

From the Desk of:

**Sarkis Joseph (Joe) Khoury, Ph.D.**

**16780 Lake knoll Parkway  
Riverside California 92503**

**Mr. F. Andrew Turley  
Supervising Attorney  
Central Enforcement Docket  
Federal Election Commission  
999 E street, NW  
Washington, D.C. 20463**

**RE: MUR 4880**

**MAR 25 3 09 PM '99**

**RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL**

**Dear Mr. Turley;**

In my last letter to you dated March 10, 1999, I mentioned that I, along with my campaign Treasurer, would respond to specific campaign finance related allegations made by Mr. R.M. Cook Barela against the Khoury for Congress Campaign Committee. The evidence and arguments presented below show, once again, and in fact, that the allegations are pure speculation, and are without foundation.

- 1- On Page 7 of Mr. Barela's complaint, he alleges that we received and did not report in-kind contributions in the form of display advertising from the publishers of the Conservative Voice and the Southern California Christian Times.

The Conservative Voice is published by World Mill Public Relations. The latter provided public relations services to the campaign. We made a check out to the Conservative Voice in the amount of \$900 (check #644) on April 17, 1998 and reported this expenditure in our 12 day pre-election report dated May 17, 1998 (see page 2 of 5 of Schedule B). This payment represented an expenditure of \$500 for display advertising in the Conservative Voice, and \$400 for our Campaign's portion of a multi-candidate display ad by World Mill Public Relations in the Southern California Christian Times.

We submit here copies of Invoice #2201 from the Conservative Voice/World Mill Publishing, and Khoury for Congress check #644 in the amount of \$900 as Attachments 1 and 2, respectively.

- 2- On page 8 of Mr. Barela's complaint, he alleges that the California Republican Assembly (CRA) worked through Ms. Shirlee Pigeon as an independent expenditure committee when it mailed out a letter (CRA letter) in support of Khoury for Congress.

In his complaint, Mr. Barela correctly states that the CRA letter was paid for by Khoury for Congress. Our campaign paid Inland Mailing Service to prepare and mail the CRA letter. Because the CRA itself, nor Ms. Pigeon made any expenditure for this letter, neither can be considered an independent expenditure committee.

We have included copies of Inland Mailing Service invoice number 17495 and our check #689 in the amount of \$9,476.60 as Attachments 3 and 4, respectively. The \$9,476.60 amount is included in the \$52,728.21 paid to Inland Mailing Service shown on page 1 of 2 of Schedule B on our June 30, 1998 quarterly report.

- 3- On Page 8 of Mr. Barela's complaint, he alleges that our campaign website was not disclosed as an expenditure.

The software for the website was developed by a campaign volunteer. Another volunteer allowed the campaign to use a portion of the disk space on his computer to host the website. Neither of these individuals incurred any expense to develop or host the website, and neither is in the business of developing or hosting websites. As a result, there were no actual or in-kind expenditures to report.

- 4- On page 26 of Mr. Barela's complaint, he alleges that I have not answered a number of requests from the FEC asking for clarifications on a \$4,000 contribution I made during the last days of the campaign.

Although the \$4,000 contribution was reported at the time on a "48 hour notice" form to the FEC, it was inadvertently not included in our initial June 30, 1998 quarterly report. On September 26, 1998, we received a letter from Ms. Lisa Simpson of the FEC informing us of our mistake. On October 15, 1998, we submitted an amended report that included the \$4,000.

5- On page 26 of Mr. Barela's complaint, he alleges that we did not list the employee or occupation for 87% of our contributors.

We have fully complied with FEC regulations to report our contributors' employers and occupations, or to put forth our "best efforts" in obtaining that information. Many of my contributors are self-employed (e.g. doctors, attorneys, etc.). For these contributors, we noted that they were self-employed and described their occupation. Perhaps Mr. Barela is including these contributors in his calculation of 87%. For the few contributors for whom we were not able to obtain information about their employer and occupation, we sent them a letter requesting that information according to the FEC's "best efforts" guidelines.

In a letter dated July 16, 1998, Mr. John D. Gibson of the FEC requested that we provide him with information regarding how contributor information was requested in order to satisfy the FEC's "best efforts" requirements. We responded to Mr. Gibson's request in a letter dated July 27, 1998 (see Attachment 5 and associated letter and exhibits).

We received, subsequently, no further requests for additional contributor information from the FEC. We then received a "notice of termination" from the FEC advising us that our Committee is closed and that we are no longer required to file reports.

The above shows that Mr. Barela knew or could have known that his allegations were speculative in nature and without foundation.

I trust that this letter addresses satisfactorily each of the specific allegations of FEC rules violations in Mr. Barela's complaint. If it does not, please contact me immediately. If you have any questions, you can reach me at My fax number is 909-352-3713.

All the best!

Very truly yours,

  
Sarkis Joseph Khoury Ph.D.

## ATTACHMENTS

Attachment 1**The Conservative Voice**

5005 LaMar • Suite 204 • Riverside, CA • 92507 • (909) 686-7575

**Invoice****2201**

1/1/98

**Khoury for Congress****Address****City****State****Zip****Phone****Fax**

2 3/4 ads in Voice: \$500

Christian Times slate: \$400

**\$900.00**

Tax

Total

**\$900.00**

Paid

**\$900.00**

Balance

**\$0.00****Terms  
&  
Notes***Please make checks payable to: Word Mill Publishing*

2001-01-01 09:10:00

Attachment 2

16-68/1220

644

KHOURY FOR CONGRESS

P.O. BOX 65870  
RIVERSIDE, CA 92517

Date 4-17-98

NO POSTAGE  
NECESSARY  
IF MAILED  
IN THE  
UNITED STATES

The Conservative Voice \$ 900<sup>00</sup>  
Nine hundred and <sup>no</sup>/100 Dollars

Bank of America  
Riverside, CA 92517 (909) 734-8833

*L.H.*

⑆ 12200066 1:0644 ⑆ 02424 ⑆ 12864 ⑆ ⑆ 00000090000 ⑆

PAY TO THE ORDER OF  
CITY NATIONAL BANK  
RIVERSIDE, CALIFORNIA 92507  
⑆ 122018083 ⑆  
FOR DEPOSIT ONLY  
THE CONSERVATIVE VOICE OF  
WORD MILL PR  
TOM PIGEON  
⑆ 122018083 ⑆

APR 24 98

04/27/98  
122000661  
02  
04/27/98  
05517160  
0122018083  
APR 24 98  
CITY NATIONAL BANK  
RIVERSIDE, CALIFORNIA 92507  
FOR DEPOSIT ONLY  
THE CONSERVATIVE VOICE OF  
WORD MILL PR  
TOM PIGEON  
⑆ 122018083 ⑆



**Inland  
Mailing  
Services, Inc.**

1253 Enterprise Court  
Corona, CA 91720

(909) 371-6245  
FAX (909) 371-1952

*Attachment 3*  
**INVOICE**

INVOICE NUMBER	INVOICE DATE
17495	05/20/98

BILL TO:

Khoury for Congress  
Attn.: Kristina Stelzer  
3694 Sunnyside Dr.  
Riverside, CA 92506-

SHIP TO:

Same

TERMS	CUSTOMER'S PHONE	CUSTOMER CONTACT	PURCHASE ORDER #	CUSTOMER SERVICE REP.
COD/Check	909-787-1998	Kristina Stelze		Glenda

QUANTITY	DESCRIPTION	TOTAL
40,000	Re: 2/2 8.5 x 11 Letter - R-60# Cffset, white 8.5 x 11 1/S Darkroom Department Neg-11 x 17 Web-Make Ready Ink\Bleeds\Wash Dept Wash Folding 5/M Ltr 8.5 x 11	468.00 154.80 40.00 190.21 <b>853.01</b>
38,356	Re: 1 pcs into #10 Env.Reg. Delivery Local SCF Presorting 8/M Sort & tray Inkjet 8/M Address Insert - Machine 10/M lpc to #10 Sealing & Tabbing N/C Envelopes Affixing Postage 8/M Stamp Data Processing 5/M Import-Cass Setup & Forms Machine & Forms Comp Postage Requirements Standard Mail Stamps	100.00 306.85 306.85 383.56 306.85 191.78 50.00 5,036.69 <b>6,682.51</b>
40,000	Re: 1/0 #10 Regular Envelopes - Vanguard #10 Reg Wht#24W ENVELOPES 1/S Darkroom Department Neg-8.5 x 11 AB Dick 9800 Metal Ink\Bleeds\Wash Dept Wash	823.00 21.00 10.00 <b>854.00</b>
<div style="text-align: center;"> <b>PAID</b>            CK NO. <u>1114 # 17537</u>            DATE <u>5/29/98</u> </div>		

1st Tax ID # 0

SHIP VIA	SUB-TOTAL	TAX RATE %	TAX	FREIGHT CHARGES	DEPOSIT	AMOUNT DUE
Del to PO	8,389.58				9,476.60	-1,087.02

05/29/78  
62-  
1920461401 023216164706 052.00

CREDIT SERVICES

ORDER OF BUSINESS BANK

POST ONLY

282161647

FEDERAL RESERVE BANK REGULATION CC

Security Features Listed Below, as well as those listed under FSA Guidelines.



Attachment 5

1 of 6

David L. Davis  
25295 Madrone Drive  
Murrieta, CA 92563  
909/694-3646

July 27, 1998

Mr. John D. Gibson  
Assistant Staff Director  
Reports Analysis Division  
Federal Election Commission  
999 "E" Street, NW  
Washington, D.C. 20463


Re: Khoury for Congress #C00329391

Dear Mr. Gibson:

I am sending you the following items in response to your letter to me dated July 16, 1998.

1. Amended Form 3 for the period April 1, 1998 through May 13, 1998;
2. Amended Form 3 for the period May 14, 1998 through June 30, 1998; and,
3. Information regarding how contributor information was requested with the initial solicitation for contributions. This includes an explanatory memo from Dr. Khoury and copies of a donor envelope, a donor information sheet, and follow up correspondence.

Please call me at 909/694-3646 if you have any questions.

Very truly yours,  
  
David L. Davis  
Treasurer

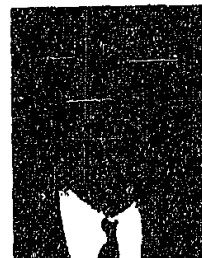
909/694-3646

Attachment 5  
2 of 6

**KHOURY FOR CONGRESS**

P.O. BOX 51598

RIVERSIDE, CALIFORNIA 92517



To: Mr. John Gibson

From: S. Joseph Khoury

Date: July 22, 1998

Dear Mr. Gibson:

This note is to deal with the second point in your inquiry of July 16, 1998.

We have solicited money by mail and mostly by special fundraisers, typically at the home of individuals. We have attempted in every case to receive full disclosure. We either distributed an envelope (Exhibit I) or a form with the equivalent information (Exhibit II). Each and every contributor received a letter of thanks for the contribution and a letter requesting complete information, if the information provided was not sufficient to meet the FEC disclosure requirements (Exhibit III). Whenever possible we called to follow up on those individuals. These procedures were implemented by our Treasurer and our Assistant Treasurer without exception.

I hope that you will find this acceptable. I look forward to hearing from you regarding this issues and any additional information you may wish us to provide or pursue.

All the best!

Joe Khoury

**JOE KHOURY.....YOUR VOICE FOR VALUES**

TEL 909-343-1998 FAX 909-352-3713

Paid for by KHOURY FOR CONGRESS Campaign Committee, David Davis, Treasurer

# C00329391

**Exhibit I**Attachment 5**S. JOSEPH KHOURY FOR CONGRESS  
CAMPAIGN COMMITTEE**3 of 6

YES! I want to help you win!

Checks should be made payable to the Khoury for Congress Campaign Committee.

Thank you for your generous support

\$25\_\_\_ \$50\_\_\_ \$100\_\_\_ \$250\_\_\_ \$500\_\_\_ \$1000\_\_\_ Other\_\_\_

I can help elect S. Joseph Khoury!

☐ Distribute brochures to my neighbors☐ Help in the telephone campaign☐ Place a sign in my yard☐ Help with transportation☐ Help with direct mail☐ Work in the headquartersPlease make checks payable to:  
**KHOURY FOR CONGRESS**~~XXXXXXXXXXXXXXXXXXXX~~  
~~XXXXXXXXXXXXXXXXXXXX~~  
~~XXXXXXXXXXXXXXXXXXXX~~The following information is necessary for the committee  
to comply with campaign reporting laws:Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
Occupation: \_\_\_\_\_ Employer: \_\_\_\_\_  
Work Phone: \_\_\_\_\_ Home Phone: \_\_\_\_\_  
Signature: \_\_\_\_\_

Paid for by the S. Joseph Khoury for Congress Campaign Committee,

~~XXXXXXXXXXXXXXXXXXXX~~, Treasurer  
~~XXXXXXXXXXXXXXXXXXXX~~

Federal Election Laws permit only United States permanent residents and United States citizens to contribute to a Congressional campaign. The limit is \$1000.00 per person per election. Contributions are not tax deductible as charitable donations. The funds contributed must be your own. Corporate checks are NOT accepted.

Attachment 5

4 of 6

**Please Note:**

**KHOURY FOR CONGRESS**  
**P.O. BOX 1217 81598**  
**RIVERSIDE, CA 92517**

# EXHIBIT I (Cont'd)

**Exhibit II**

Attachment 5

5 of 6

**KHOURY FOR CONGRESS  
CAMPAIGN COMMITTEE**

YES! I want to help you win!

Checks should be made payable to Khoury for Congress Campaign Committee.

Thank you for your generous support

\$100\_\_ \$250\_\_ \$500\_\_ \$1000\_\_ Other 25 CAS

The following information is necessary for the committee  
to comply with campaign reporting laws:

Name: Pranav A. HARB  
Address: 12839 LAKE AVE  
City: Palo Alto State: CA Zip: 94302  
Occupation: \_\_\_\_\_ Employer: Google  
Work Phone: 5290634 Home \_\_\_\_\_  
Phone: 228-8153  
Signature: \_\_\_\_\_

Please Note:

Federal Election laws Permit only United States permanent residents and United States citizens to contribute to a Congressional campaign. The limit is \$1000.00 per person per election. Contributions are not tax deductible as charitable donations. The funds contributed must be your own. Corporate checks are NOT accepted.

Paid for by the Joe Khoury for Congress Campaign Committee, David Davis, Treasurer

#C00329391

PO Box 51598 Riverside, CA 92517 Tel 909-343-1998 Fax 909-352-3713

**Exhibit III****Attachment 5**  
**6086****KHOURY FOR CONGRESS**

P.O. BOX 51598  
RIVERSIDE, CALIFORNIA 92517

Mr. Timothy Edmond  
22125 Gavilan Road  
Perris, CA 92370

December 30, 1997

Khoury for Congress-43<sup>rd</sup> District

Dear Timothy,

Thank you for your contribution to the Khoury for Congress campaign. Federal law requires that we report the name, mailing address, occupation and name of employer for each contributor. I would be very grateful if you would please provide the following information so that we may complete our records:

Name of Employer:

SELF-EMPLOYED

Occupation:

REAL ESTATE INVESTOR

I have enclosed a return envelope for your convenience. If you have any questions, please call the campaign headquarters at 909/343-1998!

Very truly yours,

*David L. Davis*  
David L. Davis

Kk/cc: Dr. Sarkis Joseph Khoury

**JOE KHOURY.....YOUR VOICE FOR VALUES**

TEL 909-343-1998 FAX 909-352-3713

Paid for by KHOURY FOR CONGRESS Campaign Committee, David Davis, Treasurer

# C00170204

TOTAL P.06