



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.  
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 1085

Date Filmed 1/11/80 Camera No. --- 2

Cameraman SRC

80010172849



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 26, 1979

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Charles V. Eckert, III  
Treasurer  
Santa Barbara County Lincoln Club  
160 North Fairview Avenue, #4  
Goleta, California 93017

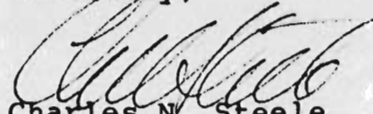
Re: MUR 1085

Dear Mr. Eckert:

This is to confirm receipt of your letter dated November 16, 1979, in connection with the Commission's investigation in the captioned matter. After considering the information you provided along with other information available and after noting the fact that your organization has registered and reported for 1978, the Commission determined, on December 20, 1979, that there was no reasonable cause to believe that your organization, the Santa Barbara County Lincoln Club, violated 2 U.S.C. § 433 and § 434. Accordingly, the Commission has closed its file on this matter.

Should you have any questions, please contact Kevin H. Smith, the attorney assigned to this matter, at (202) 523-4529.

Sincerely,

  
Charles N. Steele  
General Counsel

*KA5*

80010172950

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of  
Santa Barbara County  
Lincoln Club

)  
)  
)  
)

MUR 1085

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on December 19, 1979, the Commission decided by a vote of 5-0 to take the following actions regarding the above-captioned matter:

1. Find NO REASONABLE CAUSE TO BELIEVE that the Santa Barbara County Lincoln Club has violated 2 U.S.C. §433 or 2 U.S.C. §434.
2. Authorize the Office of General Counsel to send the letters attached to the First General Counsel's Report dated December 14, 1979.

Voting for this determination were Commissioners Aikens, Friedersdorf, Harris, McGarry, and Tiernan.

Attest:

12/20/79

Date

*Marjorie W. Emmons*

Marjorie W. Emmons  
Secretary to the Commission

Received in Office of the Commission Secretary: 12-14-79, 11:24  
Circulated on 48 hour vote basis: 12-17-79, 11:00

80040172851

8 7 6 5 4 3 2 1

Thank you.

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION  
1325 K Street, N.W.  
Washington, D.C. 20463

FIRST GENERAL COUNSEL'S REPORT

79 DEC 14 11:24

DATE AND TIME OF TRANSMITTAL  
BY OGC TO THE COMMISSION DEC 14 1979

MUR NO. 1085

STAFF  
MEMBER Kevin Smith

SOURCE: INTERNALLY GENERATED

RESPONDENT'S NAME: Santa Barbara County Lincoln Club

RELEVANT STATUTE: 2 U.S.C. §§ 433 and 434

INTERNAL REPORTS CHECKED: Santa Barbara County Lincoln Club  
Santa Barbara County Republican  
Central Committee

FEDERAL AGENCIES CHECKED: None

I. BACKGROUND/PREVIOUS COMMISSION ACTION

The Santa Barbara County Republican Central Committee [hereinafter "the County Committee"], a registered political committee, reported in its Reports of Receipts and Expenditures for 1978 total contributions of \$3,550.00 from the Santa Barbara County Lincoln Club [hereinafter "the Club"], the respondent herein. A contribution of \$3,250.00 was received on July 24, 1978, and \$300.00 more was received on November 7, 1978.

By letter dated May 23, 1979, the Staff Director advised the treasurer of the Club that it appeared from the County Committee's report that the Club had qualified as a "political committee" under the Act and would have to register as such unless either (1) the Club received refunds from the County Committee of all amounts in excess of \$1,000, or (2) the County Committee transferred all funds in excess of \$1,000 to a non-Federal account.

80010172853



On June 29, 1979, a Mr. Holt telephoned RAD to discuss the matter, stating that the County Committee would transfer the excess funds to a non-Federal account. RAD advised that Mr. Holt should explain this by letter to the Commission and instruct the County Committee to report the transfer on their next report.

Apparently because no written response was received, the Commission, by letter dated August 14, 1979, advised the Club treasurer that it had reason to believe that the Club had violated 2 U.S.C. § 433 and 2 U.S.C. § 434 by failing to register and report as a political committee.

On September 4, 1979, Mr. Holt telephoned RAD acknowledging that the "second notice" (i.e. the RTB letter) had been received and stating that the County Committee had little money in its account. He stated that he had advised the County Committee treasurer to transfer as much money as possible immediately and then to transfer the rest as money came into the County Committee. Mr. Holt asked whether this arrangement would satisfy the Commission and was advised by RAD that since installment reimbursements had never been addressed by the Commission, the County Committee should request an advisory opinion. Mr. Holt indicated that he would not do so if the County Committee raised enough money to complete the transfer.

By letter to the General Counsel dated September 8, 1979, Ms. Hickey, chairperson of the County Committee, requested an advisory opinion on two questions: (1) whether their registration requirement for the Club could be waived since the County Committee had not contributed to any Federal candidates or committees in 1978; and (2) whether the agreed upon transfer of excess funds to a non-Federal account could be made as funds become available, beginning with present funds. The letter stated that there was currently only \$600.00 in the Federal account.

By letter dated September 24, 1979, the General Counsel advised Ms. Hickey that persons requesting an opinion must establish some potential jeopardy of committing a violation themselves in order to satisfy the standing requirement. The General Counsel's letter explained that since the County Committee's request had not set forth facts establishing a basis to conclude that the County Committee may be in violation of the Act as a result of the Club's failure to register as a political committee, the County Committee could not properly obtain an advisory opinion on the questions presented.

80010172854

By letter to the General Counsel dated October 10, 1979, the Club's treasurer requested an advisory opinion which basically sought guidance on how the Club could avoid the registration and reporting requirements both with respect to the 1978 donations to the County Committee and with respect to future activities. On October 16, 1979, RAD telephoned Mr. Holt and advised that since the County Committee's AO request had been denied, the Lincoln Club would have to register unless a refund was made from the County Committee. Mr. Holt advised that the Club had requested an advisory opinion, agreeing with RAD that it would probably also be denied. Mr. Holt further advised that he had told the Club they would probably have to register and report and he expected a Statement of Organization would be forthcoming.

On the next day, the General Counsel advised the Club treasurer, by letter dated October 17, 1979, that his request was denied since a non-registered entity has no standing to request an advisory opinion.

On November 6, 1979, RAD referred this compliance matter to the Office of General Counsel. By letter dated November 16, 1979, the Club treasurer filed a Statement of Organization on behalf of the Club. By the same letter, the Club filed an Annual Report for 1978 which doubled as a termination report. The Statement of Organization indicated that the residual funds (\$127.95) would be transferred to the "Santa Barbara County Lincoln Club State Committee."

## II FACTS

This office has examined the filings of both the County Committee and the Club and has ascertained the following information therefrom:

- (1) The County Committee did not make any expenditures, whether transfers or otherwise, to any Federal candidate or registered committee during 1978.
- (2) The County Committee's expenditures for 1978 were far in excess of the \$3,550.00 in contributions received from the Club in 1978.
- (3) The Club does not appear to have received any contributions prohibited by the Act.

### III. LEGAL ANALYSIS

The Commission's interpretation of the Act and Regulations has been that if a political organization gives more than \$1,000 in a calendar year to an organization registered with the Commission as a "political committee," such donor organization must also register and report as a "political committee." One basis for this interpretation has been that since the registered donee committee is free to use that money to influence a federal election and has necessarily declared its intention to do so with at least some of its funds, it becomes a reasonable assumption that the donor organization made its donation for the purpose of influencing a federal election and the donation was therefore an "expenditure" under 2 U.S.C. § 431(f)(1) and § 431(d).

The two policy grounds which support this interpretation are as follows:

(1) Unless an organization which makes donations to registered committees is itself registered, the public does not receive any information as to the original sources from which the organization received the funds which it then donated to the registered committee; and

(2) Because of (1), above, the Commission has no way of knowing whether the donation was made up of funds prohibited by the Act (e.g., corporate money, union money, foreign money, or money in excess of contribution limits) and whether such prohibited funds had thereby entered federal campaigns.

While these are both very important policy considerations, they do not themselves form the legal basis for the Commission's interpretation. That interpretation instead relies upon the reasonable assumption described above. As reasonable as that assumption is in a majority of cases, however, it is legally a rebuttable presumption at best, i.e. if the Commission were to go to court resting entirely on that presumption, a non-registered respondent could introduce evidence showing that its donations were not made for the purpose of influencing a federal election. In this case, that evidence would be that all of the Club's other activities were strictly in connection with state elections and that the County Committee's activities in 1978 were also restricted to state elections. The Club might well be able to successfully argue that they had no reason to even suspect that the County Committee was registered with the Commission considering the limits of its 1978 activity.



Therefore, even if the Club had not eventually complied with RAD's demand that they register and report, this office is not totally convinced that the Commission could have successfully proved a violation in court.

Whatever may have been the outcome if the Club had refused to register, however, the fact that the Club has done so removes any legitimate justification for the Commission pursuing this matter any further. Their delay in so registering was substantially caused by their inability to obtain the refund or transfer of their excess donation which RAD allowed them as an alternative to registration. That inability was due to the depletion of the County Committee's treasury. Delay was further occasioned by their good faith attempts, although ill-fated, to obtain advisory opinions on the reimbursement issue both on their own and through the County Committee. Furthermore, the 1978 report which they eventually filed clearly shows that no illegal money was used in the donation and also identifies the sources from which their donations were derived. Thus, the dangers which formed the policy rationale for the registration requirement never materialized in this case and any violation which may have arisen out of their prior refusal has been rendered harmless.

It is herefore the opinion of this office that the Commission should take no further action in this matter and should close its file.

#### IV. RECOMMENDATIONS

This office recommends that the Commission:

1. Find no reasonable cause to believe that the Santa Barbara County Lincoln Club has violated 2 U.S.C. § 433 or 2 U.S.C. § 434.
2. Authorize the Office of General Counsel to send the attached letters.

#### Attachments

1. RAD Referral
2. Proposed letter to: Santa Barbara County Lincoln Club

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE 11/6/77

ANALYST Lisa Stolaruk  
Lisa Stolaruk

TO: Office of General Counsel

TEAM CHIEF Bobby Werfel *B. Werfel*

THROUGH STAFF DIRECTOR *ABP.*

COMPLIANCE REVIEW CB/PS

FROM ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

*MT* MUR1085

CANDIDATE COMMITTEE:

Santa Barbara County Lincoln Club

TREASURER:

Charles V. Eckert, III

ADDRESS:

290 La Arcada Court  
Santa Barbara, CA 93101

AFFILIATE(S)

ALLEGATION(S)

CITE:

Unregistered Political Committee 2 U.S.C. 433 & 434

ATTACHMENT(S)

DATE INITIATED: 5/23/79

MANNER IN WHICH REVIEW WAS INITIATED:

☒ Normal review ☐ Other:  
☐ Special Project:

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM \_\_\_\_\_ TO \_\_\_\_\_

TOTAL RECEIPTS \$ \_\_\_\_\_ TOTAL EXPENDITURES \$ \_\_\_\_\_

CASH ON HAND \$ \_\_\_\_\_ DEBTS \$ \_\_\_\_\_

HISTORY

RESULTS OF REVIEW

ATTACHMENT

3SV1/79-37, 5/23/79

1

3SV2/79-37, 8/14/79 (for no response)

2

NOTE: It is not known whether Santa Barbara Co. Lincoln Club contains funds prohibited under the FECA but allowed under California law.

COMMUNICATIONS WITH CANDIDATE/COMMITTEE

ATTACHMENT

Telecon: Stolaruk with Holt, 6/29/79

3

Telecon: Stolaruk with Holt, 9/4/79

4

Telecon: Stolaruk with Holt, 9/14/79

5

Telecon: Stolaruk with Holt, 10/16/79

6

REASON(S) FOR REFERRAL:

ATTACHMENT

No response to 3SV2/79-37

7

OTHER PENDING ACTIONS INITIATED BY RAD

ATTACHMENT

None

OTHER RELEVANT INFORMATION:

Request for Advisory Opinion, 9/8/79 (from recipient committee)

8

General Counsel letter responding to AOR of 9/8/79, 9/24/79

9

~~xxxxxx OGC/AUDIT REFERRALS FROM RAD~~

Request for Advisory Opinion, 10/10/79 (from contributing committee)

10

General Counsel letter responding to AOR of 10/10/79, 10/17/79

11

NO PREVIOUS AUDIT/OGC REFERRALS FROM RAD

(ATTACHMENT 1)

Wapfel

11

October 17, 1979

Charles V. Eckert, III  
160 N. Fairview Avenue, Suite 4  
Goleta, California 93017

Dear Mr. Eckert:

This refers to your letter of October 10, 1979, requesting an advisory opinion on behalf of the Santa Barbara County Lincoln Club concerning application of the Federal Election Campaign Act of 1971, as amended ("the Act").

Your letter explains that the Santa Barbara County Lincoln Club does not wish to be regarded as a "political committee" under the Act. However, the club has made transfers exceeding \$1,000 in a calendar year to the Santa Barbara County Republican Central Committee which is a "political committee" under the Act.

In view of the provisions in 2 U.S.C. §437f regarding advisory opinions, it is not appropriate for the Commission or its staff to issue an advisory opinion in response to your request unless the Lincoln Club is a "political committee" under the Act. Furthermore, even if an advisory opinion were appropriate a recent Commission policy decision precludes the issuance of advisory opinions with respect to past factual situations. An advisory opinion could be issued to a registered political committee concerning prospective conduct which involves a specific factual situation.

I regret that the advisory opinion procedure may not be used in the situation you describe. I am enclosing, for your information, copies of past advisory opinions which appear relevant to the circumstances you have described.

Sincerely yours,

William C. Oldaker  
General Counsel

Enclosures (AOs 1978-91, 1979-14)

✓ bcc: Tom Haselhorst

NBLitchfield:bwl:10/16/79

TELEX

DATE: 10/16/79

TIME: 2:35

COMMITTEE: Santa Barbara County Lincoln Club

PERSON SPOKEN TO: Jerry Holt

FEC'R: Lisa Stolaruk

SUBJECT: M letter

Since the committee's request for an Advisory Opinion was denied by the Commission, I called Mr. Holt to tell him that, barring a refund from the Central Committee, the Lincoln Club would have to register. He said that the members of the Lincoln Club apparently drafted a second AOR, this time from the perspective of the Lincoln Club rather than the registered entity, the Central Committee. I said that I was pretty sure that the Commission would also deny this request, not only because it ~~deals~~ deals with a situation that has already occurred, but because the Lincoln Club, not being registered, does not have legal standing to request an AO. J.N. said that he knew this wouldn't work and told the committee that they would surely have to register and report anyway. He said that the Statemnt of Organization should be forthcoming:

80010172861



CHARLES V. ECKERT, III

160 N. Fairview Avenue, Suite 4  
Goleta, California 93017  
(805) 984-4761

RECEIVED  
FEDERAL ELECTION  
COMMISSION

OCT 15 PM 12:55

October 10, 1979

Federal Election Commission  
1325 "K" Street, N.W.  
Washington, D.C. 20463

Attn: William C. Oldaker,  
General Counsel

RE: SANTA BARBARA COUNTY LINCOLN CLUB  
YOUR FILE NO. 3SV2/79-37

Dear Sir:

The Federal Election Commission's letter of May 23, 1979, written by Orlando B. Potter, the Commission letter of August 14, 1979, written by Thomas E. Harris, Santa Barbara County Republican Central letter of September 8, 1979, written by Martha L. Hickey and your letter of September 24, 1979, addressed to Martha L. Hickey, have all just recently come to my attention, even though I am the treasurer of the Santa Barbara County Lincoln Club.

Apparently, unbeknown to us, the Santa Barbara Lincoln Club did become a "political committee" for federal reporting purposes, by virtue of contributions made to the Santa Barbara County Republican Central Committee in 1978, in the total sum of \$3,550.00.

The Santa Barbara County Lincoln Club does not wish to constitute itself as a "political committee" for federal reporting purposes.

In the letter of May 23, 1979, Orlando B. Potter advised as follows:

"As an alternative [to federal reporting] political committees to which you made contributions may transfer all or part of the contributions to accounts which are not used to influence federal elections. Refunds or transfers must be paid in such amounts that the total remaining contributions made by you do not exceed \$1,000.00 during a calendar year."

RECEIVED  
OFFICE OF THE  
GENERAL COUNSEL

October 10, 1979

As pointed out in Mrs. Hickey's letter of September 8, 1979, the amount necessary to be so transferred or re-funded is \$2,551.00.

An advisory opinion is requested in two respects, namely:

1. If the Santa Barbara County Republican Central Committee writes us a check for \$2,551.00, will that "clear" the matter hereinabove discussed, so as to eliminate any question of violation and/or penalty?
2. If, in the future, Santa Barbara County Lincoln Club makes contributions to the Santa Barbara County Republican Central Committee in the sum of \$1,000.00 or more during any year, if all contributions above \$999.00 are "ear marked" for use in non-federal elections, will the Santa Barbara County Lincoln Club thereby avoid being a "political committee" for federal reporting purposes?

As an aside, but for purposes of our future guidance, if the Santa Barbara County Lincoln Club contributes more than \$1,000.00 in any one year to the Santa Barbara County Central Committee, without "ear marking", if, during that year, the Santa Barbara County Central Committee makes no contributions to any candidate for federal office, does the Santa Barbara County Lincoln Club thereby avoid being a "political committee" for federal reporting purposes?

Appreciating your kind attention to this matter, and assuring you that we wish to fully comply, as promptly as possible, as soon as we find out how we can do it, I am,

Sincerely yours,

By

*Chas. V. Eckert, III*

CHAS. V. ECKERT, III

CVE:mro

cc: Martha Hickey

September 24, 1979

Ms. Martha L. Hickey, Chairman  
Santa Barbara Republican Central Committee  
290 LaArcada Court  
Santa Barbara, California 93101

Dear Ms. Hickey:

This refers to your letter of September 8, 1979, requesting an advisory opinion concerning application of the Federal Election Campaign Act of 1971, as amended ("the Act"), and Commission regulations.

Under the Act and regulations, advisory opinion requests must present an issue concerning application of the Act to a specific factual situation that involves the requesting person. 2 U.S.C. §437f. The cited section enables the requestor to act and rely upon the opinion "in good faith" without being "subject to any sanction provided by" the Act. 2 U.S.C. §437f(b); see also 11 CFR 112.1, 112.5. This "good faith" reliance protection means that persons requesting an opinion must establish some potential jeopardy of committing a violation themselves in order to satisfy the standing requirement.

The situation presented in your request raises an issue regarding application of the Act's registration and reporting requirements to the Santa Barbara County Lincoln Club rather than to your committee, the Santa Barbara Republican Central Committee. Although you may be interested in how the Lincoln Club can avoid coming within the Act, you do not set forth any facts establishing a basis for us to conclude that your committee may be in violation of the Act as the direct result of the Lincoln Club's failure to register as a political committee. Thus, you cannot properly obtain an advisory opinion concerning application of the Act or Commission regulations to your committee in the factual situation as presented.

The party which has a direct interest, and may be in violation of the Act by virtue of the factual situation you describe, is the Lincoln Club. Since the Act limits advisory



opinion standing to political committees (and Federal officeholders or candidates for elective Federal office), the Lincoln Club would not have standing to request an opinion unless it registers as a political committee. The Act further provides that no other opinion of "an advisory nature" may be issued by the Commission or its staff.

Should you have any further questions on the advisory opinion procedures, please contact N. Bradley Litchfield, an Assistant General Counsel on my staff, at 202-532-4039.

Sincerely yours,

/s/

William C. Oldaker  
General Counsel

bcc: Lisa Stolarak

NBlitchfield:bwl:9/20/79  
GROSS

9/20/79  
GR 9/20/79

DATE: 9/14/79

TIME: 1:30

COMMITTEE: Santa Barbara County Lincoln Club

PERSON SPOKEN TO: Jerry Holt (805)968-3511

FROM: Lisa Stolaruk

SUBJECT: M letter

I called Mr. Holt this afternoon to find out whether or not he had drafted an AOR, and when he planned to send it. He said that he wrote it last Friday (a week ago today) and gave it to the committee secretary to type. He gave instructions to send ~~the~~ OGC's copy certified, and to send ~~it~~ my copy by regular mail. He said that we should receive both soon.

He told me that he addressed two questions to the Commission:

- 1) Whether the committee was eligible for a waiver of reporting requirements
- 2) Whether the committee could refund the excessive contribution by way of an installment plan.

80010172866



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CC

8001132  
~~8001132~~ 8  
SANTA BARBARA COUNTY  
REPUBLICAN CENTRAL COMMITTEE 01 4172

290 LA ARCADE COURT  
SANTA BARBARA, CALIFORNIA 93101  
(805) 966-7920

ID # C00045195

CERTIFIED MAIL

September 8, 1979

Federal Election Commission  
Office of General Council  
Attention William Oldaker  
Washington, D.C. 20463

Dear Mr. Oldaker:

Request for Advisory Opinion

We are writing this letter in order to clear up a problem that has arisen for one of our donors, The Santa Barbara County Lincoln Club.

80010172837  
The Santa Barbara County Lincoln Club has received two letters from the Federal Election Commission recently, 3 SV1/79-37 and 3 SV2/79-37. These letters indicated that, since the Lincoln Club donated over one thousand dollars, (\$1,000) to us in 1978, the Lincoln Club itself must be considered a Federal Political Committee.

The Lincoln Club has only been reporting as a State of California political committee and does not wish to be considered a federal political committee at this time. Therefore, we agreed with the Lincoln Club that we should transfer an amount of money from our federal account to our state account sufficient to bring their total donation for 1978 below one thousand dollars. At this point in time there is not enough money in our federal account to transfer the necessary fund. The necessary amount is \$2,551.00. The amount in the account is approximately \$600.00.

After discussing this problem with Lisa Stolaruk, reports analyst with your office, she advised us that we should request an advisory opinion from your office.

Our request is two-fold: 1st, Since our committee did not contribute to any federal candidate or committee in 1978, is it possible that the reports of the Lincoln Club could be waived? 2nd, If not, is it possible that the transfer of the necessary funds could be made as the funds are available over the next few months, beginning with our present funds?

September 3, 1979

Please notify us of your decision so that we may take any necessary action.

Sincerely,

*Martha L. Hickey*

Martha L. Hickey  
Chairperson  
Santa Barbara County  
Republican Central Committee

✓cc: Lisa Stolaruk

80040172859

DATE: 9/4/79

TIME: 2:00

COMMITTEE: Santa Barbara County Lincoln Club

PERSON SPOKEN TO: Jerry Holt (805)968-3511

FEC'R: Lisa Stolaruk

SUBJECT: M letter

I spoke with J.H. a few months ago about an M letter sent to the above committee. He said that the registered committee ~~and and~~ had agreed to transfer the amount in excess of \$1,000 to a committee maintained for state and local activity. J.H. contacted the treasurer of the unregistered committee, told her what to do, and assumed that she had followed his instructions. However, the matter was never taken care of, and J.H. received a second notice. The problem now is that the registered committee has very little money in the ~~account~~ account. J.H. instructed the treasurer to transfer as much as possible immediately, and then to transfer little by little as the money comes in. J.H. wanted to know if this would satisfy the Commission. Since paying by installments has not been addressed by the Commission in the past, I ~~recommended~~ recommended that he request an Advisory Opinion. He said that if the committee raised enough money to transfer the full amount, that he would not request an AO. He said that he would know more about the financial situation of the registered committee by the end of the week. I asked him to send me a copy of the AOR, along with the correspondence that was sent between the two committees regarding the excessive contribution (he offered to send the latter documentation ~~via~~ voluntarily).



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 14, 1979

Treasurer

Santa Barbara County Lincoln Club  
290 La Arcada Court  
Santa Barbara, CA 93101

Dear Treasurer:

On May 23, 1979, you were notified that you may have made contributions to a political committee which raised problems under 2 U.S.C. 433 and 434.

As of this date, however, we have received no response from you. Your failure to respond gives the Commission reason to believe that you may have committed a violation of 2 U.S.C. 433 and 434.

The Commission will take no action against you until you have had a reasonable opportunity to respond to this letter. This response should be mailed to the Commission within fifteen (15) days from the date of this letter.

If you have responded to the above or you require additional information, please contact Lisa Stolaruk, our Reports Analyst assigned to you on our toll free number (800)424-9530. Our local number is (202) 357-0023.

Sincerely,

Thomas E. Harris

Commissioner

Certified Mail:  
Return Receipt Requested

80040172870



3502/79-37

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

1. The following service is requested (check one).  
☐ Show to whom and date delivered.  
☐ Show to whom, date, and address of delivery.  
☐ RESTRICTED DELIVERY  
 Show to whom and date delivered.  
☐ RESTRICTED DELIVERY  
 Show to whom, date, and address of delivery. \$  
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:  
 Santa Barbara City  
 Lincoln Club

3. ARTICLE DESCRIPTION:  
 REGISTERED NO. CERTIFIED NO. INSURED NO.  
 9613443

(Always obtain signature of addressee or agent)

I have received the article described above.  
 SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY  
 X *Cliff H. Pardo*

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS  
 RM

8/14

☆GPO 1977-0-249-595

3501/79-3

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

1. The following service is requested (check one).  
☐ Show to whom and date delivered.  
☐ Show to whom, date, and address of delivery.  
☐ RESTRICTED DELIVERY  
 Show to whom and date delivered.  
☐ RESTRICTED DELIVERY  
 Show to whom, date, and address of delivery. \$  
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:  
 Santa Barbara City Lincoln

3. ARTICLE DESCRIPTION:  
 REGISTERED NO. CERTIFIED NO. INSURED NO.  
 943779

(Always obtain signature of addressee or agent)

I have received the article described above.  
 SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY  
*Wanda Brington*  
 6-12-79

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS  
 RM

5/23

☆GPO 1977-0-249-595

1 2 6 2 2 1 0 0 0 8



DATE: 6/29/79

TIME: 12:00

COMMITTEE: Santa Barbara County Lincoln Club

PERSON SPOKEN TO: Gerry Holt (805) 968-3511

FEC'R: Lisa Stolaruk

SUBJECT: M letter

The above committee received an M letter for contributing in excess of \$1,000 to the Santa Barbara County Republican Central Committee. MR. Holt called to say that the registered committee will transfer the amount over \$1,000 into their state/local account. I told Mr. Holt to write a letter to the Commission as soon as possible, explaining what will be done, and to instruct the registered committee to report the transfer on their next report.

800010172872



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 23, 1979

Treasurer  
Santa Barbara County Lincoln Club  
290 La Arcada Court  
Santa Barbara, California 93101

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting committees who wish to comply with the Federal Election Campaign Act. Our review of the receipts reported by Santa Barbara County Republican Central Committee indicates that your organization may have made contributions which total in excess of \$1,000 during the calendar year. Enclosed is a copy(s) of the report(s) in which your contribution(s) is listed.

The Act defines "political committee" to mean any organization, or other group of persons which receives contributions or makes expenditures (which includes contributions to Federal candidates and committees supporting Federal candidates), aggregating in excess of \$1,000 during a calendar year. It would appear that your organization may qualify as a "political committee" subject to registration, reporting, and contribution limitation requirements of the Act.

If you agree that your organization is a political committee, please submit a Statement of Organization on FEC Form 1, in accordance with 2 U.S.C. 433. In addition, your committee will be required to file disclosure reports in accordance with 2 U.S.C. 434 on FEC Form 3.

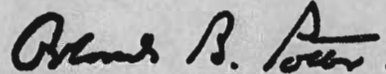
If you agree that your organization has made contributions or expenditures which qualify you as a "political committee", but you do not wish to be considered as a "political committee", you must request refund(s) from the candidate(s) and/or political committee(s) to which you have contributed. As an alternative, political committees to which you made contributions may transfer all or part of the contributions to accounts which are not used to influence Federal elections. Refunds or transfers must be made in such amounts that the total remaining contributions made by you do not exceed \$1,000 during a calendar year.

If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement which would clarify this matter for the public record. We have also enclosed relevant informational materials and forms for the registration of and reporting by the political committee. Please examine the enclosed materials.

80040172873

Please notify the Commission within thirty (30) days from the date on this letter of your decision on this matter. If you have any questions, please contact Lisa Stolaruk, in our Reports Analysis Division at (800) 424-9530. Our local number is (202) 357-0023.

Sincerely,



Orlando B. Potter  
Staff Director

Enclosure  
Certified Mail:  
Return Receipts Requested

80010172974

ITEMIZED RECEIPTS

Contributions, Transfers, Contributions In  
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a  
of FEC FORM 3

Line Number 15(b)

Use Separate Schedules for  
each numbered line)

Name of Candidate or Committee in Full

SANTA BARBARA COUNTY REPUBLICAN CENTRAL COMMITTEE

Full Name, Mailing Address and ZIP Code

SANTA BARBARA COUNTY  
LINCOLN CLUB  
290 LA ARCADE CT.  
SANTA BARBARA, CA 93101

Principal Place of Business

ID # 781853

Occupation

Date (month,  
day, year)

7/24/78

Amount of each Receipt  
this Period

3,250.00

Receipt for

☐ Primary ☐ General ☒ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$ 3,250.00

Full Name, Mailing Address and ZIP Code

REPUBLICAN STATE  
CENTRAL COMMITTEE  
2000 RIVERSIDE DR.  
LOS ANGELES, CA. 90039

Principal Place of Business

ID # 741463

Occupation

Date (month,  
day, year)

9/13/78

Amount of each Receipt  
this Period

200.00

Receipt for

☐ Primary ☐ General ☒ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$ 200.00

Full Name, Mailing Address and ZIP Code

COMMITTEE TO ELECT  
DEWAYNE HOLMBAHL  
221 LA ARCADE CT.  
SANTA BARBARA, CA. 93101

Principal Place of Business

ID # 781115

Occupation

Date (month,  
day, year)

9/13/78

Amount of each Receipt  
this Period

28.09

Receipt for

☐ Primary ☐ General ☒ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$ 28.09

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,  
day, year)

Amount of each Receipt  
this Period

Receipt for

☐ Primary ☐ General ☒ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,  
day, year)

Amount of each Receipt  
this Period

Receipt for

☐ Primary ☐ General ☒ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,  
day, year)

Amount of each Receipt  
this Period

Receipt for

☐ Primary ☐ General ☒ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,  
day, year)

Amount of each Receipt  
this Period

Receipt for

☐ Primary ☐ General ☒ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

SUBTOTAL of receipts this page (optional)

\$

TOTAL this period (last page this line number only)

\$ 3,478.09

7803089532



# ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,  
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a  
of FEC FORM 3

for  
Line Number 14(a)  
(Use Separate Schedules for  
each numbered line)

Name of Candidate or Committee in Full

SANTA BARBARA COUNTY REPUBLICAN CENTRAL COMMITTEE

Full Name, Mailing Address and ZIP Code

CARPINTERIA VALLEY REPUBLICAN  
WOMEN'S CLUB  
5522 CALLE OCHO  
CARPINTERIA, CA. 93013

Principal Place of Business

WOMEN'S CLUB

Occupation

Date (month,  
day, year)

4/12/78

Amount of each Receipt  
this Period

200.00

Receipt for:

☐ Primary ☒ General ☒ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date ... \$ 450.00

Full Name, Mailing Address and ZIP Code

SANTA BARBARA COUNTY  
LINCOLN CLUB  
290 LA ARCAHA CT.  
SANTA BARBARA, CA. 93101

Principal Place of Business

STATE RD 781853  
COUNTY CLUB

Occupation

Date (month,  
day, year)

4/2/78

Amount of each Receipt  
this Period

300.00

Receipt for:

☐ Primary ☐ General ☒ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date ... \$ 3,550.00

Full Name, Mailing Address and ZIP Code

MONTGOMERY REPUBLICAN  
WOMEN'S CLUB  
1556 SAN LEANDRO LANE  
SANTA BARBARA, CA. 93108

Principal Place of Business

WOMEN'S CLUB

Occupation

Date (month,  
day, year)

11/3/78

Amount of each Receipt  
this Period

500.00

Receipt for:

☐ Primary ☐ General ☒ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date ... \$ 550.00

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,  
day, year)

Amount of each Receipt  
this Period

Receipt for:

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date ... \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,  
day, year)

Amount of each Receipt  
this Period

Receipt for:

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date ... \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,  
day, year)

Amount of each Receipt  
this Period

Receipt for:

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date ... \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,  
day, year)

Amount of each Receipt  
this Period

Receipt for:

☐ Primary ☐ General ☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date ... \$

SUBTOTAL of receipts this page (optional) . . . . .

\$

TOTAL this period (last page this line number only) . . . . .

\$ 1,000.00





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Charles V. Eckert, III  
Treasurer  
Santa Barbara County Lincoln Club  
160 North Fairview Avenue, #4  
Goleta, California 93017

Re: MUR 1085

Dear Mr. Eckert:

This is to confirm receipt of your letter dated November 16, 1979, in connection with the Commission's investigation in the captioned matter. After considering the information you provided along with other information available and after noting the fact that your organization has registered and reported for 1978, the Commission determined, on , 1979, that there was no reasonable cause to believe that your organization, the Santa Barbara County Lincoln Club, violated 2 U.S.C. § 433 and § 434. Accordingly, the Commission has closed its file on this matter.

Should you have any questions, please contact Kevin H. Smith, the attorney assigned to this matter, at (202) 523-4529.

Sincerely,

Charles N. Steele  
Acting General Counsel

(ATTACHMENT 2)

80040173977

REPORTS ANALYSIS REFERRAL UPDATE

\*ORIGIN: RAD

DATE 11-23-79

ANALYST Lisa Stolaruk

TO: Office of General Counsel  
ATTENTION: Ken Smith

TEAM CHIEF Bobby Werfel

THROUGH: STAFF DIRECTOR JR

COMPLIANCE REVIEW CB

FROM ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

MUR No. 1085

DATE OF ORIGINAL REFERRAL 11/6/79

re: Santa Barbara County Lincoln Club

\*\*PURPOSE: Information

Please find attached the Statement of Organization and Report of Receipts and Expenditures for calendar year 1978 submitted by the Santa Barbara County Lincoln Club.

OUTCOME: (if applicable)

\*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).  
\*\*INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

8001017283

**CHARLES V. ECKERT, III**

180 N. Fairview Avenue, Suite 4  
Goleta, California 93017  
(805) 984-4761

RECEIVED  
FEDERAL ELECTION  
COMMISSION

NOV 20 PM 12 26

November 16, 1979

Federal Election Commission  
1325 "K" Street, N.W.  
Washington, D.C. 20463

Attn: Lisa Stolaruk

Dear Madam:

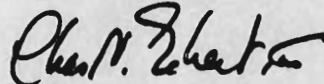
This refers to your file number 3SV2/79-37.

Enclosed herewith is a copy of our "opening" and "closing" report for the Santa Barbara County Lincoln Club.

Please close your file on this matter, resting assured that the Federal Government, through the Federal Election Commission, is enjoying some success in discouraging citizen participation in the electoral process.

Very sincerely yours,

By



CHAS. V. ECKERT, III  
Treasurer of Santa Barbara  
County Lincoln Club

CVE:mro

Enc.

cc: Santa Barbara County  
Lincoln Club

800010172877

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).







# Statement of Organization For a Committee

(Page 3)

Name of Committee  
**SANTA BARBARA COUNTY LINCOLN CLUB**

11 List by name, address and position, other principal officers of the committee (include chairman, treasurer, secretary, assistant treasurer, assistant secretary, members of finance committee):

Full name	Mailing address and ZIP code	Title or position
GEORGE CASTAGNOLA	900 JIMENO RD, S.B. CA 93103	CHAIRMAN
THEODORE ROCHG, JR.	1550 BOLETO DR. S.B. CA. 93108	VICE-CHAIRMAN
CHAS V. GCKERT III	160 N. FAIRVIEW, GOLETA CA 93017	TREASURER
JERRY R. HOLT	517 E. CALLE LAURELES S.B. FA 93105	SECRETARY

12 Does this committee plan to stay in existence beyond the current calendar year? ..... ☐ Yes ☒ No  
If "Yes" for how long? .....

13 In the event of dissolution, what disposition will be made of residual funds? **TRANSFER TO SANTA BARBARA COUNTY LINCOLN CLUB STATE COMMITTEE.**

14 List all banks or other repositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds:

Name of bank, repository, etc.	Mailing address and ZIP code
BARCLAYS BANK OF CAL 02029-34957	960 CHAPALA ST. SANTA BARBARA, CA. 93101

15 List all election reports required to be filed by this committee with States and local jurisdictions, together with the names, addresses, and positions of the recipients of the reports (other than reports filed with Secretaries of State pursuant to USC 439(a)):

Report title	Dates required	Name and position of recipient	Mailing address and ZIP code

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

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

(Signature of Treasurer)

(Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. § 437g or § 441j (see instructions)

For further  
information  
contact:

Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

REPORT OF RECEIPTS AND EXPENDITURES  
FOR A CANDIDATE OR COMMITTEE  
SUPPORTING CANDIDATE(S) FOR  
NOMINATION OR ELECTION TO FEDERAL OFFICE  
(Except for Candidates or Committees Receiving Federal Matching Funds)

RECEIVED  
FEDERAL ELECTION  
COMMISSION

79 NOV 20 P 1: 16

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1. SANTA BARBARA COUNTY LINCOLN CLUB

Name of Candidate or Committee (in full)

290 LA ARCADE CT.

Address (number and street)

SANTA BARBARA, CA 93101

City, State and ZIP Code

☐ Check if address is different than previously reported.

2 I.D. No. \_\_\_\_\_

Candidate/Committee

3

Office Sought, State/District (if applicable)

Year of Election 1978

4 Type of Report (check appropriate boxes)

☐ April 10 Quarterly Report

☐ Tenth day report preceding \_\_\_\_\_ election  
(primary, general or convention)

☒ Termination Report

☐ July 10 Quarterly Report

on \_\_\_\_\_ in the State of \_\_\_\_\_  
(date)

☐ Amendment for \_\_\_\_\_

☐ October 10 Quarterly Report

☐ Thirtieth day report following \_\_\_\_\_ election  
(primary, general or convention)

(which report)

☒ January 31 Annual Report

☐ Monthly Report \_\_\_\_\_ on \_\_\_\_\_ in the State of \_\_\_\_\_  
(month) (date)

This is a report for

☒ Primary Election

☒ General Election

☐ Primary and General

☐ Other (special, runoff, etc.)

SUMMARY OF RECEIPTS AND EXPENDITURES

(Figures may be rounded to nearest dollar.)

5 Covering Period	Column A This Period	Column B Calendar Year-To-Date
<u>1/1/78</u> Through <u>12/31/78</u>		
6 Cash on hand January 1, 19		\$ <u>0 -</u>
7 Cash on hand at beginning of reporting period	\$ <u>0 -</u>	
8 Total receipts (from line 19)	\$ <u>7,700.00</u>	\$ <u>7,700.00</u>
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ <u>7,700.00</u>	\$ <u>7,700.00</u>
9 Total expenditures (from line 25)	\$ <u>7,572.05</u>	\$ <u>7,572.05</u>
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ <u>127.95</u>	\$ <u>127.95</u>
11 Value of contributed items on hand to be liquidated (Attach itemized list)	\$ _____	
12 Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C)	\$ _____	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)	\$ _____	

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

(Date)

(Typed Name of Treasurer or Candidate)

(Signature of Treasurer or Candidate)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g, or Section 441j (see reverse side of form).

For further  
information,  
Contact:

Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

or call 800/424-9530

Approved by GAO  
B-187620 (R0506)  
Expires 3-31-81

All previous versions of FEC FORM 3 are obsolete and should no longer be used.

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

**DETAILED SUMMARY OF RECEIPTS AND EXPENDITURES**  
(Page 2, FEC FORM 3)

<b>NAME OF CANDIDATE OR COMMITTEE</b> SANTA BARBARA COUNTY LINCOLN CLUB		<b>REPORT COVERING THE PERIOD</b> FROM: 1/1/78 TO: 12/31/78	
<b>RECEIPTS</b>		<b>Column A This Period</b>	<b>Column B Calendar Year-To-Date</b>
14. Contributions from Individuals (including contributions in-kind):			
(a) Itemized (use Schedule A) . . . . .		\$ 7,700.00	
(b) Unitemized . . . . .		\$	
(c) Sales and collections included above:			
List by event on memo Schedule D (\$ _____ )			
(d) Subtotal of contributions from individuals . . . . .		\$ 7,700.00	\$ 7,700.00
15. Transfers from Political Committees:			
(a) Funds from affiliated/authorized committee (itemize on Schedule A regardless of amount) . . . . .		\$	
(b) Funds from other committees (itemize on Schedule A regardless of amount) . . . . .		\$	
(c) Contributions in-kind from political committees (itemize on Schedule A regardless of amount) . . . . .		\$	
(d) Subtotal of transfers in and contributions in-kind from political committees . . . . .		\$	\$
16. Other Income:			
(a) Itemized (use Schedule A) . . . . .		\$	
(b) Unitemized . . . . .		\$	
(c) Subtotal of other income . . . . .		\$	\$
17. Loans and Loan Repayments Received:			
(a) Itemized (use Schedule A) . . . . .		\$	
(b) Unitemized . . . . .		\$	
(c) Subtotal of loans and loan repayments received . . . . .		\$	\$
18. Refunds, Rebates, Returns of Deposits:			
(a) Itemized (use Schedule A) . . . . .		\$	
(b) Unitemized . . . . .		\$	
(c) Subtotal of refunds, rebates, returns of deposits . . . . .		\$	\$
19. Total Receipts . . . . .		\$ 7,700.00	\$ 7,700.00
<b>EXPENDITURES</b>			
20. Operating Expenditures:			
(a) Itemized (use Schedule B) . . . . .		\$ 22.05	
(b) Unitemized . . . . .		\$	
(c) Subtotal of operating expenditures . . . . .		\$ 22.05	\$ 22.05
21. Loans, Loan Repayments, and Contribution Refunds Made:			
(a) Itemized (use Schedule B) . . . . .		\$	
(b) Unitemized . . . . .		\$	
(c) Subtotal of loans and loan repayments made and contribution refunds . . . . .		\$	\$
22. Transfers Out to Political Committees:			
(a) To affiliated/authorized committee (itemize on Schedule B regardless of amount) . . . . .		\$	
(b) To other committees (itemize on Schedule B regardless of amount) . . . . .		\$ 7,550.00	
(c) Contributions in-kind to other committees (itemize on Schedule B regardless of amount) . . . . .		\$	
(d) Subtotal of transfers out . . . . .		\$ 7,550.00	\$ 7,550.00
23. Independent Expenditures (use Schedule E) . . . . .		\$	\$
24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d)) (itemize on Schedule F) . . . . .		\$	\$
25. Total Expenditures . . . . .		\$ 7,572.05	\$ 7,572.05
<b>RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES</b>			
26. Total Receipts (from line 19) . . . . .		\$	
27. Transfers In (from line 15(a)) . . . . .		\$	
28. Net Receipts (Subtract line 27 from line 26) . . . . .		\$	
29. Total Expenditures (from line 25) . . . . .		\$	
30. Transfers Out (from line 22(a)) . . . . .		\$	
31. Net Expenditures (Subtract line 30 from line 29) . . . . .		\$	



**ITEMIZED RECEIPTS**

(Contributions, Transfers, Contribution In-Kind  
 Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a  
 of FEC FORM 3

Page 1 of 4 for  
 Line Number 149.

(Use Separate Schedules for  
 each numbered line)

Name of Candidate or Committee in Full			
<b>SANTA BARBARA COUNTY LINCOLN CLUB</b>			
Full Name, Mailing Address and ZIP Code <b>GEORGE V. CASTAGNOLA</b> <b>900 JIMENO RD.</b> <b>SANTA BARBARA, CA 93103</b>	Principal Place of Business <b>RETIRED</b> Occupation	Date (month, day, year) <b>5/22/78</b>	Amount of each Receipt this Period <b>300.00</b>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ <b>300.00</b>		
Full Name, Mailing Address and ZIP Code <b>W. F. LUTON</b> <b>DRAWER X</b> <b>SANTA BARBARA, CA 93102</b>	Principal Place of Business <b>KEYT</b> <b>730 MIRAMONTE DR.</b> <b>SANTA BARBARA, CA.</b> Occupation <b>EXECUTIVE</b>	Date (month, day, year) <b>5/22/78</b>	Amount of each Receipt this Period <b>300.00</b>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ <b>300.00</b>		
Full Name, Mailing Address and ZIP Code <b>CHAS V. ECKERT III</b> <b>160 N. FAIRVIEW</b> <b>GOLGTA, CA. 93107</b>	Principal Place of Business <b>SAME</b> Occupation <b>LAWYER</b>	Date (month, day, year) <b>5/22/78</b>	Amount of each Receipt this Period <b>300.00</b>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other	<input checked="" type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ <b>300.00</b>		
Full Name, Mailing Address and ZIP Code <b>E. W. KOONCE</b> <b>802 E. CALLE LAURELES</b> <b>SANTA BARBARA, CA. 93105</b>	Principal Place of Business <b>RETIRED</b> Occupation <b>RANCHER</b>	Date (month, day, year) <b>5/22/78</b>	Amount of each Receipt this Period <b>300.00</b>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ <b>300.00</b>		
Full Name, Mailing Address and ZIP Code <b>VINCENT B. EVANS</b> <b>P.O. BOX W</b> <b>BUELLTON, CA.</b>	Principal Place of Business <b>THE DANISH INN</b> <b>1547 MISSION DR.</b> <b>SOLVANG, CA.</b> Occupation <b>INN OPERATOR</b>	Date (month, day, year) <b>5/22/78</b>	Amount of each Receipt this Period <b>300.00</b>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other	<input checked="" type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ <b>300.00</b>		
Full Name, Mailing Address and ZIP Code <b>LGSTER A. GIRSH</b> <b>1601 STATE ST.</b> <b>SANTA BARBARA, CA 93101</b>	Principal Place of Business <b>SAME</b> Occupation <b>INVESTOR</b>	Date (month, day, year) <b>5/22/78</b>	Amount of each Receipt this Period <b>200.00</b> <del>300.00</del>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other	<input checked="" type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ <b>200.00</b>		
Full Name, Mailing Address and ZIP Code <b>THOMAS N. BANKS</b> <b>3744 FOOTHILL RD.</b> <b>SANTA BARBARA, CA. 93105</b>	Principal Place of Business <b>SAME</b> Occupation <b>INVESTOR</b>	Date (month, day, year) <b>5/22/78</b>	Amount of each Receipt this Period <b>300.00</b>
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other	<input checked="" type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ <b>300.00</b>		
SUBTOTAL of receipts this page (optional) .....			\$ <b>2,000.00</b>
TOTAL this period (last page this line number only) .....			\$ <b>1</b>



**SCHEDULE A  
REVISED**

January, 1978  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

**ITEMIZED RECEIPTS**

(Contributions, Transfers, Contribution In-Kind,  
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a  
of FEC FORM 3

Page 2 of 4 for  
Line Number 14 a.

(Use Separate Schedules for  
each numbered line)

Name of Candidate or Committee in Full

**SANTA BARBARA COUNTY LINCOLN CLUB**

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
THEODORE ROCHG, JR. 1550 BOXERO DR. SANTA BARBARA, CA 93108	1014 ANACAPA ST. SANTA BARBARA, CA. Occupation <del>INVESTOR</del> ATTORNEY	5/22/78	300.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other <input checked="" type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 300.00			
ARTHUR H. KOELLER 821 N. MILPAS ST. SANTA BARBARA, CA. 93103	SAME Occupation INVESTOR	5/22/78	300.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other <input checked="" type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 300.00			
JOHN A. PUTNAM 800 GARDEN ST. SANTA BARBARA, CA 93101	RETIRED Occupation	5/22/78	300.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 300.00			
HAROLD RUNKLE 1215 ORCHID DR. SANTA BARBARA, CA. 93111	RETIRED Occupation	5/22/78	300.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 300.00			
PHILIP P. KIRST 1420 E. MOUNTAIN SANTA BARBARA, CA. 93108	1115 FOOTHILL BLVD. LA CANADA, CA, 91011 Occupation BUILDER	5/22/78	300.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other <input checked="" type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 300.00			
GEORGE B. PAGE 30 LAS ALTURAS CIRCLE SANTA BARBARA, CA 93103	P.O. DRAWER mm SANTA BARBARA, CA. Occupation LINEN SUPPLIER	5/22/78	300.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other <input checked="" type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 300.00			
E.G. WALLENBROCK 445 NICHOLAS LN. SANTA BARBARA, CA. 93108	RETIRED Occupation	5/22/78	300.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 300.00			
SUBTOTAL of receipts this page (optional)			\$ 2,100.00
TOTAL this period (last page this line number only)			\$

**ITEMIZED RECEIPTS**

(Contributions, Transfers, Contribution In-Kind,  
 Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a  
 of FEC FORM 3

Page 3 of 4 for  
 Line Number 149.

(Use Separate Schedules for  
 each numbered line)

Name of Candidate or Committee in Full

SANTA BARBARA COUNTY LINCOLN CLUB

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
GEORGE R. BUSS 6335 CASITAS PASS CARPINTERIA, CA. 93103	5030 CARPINTERIA CARPINTERIA, CA 93103 Occupation TRUCKING	5/22/78	300.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 300.00			
OSWALD DA ROSS 976 CARRILLO RD. SANTA BARBARA, CA 93101	Occupation STONE MASON	5/22/78 9/14/78	300.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 300.00			
WAYNE KEES 146 EUCALYPTUS HILL SANTA BARBARA, CA.	SAME Occupation INVESTOR	9/14/78	300.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 300.00			
FRANK L. ROSS 1045 CIMA LINDA LN. SANTA BARBARA, CA.	Occupation RETIRED	7/18/78	300.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 300.00			
ROBERT MAZZETTI 4352 VIA ESPERENZA SANTA BARBARA, CA.	231 W. PUEBLO ST. SANTA BARBARA, CA. Occupation DOCTOR	7/18/78	300.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 300.00			
A. LINTON LUNDY, JR 950 BROOK TREE RD. SANTA BARBARA, CA.	Occupation RETIRED	7/18/78	300.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 300.00			
KENNETH H. HUNTER, JR. P.O. BOX 5275 SANTA BARBARA, CA.	SAME Occupation	7/18/78	300.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 300.00			
SUBTOTAL of receipts this page (optional)			\$ 2,100.00
TOTAL this period (last page this line number only)			\$

**ITEMIZED RECEIPTS**

(Contributions, Transfers, Contribution In-Kind,  
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a  
of FEC FORM 3

Page 4 of 4 for  
Line Number 149

(Use Separate Schedules for  
each numbered line)

Name of Candidate or Committee in Full

SANTA BARBARA COUNTY LINCOLN CLUB

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
JERRY R. HOLT 517 E. CALE LAURIGES SANTA BARBARA	SAME Occupation ELECTRICAL CONTRACTOR	7/18/78	300.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other			
Aggregate Year-To-Date ... \$ 300.00			
W. R. BAILLARD P.O. BOX 5640 SANTA BARBARA, CA.	RO. BOX 69 VENTURA, CA. Occupation RANCHER	7/18/78	300.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other			
Aggregate Year-To-Date ... \$ 300.00			
EDWARD A. MIRATTI 1201 TUNNEL RD. SANTA BARBARA, CA.	SAME Occupation LIQUOR STORE OWNER	7/18/78	300.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other			
Aggregate Year-To-Date ... \$ 300.00			
A. BROOKS FIRESTONE BOX 36 LOS OLIVOS, CA.	SAME Occupation WINERY	7/18/78	300.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other			
Aggregate Year-To-Date ... \$ 300.00			
EARL R. MORGAN 695 EL RANCHO RD. SANTA BARBARA, CA.	23 E. CAÑON PERDIDO SANTA BARBARA Occupation	7/18/78	300.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other			
Aggregate Year-To-Date ... \$ 300.00			
SUBTOTAL of receipts this page (optional)			\$ 1,500.00
TOTAL this period (last page this line number only)			\$ 7,700.00



**SCHEDULE B**

**REVISED**

January, 1978

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

**ITEMIZED EXPENDITURES**

(Operating, Transfers Out, Contributions In-Kind,  
Loans, Loan Repayments and Refunds Made)  
Supporting Lines 20a, 21a, and 22a, 22b, and 22c  
of FEC FORM 3

Page 4 RECEIVED  
Line Number COMMISSION

(Use Separate Schedules for  
each numbered line) NOV 20 PM 12:26

Name of Candidate or Committee in Full			
SANTA BARBARA COUNTY LINCOLN CLUB			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
SANTA BARBARA COUNTY REPUBLICAN CENTRAL COMMITTEE 290 LA ARCADE CT. SANTA BARBARA, CA. 93001	TRANSFER - DONATION	7/18/78	3,250.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other	11/3/78	300.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
COMMITTEE TO ELECT HOLINDAHL 221 LA ARCADE CT. SANTA BARBARA, CA.	TRANSFER - DONATION (STATE)	9/19/78	2,000.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
COMMITTEE TO ELECT WALLENBROCK 1430 CHAPALA ST SANTA BARBARA, CA.	TRANSFER - DONATION (STATE)	7/19/78	2,000.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SUBTOTAL of expenditures this page (optional)			\$
TOTAL this period (last page this line number only)			\$ 7,550.00





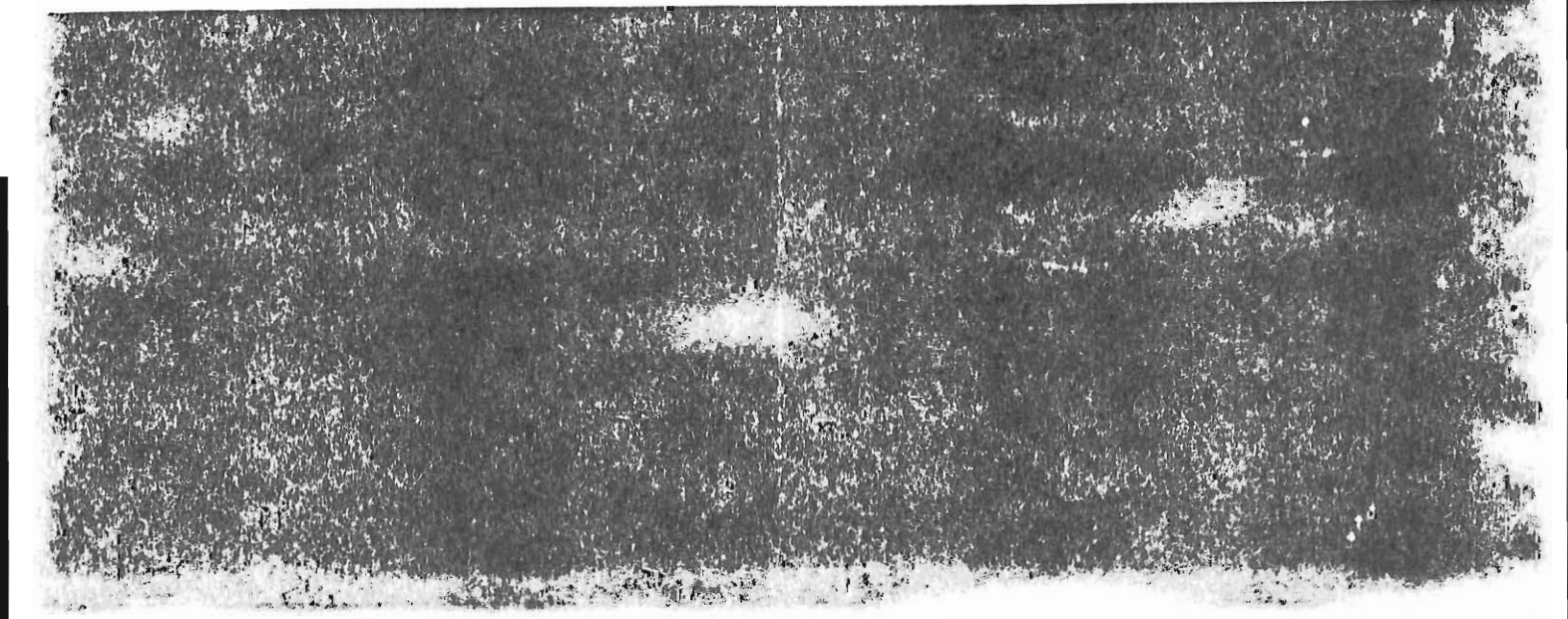
CHARLES V. ECKERT, III

160 N. Fairview Avenue, Suite 4  
Goleta, California 93017



Federal Election Commission  
1325 "K" Street, N.W.  
Washington, D.C. 20463

Attn: Lisa Stolaruk



REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE 11/6/77

ANALYST Lisa Stolaruk

TO: Office of General Counsel

TEAM CHIEF Bobby Werfel

THROUGH STAFF DIRECTOR JP

COMPLIANCE REVIEW CB/PS

FROM ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS CH

MUR1085

CANDIDATE COMMITTEE

Santa Barbara County Lincoln Club

TREASURER

Charles V. Eckert, III

ADDRESS

290 La Arcada Court  
Santa Barbara, CA 93101

AFFILIATE(S)

ALLEGATION(S)

CITE:

ATTACHMENT(S)

Unregistered Political Committee 2 U.S.C. 433 & 434

DATE INITIATED: 5/23/79

MANNER IN WHICH REVIEW WAS INITIATED:

☒ Normal review ☐ Other:  
☐ Special Project:

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM \_\_\_\_\_ TO \_\_\_\_\_

TOTAL RECEIPTS \$ \_\_\_\_\_ TOTAL EXPENDITURES \$ \_\_\_\_\_

CASH ON HAND \$ \_\_\_\_\_ DEBTS \$ \_\_\_\_\_

## HISTORY

### RESULTS OF REVIEW

ATTACHMENT

3SV1/79-37, 5/23/79

1

3SV2/79-37, 8/14/79 (for no response)

2

NOTE: It is not known whether Santa Barbara Co. Lincoln Club contains funds prohibited under the FECA but allowed under California law.

### COMMUNICATIONS WITH CANDIDATE/COMMITTEE

ATTACHMENT

Telecon: Stolaruk with Holt, 6/29/79

3

Telecon: Stolaruk with Holt, 9/4/79

4

Telecon: Stolaruk with Holt, 9/14/79

5

Telecon: Stolaruk with Holt, 10/16/79

6

### REASON(S) FOR REFERRAL:

ATTACHMENT

No response to 3SV2/79-37

7

### OTHER PENDING ACTIONS INITIATED BY RAD:

ATTACHMENT

None

### OTHER RELEVANT INFORMATION:

Request for Advisory Opinion, 9/8/79 (from recipient committee)

8

General Counsel letter responding to AOR of 9/8/79, 9/24/79

9

~~xxxxxx OGC AUDIT REFERRALS FROM RAD~~

Request for Advisory Opinion, 10/10/79 (from contributing committee)

10

General Counsel letter responding to AOR of 10/10/79, 10/17/79

11

NO PREVIOUS AUDIT/OGC REFERRALS FROM RAD



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 23, 1979

Treasurer  
Santa Barbara County Lincoln Club  
290 La Arcada Court  
Santa Barbara, California 93101

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting committees who wish to comply with the Federal Election Campaign Act. Our review of the receipts reported by Santa Barbara County Republican Central Committee indicates that your organization may have made contributions which total in excess of \$1,000 during the calendar year. Enclosed is a copy(s) of the report(s) in which your contribution(s) is listed.

The Act defines "political committee" to mean any organization, or other group of persons which receives contributions or makes expenditures (which includes contributions to Federal candidates and committees supporting Federal candidates), aggregating in excess of \$1,000 during a calendar year. It would appear that your organization may qualify as a "political committee" subject to registration, reporting, and contribution limitation requirements of the Act.

If you agree that your organization is a political committee, please submit a Statement of Organization on FEC Form 1, in accordance with 2 U.S.C. 433. In addition, your committee will be required to file disclosure reports in accordance with 2 U.S.C. 434 on FEC Form 3.

If you agree that your organization has made contributions or expenditures which qualify you as a "political committee", but you do not wish to be considered as a "political committee", you must request refund(s) from the candidate(s) and/or political committee(s) to which you have contributed. As an alternative, political committees to which you made contributions may transfer all or part of the contributions to accounts which are not used to influence Federal elections. Refunds or transfers must be made in such amounts that the total remaining contributions made by you do not exceed \$1,000 during a calendar year.

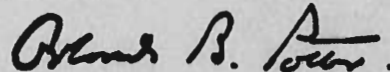
If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit a statement which would clarify this matter for the public record. We have also enclosed relevant informational materials and forms for the registration of and reporting by the political committee. Please examine the enclosed materials.

80010172893



Please notify the Commission within thirty (30) days from the date on this letter of your decision on this matter. If you have any questions, please contact Lisa Stolaruk, in our Reports Analysis Division at (800) 424-9530. Our local number is (202) 357-0023.

Sincerely,



Orlando B. Potter  
Staff Director

Enclosure  
Certified Mail:  
Return Receipts Requested

80010172894

by the Commission  
Street, N.W.  
Washington, D.C. 20463

ITEMIZED RECEIPTS  
(Contributions, Transfers, Contribution In-Kind,  
Other Income, Loans, Refunds)

Line Number **15(b)**

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a  
of FEC FORM 3

(Use separate Schedules for  
each numbered line)

Name of Candidate or Committee in Full

**SANTA BARBARA COUNTY REPUBLICAN CENTRAL COMMITTEE**

Full Name, Mailing Address and ZIP Code

**SANTA BARBARA COUNTY  
LINCOLN CLUB**

**290 LA ARCADE CT.**

**SANTA BARBARA, CA 93101**

Receipt for

☐ Primary

☐ General

☒ Other

Full Name, Mailing Address and ZIP Code

**REPUBLICAN STATE  
CENTRAL COMMITTEE**

**2000 RIVERSIDE DR.**

**LOS ANGELES, CA 90039**

Receipt for

☐ Primary

☐ General

☒ Other

Full Name, Mailing Address and ZIP Code

**COMMITTEE TO ELECT  
DEWAYNE HOLMBAHL**

**221 LA ARCADE CT.**

**SANTA BARBARA, CA 93101**

Receipt for

☐ Primary

☐ General

☒ Other

Full Name, Mailing Address and ZIP Code

Principal Place of Business

**ID # 781853**

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-To-Date

**\$ 3,250.00**

Principal Place of Business

**ID # 741463**

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-To-Date

**\$ 200.00**

Principal Place of Business

**ID # 781115**

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-To-Date

**\$ 28.09**

Principal Place of Business

Date (month,  
day, year)

**7/24/78**

Amount of each Receipt  
this Period

**3,250.00**

Date (month,  
day, year)

**9/13/78**

Amount of each Receipt  
this Period

**200.00**

Date (month,  
day, year)

**9/13/78**

Amount of each Receipt  
this Period

**28.09**

Date (month,  
day, year)

Date (month,  
day, year)

Date (month,  
day, year)

Date (month,  
day, year)

SUBTOTAL of receipts this page (optional)

\$

TOTAL this period (last page this line number only)

**\$ 3,478.09**

1978  
and Election Commission  
6 K Street, N.W.  
Washington, D.C. 20463

# ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,  
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a  
of FEC FORM 3

Page 1 of 1 for

Line Number 14(a)

(Use Separate Schedules for  
each numbered line)

Name of Candidate or Committee in Full

SANTA BARBARA COUNTY REPUBLICAN CENTRAL COMMITTEE

Full Name, Mailing Address and ZIP Code

CARPINTERIA VALLEY REPUBLICAN  
WOMEN'S CLUB  
5522 CALLE OCHO  
CARPINTERIA, CA. 93013

Principal Place of Business

WOMEN'S CLUB

Occupation

Date (month,  
day, year)

4/12/78

Amount of each Receipt  
this Period

200.00

Receipt for:

☐ Primary

☐ General

☒ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date ... \$ 450.00

Full Name, Mailing Address and ZIP Code

SANTA BARBARA COUNTY  
LINCOLN CLUB  
290 LA ARCADE CT.  
SANTA BARBARA, CA. 93101

Principal Place of Business

STATE RD 781853  
COUNTY CLUB

Occupation

Date (month,  
day, year)

4/7/78

Amount of each Receipt  
this Period

300.00

Receipt for:

☐ Primary

☐ General

☒ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date ... \$ 3,550.00

Full Name, Mailing Address and ZIP Code

MONTECITO REPUBLICAN  
WOMEN'S CLUB  
1556 SAN LEANDRO LANE  
SANTA BARBARA, CA. 93108

Principal Place of Business

WOMEN'S CLUB

Occupation

Date (month,  
day, year)

4/3/78

Amount of each Receipt  
this Period

500.00

Receipt for:

☐ Primary

☐ General

☒ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date ... \$ 550.00

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,  
day, year)

Amount of each Receipt  
this Period

Receipt for:

☐ Primary

☐ General

☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date ... \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,  
day, year)

Amount of each Receipt  
this Period

Receipt for:

☐ Primary

☐ General

☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date ... \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,  
day, year)

Amount of each Receipt  
this Period

Receipt for:

☐ Primary

☐ General

☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date ... \$

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

Date (month,  
day, year)

Amount of each Receipt  
this Period

Receipt for:

☐ Primary

☐ General

☐ Other

☐ Check if Contributor is self-employed

Aggregate Year-To-Date ... \$

SUBTOTAL of receipts this page (optional) . . . . .

\$

TOTAL this period (last page this line number only) . . . . .

\$ 1,000.00

DATE: 6/29/79

TIME: 12:00

COMMITTEE: Santa Barbara County Lincoln Club

PERSON SPOKEN TO: Gerry Holt (805) 968-3511

FEC'R: Lisa Stolaruk

SUBJECT: M letter

The above committee received an M letter for contributing in excess of \$1,000 to the Santa Barbara County Republican Central Committee. MR. Holt called to say that the registered committee will transfer the amount over \$1,000 into their state/local account. I told Mr. Holt to write a letter to the Commission as soon as possible, explaining what will be done, and to instruct the registered committee to report the transfer on their next report.

800-72397



2



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 14, 1979

Treasurer  
Santa Barbara County Lincoln Club  
290 La Arcada Court  
Santa Barbara, CA 93101

Dear Treasurer:

On May 23, 1979, you were notified that you may have made contributions to a political committee which raised problems under 2 U.S.C. 433 and 434.

As of this date, however, we have received no response from you. Your failure to respond gives the Commission reason to believe that you may have committed a violation of 2 U.S.C. 433 and 434.

The Commission will take no action against you until you have had a reasonable opportunity to respond to this letter. This response should be mailed to the Commission within fifteen (15) days from the date of this letter.

If you have responded to the above or you require additional information, please contact Lisa Stolaruk, our Reports Analyst assigned to you on our toll free number (800)424-9530. Our local number is (202) 357-0023.

Sincerely,

Thomas E. Harris

Commissioner

Certified Mail:  
Return Receipt Requested

80010172899

PS Form 3611, Apr 1977

350279-37

SENDER: Complete items 1, 2, and 3. Add your address in the RETURN TO space on reverse.

1. The following service is requested (check one):

- ☒ Show to whom and date delivered.
- ☐ Show to whom, date, and address of delivery.
- ☐ RESTRICTED DELIVERY
- ☐ RESTRICTED DELIVERY

Show to whom and date delivered: \_\_\_\_\_

Show to whom, date, and address of delivery: \$ \_\_\_\_\_

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO: Santa Barbara City Lincoln

3. ARTICLE DESCRIPTION: REGISTERED NO. 943443 INSURED NO. \_\_\_\_\_

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE: [Signature] ☐ Addressee ☐ Authorized agent

DATE OF DELIVERY: 8/14

5. ADDRESS (Complete only if requested):

6. UNABLE TO DELIVER BECAUSE: \_\_\_\_\_

CLERKS INITIALS: [Initials]

OFFICE OF THE POSTMASTER AUG 31 1979

STARPO 1977-0-249 595

RETURN RECEIPT REGISTERED, INSURED AND CERTIFIED MAIL

PS Form 3611, Apr 1977

350179-3

SENDER: Complete items 1, 2, and 3. Add your address in the RETURN TO space on reverse.

1. The following services requested (check one):

- ☒ Show to whom and date delivered.
- ☐ Show to whom, date, and address of delivery.
- ☐ RESTRICTED DELIVERY
- ☐ RESTRICTED DELIVERY

Show to whom and date delivered: \_\_\_\_\_

Show to whom, date, and address of delivery: \$ \_\_\_\_\_

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO: Santa Barbara City Lincoln

3. ARTICLE DESCRIPTION: REGISTERED NO. 943779 INSURED NO. \_\_\_\_\_

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE: [Signature] ☐ Addressee ☐ Authorized agent

DATE OF DELIVERY: 6-12-79

5. ADDRESS (Complete only if requested):

6. UNABLE TO DELIVER BECAUSE: \_\_\_\_\_

CLERKS INITIALS: [Initials]

OFFICE OF THE POSTMASTER AUG 19 1979

STARPO 1977-0-249 595

RETURN RECEIPT REGISTERED, INSURED AND CERTIFIED MAIL

66827.0008

DATE: 9/4/79

TIME: 2:00

COMMITTEE: Santa Barbara County Lincoln Club

PERSON SPOKEN TO: Jerry Holt (805)968-3511

FEC'R: Lisa Stolaruk

SUBJECT: M letter

I spoke with J.H. a few months ago about an M letter sent to the above committee. He said that the registered committee ~~and and~~ had agreed to transfer the amount in excess of \$1,000 to a committee maintained for state and local activity. J.H. contacted the treasurer of the unregistered committee, told her what to do, and assumed that she had followed his instructions. However, the matter was never taken care of, and J.H. received a second notice. The problem now is that the registered committee has very little money in the ~~account~~ account. J.H. instructed the treasurer to transfer as much as possible immediately, and then to transfer little by little as the money comes in. J.H. wanted to know if this would satisfy the Commission. Since paying by installments has not been addressed by the Commission in the past, I ~~recommended~~ recommended that he request an Advisory Opinion. He said that if the committee raised enough money to transfer the full amount, that he would not request an AO. He said that he would know more about the financial situation of the registered committee by the end of the week. I asked him to send me a copy of the AOR, along with the correspondence that was sent between the two committees regarding the excessive contribution (he offered to send the latter documentation ~~via~~ voluntarily).

DATE: 9/14/79

TIME: 1:30

COMMITTEE: Santa Barbara County Lincoln Club

PERSON SPOKEN TO: Jerry Holt (805)968-3511

FIGURE: Lisa Stolaruk

SUBJECT: M letter

I called Mr. Holt this afternoon to find out whether or not he had drafted an AOR, and when he planned to send it. He said that he wrote it last Friday (a week ago today) and gave it to the committee secretary to type. He gave instructions to send ~~the~~ OGC's copy certified, and to send ~~it~~ my copy by regular mail. He said that we should receive both soon.

He told me that he addressed two questions to the Commission:

- 1) Whether the committee was eligible for a waiver of reporting requirements
- 2) Whether the committee could refund the excessive contribution by way of an installment plan.

80040172901



TELECON

DATE: 10/16/79

TIME: 2:35

COMMITTEE: Santa Barbara County Lincoln Club

PERSON SPOKEN TO: Jerry Holt

FEC'R: Lisa Stolaruk

SUBJECT: M letter

Since the committee's request for an Advisory Opinion was denied by the Commission, I called Mr. Holt to tell him that, barring a refund from the Central Committee, the Lincoln Club would have to register. He said that the members of the Lincoln Club apparently drafted a second AOR, this time from the perspective of the Lincoln Club rather than the registered entity, the Central Committee. I said that I was pretty sure that the Commission would also deny this request, not only because it ~~deals~~ deals with a situation that has already occurred, but because the Lincoln Club, not being registered, does not have legal standing to request an AO. J.N. said that he knew this wouldn't work and told the committee that they would surely have to register and report anyway. He said that the Statemnt of Organization should be forthcoming:

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SANTA BARBARA COUNTY  
REPUBLICAN CENTRAL COMMITTEE 01 4172

290 LA ARCADE COURT  
SANTA BARBARA, CALIFORNIA 93101  
(805) 966-7920

ID # C00045195

CERTIFIED MAIL

September 8, 1979

Federal Election Commission  
Office of General Council  
Attention William Oldaker  
Washington, D.C. 20463

Dear Mr. Oldaker:

Request for Advisory Opinion

We are writing this letter in order to clear up a problem that has arisen for one of our donors, The Santa Barbara County Lincoln Club.

The Santa Barbara County Lincoln Club has received two letters from the Federal Election Commission recently, 3 SV1/79-37 and 3 SV2/79-37. These letters indicated that, since the Lincoln Club donated over one thousand dollars, (\$1,000) to us in 1978, the Lincoln Club itself must be considered a Federal Political Committee.

The Lincoln Club has only been reporting as a State of California political committee and does not wish to be considered a federal political committee at this time. Therefore, we agreed with the Lincoln Club that we should transfer an amount of money from our federal account to our state account sufficient to bring their total donation for 1978 below one thousand dollars. At this point in time there is not enough money in our federal account to transfer the necessary fund. The necessary amount is \$2,551.00. The amount in the account is approximately \$600.00.

After discussing this problem with Lisa Stolaruk, reports analyst with your office, she advised us that we should request an advisory opinion from your office.

Our request is two-fold: 1st, Since our committee did not contribute to any federal candidate or committee in 1978, is it possible that the reports of the Lincoln Club could be waived? 2nd, If not, is it possible that the transfer of the necessary funds could be made as the funds are available over the next few months, beginning with our present funds?

80010172903

September 8, 1979

Please notify us of your decision so that we may take any necessary action.

Sincerely,

*Martha L. Hickey*

Martha L. Hickey  
Chairperson  
Santa Barbara County  
Republican Central Committee

✓cc: Lisa Stolaruk

80040172904

9

September 24, 1979

Ms. Martha L. Hickey, Chairman  
Santa Barbara Republican Central Committee  
290 LaArcada Court  
Santa Barbara, California 93101

Dear Ms. Hickey:

This refers to your letter of September 8, 1979, requesting an advisory opinion concerning application of the Federal Election Campaign Act of 1971, as amended ("the Act"), and Commission regulations.

Under the Act and regulations, advisory opinion requests must present an issue concerning application of the Act to a specific factual situation that involves the requesting person. 2 U.S.C. §437f. The cited section enables the requestor to act and rely upon the opinion "in good faith" without being "subject to any sanction provided by" the Act. 2 U.S.C. §437f(b); see also 11 CFR 112.1, 112.5. This "good faith" reliance protection means that persons requesting an opinion must establish some potential jeopardy of committing a violation themselves in order to satisfy the standing requirement.

The situation presented in your request raises an issue regarding application of the Act's registration and reporting requirements to the Santa Barbara County Lincoln Club rather than to your committee, the Santa Barbara Republican Central Committee. Although you may be interested in how the Lincoln Club can avoid coming within the Act, you do not set forth any facts establishing a basis for us to conclude that your committee may be in violation of the Act as the direct result of the Lincoln Club's failure to register as a political committee. Thus, you cannot properly obtain an advisory opinion concerning application of the Act or Commission regulations to your committee in the factual situation as presented.

The party which has a direct interest, and may be in violation of the Act by virtue of the factual situation you describe, is the Lincoln Club. Since the Act limits advisory



- 2 -

opinion standing to political committees (and Federal officeholders or candidates for elective Federal office), the Lincoln Club would not have standing to request an opinion unless it registers as a political committee. The Act further provides that no other opinion of "an advisory nature" may be issued by the Commission or its staff.

Should you have any further questions on the advisory opinion procedures, please contact N. Bradley Litchfield, an Assistant General Counsel on my staff, at 202-532-4039.

Sincerely yours,

/s/

William C. Oldaker  
General Counsel

bcc: Lisa Stolarak

NBlitchfield:bwl:9/20/79  
Gross

OK 9/20/79  
GR 9/20/79

CHARLES V. ECKERT, III

160 N. Fairview Avenue, Suite 4  
Goleta, California 93017  
(805) 964-4761

RECEIVED  
FEDERAL ELECTION  
COMMISSION

79 OCT 15 PM 12:55

11363

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October 10, 1979

Federal Election Commission  
1325 "K" Street, N.W.  
Washington, D.C. 20463

004543

Attn: William C. Oldaker,  
General Counsel

RE: SANTA BARBARA COUNTY LINCOLN CLUB  
YOUR FILE NO. 3SV2/79-37

Dear Sir:

The Federal Election Commission's letter of May 23, 1979, written by Orlando B. Potter, the Commission letter of August 14, 1979, written by Thomas E. Harris, Santa Barbara County Republican Central letter of September 8, 1979, written by Martha L. Hickey and your letter of September 24, 1979, addressed to Martha L. Hickey, have all just recently come to my attention, even though I am the treasurer of the Santa Barbara County Lincoln Club.

Apparently, unbeknown to us, the Santa Barbara Lincoln Club did become a "political committee" for federal reporting purposes, by virtue of contributions made to the Santa Barbara County Republican Central Committee in 1978, in the total sum of \$3,550.00.

The Santa Barbara County Lincoln Club does not wish to constitute itself as a "political committee" for federal reporting purposes.

In the letter of May 23, 1979, Orlando B. Potter advised as follows:

"As an alternative [to federal reporting] political committees to which you made contributions may transfer all or part of the contributions to accounts which are not used to influence federal elections. Refunds or transfers must be paid in such amounts that the total remaining contributions made by you do not exceed \$1,000.00 during a calendar year."

RECEIVED  
OFFICE OF THE  
GENERAL COUNSEL

80010172907

October 10, 1979

As pointed out in Mrs. Hickey's letter of September 8, 1979, the amount necessary to be so transferred or re-funded is \$2,551.00.

An advisory opinion is requested in two respects, namely:

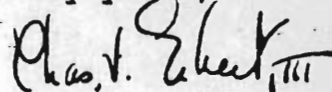
1. If the Santa Barbara County Republican Central Committee writes us a check for \$2,551.00, will that "clear" the matter hereinabove discussed, so as to eliminate any question of violation and/or penalty?
2. If, in the future, Santa Barbara County Lincoln Club makes contributions to the Santa Barbara County Republican Central Committee in the sum of \$1,000.00 or more during any year, if all contributions above \$999.00 are "ear marked" for use in non-federal elections, will the Santa Barbara County Lincoln Club thereby avoid being a "political committee" for federal reporting purposes?

As an aside, but for purposes of our future guidance, if the Santa Barbara County Lincoln Club contributes more than \$1,000.00 in any one year to the Santa Barbara County Central Committee, without "ear marking", if, during that year, the Santa Barbara County Central Committee makes no contributions to any candidate for federal office, does the Santa Barbara County Lincoln Club thereby avoid being a "political committee" for federal reporting purposes?

Appreciating your kind attention to this matter, and assuring you that we wish to fully comply, as promptly as possible, as soon as we find out how we can do it, I am,

Sincerely yours,

By



CHAS. V. ECKERT, III

CVE:mro

cc: Martha Hickey



Worfil  
11

October 17, 1979

Charles V. Eckert, III  
160 N. Fairview Avenue, Suite 4  
Goleta, California 93017

Dear Mr. Eckert:

This refers to your letter of October 10, 1979, requesting an advisory opinion on behalf of the Santa Barbara County Lincoln Club concerning application of the Federal Election Campaign Act of 1971, as amended ("the Act").

Your letter explains that the Santa Barbara County Lincoln Club does not wish to be regarded as a "political committee" under the Act. However, the club has made transfers exceeding \$1,000 in a calendar year to the Santa Barbara County Republican Central Committee which is a "political committee" under the Act.

In view of the provisions in 2 U.S.C. §437f regarding advisory opinions, it is not appropriate for the Commission or its staff to issue an advisory opinion in response to your request unless the Lincoln Club is a "political committee" under the Act. Furthermore, even if an advisory opinion were appropriate a recent Commission policy decision precludes the issuance of advisory opinions with respect to past factual situations. An advisory opinion could be issued to a registered political committee concerning prospective conduct which involves a specific factual situation.

I regret that the advisory opinion procedure may not be used in the situation you describe. I am enclosing, for your information, copies of past advisory opinions which appear relevant to the circumstances you have described.

Sincerely yours,

William C. Oldaker  
General Counsel

Enclosures (AOs 1978-91, 1979-14)

✓ bcc: Tom Haselhorst

NBLitchfield:bwl:10/16/79





FEDERAL ELECTION COMMISSION

1125 K STREET N.W.  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 1085

Date Filmed 1/11/80 Camera No. --- 2

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