



FEDERAL ELECTION COMMISSION

WASHINGTON DC 20463

THIS IS THE BEGINNING OF MUR # 4585

DATE FILMED 3/11/98 CAMERA NO. 2

CAMERAMAN EES

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November 1, 1996

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RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL

MUR 4585

Office of General Counsel
Federal Election Commission
Washington, DC 20463

Dear General Counsel:

I am writing to file a complaint concerning violations of federal election law by Duane Hughes and the Hughes for Congress Committee, as well as two other groups known as Californians for an Educated Electorate and Redwood Empire TRIM Committee. The specific violations are as follows:

PART ONE: Hughes Campaign Received Illegal In-Kind Contribution that Exceeds Legal Limits and Violates Reporting and Disclosure Requirements

On October 27, 1996, a group calling itself Californians for an Educated Electorate placed a full-page ad in the Santa Rosa Press Democrat containing harsh negative attacks on Representative Lynn Woolsey (D-Petaluma). This advertisement represents an in-kind contribution to the Hughes for Congress Committee since it is a republication of campaign materials previously prepared by the Hughes for Congress Campaign.

Attached to this letter are copies of the advertisement placed in the newspaper (Exhibit A), as well as a copy of a campaign flyer produced and distributed by the Hughes for Congress Committee weeks earlier (Exhibit B). It is immediately obvious to any viewer that the two pieces contain almost identical text. They are even in the same exact typeface. According to the Federal Election Commission (FEC) brochure titled Independent Expenditures, "Any expenditure to finance the dissemination or republication of a broadcast or other campaign materials prepared by a candidate (or his/her campaign) is considered an in-kind contribution, not an independent expenditure."

The regulations governing in-kind contributions are quite clear. In-kind contributions must be reported by the campaign receiving them. Like monetary contributions, they are limited to \$1000 per contributor. In addition, any political ad that is paid for with an in-kind contribution must still state that the ad was paid for by the candidate's campaign committee.

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Duane Hughes and his campaign committee are guilty of serious violations of federal campaign law, since they have not complied with any of these requirements. First, according to information received over the phone from the Santa Rosa Press Democrat, the cost of a full-page ad in the front section of the newspaper on a Sunday is \$5752. This is a flagrant violation of the federal contribution limit of \$1000. Second, Hughes for Congress has not reported receipt of this in-kind contribution on a regular FEC report or on the 48-hour report required for all contributions of \$1000 received after October 17. This is based on a review of materials on file with the FEC and the California Secretary of State as of October 31, 1996. Third, paid political ads must contain the name of the sponsoring campaign committee. Since the advertisement does not identify the Hughes campaign, this is also a violation.

I believe the evidence is clear that this expenditure represented an illegal in-kind contribution to the Hughes campaign that flagrantly violated the contribution limit and was not reported or disclosed as required. However, even if the FEC should find that this was not an in-kind expenditure, it remains clear that serious violations of federal election law occurred.

It is clear that the advertisement expressly advocates the defeat of Congresswoman Woolsey in the upcoming election. For example, it contains the following sentences: "Regardless of your political affiliation, make an informed choice. Don't we deserve better than Lynn Woolsey?" The express advocacy of the defeat of a candidate for federal office means that this advertisement qualifies as an independent expenditure in support of Mr. Hughes' campaign, and important reporting and disclosure requirements apply for the independent entity sponsoring the advertisement (Californians for an Educated Electorate). This group is required to register with the FEC, and it has not done so. This group is required to report its expenditures, and it has not done so either on a regular FEC report, or the required 24 hour report for expenditures after October 17. This is based on information on file with the FEC as of October 31, 1996. Third, this group is required to print a disclaimer stating that their expenditure is not authorized by any candidate, and it has failed to do so.

The FEC should rule that Duane Hughes and his campaign has received an illegal in-kind contribution that exceeds the legal limits and evades reporting and disclosure requirements. However, if the FEC finds that this was not an in-kind contribution, it should cite Californians for an Educated Electorate for failing to register as a political committee, failing to report its

expenditures, and failing to print the proper disclaimers on its advertisement.

PART TWO: Hughes Received a Second Illegal In-Kind Contribution that Exceeds Legal Limits and Violates Reporting and Disclosure Requirements

In early October, a group calling itself Redwood Empire TRIM Committee mailed a flyer to senior citizens throughout the 6th Congressional District that contains a letter from a group calling itself Seniors Concerned About Tomorrow (S.C.A.T.). A copy of this flyer is attached as Exhibit C. The letter printed in the flyer also contained harsh negative attacks on Representative Lynn Woolsey. This flyer also represents an in-kind contribution to the Hughes for Congress Committee, since it was likely coordinated with that Committee.

On October 8, the author of the letter contained in this flyer, Mr. Robert D. Weinmann, Executive Director of S.C.A.T., attended a campaign rally sponsored by the Hughes for Congress Committee at the Woolsey for Congress headquarters. After participating in this campaign event, which Duane Hughes also attended, Mr. Weinmann entered the campaign headquarters, introduced himself to a campaign worker, and informed her that he had authored the letter from S.C.A.T.

According to the FEC brochure titled Independent Expenditures, "Any expenditure made in cooperation, consultation or in concert with the candidate (or agent), or as a result of his/her request or suggestion, is considered an in-kind contribution, not an independent expenditure. It is clear from the events I have described that Mr. Weinmann is working closely with the Hughes for Congress campaign and that the Redwood Empire TRIM Committee flyer that his letter appeared in was likely coordinated with the Hughes for Congress campaign and therefore represents an in-kind contribution.

As noted above, the regulations governing in-kind contributions are quite clear. In-kind contributions must be reported by the campaign receiving them. Like monetary contributions, they are limited to \$1000 per contributor. In addition, any political flyer that is paid for as an in-kind contribution must state that the flyer was paid for by the candidate's campaign committee.

Duane Hughes and his campaign committee are again guilty of serious violations of federal campaign law, since they have not complied with any of these requirements. First, according to anecdotal evidence based on

calls to the Woolsey for Congress campaign and Democratic activists in the 6th Congressional District, it appears that thousands of seniors received this mailing. This means that it is extremely likely that the costs of paper, printing, and postage for this mailing exceeded the \$1000 contribution limit for federal elections. Second, Hughes for Congress has not reported receipt of this in-kind contribution on a regular FEC report or on the 48-hour report required for all contributions of \$1000 received after October 17. This is based on information on file with the FEC and the California Secretary of State as of October 31, 1996. Third, paid political flyers must contain the name of the sponsoring campaign committee. Since the flyer does not identify the Hughes campaign, this is also a violation.

I believe there is significant evidence to suggest that this expenditure represented an illegal in-kind contribution to the Hughes campaign that violated the contribution limit and was not reported or disclosed as required. However, even if the FEC should find that this was not an in-kind expenditure, it is again clear that serious violations of federal election law occurred.

The timing of the mailer (several weeks before the election), as well as the specific language directed at Rep. Lynn Woolsey demonstrate that the flyer expressly advocates the defeat of Congresswoman Woolsey in the upcoming election. In addition, it is extremely likely that the group calling itself S.C.A.T. was set up for the express purpose of defeating Congresswoman Woolsey, since nobody in the community has ever heard of this organization previously, and the mailing of the letter by Mr. Weinmann is the only known activity of this organization in our community.

The express advocacy of the defeat of a candidate for federal office means that this advertisement would qualify as an independent expenditure in support of Mr. Hughes' campaign, and important reporting and disclosure requirements apply for the independent entity sponsoring the advertisement (Redwood Empire TRIM Committee and/or Seniors Concerned About Tomorrow). Whichever group financed this mailing is required to register with the FEC, and it has not done so, according to information on file as of October 31st. This group is required to report its expenditures, and it has not done so either on a regular FEC report, or the required 24 hour report for expenditures after October 17. This is based on information on file with the FEC as of October 31st. Third, this group would be required to print a disclaimer stating that this expenditure is not authorized by any candidate, and it has failed to do so.

The FEC should rule that Duane Hughes and his campaign have received an illegal in-kind contribution that exceeds the legal limits and evades reporting and disclosure requirements. However, if the FEC finds that this was not an in-kind contribution, it should cite Redwood Empire TRIM Committee and/or Seniors Concerned About Tomorrow for failing to register as a political committee, failing to report its expenditures, and failing to print the proper disclaimers on its advertisement.

In light of all the information contained in this complaint, I am asking that the FEC investigate these serious violations and engage in appropriate enforcement action designed to prevent further violations of federal campaign law by Duane Hughes, Hughes for Congress, and the other organizations cited.

In order to facilitate this process, I am including the name and address and phone number (if available) of all of the parties cited in this complaint:

Duane Hughes
Hughes for Congress Committee
P.O. Box 750755
Petaluma, CA 94975
(707) 769-9595 or (415) 458-2844

Bob Gentry, Treasurer
Californians for an Educated Electorate
19 4th Street
Petaluma, CA 94952

Redwood Empire TRIM Committee
2314 4th Street
Santa Rosa, CA 95404

Robert D. Weinmann, Executive Director
Seniors Concerned About Tomorrow (S.C.A.T.)
979 Golf Course Drive, Suite 132
Rohnert Park, CA 94928

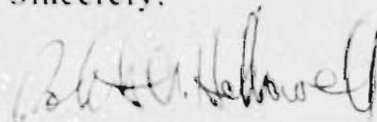
In addition to the specific FEC violations cited herein, I wish to mention for the record that both the full-page ad in the Santa Rosa Press Democrat and the flyer distributed by Redwood Empire TRIM Committee and/or S.C.A.T. contain a series of total falsehoods that have no place in any campaign. While these do not constitute FEC violations, this type of negative campaigning is a violation of the public trust and contributes to declining

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confidence in our system of government. It is fundamentally important that we reject this type of campaigning and restore civility to our public discourse.

Thank you very much for your attention to this important matter. I look forward to your prompt response.

Sincerely,



Roberta Hollowell
California Democratic Party Region 2 Director
1176 Neale Drive
Santa Rosa, CA 95404
(707) 528-0287

CALIFORNIA
ACKNOWLEDGMENT
ATTACHED

93043362405

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

State of California
 County of Sonoma
 On November 1, 1996 before me, Monica Ferrick, Notary Public
 personally appeared Robert A. Hollowell
Name and Title of Officer (e.g., "Jane Doe, Notary Public")
Name(s) of Signer(s)

~~personally known to me~~ OR X proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.



WITNESS my hand and official seal.

Monica Ferrick
Signature of Notary Public

OPTIONAL

Though the information below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.

Description of Attached Document

Title or Type of Document: Letter
 Document Date: 11-1-96 Number of Pages: 6 + exhibits
 Signer(s) Other Than Named Above: n/a

Capacity(ies) Claimed by Signer(s)

Signer's Name: _____

- ☐ Individual
☐ Corporate Officer
 Title(s): _____
☐ Partner — ☐ Limited ☐ General
☐ Attorney-in-Fact
☐ Trustee
☐ Guardian or Conservator
 Other: _____

RIGHT THUMBPRINT
OF SIGNER

Signer Is Representing: _____

Signer's Name: _____

- ☐ Individual
☐ Corporate Officer
 Title(s): _____
☐ Partner — ☐ Limited ☐ General
☐ Attorney-in-Fact
☐ Trustee
☐ Guardian or Conservator
 Other: _____

RIGHT THUMBPRINT
OF SIGNER

Signer Is Representing: _____

FOR PEOPLE WHO DON'T WANT TO VOTE
FOR PEOPLE WHO DON'T WANT TO VOTE

WITH A VOTING RECORD LIKE THIS...

Lynn Woolsey voted to **retroactively increase taxes** by \$275 billion—the largest tax increase in U.S. history, including **increased taxes on Social Security benefits**. (HR2264)

She **opposes a balanced budget** amendment. She's rated as one of the 30 biggest-spending members of Congress by the National Taxpayers Union. (HJRI)

She **opposes term limits** for members of Congress.

She received a **favorable to business rating of only 17%** from the National Chamber of Commerce.

She **voted against** the bipartisan **welfare reform** bill signed into law by President Clinton. (HR4)

LYNN PULLED THE WOOLSEY OVER OUR EYES!

She voted to **abolish the death penalty** (HR729) and **reduce penalties for crack cocaine** dealers. (HR2266)

She **voted against** a bipartisan **illegal immigration reform** bill that passed both houses of Congress—a bill that she subsequently says she helped pass (by voting NO?).

She **voted in favor of late term abortions** (HR1833) and **in favor of same-sex marriages**.

She **voted against** the Crime Bill (HR3355) that "would allow information about prior sex offenses by a defendant to be admitted as evidence in federal trials alleging sex offenses."

Regarding Hwy. 101: Contrary to what Ms. Woolsey claims, she has **NOT contacted** the Chairman of the House Transportation and Infrastructure Committee once in her 4 years in office.

**Regardless of your political affiliation, make an informed choice.
Don't we deserve better than Lynn Woolsey?**

All information taken from official statements and public records.

For more information on the 2000 election, visit our website at www.2000election.com or call 1-800-200-2000.

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Does Lynn Woolsey really speak for the people of Marin and Sonoma?

She voted to **retroactively increase** taxes by \$275 billion—the largest tax increase in U.S. history.

She **opposes a balanced budget** amendment.
She's rated as one of the 30 biggest spending members of Congress by the National Taxpayers Union.

She **opposes term limits** for members of Congress.

She received a **favorable to business rating of only 17%** from the National Chamber Commerce.

She **voted against** the bipartisan **welfare reform** bill signed into law by President Clinton.

She favors extending welfare benefits to **illegal aliens**.

She voted to **abolish the death penalty**.

She voted to **reduce penalties** for crack cocaine dealers.

All information taken from official statements and public records.

NO!

"Duane has a well-deserved reputation for honesty and integrity. We can count on him to make government more accountable to those of us who pay the bills—the taxpayers."

—Fred Raab, United Taxpayers of Marin County



Hughes '96-

CONGRESS

Send for Ex. Hughes for Congress, P.O. Box 751955, Petaluma, CA 94975 • Sonoma: 707-769-9595 • Marin: 415-458-2333

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U.S. POSTAGE PAID
SANTA ROSA, CA
PERMIT NO. 249

[illegible]

✱ ✱

Redwood Empire TRIM Asks You To
Read This Important Message From
Seniors Concerned About Tomorrow
About Congresswoman Lynn Woolsey

9804386241C

**Seniors Concerned About Tomorrow
S.C.A.T.
979 Golf Course Drive Ste. 132
Rohnert Park, CA 94928**

**"I'm as mad as hell and I'm not going
to take this anymore!"**

**Howard Beale, News Anchorman
"NETWORK" 1976**

Dear Senior Friend,

The statement above accurately describes our attitude about Congresswoman Lynn Woolsey. She has been lying to us for the last two years.

There's another well known saying, "If it ain't broke don't fix it."

Now Congresswoman Lynn Woolsey can give it a different spin. If Medicare ain't broke by 2001, just wait. She will see to it.

Woolsey's frequent mailings--sent at taxpayer's expense--are filled with doomsday messages warning that Congress is about to "shred the safety net for women and children on welfare, slash Medicare by \$270 billion, and end the guarantee of nursing home coverage for older women and men."

With her fright peddling she claims a Congressional majority voted "deep Medicare and Medicaid cuts [resulting] in higher healthcare costs for older women and men, restrictions on choice of doctors, reduced services at local hospitals."

In fact, Woolsey's scare tactics are not just misleading--they're blatant lies! Medicare is not under attack. Just the opposite. Let's look at her voting record:

HR 2264 - In 1993 Lynn Woolsey voted FOR \$250 billion in new income taxes and Social Security taxes. These tax increases adversely affect working seniors, our children and grandchildren.

HR 64 - In 1993 Woolsey voted FOR \$253 billion in deficit spending. We must end deficit spending or our national debt will destroy the future for our children and all future generations?

HR 4 - In 1994 Lynn Woolsey voted against welfare reform. She voted for an increase in welfare spending by over \$7 billion.

HR 2621 (Dec. 14, 1995) She refused to stop the Secretary of the Treasury from raiding the Social Security Trust Fund of \$440 Billion!

HR 2425 (Oct. 19, 1995) Woolsey voted against a plan that would have saved the Medicare Trust fund from bankruptcy.

It should be noted that the President's Commission on Medicare reports that Medicare will be bankrupt in 2001 if measures to avoid it are not taken immediately!

Seniors' concerns cannot be ignored. Our benefits and those of future generations must be protected.

Not content with opposing bills affecting Medicare for those in their twilight years, Woolsey also would destroy life at its dawn--among the innocent unborn. HR 1833 (November '95) Woolsey voted against outlawing Partial Birth Abortions, a barbaric procedure that kills a newborn baby just before the head leaves the mother's womb. An overwhelming majority of Congress (71%) voted to outlaw this hideous procedure that is nothing short of infanticide--but not Woolsey! She is against capital punishment for Richard Allen Davis--the murderer of Polly Klass--but supports killing infants!

Shouldn't she explain the inconsistencies between her Congressional voting record and false statements she has sent to North Bay constituents?

If you're concerned about Woolsey's record, I urge you to contact her immediately. Ask about her votes for tax increases, against a balanced budget and failure to save Medicare from bankruptcy and taxes on social security. Call her:

Marin Co. (415) 507-9554

Petaluma (707) 795-1462

Sonoma Co. (707) 542-7182

And finally--just last month Lynn Woolsey voted in favor of homosexual marriage.

If her behavior offends you and you are "...mad as hell..." then call her today and demand an explanation for her voting record. She's done nothing for Seniors. Thank you.

Sincerely,


Robert D. Weinmann
Executive Director

PS. Your financial support will help us to continue our fight against reckless policies like Woolsey's. Your contribution will be greatly appreciated and help launch our newsletter. If you are serious about protecting senior benefits please send a donation now.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 8, 1996

Roberta Hollowell
California Democratic Party
Region 2 Director
1176 Neale Drive
Santa Rose, California 95404

Dear Ms. Hollowell:

This is to acknowledge receipt on November 6, 1996, of your letter dated November 1, 1996. The Federal Election Campaign Act of 1971, as amended ("the Act") and Commission Regulations require that the contents of a complaint meet certain specific requirements. One of these requirements is that a complaint be sworn to and signed in the presence of a notary public and notarized. Your letter was not properly sworn to.

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

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

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

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

93043862412

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

Sincerely,

Retha Dixon

Retha Dixon
Docket Chief

Enclosure

cc: Duane Hughes
Hughes for Congress
Redwood Empire TRIM Committee
Californians for an Educated Electorate
Seniors Concerned About Tomorrow (S.C.A.T.)

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November 1, 1996

RECEIVED
FEDERAL ELECTION
COMMISSION
WASHINGTON, DC 20463

Nov 23 3 07 PM '96

MUR 4585

Office of General Counsel
Federal Election Commission
Washington, DC 20463

SENSITIVE

Dear General Counsel:

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Attached to this letter are copies of the advertisement placed in the newspaper (Exhibit A), as well as a copy of a campaign flyer produced and distributed by the Hughes for Congress Committee weeks earlier (Exhibit B). It is immediately obvious to any viewer that the two pieces contain almost identical text. They are even in the same exact typeface. According to the Federal Election Commission (FEC) brochure titled Independent Expenditures, "Any expenditure to finance the dissemination or republication of a broadcast or other campaign materials prepared by a candidate (or his/her campaign) is considered an in-kind contribution, not an independent expenditure."

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Duane Hughes and his campaign committee are guilty of serious violations of federal campaign law, since they have not complied with any of these requirements. First, according to information received over the phone from the Santa Rosa Press Democrat, the cost of a full-page ad in the front section of the newspaper on a Sunday is \$5752. This is a flagrant violation of the federal contribution limit of \$1000. Second, Hughes for Congress has not reported receipt of this in-kind contribution on a regular FEC report or on the 48-hour report required for all contributions of \$1000 received after October 17. This is based on a review of materials on file with the FEC and the California Secretary of State as of October 31, 1996. Third, paid political ads must contain the name of the sponsoring campaign committee. Since the advertisement does not identify the Hughes campaign, this is also a violation.

I believe the evidence is clear that this expenditure represented an illegal in-kind contribution to the Hughes campaign that flagrantly violated the contribution limit and was not reported or disclosed as required. However, even if the FEC should find that this was not an in-kind expenditure, it remains clear that serious violations of federal election law occurred.

It is clear that the advertisement expressly advocates the defeat of Congresswoman Woolsey in the upcoming election. For example, it contains the following sentences: "Regardless of your political affiliation, make an informed choice. Don't we deserve better than Lynn Woolsey?" The express advocacy of the defeat of a candidate for federal office means that this advertisement qualifies as an independent expenditure in support of Mr. Hughes' campaign, and important reporting and disclosure requirements apply for the independent entity sponsoring the advertisement (Californians for an Educated Electorate). This group is required to register with the FEC, and it has not done so. This group is required to report its expenditures, and it has not done so either on a regular FEC report, or the required 24 hour report for expenditures after October 17. This is based on information on file with the FEC as of October 31, 1996. Third, this group is required to print a disclaimer stating that their expenditure is not authorized by any candidate, and it has failed to do so.

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PART TWO: Hughes Received a Second Illegal In-Kind Contribution that Exceeds Legal Limits and Violates Reporting and Disclosure Requirements

In early October, a group calling itself Redwood Empire TRIM Committee mailed a flyer to senior citizens throughout the 6th Congressional District that contains a letter from a group calling itself Seniors Concerned About Tomorrow (S.C.A.T.). A copy of this flyer is attached as Exhibit C. The letter printed in the flyer also contained harsh negative attacks on Representative Lynn Woolsey. This flyer also represents an in-kind contribution to the Hughes for Congress Committee, since it was likely coordinated with that Committee.

On October 8, the author of the letter contained in this flyer, Mr. Robert D. Weinmann, Executive Director of S.C.A.T., attended a campaign rally sponsored by the Hughes for Congress Committee at the Woolsey for Congress headquarters. After participating in this campaign event, which Duane Hughes also attended, Mr. Weinmann entered the campaign headquarters, introduced himself to a campaign worker, and informed her that he had authored the letter from S.C.A.T.

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According to the FEC brochure titled Independent Expenditures, "Any expenditure made in cooperation, consultation or in concert with the candidate (or agent), or as a result of his/her request or suggestion, is considered an in-kind contribution, not an independent expenditure. It is clear from the events I have described that Mr. Weinmann is working closely with the Hughes for Congress campaign and that the Redwood Empire TRIM Committee flyer that his letter appeared in was likely coordinated with the Hughes for Congress campaign and therefore represents an in-kind contribution.

As noted above, the regulations governing in-kind contributions are quite clear. In-kind contributions must be reported by the campaign receiving them. Like monetary contributions, they are limited to \$1000 per contributor. In addition, any political flyer that is paid for as an in-kind contribution must state that the flyer was paid for by the candidate's campaign committee.

Duane Hughes and his campaign committee are again guilty of serious violations of federal campaign law, since they have not complied with any of these requirements. First, according to anecdotal evidence based on

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calls to the Woolsey for Congress campaign and Democratic activists in the 6th Congressional District, it appears that thousands of seniors received this mailing. This means that it is extremely likely that the costs of paper, printing, and postage for this mailing exceeded the \$1000 contribution limit for federal elections. Second, Hughes for Congress has not reported receipt of this in-kind contribution on a regular FEC report or on the 48-hour report required for all contributions of \$1000 received after October 17. This is based on information on file with the FEC and the California Secretary of State as of October 31, 1996. Third, paid political flyers must contain the name of the sponsoring campaign committee. Since the flyer does not identify the Hughes campaign, this is also a violation.

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The timing of the mailer (several weeks before the election), as well as the specific language directed at Rep. Lynn Woolsey demonstrate that the flyer expressly advocates the defeat of Congresswoman Woolsey in the upcoming election. In addition, it is extremely likely that the group calling itself S.C.A.T. was set up for the express purpose of defeating Congresswoman Woolsey, since nobody in the community has ever heard of this organization previously, and the mailing of the letter by Mr. Weinmann is the only known activity of this organization in our community.

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In light of all the information contained in this complaint, I am asking that the FEC investigate these serious violations and engage in appropriate enforcement action designed to prevent further violations of federal campaign law by Duane Hughes, Hughes for Congress, and the other organizations cited.

In order to facilitate this process, I am including the name and address and phone number (if available) of all of the parties cited in this complaint:

Duane Hughes
Hughes for Congress Committee
P.O. Box 750755
Petaluma, CA 94975
(707) 769-9595 or (415) 458-2844

Bob Gentry, Treasurer
Californians for an Educated Electorate
19 4th Street
Petaluma, CA 94952

Redwood Empire TRIM Committee
2314 4th Street
Santa Rosa, CA 95404

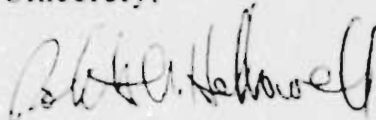
Robert D. Weinmann, Executive Director
Seniors Concerned About Tomorrow (S.C.A.T.)
979 Golf Course Drive, Suite 132
Rohnert Park, CA 94928

In addition to the specific FEC violations cited herein, I wish to mention for the record that both the full-page ad in the Santa Rosa Press Democrat and the flyer distributed by Redwood Empire TRIM Committee and/or S.C.A.T. contain a series of total falsehoods that have no place in any campaign. While these do not constitute FEC violations, this type of negative campaigning is a violation of the public trust and contributes to declining

confidence in our system of government. It is fundamentally important that we reject this type of campaigning and restore civility to our public discourse.

Thank you very much for your attention to this important matter. I look forward to your prompt response.

Sincerely,



Roberta Hollowell
California Democratic Party Region 2 Director
1176 Neale Drive
Santa Rosa, CA 95404
(707) 528-0287

**CALIFORNIA
ACKNOWLEDGMENT
ATTACHED**

93043962112

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

State of California

Nov 18 3 28 PM '96

County of Sonoma

On November 13, 1996 before me, Monica Ferrick, Notary Public

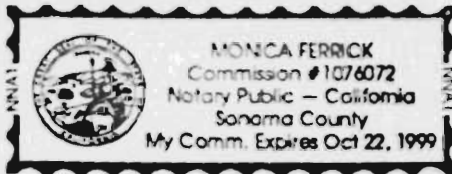
personally appeared Robert A. Hollowell

Name and Title of Officer (e.g., "Jane Doe, Notary Public")

Name(s) of Signer(s)

~~personally known to me~~ OR ☒ proved to me on the basis of satisfactory evidence to be the person(s)

whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.



WITNESS my hand and official seal.

Subscribed and sworn to
before me November 13, 1996

Monica Ferrick
Signature of Notary Public

OPTIONAL

Though the information below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.

Description of Attached Document

Title or Type of Document: Letter (previously submitted)

Document Date: 11-1-96

Number of Pages: 6 + exhibits

Signer(s) Other Than Named Above: n/a

Capacity(ies) Claimed by Signer(s)

Signer's Name: _____

Individual
Corporate Officer
Title(s): _____
Partner — ☐ Limited ☐ General
Attorney-in-Fact
Trustee
Guardian or Conservator
Other: _____

RIGHT THUMBPRINT
OF SIGNER

Signer Is Representing: _____

Signer's Name: _____

☐ Individual
☐ Corporate Officer
Title(s): _____
☐ Partner — ☐ Limited ☐ General
☐ Attorney-in-Fact
☐ Trustee
☐ Guardian or Conservator
☐ Other: _____

RIGHT THUMBPRINT
OF SIGNER

Signer Is Representing: _____

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

State of California
 County of Sonoma
 On November 1, 1996 before me, Monica Ferrick, Notary Public
Date Name and Title of Officer (e.g., "Jane Doe, Notary Public")
 personally appeared Robert A. Hollowell
Name(s) of Signer(s)

~~personally known to me~~ **OR** ☒ proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that ~~he/she/they~~ executed the same in ~~his/her/their~~ authorized capacity(ies), and that by ~~his/her/their~~ signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.



WITNESS my hand and official seal.

Monica Ferrick
Signature of Notary Public

OPTIONAL

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Description of Attached Document

Title or Type of Document: Letter
 Document Date: 11-1-96 Number of Pages: 6 + exhibits
 Signer(s) Other Than Named Above: n/a

Capacity(ies) Claimed by Signer(s)

Signer's Name: _____

- ☐ Individual
- ☐ Corporate Officer
- Title(s): _____
- ☐ Partner — ☐ Limited ☐ General
- ☐ Attorney-in-Fact
- ☐ Trustee
- ☐ Guardian or Conservator
- ☐ Other: _____

Signer Is Representing: _____

RIGHT THUMBPRINT OF SIGNER

Top of thumb here

Signer's Name: _____

- ☐ Individual
- ☐ Corporate Officer
- Title(s): _____
- ☐ Partner — ☐ Limited ☐ General
- ☐ Attorney-in-Fact
- ☐ Trustee
- ☐ Guardian or Conservator
- ☐ Other: _____

Signer Is Representing: _____

RIGHT THUMBPRINT OF SIGNER

Top of thumb here

WITH A VOTING RECORD LIKE THIS...

Lynn Woolsey voted to **retroactively increase taxes** by \$275 billion—the largest tax increase in U.S. history, including **increased taxes on Social Security benefits**. (HR2264)

She **opposes a balanced budget** amendment. She's rated as one of the 30 biggest-spending members of Congress by the National Taxpayers Union. (HHR1)

She **opposes term limits** for members of Congress.

She received a **favorable to business rating of only 17%** from the National Chamber of Commerce.

She **voted against** the bipartisan **welfare reform** bill signed into law by President Clinton. (HR4)

LYNN PULLED THE WOOLSEY OVER OUR EYES!

She voted to **abolish the death penalty** (HR729) and **reduce penalties for crack cocaine** dealers. (HR2259)

She **voted against** a bipartisan **illegal immigration reform** bill that passed both houses of Congress—a bill that she subsequently says she helped pass (by voting NO!).

She voted **in favor of late term abortions** (HR1833) and **in favor of same-sex marriages**.

She **voted against** the Crime Bill (HR3355) that "would allow information about prior sex offenses by a defendant to be admitted as evidence in federal trials alleging sex offenses."

Regarding Hwy. 101: Contrary to what Ms. Woolsey claims, she has **NOT contacted** the Chairman of the House Transportation and Infrastructure Committee once in her 4 years in office.

**Regardless of your political affiliation, make an informed choice.
Don't we deserve better than Lynn Woolsey?**

All information taken from official statements and public records.

For the No. 1 California Senate Educated Electorate
19-40-10 Petaluma, CA 94952 • No. Center-Awardee

9 8 0 4 3 8 6 2 4 2 2

Does Lynn Woolsey really speak for the people of Marin and Sonoma?

She voted to **retroactively increase** taxes by \$275 billion--
the largest tax increase in U.S. history.

She **opposes a balanced budget** amendment.
She's rated as one of the 30 biggest spending members of
Congress by the National Taxpayers Union.

She **opposes term limits** for members of Congress.

She received a **favorable to business rating of only 17%**
from the National Chamber Commerce.

She **voted against** the bipartisan **welfare reform** bill
signed into law by President Clinton.

She favors extending welfare benefits to **illegal aliens**.

She voted to **abolish the death penalty**.

She voted to **reduce penalties** for crack cocaine dealers.

All information taken from official statements and public records

NO!

"Duane has a well-deserved reputation for honesty and integrity.
We can count on him to make government more accountable
to those of us who pay the bills--the taxpayers."

—Fred Raab, United Taxpayers of Marin County



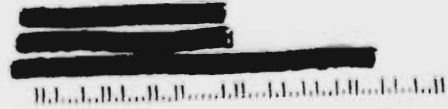
Hughes '96-
CONGRESS

Paid for by Hughes for Congress, P.O. Box 750755, Petaluma, CA 94975 • Sonoma 707-769-9595 Marin: 415-458-2555

9 8 0 4 3 8 6 2 4 2 3

Redwood Empire TRIM Committee
2114 4th Street
Santa Rosa, CA 95404

NON-PROFIT
U.S. POSTAGE PAID
SANTA ROSA, CA
PERMIT NO. 240



Redwood Empire TRIM Asks You To
Read This Important Message From
Seniors Concerned About Tomorrow
About Congresswoman Lynn Woolsey

98043862424

**Seniors Concerned About Tomorrow
S.C.A.T.**

**979 Golf Course Drive Ste. 132
Rohnert Park, CA 94928**

**"I'm as mad as hell and I'm not going
to take this anymore!"**

**Howard Beale, News Anchorman
"NETWORK" 1976**

Dear Senior Friend,

The statement above accurately describes our attitude about Congresswoman Lynn Woolsey. She has been lying to us for the last two years.

There's another well known saying, "If it ain't broke don't fix it."

Now Congresswoman Lynn Woolsey can give it a different spin. If Medicare ain't broke by 2001, just wait. She will see to it.

Woolsey's frequent mailings--sent at taxpayer's expense--are filled with doomsday messages warning that Congress is about to "shred the safety net for women and children on welfare, slash Medicare by \$270 billion, and end the guarantee of nursing home coverage for older women and men."

With her fright peddling she claims a Congressional majority voted "deep Medicare and Medicaid cuts [resulting] in higher healthcare costs for older women and men, restrictions on choice of doctors, reduced services at local hospitals."

In fact, Woolsey's scare tactics are not just misleading--they're blatant lies! Medicare is not under attack. Just the opposite. Let's look at her voting record:

HR 2264 - In 1993 Lynn Woolsey voted FOR \$250 billion in new income taxes and Social Security taxes. These tax increases adversely affect working seniors, our children and grandchildren.

HR 64 - In 1993 Woolsey voted FOR \$253 billion in deficit spending. We must end deficit spending or our national debt will destroy the future for our children and all future generations!

HR 4 - In 1994 Lynn Woolsey voted against welfare reform. She voted for an increase in welfare spending by over \$7 billion.

HR 2621 (Dec. 14, 1995) She refused to stop the Secretary of the Treasury from raiding the Social Security Trust Fund of \$440 Billion!

HR 2425 (Oct. 19, 1995) Woolsey voted against a plan that would have saved the Medicare Trust fund from bankruptcy.

It should be noted that the President's Commission on Medicare reports that Medicare will be bankrupt in 2001 if measures to avoid it are not taken immediately!

Seniors' concerns cannot be ignored. Our benefits and those of future generations must be protected.

Not content with opposing bills affecting Medicare for those in their twilight years, Woolsey also would destroy life at its dawn--among the innocent unborn.

HR 1833 (November '95) Woolsey voted against outlawing Partial Birth Abortions, a barbaric procedure that kills a newborn baby just before the head leaves the mother's womb. An overwhelming majority of Congress (71%) voted to outlaw this hideous procedure that is nothing short of infanticide--but not Woolsey! She is against capital punishment for Richard Allen Davis--the murderer of Polly Klass--but supports killing infants!

Shouldn't she explain the inconsistencies between her Congressional voting record and false statements she has sent to North Bay constituents?

If you're concerned about Woolsey's record, I urge you to contact her immediately. Ask about her votes for tax increases, against a balanced budget and failure to save Medicare from bankruptcy and taxes on social security. Call her:

Marin Co. (415) 507-9554

Petaluma (707) 795-1462

Sonoma Co. (707) 542-7182

And finally--just last month Lynn Woolsey voted in favor of homosexual marriage.

If her behavior offends you and you are "...mad as hell..." then call her today and demand an explanation for her voting record. She's done nothing for Seniors. Thank you.

Sincerely,



Robert D. Weinmann
Executive Director

P.S. Your financial support will help us to continue our fight against reckless policies like Woolsey's. Your contribution will be greatly appreciated and help launch our newsletter. If you are serious about protecting senior benefits please send a donation now.

98043862425



FEDERAL ELECTION COMMISSION

Washington, DC 20463

November 25, 1996

Roberta Hollowell, Director
California Democratic Party Region 2
1176 Neale Drive
Santa Rosa, CA 95404

RE: MUR 4585

Dear Ms. Hollowell:

This letter acknowledges receipt on November 19, 1996, of the complaint you filed alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). The respondent(s) will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 4585. Please refer to this number in all future communications. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

A handwritten signature in dark ink, appearing to read "F. Andrew Tarley".

F. Andrew Tarley
Supervisory Attorney
Central Enforcement Docket

Enclosure
Procedures

93043862425



FEDERAL ELECTION COMMISSION

Washington, DC 20463

November 25, 1996

Reginald H. Leighton, Treasurer
Hughes for Congress
PO Box 750755
Petaluma, CA 94975

RE: MUR 4585

Dear Mr. Leighton:

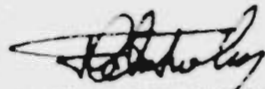
The Federal Election Commission received a complaint which indicates that Hughes for Congress ("Committee") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4585. Please refer to this number in all future correspondence.

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

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

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

Sincerely,



F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Enclosures

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

23043362423



FEDERAL ELECTION COMMISSION

Washington, DC 20463

November 25, 1996

Duane Hughes
1036 Wren Drive
Petaluma, CA 94954

RE: MUR 4585

Dear Mr. Hughes:

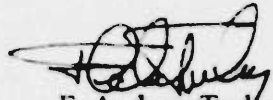
The Federal Election Commission received a complaint which indicates that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4585. Please refer to this number in all future correspondence.

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

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

Sincerely,



F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Enclosures

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

93043362430



FEDERAL ELECTION COMMISSION

Washington, DC 20463

November 25, 1996

Bob Gentry, Treasurer
Californians for an Educated Electorate
19 4th Street
Petaluma, CA 94952

RE: MUR 4585

Dear Mr. Gentry:

The Federal Election Commission received a complaint which indicates that Californians for an Educated Electorate ("Committee") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4585. Please refer to this number in all future correspondence.

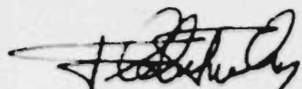
Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against the Committee and you, as treasurer, in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements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

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

0304382171

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

Sincerely,



F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Enclosures

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

20043362472



FEDERAL ELECTION COMMISSION

Washington, DC 20463

November 25, 1996

Treasurer
Redwood Empire TRIM Committee
2314 4th Street
Santa Rose, CA 95404

RE: MUR 4585

Dear Sir or Madam:

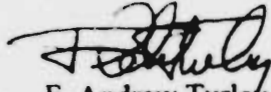
The Federal Election Commission received a complaint which indicates that the Redwood Empire TRIM Committee ("Committee") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4585. Please refer to this number in all future correspondence.

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

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

Sincerely,



F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Enclosures

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

2 3 0 4 3 8 6 2 1 3 1



FEDERAL ELECTION COMMISSION

Washington, DC 20463

November 25, 1996

Treasurer
Seniors Concerned About Tomorrow (S.C.A.T.)
979 Golf Course Drive, Suite 132
Rohnert Park, CA 94928

RE: MUR 4585

Dear Sir or Madam:

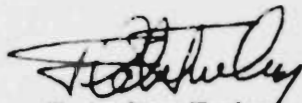
The Federal Election Commission received a complaint which indicates that Seniors Concerned About Tomorrow (S.C.A.T.) ("S.C.A.T.") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4585. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against S.C.A.T. and you, as treasurer, in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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

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

Sincerely,



F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Enclosures

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

98043862135



FEDERAL ELECTION COMMISSION

Washington, DC 20463

November 25, 1996

Robert D. Weinmann, Executive Director
Seniors Concerned About Tomorrow (S.C.A.T.)
979 Golf Course Drive, Suite 132
Rohnert Park, CA 94928

RE: MUR 4585

Dear Mr. Weinmann:

The Federal Election Commission received a complaint which indicates that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4585. Please refer to this number in all future correspondence.

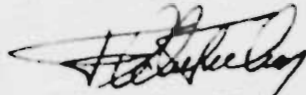
Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under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

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93043362437

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

Sincerely,



F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

Enclosures

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

93043862433

William Pisenti
President

William Bisso
President

Doris Kline
Secretary

Fred Jennings
Treasurer

TRIM

Tax Reform **IM**mediately

2314 4th Street, Santa Rosa, California Ph 707-542-3686

Del Norte County
John L. Costorphine
Catherine Costorphine

Humboldt County
R. Leo Osburn
Doris M. Osburn

Lake County
Genevieve Canfield
John A. Paskaly
John E. Z. Pickens

Marin County
Raymond C. Kesner
Gay H. Hoover

Mendocino County
Clark M. Miller
Lula M. Miller
Dan Sargentini
Irene Sargentini

Napa County
Marvin Tews
Beulah S. Tews
Theodore A. George
Cliff Rodgers
Emilie Rodgers
Murray S. Knapp

Sonoma County
Jerome R. Kelley
Jack H. Stuart
David P. Kline
Jack Bisso
Charles Rogers
Edward Deeney
Vasco Brazil
John Rodgers

*Federal Election Commission
7. Andrew Jurly
Supervisory Attorney
Central Enforcement Docket
Washington, D.C. 20463*

12-5-96

DEC 10 10 22 AM '96
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
R. E. M. R. 4585

Dear Sir,
In response to your letter of 11-25-96,
I can only make the following remark.
We only granted permission to Post
Wiemann to use our bulk permit.
The post office said it was alright
only we had to put our name on
the outside of the flyer.
We paid no money to anyone, we had
nothing to do about raising money,
therefore no nothing about how much
they raised. They paid the postage
with their own check.

If we made a mistake we are
sorry about it, as we don't get involved
with laws such as this. Hope this clarifies
our position.
Sincerely William W. Pisenti Pres. Trim

FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL

Enforcement Division
General Counsel's Office
Federal Elections Commission
999 "E" Street Northeast
Washington, DC 20463
FAX 202-219-3923

DEC 19 9 40 AM '96

16 December 1996

RE MUR 4585

Dear General Counsel,

Pursuant to a 25 November 1996 letter from F. Andrew Turley, Supervisory Attorney in the Central Enforcement Docket, informing me of this Matter Under Review (MUR), I make the answer contained in the rest of this letter. This response clearly shows that no further action should be taken in MUR 4585 (except sanctions against the complainant) and that the matter should be dismissed with prejudice as frivolous and completely lacking in merit. As discussed in Mr. Turley's letter, under the rules and statutes, this matter will remain confidential unless I waive such confidentiality. I do not waive it.

"Part One" of the complaint alleges that my Congressional campaign received an illegal in-kind contribution, etc., due to a newspaper advertisement placed by other parties -- who, in fact, acted entirely separately and independently from my campaign. The charge is completely false. The parties placing the ad proceeded on their own, without any coordination with or control by myself or anyone else in my campaign as to what they were doing.

Upon receiving this complaint, I made inquiries to determine the facts. It appears that, completely independent of my campaign, the parties placing the ad may have used materials previously distributed by my campaign that were in the hands of the public as partial source data for their ad. Because we had no knowledge of this matter and no control, direction or consultation regarding it in any way (as it was done by persons outside my campaign and not with the knowledge, assistance or control of anyone in the campaign), we had no way to avoid or influence the use that apparently was made of our campaign materials. Thus, it is simply wrong to say, as the complaint does, that we received such help for which we bear responsibility or which we must report.

In addition, the complaint alleges that there is a great similarity between the ad and a flyer previously disseminated by my campaign. Actually, as even a brief review of the two items shows, there is only a little similarity between limited parts of them, and the differences are much more significant. The major headlines are different, as is the format, layout, medium and even the text -- with the ad containing much detail our flyer did not. (Even the allegation that type faces are the same errors: see, for example, the headlines and the attribution, "All information taken from ...".) Moreover, the purpose of the two items is different: my campaign flyer expressly promotes my candidacy, while the ad opposes Woolsey. The difference is significant, because

9304336211C

there were two other candidates in the race, and thus the ad would just as correctly be characterized as being help received by each of them, while my flyer would not.

The complaint shows no effort at all to determine what were the facts. It is an abuse of your processes, based on assertions which are completely erroneous on their face and that demonstrate a distinct lack of good faith effort to ascertain what were the facts, make full disclosure of them, and to present only the facts and reasonable arguments of law. Instead, the complainant merely seized upon the fact that some points were similar in the two items and launched into a partisan rant that wastes the time of both sides and the Commission. Thus, on this point, the complaint is frivolous and without any merit, and it should be rejected with prejudice, and no other action should be taken on it (except perhaps to sanction the complainant, as discussed below).

9304336211
"Part Two" of the complaint is even more ridiculous. It is based wholly on innuendo, silly assertion and speculation -- e.g., "was likely", "anecdotal evidence", "it is extremely likely", "I believe", "since nobody in the community has ever heard", "the only known activity", etc. It alleges activities on the part of a person who was not part of our campaign, but was in fact a member of a fully independent organization (as the complaint inadvertently admits and then denies). Among the dastardly deeds alleged is that this person spoke critically of Cong. Woolsey in a flyer, attended an event we held, and then entered Woolsey campaign headquarters and stated he was the author of a flyer critical of Cong. Woolsey. Apparently, for the author of this complaint, people who are critical of Cong. Woolsey don't have any First Amendment free-speech or association rights.

Let me state unequivocally the following. Whatever actions this person or the cited organizations may have taken in this regard, they were their own, and they were done without consultation or coordination with me or my campaign -- and they were certainly done without our control or direction. Thus, we had no opportunity or power to influence or avoid them, and it is false to say we thus received any benefit from them for which we can be held responsible or on which we must report. In addition, because the flyer of this independent organization also only opposes Cong. Woolsey and does not promote my candidacy, it would make just as much sense to ascribe benefit from and reporting responsibility for it to the other two candidates as to my campaign.

Because it is made up from whole cloth -- as the speculative phrases cited above show -- this item is even more egregiously frivolous, lacking in merit and a matter of bad faith than the first one. It is an obvious abuse of process and should not only be thus dismissed with prejudice, but also merits sanctions for wasting the time and resources of the Commission and parties. The frivolousness, lack of merit and abuse of process are also apparent in the fact that this complaint was launched merely vindictively to harass me after Cong. Woolsey won with over 60% to my less than 35%. This fact alone emphasizes that Cong. Woolsey's gadfly, using canned complaint

fodder from the Beltway Democrat machine, is wasting the time of everyone involved for no good end.

In sum, this complaint and the incontinent rhetoric in which it is couched have no place in serious campaigns. The attempt to suppress the free-speech and association rights of citizens who disagree with elitists such as this complainant is really scary and is the nadir so far of our political processes. Ironically, this complaint is made by the party that benefitted from \$35-million in Big Labor "independent" expenditures paid for in substantial part from the member dues of Republican and independent union members who opposed the candidates they were thus forced to support.

Further, the substantive criticism at the end of the complaint of the particular points made in the ad and flyers is simply a lie: it tries to cover up the fact that every point of criticism is true and was backed up by the public record. What this complaint really amounts to is a reaction to the fact that our campaign and other concerned citizens tried to educate the public about the facts concerning Cong. Woolsey. What they're afraid of is that, if the public ever learns the facts about what an extreme leftist she is, she'll be booted in a flash. What this complaint intends to signal is that the leftist supporters of Cong. Woolsey will go to any lengths to punish people for trying to educate the electorate -- which is what our political processes should do.

Thank you for the opportunity to respond to this matter. Please notify me if you need anything else from me, and please ask the Commission to take no further action on it, except to sanction the complainant.

Sincerely,



Duane Hughes
Republican 1996 Congressional Candidate
California Sixth District (Sonoma and Marin Counties)
P.O. Box 750755
Petaluma, CA 94975
Voice 415-899-7244
FAX 415-899-7255

93043862442

S.C.A.T.
Seniors Concerned About Tomorrow

Andrew F. Turley, J.D.
Supervisory Attorney
Federal Election Commission
999 E. Street, N.W.
Washington, D.C. 20463

December 11, 1996

MUR 4585

Dec 19 12 49 PM '96

FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

Dear Mr. Turley:

I am in receipt of the complaint filed with the FEC by MS ROBERTA HOLLOWELL on November 1, 1996. This complaint was sent by you on November 25, 1996 and received by me on the 2nd of December 1996.

I will be as succinct as possible to dispel the myths presented in Ms. Hollowell's complaint about our organization, Seniors Concerned About Tomorrow, (S C A T.)

Referring to PART TWO of her letter, ours is NOT a Political Action Committee to defeat Congresswoman Lynn Woolsey, as charged, and is evidenced by the following: A large group of past and some present members of The American Association of Retired Persons formed SCAT, a non-partisan organization, in July of 1995 which coincided with the U.S. Senate sub-committee hearing held by Senator Alan Simpson on June 13, 1995 to expose AARP as a profit making organization and not representative of their senior citizen members.

I submit for your viewing exhibits substantiating the fact that we were not formed by the HUGHES FOR CONGRESS COMMITTEE to help defeat Congresswoman Woolsey.

- Exhibit A: First meeting September 29, 1995.
- Exhibit B: Letter of support Seniors Advisory Committee.
- Exhibit C: Letter of support Sonoma Taxpayers Association.
- Exhibit D: Letter of support Marin Taxpayers Association.
- Exhibit E: Letter of support TRIM Committee.
- Exhibit F: Sons in Retirement speaking engagement.
- Exhibit G: Santa Rosa Rotary Club speaking engagement.

F & G and other speaking engagements took place in 1995 & 1996.

S.C.A.T.
Seniors Concerned About Tomorrow

PAGE 2-

I did indeed attend a rally on October 8, 1996 at ONE of the offices of Ms. Woolsey. However, as Ms. Hollowell also incorrectly claims, it was NOT staged by the Hughes campaign but rather a coalition of all the above tax groups mentioned and coordinated, as I understand, by the National Taxpayers Association which, for years, has targeted Congressional spenders like Woolsey.

Unlike the The Seniors Coalition, the United Seniors Association and 60 Plus we do not ask for a membership fee and no one is compensated. Whatever contributions SCAT receives are always voluntary.

SCAT put out a solicitation to its supporters, of all parties, to help pay for our mailing. This, exhibit H, was mailed to 10,000 senior democrats. Our original goal was 30,000 but we raised just enough for the 10,000 mailing. The TRIM organization loaned us their mailing permit to keep our costs down.

If Ms. Hollowell is witch hunting for "in-kind" contributions please direct her attention to the AF of L/CIO labor unions that "stole" 35 million dollars from their members for in-kind contributions to democratic candidates to unseat republican incumbents. A classic example of "in-kind" contributions would be the first congressional district in California where democratic candidate, Michaela Alioto, received thousands of advertising dollars to unseat congressman Frank Riggs.

I have voluntarily enclosed a financial report (exhibit I) that was sent to every contributor some of whom contributed as little as 10 dollars.

In Ms. Hollowell's last paragraph of her verbose complaint that our flyer (letter) "contains a series of total falsehoods", is an obvious indication of grasping for the "last straw". EVERY FACT stated in our letter is substantiated by House Resolutions. (see exhibit H). The truth hurts!

Congresswoman Lynn Woolsey should be charged for mailing false and fright peddling information with her franking privilege.

I hope that the information provided answers the frivolous, needless and time consuming complaint of Ms. Hollowell.

Sincerely,



ROBERT D. WEINMANN, EXECUTIVE DIRECTOR

Senior Citizen Alert
Important Meeting
September 29th

Exhibit "A"

Learn The Truth About:

- So Called MEDICARE CUTS
- The Future of Social Security
- A.A.R.P.
- Cruel Misinformation Campaigns Designed to Frighten Senior Citizens

It Is Important Learn The Truth About These And Other Issues That Affect Senior Citizens!

Sponsored by:

City of Rohnert Park Senior Citizens Advisory Commission
Seniors Concerned About Tomorrow

WHERE: Senior Citizen Center
6800 Hunter Dr. Ste. A
Rohnert Park, CA 94928

WHEN: Friday September 29th

TIME: 10:00 A.M.

For additional information contact:
Robert D. "Bob" Weinmann,
707/584-5898

Learn The Truth About Important Senior Issues!

93043862445

Exhibit "B"

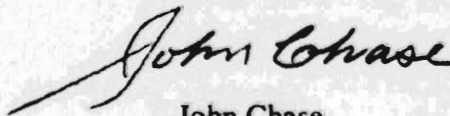
CITY OF ROHNERT PARK
SENIOR CITIZENS ADVISORY COMMISSION

Senior Center
6800 Hunter Drive, Suite C
Rohnert Park, CA 94928

To Whom It May Concern

On Thursday, August 29, 1995, the City of Rohnert Park's Senior Citizens Advisory Commission voted to support the efforts of the organization Seniors Concerned About Tomorrow (S C A T) which will expose the inequities of the American Association of Retired Persons (A A R P) with regard to important senior issues such as their lack of concern for their members, Medicare and Social Security

Yours Truly,



John Chase
Chairman
CITY OF ROHNERT PARK
Senior Citizens Advisory Commission

93043862415

Exhibit "c"

Sonoma County Taxpayers' Association

P.O. Box 14241, Santa Rosa, CA 95402, 707 542-0442, Fax 576-1697

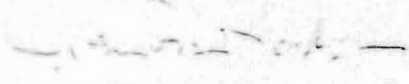
October 19, 1995

Robert Weinmann
5763 Dexter Circle
Rohnert Park, CA 94928

To Whom It May Concern:

On Thursday, October 19, 1995, the Board of Directors of the Sonoma County Taxpayers' Association voted to support the efforts of the organization, Seniors Concerned About Tomorrow (S.C.A.T.), to expose the inequities of the American Association of Retired Persons (A.A.R.P.) with regard to important senior issues such as their lack of concern for their members.

Sincerely,


Jean-Marie Foster
Executive Director

93043862117



Exhibit "D"

Marin United Taxpayers Association

819 A Street, San Rafael, CA 94901 Suite 21 (415) 456-7910

January 17, 1996

Mr. Robert Weinmann
Seniors Concerned About Tomorrow
979 Golf Course Drive Suite 132
Rohnert Park, CA 94928

Re: Seniors Concerned About Tomorrow Efforts to Terminate
Tax-Exempt Status of AARP

Dear Mr. Weinmann:

The Marin United Taxpayers Association has voted to support you and your organization in your efforts to seek the termination of the tax-exempt status of the American Association of Retired People. Your presentation to our Board of Directors was as compelling as it was distressing to hear of the significant "profits" of the AARP "businesses", and to know that such profits are not taxed and that the AARP also is subsidized by federal dollars (taxpayers' money).

We wish you success in your efforts.

Sincerely yours,

Nancy P. McCarthy
President - Marin United
Taxpayers Assn.

William Pisenti
President

William Bisso
Vice President

Doris Kline
Secretary

Fred Jennings
Treasurer

TRIM

Tax Reform IMmediately

2314 4th Street, Santa Rosa, California Ph 707-542-3686

Exhibit "E"

Del Norte County
John L. Costorphine
Catherine Costorphine

September 18, 1995

Humboldt County
R. Leo Osburn
Doris M. Osburn

TO: ROBERT D. WEINMANN, Executive Director
Seniors Concerned About Tomorrow (S.C.A.T.)

Lake County
Genevieve Canfield
John A. Paskaly
John E. Z. Pickens

OUR BOARD OF DIRECTORS VOTED UNANIMOUSLY TO
SUPPORT YOUR EFFORTS TO EXPOSE INDIVIDUALS
AND ORGANIZATIONS, SUCH AS THE AMERICAN ASSOC-
IATION OF RETIRED PERSONS (A.A.R.P.), WHO DO
NOT REPRESENT THE INTERESTS OF SENIOR CITIZENS.

Marin County
Raymond C. Kesner
Gay H. Hoover

WE HOPE THAT YOU AND OTHER ORGANIZATIONS ARE
SUCCESSFUL IN HAVING CONGRESS REVOKE A.A.R.P.'S
NON PROFIT AND TAX EXEMPT STATUS.

Mendocino County
Clark M. Miller
Lula M. Miller
Dan Sargentini
Irene Sargentini

WE FURTHER ENCOURAGE YOUR GROUPS INVOLVEMENT TO
TELL THE TRUTH ABOUT MEDICARE AND SOCIAL SECURITY
AND KEEP US INFORMED HOW ARE REPRESENTATIVES VOTE
ON ISSUES THAT EFFECT SENIOR CITIZENS.

WE WISH YOU THE VERY BEST IN YOUR ENDEAVORS.

SINCERELY,

Napa County
Marvin Tews
Beulah S. Tews
Theodore A. George
Cliff Rodgers
Emilie Rodgers
Murray S. Knapp

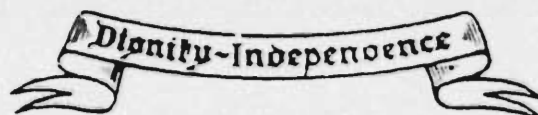
William W. Fries Pres.

Sonoma County
Jerome R. Kelley
Jack H. Stuart
David P. Kline
Jack Bisso
Charles Rogers
Edward Deeney
Vasco Brazil
John Rodgers

Exhibit "F"

Sons in Retirement
Incorporated

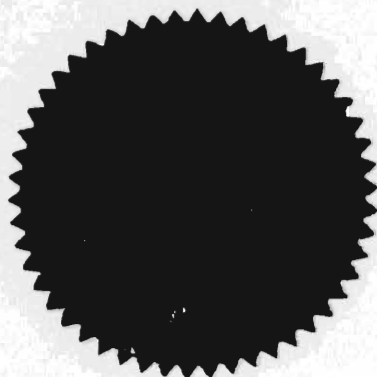
Branch No 132



To

Robert D. Weinmann

Ihis certificate is presented in
grateful appreciation of your
service to the Sons In Retirement.



February 15, 1996

Dated

Gene Temple

Big Sir

Robert D. Weinmann

Little Sir

Ray B. Brown

Sec'y

Santa Rosarian



VOL LXV

NO. 9

August 28, 1996

EDITOR: Vickie Hardcastle

Robert D. Weinmann exposes A.A.R.P.

Our speaker next week will be Bob Weinmann, the Executive Director of S.C.A.T. Seniors Concerned About Tomorrow. This organization is composed of present and past members of the American Association of Retired People.

The main purpose of this growing group is to expose A.A.R.P., to lobby congress for their legislation and to control and manipulate it's 33 million members and make money.

**Seniors Concerned About Tomorrow
S.C.A.T.
979 Golf Course Drive Ste. 132
Rohnert Park, CA 94928**

**"I'm as mad as hell and I'm not going
to take this anymore!"**

**Howard Beale, News Anchorman
"NETWORK" 1976**

Dear Senior Friend,

The statement above accurately describes our attitude about Congresswoman Lynn Woolsey. She has been lying to us for the last two years.

There's another well known saying, "If it ain't broke don't fix it."

Now Congresswoman Lynn Woolsey can give it a different spin. If Medicare ain't broke by 2001, just wait. She will see to it.

Woolsey's frequent mailings--sent at taxpayer's expense--are filled with doomsday messages warning that Congress is about to "shred the safety net for women and children on welfare, slash Medicare by \$270 billion, and end the guarantee of nursing home coverage for older women and men."

With her fright peddling she claims a Congressional majority voted "deep Medicare and Medicaid cuts [resulting] in higher healthcare costs for older women and men, restrictions on choice of doctors, reduced services at local hospitals."

In fact, Woolsey's scare tactics are not just misleading--they're blatant lies! Medicare is not under attack. Just the opposite. Let's look at her voting record:

HR 2264 - In 1993 Lynn Woolsey voted FOR \$250 billion in new income taxes and Social Security taxes. These tax increases adversely affect working seniors, our children and grandchildren.

HR 64 - In 1993 Woolsey voted FOR \$253 billion in deficit spending. We must end deficit spending or our national debt will destroy the future for our children and all future generations!

HR 9 - In 1992 Lynn Woolsey voted against welfare reform. She voted for an increase in welfare spending by over \$7 billion.

HR 2621 (Dec. 14, 1995) She refused to stop the Secretary of the Treasury from raiding the Social Security Trust Fund of \$440 Billion!

HR 2425 (Oct. 19, 1995) Woolsey voted against a plan that would have saved the Medicare Trust fund from bankruptcy.

Exhibit "H"
It should be noted that the President's Commission on Medicare reports that Medicare will be bankrupt in 2001 if measures to avoid it are not taken immediately!

Seniors' concerns cannot be ignored. Our benefits and those of future generations must be protected.

Not content with opposing bills affecting Medicare for those in their twilight years, Woolsey also would destroy life at its dawn--among the innocent unborn.

HR 1833 (November '95) Woolsey voted **against outlawing Partial Birth Abortions**, a barbaric procedure that kills a newborn baby just before the head leaves the mother's womb.

An overwhelming majority of Congress (71%) voted to outlaw this hideous procedure that is nothing short of infanticide--but not Woolsey! She is against capital punishment for Richard Allen Davis--the murderer of Polly Klass--but supports killing infants!

Shouldn't she explain the inconsistencies between her Congressional voting record and false statements she has sent to North Bay constituents?

If you're concerned about Woolsey's record, I urge you to contact her immediately. Ask about her votes for tax increases, against a balanced budget and failure to save Medicare from bankruptcy and taxes on social security. Call her:

Marin Co. (415) 507-9554

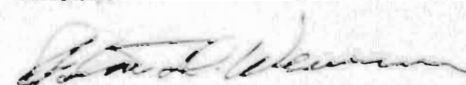
Petaluma (707) 795-1462

Sonoma Co. (707) 542-7182

And finally--just last month Lynn Woolsey voted in favor of homosexual marriage.

If her behavior offends you and you are "...mad as hell..." then call her today and demand an explanation for her voting record. She's done nothing for Seniors. Thank you.

Sincerely,



Robert D. Weinmann
Executive Director

PS Your financial support will help us to continue our fight against reckless policies like Woolsey's. Your contribution will be greatly appreciated and help launch our newsletter. If you are serious about protecting senior benefits please send a donation now.

98043862452

Redwood Empire TRIM Committee
2314 4th Street
Santa Rosa, CA 95404

NON-PROFIT
U.S. POSTAGE PAID
SANTA ROSA, CA
PERMIT NO. 24

Redwood Empire TRIM Asks You To
Read This Important Message From
Seniors Concerned About Tomorrow
About Congresswoman Lynn Woolsey

9 8 0 4 3 8 6 2 4 5 3



Voting Record U.S. House of Representatives

104TH CONGRESS - FIRST SESSION - 1995

NORTHERN CALIFORNIA -- HAWAII

Founders Building
9696 Skillman
Dallas, TX 75243-8253

Y - Voted Yes
N - Voted No
O - Did Not Vote
S - Senate Bill
H - House Bill

	H.2	H.4	H.645	H.666	H.729	H.925	H.956	H.961	H.968	H.1022	H.1215	H.1811	H.2274	H.2425	H.2539	H.2564	H.2684	H.R. 302	H.R. 1	H.R. 71	H.R. 79	S.1	S.2
	Line-Item Veto	Welfare Reform	Crime/Victim Restitution	Exclusionary Rule Exempt BAIL	More Effective Death Penalty	Property Rights	Product Liability Litigation Reform	Require EPA Risk Assessments	Define Frivolous Lawsuits	Regulatory Reform	Tax Fairness and Deficit Reduction	Ban Partial Birth Abortions	National Standard for Minors/DWI	Medicare Reform	Abolish the ICC	Lobbying Disclosure	S.S. Earnings Limit Increase	Oppose Deployment Support Troops	Balanced Budget Amendment	Term Limit Amendment	Flag Designation Amendment	Curb Unfunded Mandates	Congressional Accountability
Baker (R-CA)	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
*Campbell (R-CA)	•	N	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
Condit (D-CA)	Y	Y	Y	Y	Y	Y	Y	N	O	Y	Y	Y	N	N	Y	Y	Y	Y	Y	Y	Y	Y	Y
Delums (D-CA)	N	N	Y	Y	N	N	N	Y	N	N	N	N	N	N	Y	Y	Y	N	N	N	N	N	Y
Dooley (D-CA)	Y	N	Y	Y	Y	Y	Y	N	Y	Y	N	N	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	Y
Doolittle (R-CA)	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	O
Egbo (D-CA)	Y	N	Y	N	N	N	N	Y	N	N	N	N	Y	N	Y	Y	Y	N	Y	Y	Y	Y	Y
Farr (D-CA)	N	N	Y	Y	N	N	N	Y	N	N	N	N	Y	N	Y	Y	Y	N	N	N	N	Y	O
Fazio (D-CA)	N	N	Y	Y	N	Y	N	Y	Y	N	N	N	Y	N	Y	Y	Y	N	N	N	N	Y	O
Herger (R-CA)	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Leantos (D-CA)	Y	O	Y	N	N	Y	N	Y	N	N	N	N	Y	N	Y	Y	Y	N	N	N	N	Y	O
Lofgren (D-CA)	N	N	Y	Y	N	N	N	Y	N	N	N	N	N	N	Y	Y	Y	N	N	N	N	Y	O
Matsui (D-CA)	N	N	Y	Y	N	N	N	Y	N	N	N	N	N	N	Y	Y	Y	N	N	N	N	Y	O
Miller (D-CA)	N	N	Y	Y	N	N	N	Y	N	N	N	N	N	N	Y	Y	Y	N	N	N	N	Y	O
*Mineta (D-CA)	N	•	Y	Y	N	N	Y	Y	N	N	N	N	N	N	•	•	•	•	•	•	•	•	•
Pelosi (D-CA)	N	N	Y	Y	N	N	N	Y	N	N	N	N	N	N	Y	O	N	N	N	N	N	Y	O
Pombo (R-CA)	Y	Y	Y	Y	Y	Y	N	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Radanovich (R-CA)	Y	Y	Y	N	Y	Y	Y	N	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Riggs (R-CA)	Y	Y	Y	Y	Y	Y	N	N	Y	Y	Y	N	Y	Y	O	Y	Y	Y	Y	Y	Y	Y	Y
Stark (D-CA)	N	N	Y	Y	N	N	N	Y	Y	N	N	N	N	Y	Y	Y	Y	N	N	N	N	N	Y
Woolsey (D-CA)	N	N	Y	Y	N	N	N	Y	N	N	N	N	Y	N	Y	Y	Y	N	N	N	N	Y	O
Abercrombie (D-HI)	N	N	Y	N	N	N	N	Y	N	N	N	N	N	N	Y	Y	Y	N	N	N	N	Y	Y
Mink (D-HI)	N	N	Y	Y	N	N	N	Y	N	N	N	N	Y	N	O	Y	Y	N	N	N	N	Y	Y

*Cong. Campbell was sworn in on December 15, 1995

*Cong. Mineta resigned on October 10, 1995

"YOU CANNOT HELP MEN PERMANENTLY BY DOING FOR THEM WHAT
THEY COULD AND SHOULD DO FOR THEMSELVES"
(--ABRAHAM LINCOLN)

Explanation of Bills on Reverse Side
For Additional Information On Any Bill, Write To The Above Address

EUGENE R SWANSON
DOROTHY R SWANSON

CMA Cash Management Account

3980

PAY TO THE
ORDER OF

S.C.A.T.

5-17-96

\$ 50.00

DOLLARS

Merrill Lynch

BANK OF AMERICA
MEMO Contribution

Eugene R. Swanson

Copy of
just a few
of the many
checks received
JW

VALUED
customer
since
1990

RONALD J. DERENZO
INVESTIGATIVE SERVICES

537

8-16-96

\$ 10.00

DOLLARS

1ST NATIONWIDE BANK

1304 Northgate Drive
San Rafael, CA 94903-2502

CUSTOM

Ronald J. Derenzo

JOHN PAUL RUSSO

Aug 15 '96 2220

11-7844/3210

Pay to the
order of

SCAT

\$ 25.00

Twenty five and no/100

SAN FRANCISCO
Federal Credit Union

70 Golden Gate Avenue, San Francisco, CA 94102

Referred by R. Olman

John Russo

BEVERLY S. HEINECKE

1369

DATE Aug 15, 1996

11-7015/24
3210
60003079407

PAY TO THE
ORDER OF

SCAT

\$ 25.00

Twenty five and no/100

DOLLARS

BAY VIEW FEDERAL BANK

A FEDERAL SAVINGS BANK

SAN ANSELMO OFFICE: 305 SAN ANSELMO AVE. SAN ANSELMO, CA 94080

Beverly Heinecke

December 17, 1996

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
JAN 21 10 27 AM '97

**Office of General Counsel
Federal Election Commission
Washington, DC 20463**

Re: MUR #4585

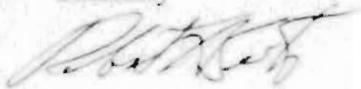
Dear General Counsel

I am writing in response to a complaint, filed with your office, (of which I received a copy via fax). I question if I am the intended party named, as there are numerous "BOB GENTRY'S" in California, and I have heard of several having lived in Sonoma County. My name is Robert Howard Gentry. I reside at 2641 South Dutton Avenue, Santa Rosa, CA 95407.

At no time have I contributed any funds to a committee named (California's for an Educated Electorate). I have never placed or caused to be placed an add of political nature with the Press Democrat, or any other media source. I have although placed adds offering a variety of items for sale over the 43 years I've lived in Sonoma County.

If you have any question regarding my political involvement feel free to contact me at the above mentioned address.

Sincerely



Robert H. Gentry

98043367456

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)
)
)
)
)

CASE CLOSURES UNDER
ENFORCEMENT PRIORITY

FEB 11 3 11 PM '03

GENERAL COUNSEL'S REPORT

I. INTRODUCTION.

The cases listed below have been identified as either stale or of low priority based upon evaluation under the Enforcement Priority System (EPS). This report is submitted to recommend that the Commission no longer pursue these cases.

II. CASES RECOMMENDED FOR CLOSURE.

A. Cases Not Warranting Further Action Relative to Other Cases Pending Before the Commission

EPS was created to identify pending cases which, due to the length of their pendency in inactive status or the lower priority of the issues raised in the matters relative to others presently pending before the Commission, do not warrant further expenditure of resources. Central Enforcement Docket (CED) evaluates each incoming matter using Commission-approved criteria which results in a numerical rating of each case.

Closing cases permits the

Commission to focus its limited resources on more important cases presently

93043862457

pending before it. Based upon this review, we have identified 16 cases that do not warrant further action relative to other pending matters.¹ The attachment to this report contains summaries of each case, the EPS rating, and the factors leading to assignment of a low priority and recommendation not to further pursue the matter.

B. Stale Cases

Effective enforcement relies upon the timely pursuit of complaints and referrals to ensure compliance with the law. Investigations concerning activity more remote in time usually require a greater commitment of resources, primarily due to the fact that the evidence of such activity becomes more difficult to develop as it ages. Focusing investigative efforts on more recent and more significant activity also has a more positive effect on the electoral process and the regulated community. In recognition of this fact, EPS provides us with the means to identify those cases which remained unassigned for a significant period due to a lack of staff resources for effective investigation. The utility of commencing an investigation declines as these cases age, until they reach a point when activation of a case would not be an efficient use of the Commission's resources.

¹ These cases are: MUR 4631 (Perot/McClure); MUR 4661 (Cox and Amplicon, Inc.); MUR 4667 (Specter & Greenwood); MUR 4668 (Schakowsky for Congress); MUR 4672 (Friends of John O'Toole); MUR 4673 (Papan for Assembly); MUR 4676 (Warren County Democrats Committee); MUR 4677 (Patrick Kennedy); MUR 4681 (Jack Block); MUR 4683 (Janice Schakowsky for Congress); MUR 4684 (Spartanburg County Republicans); MUR 4694 (Jan Schakowsky for Congress); MUR 4695 (Schakowsky for Congress); MUR 4696 (Janice Schakowsky for Congress); MUR 4703 (Dumont Institute / Robert M. Gre); and Pre-MUR 356 (Pritzker for Congress).

We have identified cases which have remained on the Central Enforcement Docket for a sufficient period of time to render them stale. We recommend 27 of these cases be closed.³ Nine of these cases were part of the so-called "Major 96" cases that have not been able to be activated due to a lack of resources to effectively pursue them in a timely fashion.⁴ Since the time period rendering them stale has now passed, we recommend their closure at this time.

We recommend that the Commission exercise its prosecutorial discretion and direct closure of the cases listed below, effective February 24, 1998. Closing

³ These cases are: MUR 4317 (Republican Party of Minnesota), MUR 4355 (Aqua-Leisure Industries, Inc.), MUR 4372 (Nebraska Democratic Party), MUR 4394 (Americans for Term Limits), MUR 4472 (Committee to Elect Winston), MUR 4483 (Nebraska Democratic State Central Committee), MUR 4504 (NH Democratic State Party Committee), MUR 4507 (People for Boschnitz), MUR 4509 (Wellstone for Senate), MUR 4565 (Bell for Congress), MUR 4570 (Congresswoman Andrea Seastrand), MUR 4571 (Subert for Congress Committee), MUR 4572 (Friends of Dick B. Durbin), MUR 4575 (Dana Corrington), MUR 4585 (Hughes for Congress Committee), MUR 4589 (Congressman Bart Gordon), MUR 4592 (Iowa Public Television), MUR 4593 (Public Interest Institute), MUR 4599 (Bruce W. Hapanowicz), MUR 4601 (Choctaw Nation of Oklahoma), MUR 4602 (NFSB-TV Channel 3), MUR 4604 (Dana Corrington), MUR 4605 (Christian Coalition), Pre-MUR 346 (Coalition of Politically Active Christians), RAD 96NF-09 (O'Sullivan for Congress), RAD 96L-12 (Alaska Democratic Party), and RAD 97NF-02 (Zien for Congress).

⁴ These cases are: MUR 4350 (Republican Party of Minnesota), MUR 4372 (Nebraska Democratic Party), MUR 4394 (Americans for Term Limits), MUR 4472 (Committee to Elect Winston), MUR 4483 (Nebraska Democratic State Central Committee), MUR 4504 (NH Democratic State Party Committee), MUR 4507 (People for Boschnitz), MUR 4509 (Wellstone for Senate), and MUR 4565 (Bell for Congress).

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these cases as of this date will permit CED and the Legal Review Team the necessary time to prepare closing letters and case files for the public record.

III. RECOMMENDATIONS.

A. Decline to open a MUR, close the file effective February 24, 1998, and approve the appropriate letters in the following matters:

- | | | |
|----------------|----------------|----------------|
| 1. RAD 96NF-09 | 3. RAD 97NF-02 | 5. Pre-MUR 356 |
| 2. RAD 96L-12 | 4. Pre-MUR 346 | |

B. Take no action, close the file effective March 2, 1998, and approve the appropriate letters in the following matters:

- | | | |
|--------------|--------------|--------------|
| 1. MUR 4350 | 14. MUR 4575 | 27. MUR 4668 |
| 2. MUR 4355 | 15. MUR 4585 | 28. MUR 4672 |
| 3. MUR 4372 | 16. MUR 4589 | 29. MUR 4673 |
| 4. MUR 4394 | 17. MUR 4592 | 30. MUR 4676 |
| 5. MUR 4472 | 18. MUR 4593 | 31. MUR 4677 |
| 6. MUR 4483 | 19. MUR 4599 | 32. MUR 4681 |
| 7. MUR 4504 | 20. MUR 4601 | 33. MUR 4683 |
| 8. MUR 4507 | 21. MUR 4602 | 34. MUR 4684 |
| 9. MUR 4509 | 22. MUR 4604 | 35. MUR 4694 |
| 10. MUR 4565 | 23. MUR 4605 | 36. MUR 4695 |
| 11. MUR 4570 | 24. MUR 4631 | 37. MUR 4696 |
| 12. MUR 4571 | 25. MUR 4661 | 38. MUR 4703 |
| 13. MUR 4572 | 26. MUR 4667 | |

Date

Lawrence M. Noble
General Counsel

28043862450



FEDERAL ELECTION COMMISSION

Washington, DC 20463

MEMORANDUM

TO LAWRENCE M NOBLE
GENERAL COUNSEL

FROM MARJORIE W. EMMONS/LISA R. DAVIS
COMMISSION SECRETARY

DATE FEBRUARY 19, 1998

SUBJECT Case Closures Under Enforcement Priority. General
Counsel's Report dated February 11, 1998.

The above-captioned document was circulated to the Commission
on Thursday, February 12, 1998

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

Commissioner Aikens	—
Commissioner Elliott	—
Commissioner McDonald	<u>XXX</u>
Commissioner McGarry	—
Commissioner Thomas	<u>XXX</u>

This matter will be placed on the meeting agenda for

Tuesday, February 24, 1998

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

AGENDA DOCUMENT NO. X98-13

93043862461

93043862462

)
) **Agenda Document**
) **No. X98-13**
)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on February 24, 1998, do hereby certify that the Commission took the following actions with respect to Agenda Document No. X98-13:

1. Failed in a vote of 3-2 to pass a motion to approve the General Counsel's recommendations, subject to amendment of the closing date in recommendation A to read March 2, 1998, and subject to deletion of those cases listed in footnote 4 on Page 3 of the staff report.

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

2. Decided by a vote of 5-0 to
- A. Decline to open a MUR, close the file effective March 2, 1998, and approve the appropriate letters in the following matters:
- | | |
|----------------|----------------|
| 1. RAD 96NF-09 | 4. Pre-MUR 346 |
| 2. RAD 96L-12 | 5. Pre-MUR 356 |
| 3. RAD 97NF-02 | |

(continued)

- B. Take no action, close the file effective March 2, 1998, and approve the appropriate letters in the following matters:

1. MUR 4350	20. MUR 4601
2. MUR 4355	21. MUR 4602
3. MUR 4372	22. MUR 4604
4. MUR 4394	23. MUR 4605
5. MUR 4472	24. MUR 4631
6. MUR 4483	25. MUR 4661
7. MUR 4504	26. MUR 4667
8. MUR 4507	27. MUR 4668
9. MUR 4509	28. MUR 4672
10. MUR 4565	29. MUR 4673
11. MUR 4570	30. MUR 4676
12. MUR 4571	31. MUR 4677
13. MUR 4572	32. MUR 4681
14. MUR 4575	33. MUR 4683
15. MUR 4585	34. MUR 4684
16. MUR 4589	35. MUR 4694
17. MUR 4592	36. MUR 4695
18. MUR 4593	37. MUR 4696
19. MUR 4599	38. MUR 4703

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

Attest:

2-25-98
Date

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

93043862463



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 2, 1998

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Roberta Hollowell, Director
California Democratic Party Region 2
1176 Neale Drive
Santa Rosa, CA 95404

RE MUR 4585

Dear Ms. Hollowell:

On November 19, 1996, the Federal Election Commission received your complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act").

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no action in the matter. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on March 2, 1998. This matter will become part of the public record within 30 days.

The Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437(g)(4)(B).

Sincerely,

A handwritten signature in black ink, appearing to read "F. Andrew Turley".

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

98043362154



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 2, 1998

Reginald H. Leighton, Treasurer
Hughes for Congress
1018 E Street
San Rafael, CA 94901

RE: MUR 4585

Dear Mr. Leighton:

On November 25, 1996, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no action against Hughes for Congress and you, as treasurer. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on March 2, 1998.

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

If you have any questions, please contact Jennifer H. Boyt on our toll-free number, (800)-424-9530. Our local number is (202) 694-1650.

Sincerely,

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

93043062135



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 2, 1998

Duane Hughes
1036 Wren Drive
Petaluma, CA 94954

RE: MUR 4585

Dear Mr. Hughes:

On November 25, 1996, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no action against you. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on March 2, 1998.

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

If you have any questions, please contact Jennifer H. Boyt on our toll-free number, (800)-424-9530. Our local number is (202) 694-1650.

Sincerely,

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 2, 1998

Bob Gentry, Treasurer
Californians for an Educated Electorate
19 4th Street
Petaluma, CA 94952

RE: MUR 4585

Dear Mr. Gentry:

On November 25, 1996, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no action against Californians for an Educated Electorate and you, as treasurer. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on March 2, 1998.

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

If you have any questions, please contact Jennifer H. Boyt on our toll-free number, (800)-424-9530. Our local number is (202) 694-1650.

Sincerely,

A handwritten signature in black ink, appearing to read "F. Andrew Tarley".

F. Andrew Tarley
Supervisory Attorney
Central Enforcement Docket

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 2, 1998

Fred Jennings, Treasurer
Redwood Empire TRIM Committee
2314 4th Street
Santa Rosa, CA 95404

RE: MUR 4585

Dear Mr. Jennings:

On November 25, 1996, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no action against Redwood Empire TRIM Committee and you, as treasurer. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on March 2, 1998.

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

If you have any questions, please contact Jennifer H. Boyt on our toll-free number, (800)-424-9530. Our local number is (202) 694-1650.

Sincerely,

A handwritten signature in black ink, appearing to read "F. Andrew Turley".

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 2, 1998

Treasurer
Seniors Concerned About Tomorrow (S.C.A.T.)
979 Golf Course Drive, Suite 132
Rohnert Park, CA 94928

RE: MUR 4585

Dear Sir or Madam:

On November 25, 1996, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no action against Seniors Concerned About Tomorrow (S.C.A.T.) and you, as treasurer. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on March 2, 1998.

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

If you have any questions, please contact Jennifer H. Boyt on our toll-free number, (800)-424-9530. Our local number is (202) 694-1650.

Sincerely,

F. Andrew Turley
Supervisor/Attorney
Central Enforcement Docket

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 2, 1998

Robert D. Weinmann, Executive Director
Seniors Concerned About Tomorrow (S.C.A.T.)
979 Golf Course Drive, Suite 132
Rohnert Park, CA 94928

RE: MUR 4585

Dear Mr. Weinmann:

On November 25, 1996, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no action against you. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on March 2, 1998.

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

If you have any questions, please contact Jennifer H. Boyt on our toll-free number, (800) 424-9530. Our local number is (202) 694-1650.

Sincerely,

A handwritten signature in black ink, appearing to read "F. Andrew Turley".

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

THIS IS THE END OF MUR # 4585

DATE FILMED 3/11/98 CAMERA NO. 2

CAMERAMAN EES

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