, of each contribution totaling \$1,000 or more, received by any authorized committee of the candidate after the 20th day but more than 48 hours before any election. 2 U.S.C. § 434(a)(6)(A); 11 C.F.R. § 104.5.

12. The Act further requires notification to be made within 48 hours after the receipt of the contribution and to include the name of the candidate and office sought, the date of receipt, the amount of the contribution, and the identification of the contributor. *Id.* The notification of these contributions shall be in addition to all other reporting requirements. 2 U.S.C. § 434(a)(6)(B).

13. The California Senate Republican primary election was held on June 2, 1992, and the general election was held on November 3, 1992.

14. Pursuant to the Act, the Committee was required to notify the Secretary of the Senate, in writing of all contributions of \$1,000 or more received from May 14, 1992 through May 30, 1992 and from October 15, 1992 through October 31, 1992, within 48

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hours of their receipt. The Respondents did not submit 48 hour notices for 22 contributions of \$1,000 or more totaling \$31,500, received during the 48 hour notice periods.

V. The Respondents accepted excessive contributions from 194 individuals and four partnerships in violation of 2 U.S.C. § 441a(f). The Respondents failed to report campaign contributions in excess of \$1,000 after the 20th day, but more than 48 hours before the primary and general elections, within 48 hours of receipt of the contributions, in violation of 2 U.S.C. § 434(a)(6).

VI. The Respondents will pay a civil penalty to the Federal Election Commission in the amount of Fifteen Thousand Three Hundred Fifty Two Dollars (\$15,352) pursuant to 2 U.S.C. § 437g(a)(5)(A). The Respondents will continue to report as debts owed to contributors the excessive contributions totaling \$43,049, until these refunds are made to the contributors.

VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein, or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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

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

X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either

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FEDERAL ELECTION COMMISSION
MAIL ROOM

written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY: Kim Bright-Coleman 10/2/96
Kim Bright-Coleman Date
Associate General Counsel

FOR THE RESPONDENTS:

Betty Presley 9/9/96
(name) Date
(position) Treasurer

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HERSCHENSOHN FOR US SENATE 1992

3131

GENERAL
1251 E DYER ROAD SUITE 100
SANTA ANA, CA 92705

15-66
1220

9-9 1986

PAY
TO THE
ORDER OF

Federal Election Commission \$ 9716 ³²/₁₀₀
Ninety Seven Hundred Sixteen and ³²/₁₀₀ DOLLARS

 Bank of America (714) 973-8495
Bolsa Magnolia Branch 2177
8850 Bolsa Avenue
Westminster CA 92683

FOR

Care Penalty

Betty Presley

9 6 0 4 3 7 6 1 7 5 0

HERSCHENSOHN FOR US SENATE

PRIMARY ACCOUNT

1251 E. DYER ROAD, 100
SANTA ANA, CA 92705

3003

PAY
TO THE
ORDER OF

9-8 1986 16-66
1220
Federal Election Comm. \$5635⁰⁰
Fifty Six Hundred Thirty Five and 68/100 — DOLLARS

 **Bank of America** (714) 973-8495
Boise-Magnolia Branch 2177
8850 Boise Avenue
Westminster, CA 92683

FOR

Civil Penalty

Bette Presley

9 6 0 4 3 7 6 1 7 5 1



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 4200

DATE FILMED 11-7-96 CAMERA NO. 4

CAMERAMAN JM H

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