



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2102

DATE FILMED 8/26/88 CAMERA NO. 2

CAMERAMAN K.A.U.

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## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

21 June 1985

MEMORANDUM

TO: CHARLES N. STEELE  
GENERAL COUNSEL

THROUGH: JOHN C. SURINA  
STAFF DIRECTOR

FROM: JOHN D. GIBSON  
ASSISTANT STAFF DIRECTOR  
REPORTS ANALYSIS DIVISION

SUBJECT: REFERRAL OF THE SANTA BARBARA COUNTY LINCOLN CLUB

This is a referral of the Santa Barbara County Lincoln Club ("the Club") for failing to file the 1983 Year End Report by Election Day, November 6, 1984.

The Club also made apparent excessive contributions totalling \$19,862.50 in 1983 and \$13,325 in 1984. The Club has notified the recipient committee and requested a refund, which it expects to receive in July of this year.

For your information, a companion referral is being submitted for the Santa Barbara County Republican Central Committee. If you have any questions, please contact Michael D. Butterfield at 523-4048.

Attachment

88040713448

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 21 June 1985

ANALYST: Michael D. Butterfield

I. COMMITTEE: Santa Barbara County Lincoln Club  
(C00178160)  
Nellie Koart, Treasurer  
P.O. Box 30100  
Santa Barbara, CA 93130-0349

II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(A)(iv)  
11 CFR 104.5(c)(2)(i)(B)  
2 U.S.C. §441a(a)(1)(C)

III. BACKGROUND:

A. Failure to Timely File the 1983 Year End Report  
- 2 U.S.C. §434(a)(4)(A)(iv)  
11 CFR 104.5(c)(2)(i)(B)

The Santa Barbara County Lincoln Club ("the Club") failed to file the 1983 Year End Report by Election Day, November 6, 1984. The Club registered with the Commission as a non-party committee on March 1, 1984 (Attachment 2). The first report filed by the Club, the 1984 April Quarterly Report, disclosed an initial cash-on-hand figure of \$20,190.99 (Attachment 3).

A Request for Additional Information ("RFAI") was sent to the Club on January 30, 1985, questioning the source of the initial cash (Attachment 4). The Club responded by letter on February 14, 1985, stating that its April Quarterly Report covered two months of activity prior to the filing of its Statement of Organization and included all contributions received from January 1, 1984 (Attachment 5).

Since the requested information had not been provided and Commission records disclosed that the Club had contributed \$20,737.50 to the Santa Barbara County Republican Central Committee ("the Committee") in 1983, a Non-Filer Notice was sent to the Club on March 8, 1985 (Attachment 6). On March 22, 1985, the Club filed a 1983 Year End Report disclosing activity from July 1, 1983 through December 31, 1983 (Attachment 7).

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SANTA BARBARA COUNTY LINCOLN  
CLUB  
REPORTS ANALYSIS OGC REFERRAL  
PAGE 2

B. Excessive Contributions to a Political Committee  
- 2 U.S.C. §441a(a)(1)(C)

The Club's 1983 Year End Report disclosed contributions totalling \$20,737.50 made to the Committee between July 20 and December 30, 1983 (See Chart A and Attachment 7). Based on the Committee's reported aggregate year-to-date total of \$24,862.50 in contributions received from the Club, and communications with both the Club and the Committee, it appears that the Club contributed an additional \$4,125 to the Committee prior to July 20, 1983. This resulted in \$19,862.50 of apparent excessive contributions made to the Committee (a party committee) in 1983.

The Club's 1984 July Quarterly, October Quarterly and 12 Day Pre-General Reports disclosed contributions totalling \$18,325.00 made to the Committee between April 2 and October 11, 1984 (See Chart B and Attachments 8, 9, and 10). This resulted in \$13,325.00 of apparent excessive contributions made to the Committee in 1984.

When the Club registered on March 1, 1984, Line 6 on the Statement of Organization which identifies the name of any connected organization or affiliate committee was blank. Therefore, an RFAI for the Club's Statement of Organization was sent on January 30, 1985, questioning possible affiliation with the Committee (Attachment 11). The RFAI advised the Club that if it shared control or financing with other committees or organizations, it should disclose the relationship on Line 6 of its Statement of Organization. The Club was instructed to indicate "None" on Line 6 if it did not share financing or control with other committees or organizations.

In addition, an RFAI was sent on February 13, 1985 for the apparent excessive contributions disclosed on the 1984 October Quarterly and 12 Day Pre-General Reports (Attachment 12). The RFAI advised the Club that the Act precluded a committee from making contributions to another political committee in excess of \$5,000 per calendar year. The Club was instructed to notify the recipient and request a refund of the amount in excess of \$5,000, and to provide the Commission with a photocopy of the refund request.

The Commission received a letter from the Club on February 20, 1985, which stated that it "...is in no way affiliated or connected to the Santa Barbara County Republican Central Committee." (See Attachment 13.)

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SANTA BARBARA COUNTY LINCOLN  
CLUB  
REPORTS ANALYSIS OGC REFERRAL  
PAGE 3

On February 26, 1985, the treasurer of the Club, Ms. Nellie Koart, contacted the Reports Analysis Division ("RAD") analyst. Ms. Koart was not aware of the contribution limits and requested guidance on how to handle the problem. The RAD analyst explained the indicia of affiliation and suggested that Ms. Koart research the matter. Ms. Koart said she would contact Evelyn Sullivan, the treasurer of the Committee, to determine if the organizations were affiliated, and call the RAD analyst the following day (Attachment 14).

Ms. Koart phoned the RAD analyst on February 27, 1985 and stated that the Club and the Committee were not affiliated. The RAD analyst advised Ms. Koart to request a refund from the Committee and to send a copy of the letter to the Commission. Ms. Koart indicated that the Committee did not have sufficient funds to refund the excessive portion and therefore would have to disclose it as a debt (Attachment 15).

Ms. Koart's February 27, 1985 written response and a copy of a letter requesting a refund from the Committee were received at the Commission on March 6, 1985. The response stated that the Club "...was unaware that it could not give the Santa Barbara County Republican Central Committee funds in excess of \$5,000.00 per calendar year." The Club expects to receive a refund "sometime in July" after the Committee conducts its annual fundraiser. In the meantime, the amount in excess will be carried as a debt (Attachment 16).<sup>1/</sup>

An Informational Notice was sent to the Club on April 19, 1985, acknowledging the apparent excessive contributions disclosed on the 1983 Year End Report, and advising the treasurer that the Commission may take further legal action (Attachment 17).

Ms. Koart phoned the RAD analyst on May 9, 1985 to discuss the April 19, 1985 notice concerning the apparent excessive contributions made to the Committee in 1983 (Attachment 18).

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<sup>1/</sup> A Second Notice for failure to respond to the RFAI's was sent on March 7, 1985. The Club filed a March 22, 1985 response which stated that communications between the Club and the Commission had "apparently crossed in the mails." The letter referenced the Club's February 27, 1985 response.

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SANTA BARBARA COUNTY LINCOLN  
CLUB  
REPORTS ANALYSIS OGC REFERRAL  
PAGE 4

The Commission received a letter on May 16, 1985 from Ms. Koart (Attachment 19). The letter referenced the apparent excessive contributions made to the Committee in 1983 and reiterated the information provided in the Club's February 27, 1985 letter to the Commission.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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## CHART A

## Apparent Excessive Contributions Made in 1983

NAME OF RECIPIENT	AMOUNT AND DATE OF CONTRIBUTION	AMOUNT IN EXCESS	AMOUNT AND DATE OF REFUND OR TRANSFER-OUT
Santa Barbara County Republican Central Committee	\$ 4,125.00*/ 8,150.00 - 07/20/83 9,575.00 - 09/20/83 3,012.50 - 12/30/83	\$ 7,275.00 9,575.00 3,012.50	** ** **
TOTAL	\$24,862.50	\$19,862.50	

\*/ Based on the Committee's reported aggregate year-to-date figure and correspondence received from both the Club and the Committee, it appears that the Club made a total of \$4,125 in contributions to the Committee prior to July 20, 1983.

\*\*/ The Club has requested a refund from the Committee; however, due to a lack of funds, the Committee has disclosed the apparent excessive contributions as an outstanding obligation on Schedule D.

## CHART B

## Apparent Excessive Contributions Made in 1984

NAME OF RECIPIENT	AMOUNT AND DATE OF CONTRIBUTION	AMOUNT IN EXCESS	AMOUNT AND DATE OF REFUND OR TRANSFER-OUT
Santa Barbara County Republican Central Committee	\$ 2,075.00 - 04/02/84 1,350.00 - 07/23/84 11,000.00 - 09/20/84 2,000.00 - 10/03/84 1,900.00 - 10/11/84	\$ 9,245.00 2,000.00 1,900.00	* * *
TOTAL	\$18,325.00	\$13,325.00	

\*/ The Club has requested a refund from the Committee; however, due to a lack of funds, the Committee has disclosed the apparent excessive contributions as an outstanding obligation on Schedule D.



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FEDERAL ELECTION COMMISSION  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (83-84)

DATE 12JUN85  
PAGE 1

## NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
SANTA BARBARA COUNTY LINCOLN CLUB						
CONNECTED ORGANIZATION: BLANK						
NON-PARTY NON-QUALIFIED ID #C00178160						
1983	YEAR-END	27,429	26,579	1JUL83 -31DEC83	27	85FEC/369/045
	YEAR-END - AMENDMENT	-	-	1JUL83 -31DEC83	2	85FEC/373/3467
	NOTICE OF FAILURE TO FILE			20JUL83 -31DEC83	2	85FEC/367/4536
	1'ST LETTER INFORMATIONAL NOTICE			1JUL83 -31DEC83	2	85FEC/371/1803
1984	STATEMENT OF ORGANIZATION			1MAR84	2	84FEC/297/4009
	APRIL QUARTERLY	7,260	14,189	1JAN84 -31MAR84	8	84FEC/309/3713
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN84 -31MAR84	1	85FEC/366/3549
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN84 -31MAR84	1	85FEC/366/4130
	REQUEST FOR ADDITIONAL INFORMATION			1JAN84 -31MAR84	2	85FEC/362/2800
	JULY QUARTERLY	3,285	15,004	1APR84 -30JUN84	8	84FEC/320/0177
	JULY QUARTERLY - AMENDMENT	-	-	1APR84 -30JUN84	1	85FEC/366/4131
	REQUEST FOR ADDITIONAL INFORMATION			1APR84 -30JUN84	2	85FEC/362/2803
	OCTOBER QUARTERLY	30,832	29,990	1JUL84 -30SEP84	22	84FEC/336/4081
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL84 -30SEP84	1	85FEC/366/4132
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL84 -30SEP84	3	85FEC/367/3429
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL84 -30SEP84	1	85FEC/369/4251
	REQUEST FOR ADDITIONAL INFORMATION			1JUL84 -30SEP84	4	85FEC/366/0227
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL84 -30SEP84	1	85FEC/367/4580
	PRE-GENERAL	2,550	3,903	1OCT84 -17OCT84	7	84FEC/345/2577
	PRE-GENERAL - AMENDMENT	-	-	1OCT84 -17OCT84	1	85FEC/366/4133
	PRE-GENERAL - AMENDMENT	-	-	1OCT84 -17OCT84	1	85FEC/367/3515
	PRE-GENERAL - AMENDMENT	-	-	1OCT84 -17OCT84	1	85FEC/369/4251
	REQUEST FOR ADDITIONAL INFORMATION			1OCT84 -17OCT84	1	85FEC/366/086
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT84 -17OCT84	2	85FEC/367/3897
	POST-GENERAL	3,325	590	18OCT84 -26NOV84	6	84FEC/350/0416
	POST-GENERAL - AMENDMENT	-	-	18OCT84 -26NOV84	1	85FEC/366/4134
	YEAR-END	2,300	1,341	27NOV84 -31DEC84	12	85FEC/361/2066
	YEAR-END - AMENDMENT	-	-	27NOV84 -31DEC84	2	85FEC/366/3550
1985	REQUEST FOR ADDITIONAL INFORMATION				1	85FEC/362/2798
TOTAL		76,981	0 91,596	0	125	TOTAL PAGES

All reports have been reviewed.

Ending cash-on hand (12/31/84) = \$4,722

Debts owed by the committee = \$0

Debts owed to the committee = \$0

8 8 0 4 0 7 1 3 4 5 6

FEDERAL ELECTION COMMISSION  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-86)

DATE 12JUN85  
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
SANTA BARBARA COUNTY LINCOLN CLUB						
CONNECTED ORGANIZATION:	NONE					
	1985 STATEMENT OF ORGANIZATION - AMENDMENT			14FEB85	1	85FEC/366/354
	TOTAL	0	0	0	1	TOTAL PAGES

Memorial L 1-100

1. (a) Name of Committee (in full) <input type="checkbox"/> Check if name or address is changed.	2. Date
Santa Barbara County Lincoln Club	2/25/84
(b) Address (Number and Street)	3. FEC Identification Number
P. O. Box 30100	not yet assigned
(c) City, State and ZIP Code	4. Is this an amended Statement? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
Santa Barbara, CA 93130-0349	

## SEC FORM 1 (3-79)

**REPORT OF RECEIPTS AND DISBURSEMENTS**  
For a Political Committee Other Than an Authorized Committee

The FEC  
Attachment 3  
Page 1 of 2  
84 APR 16 P 1:39

(Summary Page)

ALIGN AREA

ALIGN AREA

1. Name of Committee (in Full)

SANTA BARBARA COUNTY LINCOLN CLUB

Address (Number and Street)

POST OFFICE BOX 30100

City, State and ZIP Code

SANTA BARBARA, CA 93130-0349

☐ Check here if address is different than previously reported.

2. FEC Identification Number

C-00178160

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_

4. TYPE OF REPORT (Check appropriate box)

- (a) ☒ April 15 Quarterly Report ☐ October 15 Quarterly Report  
☐ July 15 Quarterly Report ☐ January 31 Year End Report  
☐ July 31 Mid Year Report (Non Election Year Only)  
☐ Monthly Report for \_\_\_\_\_  
☐ Twelfth day report preceding \_\_\_\_\_ (Type of Election)  
election on \_\_\_\_\_ in the State of \_\_\_\_\_  
☐ Thirtieth day report following the General Election  
on \_\_\_\_\_ in the State of \_\_\_\_\_  
☐ Termination Report

(b) Is this Report an Amendment?

☐ YES ☒ NO

**SUMMARY**

6. Covering Period JANUARY 1, 1984 through MARCH 31, 1984

6. (a) Cash on hand January 1, 19 84

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 1b)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)

7 Total Disbursements (from Line 2b)

8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

9. Debts and Obligations Owed TO The Committee  
(Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee  
(Itemize all on Schedule C or Schedule D)

COLUMN A  
This Period

COLUMN B  
Calendar Year-to-Date

\$ 20,190.99

\$ 20,190.99

\$ 7,260.00 \$ 7,260.00

\$ 27,450.99 \$ 27,450.99

\$ 14,189.46 \$ 14,189.46

\$ 13,261.53 \$ 13,261.53

\$ -0-

\$ -0-

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

Nellie Koart

Type or Print Name of Treasurer

*Nellie Koart*

(Signature of Treasurer)

4/11/84

Date

For further information contact

Federal Election Commission

Toll Free 800-424-9530

Local 202-523-4888

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 437a

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

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FEC FORM 3X (3/80)

0 2 0 4 0 7 1 3 4 5 8  
3 1 7 : 3 7 , 3 7 1 3



**DETAILED SUMMARY PAGE  
of Receipts and Disbursements  
(Page 2, FEC FORM 3X)**

Attachment 3  
Page 2 of 2

Name of Committee (or Fund)		Report Covering the Period	
SANTA BARBARA COUNTY LINCOLN CLUB C-00178160		From	To
		JAN. 1, 1984	MAR. 31, 1984
		COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
<b>I. RECEIPTS</b>			
<b>11. CONTRIBUTIONS (other than loans) FROM:</b>			
(a) Individuals/Persons Other Than Political Committees	.....	\$ 7,260.00	\$ 7,260.00
(b) Political Party Committees	.....	-0-	-0-
(c) Other Political Committees	.....	-0-	-0-
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	.....	7,260.00	7,260.00
<b>12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES</b>			
<b>13. ALL LOANS RECEIVED</b>			
<b>14. LOAN REPAYMENTS RECEIVED</b>			
<b>15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)</b>			
<b>16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b>			
<b>17. OTHER RECEIPTS (Dividends, Interest, etc.)</b>			
<b>18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)</b>		<b>7,260.00</b>	<b>7,260.00</b>
<b>II. DISBURSEMENTS</b>			
<b>19. OPERATING EXPENDITURES</b>			
<b>20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES</b>			
<b>21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b>			
<b>22. INDEPENDENT EXPENDITURES (use Schedule E)</b>			
<b>23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 641 (d)) (Use Schedule F)</b>			
<b>24. LOAN REPAYMENTS MADE</b>			
<b>25. LOANS MADE</b>			
<b>26. REFUNDS OF CONTRIBUTIONS TO</b>			
(a) Individuals/Persons Other Than Political Committees	.....	-0-	-0-
(b) Political Party Committees	.....	-0-	-0-
(c) Other Political Committees	.....	-0-	-0-
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))	.....	-0-	-0-
<b>27. OTHER DISBURSEMENTS</b>			
<b>28. TOTAL DISBURSEMENTS (Add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)</b>		<b>14,189.46</b>	<b>14,189.46</b>
<b>III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES</b>			
<b>29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)</b>		<b>7,260.00</b>	<b>7,260.00</b>
<b>30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)</b>		<b>-0-</b>	<b>-0-</b>
<b>31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)</b>		<b>7,260.00</b>	<b>7,260.00</b>
<b>32. TOTAL OPERATING EXPENDITURES from Line 19</b>		<b>2,389.46</b>	<b>2,389.46</b>
<b>33. OFFSETS TO OPERATING EXPENDITURES from Line 15</b>		<b>-0-</b>	<b>-0-</b>
<b>34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)</b>		<b>2,389.46</b>	<b>2,389.46</b>

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**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

**BQ-2**

**Nellie Koart, Treasurer  
Santa Barbara County Lincoln Club  
P.O. Box 30100  
Santa Barbara, CA 93130-0349**

**JAN 30 1985**

**Identification Number: C00178160**

**Reference: April Quarterly Report (1/1/84-3/31/84)**

**Dear Ms. Koart:**

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

*MB.* [ -Political committees which have cash on hand at the time of registration must disclose the source of the funds. The balance is assumed to be composed of those contributions most recently received by the committee prior to registration. Please identify the source of these contributions on a memo Schedule A. 11 CFR 104.12. ]

-Your report discloses no payments for administrative expenses. Each committee utilizing separate Federal and non-Federal accounts is required to allocate any administrative expenses between the accounts in proportion to the amount of funds expended on Federal and non-Federal elections or on another reasonable basis. Administrative expenses are those day-to-day costs of operating the committee, including rent, utilities, salaries and other miscellaneous office expenses. The Federal account of the committee must pay its share of such expenses. 11 CFR 106.1(e) and 102.5(a)(1)(i).

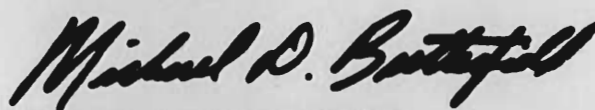
If your organization has incurred such administrative costs and your non-Federal account has paid for all such costs, your Federal account must reimburse the non-Federal account for its portion of the expenses. The amount incurred by the Federal account should be disclosed as a debt or obligation owed to the non-Federal account on Schedule D supporting Line 10 of the Summary Page. When payments are made toward the debt,

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they should be reported on Schedule B supporting Line 19 of the Detailed Summary Page and the debt should be reduced by a corresponding amount.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,



Michael D. Butterfield  
Reports Analyst  
Reports Analysis Division

2 8 0 4 0 7 1 3 4 6 1

9 5 0 3 3 5 2 2 8 0 1



**Lincoln Club**  
 SANTA BARBARA COUNTY  
 POST OFFICE BOX 88100  
 SANTA BARBARA, CALIFORNIA 93120-0800  
 P C 93178160

**OFFICERS**

James E. Campbell Sr., President  
 Diane Klingler, Vice President  
 Nellie Koart, Treasurer  
 Phil Moore, Secretary

**DIRECTORS**

Holmes Tuttle  
 A. Brooks Pirstone  
 J. William Beaver  
 Elmer W. Keance  
 Eldon Marshall  
 George Bliss  
 Michel Shults  
 Mark Smith  
 Louis A. Lucas  
 General S.W. Wells  
 Clifford Spencer  
 Hazel Richardson  
 Pat Roberts  
 Gary Richs  
 Jennie Petlow  
 Oswald De Ros  
 Steven Little  
 John Van Wingerden

**PAST PRESIDENTS**

J. William Beaver  
 A. Brooks Pirstone  
 Elmer W. Keance  
 George Castagnola

Michael B. Butterfield  
 Federal Election Commission  
 Washington, D.C. 20463

February 14, 1985

Re: April Quarterly Report (1/1/84-3/31/84), Item 1

Dear Mr. Butterfield:

In response to your inquiry of January 30, 1985, I submit to you the following information for clarification purposes:

Our Statement of Organization was filed on 3/1/84. The first report we submitted was the April Quarterly Report (1/1/84-3/31/84). This report included all of the monies contributed to our organization from January 1, 1984. All contributors are identified in this report: names, addresses, occupations, employers, and dates of contributions. The report therefore covered two (2) full months of activity prior to the date of our filing our Statement of Organization.

Most sincerely,

*Nellie Koart*

Nellie Koart, Treasurer





**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

MAR 8 1985

HQ-7

Hellie Koart, Treasurer  
Santa Barbara County Lincoln Club  
P.O. Box 30100  
Santa Barbara, CA 93130-0349

Identification Number: C00178160

Reference: 1983 Year End Report (7/20/83-12/31/83)

Dear Ms. Koart:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Report of Receipts and Disbursements as required by the Federal Election Campaign Act. Your Committee registered with the Federal Election Commission on March 1, 1984; however, the 1983 Year End Report filed by the Santa Barbara County Republican Central Committee disclosed receiving funds from your committee between 7/20/83 and 12/30/83 (pertinent portion attached).

The Act defines a "political committee" to include any local committee of a political party which receives contributions aggregating in excess of \$5,000 during a calendar year, or makes payments exempted from the definition of contribution or expenditure as defined in paragraphs (8) and (9) of 2 U.S.C. §431 aggregating in excess of \$5,000 during a calendar year, or makes contributions aggregating in excess of \$1,000 during a calendar year or makes expenditures aggregating in excess of \$1,000 during a calendar year. 2 U.S.C. §431(4).

It is important that you file this report immediately with the Federal Election Commission, 1325 K Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or the relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

The failure to file this report may result in an audit or legal enforcement action.

If you have any questions regarding this matter, please contact Michael D. Butterfield on our toll-free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

8 3 0 4 0 7 1 3 4 6 3  
9 5 0 3 3 7 1 5 3 6

**REPORT OF RECEIPTS AND DISBURSEMENTS**  
For a Political Committee Other Than an Authorized Committee  
**PRE-REGISTRATION SUMMARY**  
(Summary Page)

Attachment 7  
Page 1 of 4  
MAR 25 P 1:48  
ALIGN AREA

ALIGN AREA

1. Name of Committee (in Full)

SANTA BARBARA COUNTY LINCOLN CLUB

Address (Number and Street)

POST OFFICE BOX 30100

City, State and ZIP Code

SANTA BARBARA, CA 93130-0349

☐ Check here if address is different than previously reported

2. FEC Identification Number

C-00178160

3. ☐ This committee qualified as a multicandidate committee during the Reporting Period on \_\_\_\_\_ (Date)

4. TYPE OF REPORT (Check appropriate boxes)

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report  
☐ July 15 Quarterly Report ☒ 7/1/83-12/31/83  
☐ July 31 Mid Year Report (Non Election Year Only) ☒ January 31 Year End Rep. "Pre-registration summary"

☐ Monthly Report for \_\_\_\_\_

☐ Twelfth day report preceding \_\_\_\_\_ (Type of Election)

election on \_\_\_\_\_ in the State of \_\_\_\_\_

☐ Thirtieth day report following the General Election

on \_\_\_\_\_ in the State of \_\_\_\_\_

☐ Termination Report

(b) Is this Report an Amendment?

☐ YES ☐ NO

**SUMMARY (Pre-Registration)**

5. Covering Period 7/1/83 through 12/31/83

6. (a) Cash on Hand Jan. 1, 1983

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 28)

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

9. Debts and Obligations Owed TO The Committee  
(Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee  
(Itemize all on Schedule C or Schedule D)

COLUMN A  
This Period

COLUMN B  
Calendar Year-to-Date

\$ 5,648.73	\$ 5,648.73
\$ 19,341.78	\$ 19,341.78
\$ 27,429.00	\$ 53,321.71
\$ 46,770.78	\$ 58,970.44
\$ 26,579.79	\$ 38,779.45
\$ 20,190.99	\$ 20,190.99
\$ -0-	\$ -0-
\$ -0-	\$ -0-

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

Mellie Koart  
Type or Print Name of Treasurer

Mellie Koart  
SIGNATURE OF TREASURER

Mar. 22, 1985  
Date

For further information contact  
Federal Election Commission  
Tel. (202) 424-9530  
Lodge 202-223-4056

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 18 U.S.C. § 427.

All previous editions of FEC FORM 28 and FEC FORM 28a are obsolete and should no longer be used

FEC FORM 28 (3-80)

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**DETAILED SUMMARY PAGE  
of Receipts and Disbursements  
(Page 2, FEC FORM 3X)**

Attachment 7  
Page 2 of 4

**PRE-REGISTRATION SUMMARY**

Name of Committee (or Club) <b>SANTA BARBARA COUNTY LINCOLN CLUB C-00178160</b>		Report Covering the Period From <b>7/1/83</b> To <b>12/31/83</b>	
		<b>COLUMN A Total This Period</b>	<b>COLUMN B Calendar Year To-Date</b>
<b>I. RECEIPTS</b>			
<b>11. CONTRIBUTIONS (other than loans) FROM:</b>			
(a) Individuals/Persons Other Than Political Committees		27,279.00	53,171.71
(b) Political Party Committees		150.00	150.00
(c) Other Political Committees		-0-	-0-
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))		27,429.00	53,321.71
<b>12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES</b>		-0-	-0-
<b>13. ALL LOANS RECEIVED</b>		-0-	-0-
<b>14. LOAN REPAYMENTS RECEIVED</b>		-0-	-0-
<b>15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)</b>		-0-	-0-
<b>16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b>		-0-	-0-
<b>17. OTHER RECEIPTS (Dividends, Interest, etc.)</b>		-0-	-0-
<b>18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)</b>		27,429.00	53,321.71
<b>II. DISBURSEMENTS</b>			
<b>19. OPERATING EXPENDITURES</b>		3,844.29	10,218.95
<b>20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES</b>		-0-	-0-
<b>21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b>		20,737.50	24,062.50
<b>22. INDEPENDENT EXPENDITURES (use Schedule E)</b>		-0-	-0-
<b>23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 a(d)) (Use Schedule F)</b>		-0-	-0-
<b>24. LOAN REPAYMENTS MADE</b>		-0-	-0-
<b>25. LOANS MADE</b>		-0-	-0-
<b>26. REFUNDS OF CONTRIBUTIONS TO</b>			
(a) Individuals/Persons Other Than Political Committees		-0-	-0-
(b) Political Party Committees		-0-	-0-
(c) Other Political Committees		-0-	-0-
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))		-0-	-0-
<b>27. OTHER DISBURSEMENTS</b>		1,998.00	4,498.00
<b>28. TOTAL DISBURSEMENTS (Add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)</b>		26,579.79	38,779.45
<b>III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES</b>			
<b>29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)</b>		27,429.00	53,321.71
<b>30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)</b>		-0-	-0-
<b>31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)</b>		27,429.00	53,321.71
<b>TOTAL OPERATING EXPENDITURES from Line 19</b>		3,844.29	10,218.95
<b>33. OFFSETS TO OPERATING EXPENDITURES from Line 15</b>		-0-	-0-
<b>34. NET OPERATING EXPENDITURE (Subtract Line 33 from Line 32)</b>		3,844.29	10,218.95

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SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 1  
LINE NUMBER 21  
(Use original schedule for card category at the bottom  
Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

SANTA BARBARA COUNTY LINCOLN CLUB

C-00178160

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Contribution to Central Committee	Date (month, day, year)	Amount of Each Disbursement This Period
Santa Barbara County Republican Central Committee 3324 State St. "G" Santa Barbara, CA 93105	Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7/20/83	8,150.00
		9/30/83	9,575.00
		12/30/83	3,012.50
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
SUBTOTAL (Total Disbursements This Page, including all)			\$20,737.50
TOTAL (Total Disbursements This Page, this line number only)			\$20,737.50

MB

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THE LINCOLN CLUB  
of Santa Barbara County  
Post Office Box 30900  
Santa Barbara, CA 93130-0900



*Forrest*  
*1952*

RETURN RECEIPT  
REQUESTED

*Attorney General*

CERTIFIED

P 108 169 893

MAIL

**REPORT OF RECEIPTS AND DISBURSEMENTS**  
For a Political Committee Other Than an Authorized Committee

Attachment 8  
Page 1 of 3

84 JUL 12 1:22

(Summary Page)

<p><b>1. Name of Committee (In Full)</b> SANTA BARBARA COUNTY LINCOLN CLUB</p> <p><b>Address (Number and Street)</b> POST OFFICE BOX 30100</p> <p><b>City, State and ZIP Code</b> SANTA BARBARA, CA 93130-0349</p> <p><input type="checkbox"/> Check here if address is different than previously reported.</p> <p><b>2. FEC Identification Number</b> C-00176160</p> <p><b>3. <input type="checkbox"/> This committee qualified as a multicandidate committee during this Reporting Period on _____</b></p>	<p><b>4. TYPE OF REPORT (Check appropriate boxes)</b></p> <p>(a) <input type="checkbox"/> April 15 Quarterly Report    <input type="checkbox"/> October 15 Quarterly Report</p> <p><input checked="" type="checkbox"/> July 15 Quarterly Report    <input type="checkbox"/> January 31 Year End Report</p> <p><input type="checkbox"/> July 31 Mid Year Report (Non-Election Year Only)</p> <p><input type="checkbox"/> Monthly Report for _____</p> <p><input type="checkbox"/> Twelfth day report preceding _____ election on _____ in the State of _____</p> <p><input type="checkbox"/> Thirtieth day report following the General Election on _____ in the State of _____</p> <p><input type="checkbox"/> Termination Report</p> <p><b>(b) Is this Report an Amendment?</b></p> <p><input type="checkbox"/> YES    <input checked="" type="checkbox"/> NO</p>
--	--

SUMMARY		
<b>6. Covering Period</b> <u>APRIL 1, 1984</u> through <u>JUNE 30, 1984</u>	<b>COLUMN A</b> This Period	<b>COLUMN B</b> Calendar Year-to-Date
<b>6(a) Cash on hand January 1, 1984</b> .....		\$ 20,190.99
<b>(b) Cash on Hand at Beginning of Reporting Period</b> .....	\$ 13,261.53	
<b>(c) Total Receipts (from Line 10)</b> .....	\$ 3,285.00	\$ 10,545.00
<b>(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)</b> .....	\$ 16,546.53	\$ 30,735.99
<b>7. Total Disbursements (from Line 20)</b> .....	\$ 15,004.93	\$ 29,194.30
<b>8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))</b> .....	\$ 1,541.60	\$ 1,541.69
<b>9. Debts and Obligations Owed TO The Committee</b> .....	\$ -0-	
<b>10. Debts and Obligations Owed BY the Committee</b> .....	\$ -0-	

**NOTE:** I have examined this report and to the best of my knowledge and belief it is true, correct and complete.

Julia Koser  
Type or Print Name of Treasurer

Diane Hart  
Signature of Treasurer

7/6/84

For further information contact:  
Federal Election Commission  
Tel: Free 800-424-9630  
Local 202-523-4888

**NOTE:** Submission of false or misleading or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 437c.

All previous editions of FEC FORM 2 and FEC FORM 2a are obsolete and should no longer be used.

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FEC FORM 2a (3-80)

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**DETAILED SUMMARY PAGE  
of Receipts and Disbursements  
(Page 2, FIG FROM 3X)**

Name of Committee or Club <b>SANTA BARBARA COUNTY LINCOLN CLUB G-00178160</b>		Report Covering the Period From <b>Apr. 1, 1984</b> To <b>June 30, 1984</b>	
		<b>COLUMN A Total This Period</b>	<b>COLUMN B Calendar Year-To-Date</b>
<b>I. RECEIPTS</b>			
<b>11. CONTRIBUTIONS (other than loan) FROM:</b>			
(a) Individuals/Persons Other Than Political Committees .....		<b>3,285.00</b>	<b>810,545.00</b>
(b) Political Party Committees .....		<b>-0-</b>	<b>-0-</b>
(c) Other Political Committees .....		<b>-0-</b>	<b>-0-</b>
(d) TOTAL CONTRIBUTIONS (other than loan) (Add 11(a), 11(b) and 11(c)) .....		<b>3,285.00</b>	<b>10,545.00</b>
<b>12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES .....</b>		<b>-0-</b>	<b>-0-</b>
<b>13. ALL LOANS RECEIVED .....</b>		<b>-0-</b>	<b>-0-</b>
<b>14. LOAN REPAYMENTS RECEIVED .....</b>		<b>-0-</b>	<b>-0-</b>
<b>15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Returns, etc.) .....</b>		<b>-0-</b>	<b>-0-</b>
<b>16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES .....</b>		<b>-0-</b>	<b>-0-</b>
<b>17. OTHER RECEIPTS (Dividends, Interest, etc.) .....</b>		<b>-0-</b>	<b>-0-</b>
<b>18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17) .....</b>		<b>3,285.00</b>	<b>10,545.00</b>
<b>II. DISBURSEMENTS</b>			
<b>19. OPERATING EXPENDITURES .....</b>		<b>1,429.93</b>	<b>3,819.39</b>
<b>20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES .....</b>		<b>-0-</b>	<b>-0-</b>
<b>21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES .....</b>		<b>2,075.00</b>	<b>2,075.00</b>
<b>22. INDEPENDENT EXPENDITURES (see Schedule E) .....</b>		<b>-0-</b>	<b>-0-</b>
<b>23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 641 (d)) (Use Schedule F) .....</b>		<b>-0-</b>	<b>-0-</b>
<b>24. LOAN REPAYMENTS MADE .....</b>		<b>-0-</b>	<b>-0-</b>
<b>25. LOANS MADE .....</b>		<b>-0-</b>	<b>-0-</b>
<b>26. REFUNDS OF CONTRIBUTIONS TO</b>			
(a) Individuals/Persons Other Than Political Committees .....		<b>-0-</b>	<b>-0-</b>
(b) Political Party Committees .....		<b>-0-</b>	<b>-0-</b>
(c) Other Political Committees .....		<b>-0-</b>	<b>-0-</b>
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c)) .....		<b>-0-</b>	<b>-0-</b>
<b>27. OTHER DISBURSEMENTS .....</b>		<b>11,500.00</b>	<b>23,300.00</b>
<b>28. TOTAL DISBURSEMENTS (Add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27) .....</b>		<b>15,004.93</b>	<b>29,194.39</b>
<b>III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES</b>			
<b>29. TOTAL CONTRIBUTIONS (other than loan) from Line 11(d) .....</b>		<b>3,285.00</b>	<b>10,545.00</b>
<b>30. TOTAL CONTRIBUTION REFUNDS from Line 26(d) .....</b>		<b>-0-</b>	<b>-0-</b>
<b>31. NET CONTRIBUTIONS (other than loan) (Subtract Line 30 from Line 29) .....</b>		<b>3,285.00</b>	<b>10,545.00</b>
<b>32. TOTAL OPERATING EXPENDITURES from Line 19 .....</b>		<b>1,429.93</b>	<b>3,819.39</b>
<b>33. OFFSETS TO OPERATING EXPENDITURES from Line 15 .....</b>		<b>-0-</b>	<b>-0-</b>
<b>34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32) .....</b>		<b>1,429.93</b>	<b>3,819.39</b>

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## SCHEDULE B

## ITEMIZED DISBURSEMENTS

Page 12 of 1  
 NUMBER 21  
 Use separate schedules for each category of the Detailed Summary Page

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

SANTA BARBARA COUNTY LINCOLN CLUB C- 00178160

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Santa Barbara County Republican Central Committee 3324 State St. "G" Santa Barbara, CA 93105	Contribution to County Central Committee Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	4/2/84	\$2,075.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL			
TOTAL			\$2,075.00

M.B.

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## Page 1 of 3

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ALIGN AREA

ALIGN AND

☐ YES ☒ NO

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FEC FORM 3X (3/80)



**DETAILED SUMMARY PAGE  
of Receipts and Disbursements  
(Page 2, FEC FORM 3X)**

Attachment 9  
Page 2 of 3

Name of Committee (in Full)		Report Covering the Period		
SANTA BARBARA COUNTY LINCOLN CLUB C-00178160		From 7/1/84	To 10/1/84	
		COLUMN A Total This Period	COLUMN B Calendar Year To-Date	
<b>I. RECEIPTS</b>				
11. CONTRIBUTIONS (other than loans) FROM:				
(a) Individuals/Persons Other Than Political Committees		530,832.00	1,177.00	11(a)
(Memo Entry Unitemized \$ 320.00 )				
(b) Political Party Committees		-0-	-0-	11(b)
(c) Other Political Committees		-0-	-0-	11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (Add 11(a), 11(b) and 11(c))		30,832.00	1,377.00	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		-0-	-0-	12
13. ALL LOANS RECEIVED		-0-	-0-	13
14. LOAN REPAYMENTS RECEIVED		-0-	-0-	14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		-0-	-0-	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		-0-	-0-	16
17. OTHER RECEIPTS (Dividends, Interest, etc.)		-0-	-0-	17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)		30,832.00	41,377.00	18
<b>II. DISBURSEMENTS</b>				
19. OPERATING EXPENDITURES		1,540.80	5,360.19	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		-0-	-0-	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		16,450.00	18,525.00	21
22. INDEPENDENT EXPENDITURES (Use Schedule E)		-0-	-0-	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 (d)) (Use Schedule F)		-0-	-0-	23
24. LOAN REPAYMENTS MADE		-0-	-0-	24
25. LOANS MADE		-0-	-0-	25
26. REFUNDS OF CONTRIBUTIONS TO:				
(a) Individuals/Persons Other Than Political Committees		-0-	-0-	26(a)
(b) Political Party Committees		-0-	-0-	26(b)
(c) Other Political Committees		-0-	-0-	26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))		-0-	-0-	26(d)
27. OTHER DISBURSEMENTS		12,000.00	4,300.00	27
28. TOTAL DISBURSEMENTS (Add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)		29,990.80	59,185.19	28
<b>III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES</b>				
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)		30,832.00	41,377.00	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)		-0-	-0-	30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)		30,832.00	41,377.00	31
32. TOTAL OPERATING EXPENDITURES from Line 19		1,540.80	5,360.19	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15		-0-	-0-	33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)		1,540.80	5,360.19	34

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### ITEMIZED DISBURSEMENTS

Any information obtained from such Reports and Statements may not be sold or used by any person for the purpose of obtaining contributions or for commercial purposes, other than using the name and address of any individual contributor to obtain contributions from such contributor			
Name of Contributor (in Full)			
<b>SANTA BARBARA COUNTY LINCOLN LCUB C-00178160</b>			
A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Cash Disbursement This Period
Santa Barbara County Republican Central Committee 3324 State St. "G" Santa Barbara, CA 93103	Contribution to County Central Committee Disbursement for Primary & General - Other (specify)	7/23/84 9/20/84	\$ 1,350.00 11,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Cash Disbursement This Period
Carpinteria Federated Republican Women 4514 Foothill Rd. Carpinteria, CA 93013	Contribution to be used for headquarters rent Disbursement for Primary & General - Other (specify)	9/18/84	500.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Cash Disbursement This Period
Lompoc Federated Republican Women 1517 Onstott Rd. Lompoc, CA 93436	Contribution to be used for phone bank Disbursement for Primary & General - Other (specify)	9/18/84	800.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Cash Disbursement This Period
Santa Maria Republican Club 4565 Orcutt Expressway Santa Maria, CA 93455	Contribution to be used for phone bank Disbursement for Primary & General - Other (specify)	9/18/84	1,800.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Cash Disbursement This Period
Santa Ynez Federated Republican Women 46 Alta Vista Solvang, CA 93463	Contribution to be used for phone bank Disbursement for Primary & General - Other (specify)	9/20/84 9/18/84 9/18/84	290.00 510.00 200.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Cash Disbursement This Period
*General Telephone Co. 209 W. Pine Ave. Lompoc, CA 93436	Installation & rental of two phones for phone bank. (Santa Ynez Club)		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Cash Disbursement This Period
*Gayle Villa 648 Chalkhill Rd. Solvang, CA 96463	Rental of two flatbed trucks + supplies for Republican registration drive. (Santa Ynez Club)		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Cash Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Cash Disbursement This Period
<b>TOTAL</b>			

**REPORT OF RECEIPTS AND DISBURSEMENTS**  
For a Political Committee Other Than an Authorized Committee

Attachment 10  
Page 1 of 3

OCT 24 11:32

(Summary Page)

ALIGN AREA

ALIGN AREA

1 Name of Committee (In Full)

SANTA BARBARA COUNTY LINCOLN CLUB

Address (Number and Street)

POST OFFICE BOX 30100

City, State and ZIP Code

SANTA BARBARA, CA 93130-0349

☐ Check here if address is different than previously reported

2 FEC Identification Number

C-00178160

3 ☐ This committee qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_ (Date)

4 TYPE OF REPORT (check appropriate boxes)

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report

☐ July 15 Quarterly Report ☐ January 31 Year End Report

☐ July 31 Mid Year Report (In Collection Year Only)

☐ Monthly Report for \_\_\_\_\_

☒ Twelfth day report preceded by General (Type of Election)

Election on Nov. 6, '84 in the State of California

☐ Thirtieth day report following the General Election

on \_\_\_\_\_ in the State of \_\_\_\_\_

☐ Termination Report

(b) Is this Report an Amendment?

☐ YES

☒ NO

**SUMMARY**

5 Covering Period OCTOBER 1, 1984 through OCTOBER 17, 1984

6 (a) Cash on hand January 1, 19 84

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)

7 Total Disbursements (from Line 28)

8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

9 Debts and Obligations Owed TO The Committee

(itemize all on Schedule C or Schedule D)

10 Debts and Obligations Owed BY the Committee

(itemize all on Schedule C or Schedule D)

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

Nellie Koart

SIGNATURE OF TREASURER

October 19, 1984

For further information contact

Federal Election Commission

Washington, D.C. 20543-3031

202-436-6000

**DETAILED SUMMARY PAGE  
of Receipts and Disbursements  
(Page 2, FEC FORM 3)**

Attachment 10  
Page 2 of 3

Name of Committee: \_\_\_\_\_

**SANTA BARBARA COUNTY LINCOLN CLUB** C-00178160

From: \_\_\_\_\_ To: 10/15/84

**COLUMN A**      **COLUMN B**  
Total To Date      Calendar Year To Date

**I. RECEIPTS**

**11 CONTRIBUTIONS (other than loans) FROM**

(a) Individuals/Persons Other Than Political Committees

     Name Entry Unitemized \$ -0-

(b) Political Party Committees

(c) Other Political Committees

(d) **TOTAL CONTRIBUTIONS** (other than loans) (add 11(a), 11(b) and 11(c))

**12 TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES**

**13 ALL LOANS RECEIVED**

**14 LOAN REPAYMENTS RECEIVED**

**15 OFFSETS TO OPERATING EXPENDITURES** (Refunds, Rebates, etc.)

**16 REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES  
AND OTHER POLITICAL COMMITTEES**

**17 OTHER RECEIPTS** (Dividends, Interest, etc.)

**18 TOTAL RECEIPTS** (Add 11(d), 12, 13, 14, 15, 16 and 17)

**II. DISBURSEMENTS**

**19 OPERATING EXPENDITURES**

**20 TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES**

**21 CONTRIBUTIONS TO FEDERAL CANDIDATES AND  
OTHER POLITICAL COMMITTEES**

**22 INDEPENDENT EXPENDITURES** (Use Schedule E)

**23 COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES**

2 USC § 441 aid Use Schedule F

**24 LOAN REPAYMENTS MADE**

**25 LOANS MADE**

**26 REFUNDS OF CONTRIBUTIONS TO**

(a) Individuals/Persons Other Than Political Committees

(b) Political Party Committees

(c) Other Political Committees

(d) **TOTAL CONTRIBUTION REFUNDS** (Add 26(a), 26(b) and 26(c))

**27 OTHER DISBURSEMENTS**

**28 TOTAL DISBURSEMENTS** (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)

**III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES**

**29 TOTAL CONTRIBUTIONS** (other than loans) from Line 11(d)

**30 TOTAL CONTRIBUTION REFUNDS** from Line 26(d)

**31 NET CONTRIBUTIONS** (other than loans) (Subtract Line 30 from Line 29)

**32 TOTAL OPERATING EXPENDITURES** from Line 19

**33 OFFSETS TO OPERATING EXPENDITURES** from Line 15

**34 NET OPERATING EXPENDITURES** (Subtract Line 33 from Line 32)

COLUMN A Total To Date	COLUMN B Calendar Year To Date	
\$ 2,550.00	\$ 43,777.00	11(d)
-0-	150.00	11(b)
-0-	-0-	11(c)
2,550.00	43,927.00	11(d)
-0-	-0-	12
-0-	-0-	13
-0-	-0-	14
-0-	-0-	15
-0-	-0-	16
-0-	-0-	17
2,550.00	43,927.00	18
3,363.81		19
-0-	-0-	20
3,363.81	2,425.00	21
-0-	-0-	22
-0-	-0-	23
-0-	-0-	24
-0-	-0-	25
-0-	-0-	26(a)
-0-	-0-	26(b)
-0-	-0-	26(c)
-0-	-0-	26(d)
3,363.81		27
3,363.81	43,068.81	28
	43,927.00	29
	-0-	30
	43,927.00	31
		32
		33
		34



## SCHEDULE C

## FINANCED DISBURSEMENTS

Page 1 of 3  
 Date: 10/11/04  
 The information provided for each category of the Schedule is on a separate page.

Page 3 of 3

Any information copied from such Reports and Disbursements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full) **SANTA BARBARA COUNTY LINCOLN CLUB** C-00170100

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
<b>Santa Barbara County Republican Central Committee</b>	<b>Contribution to Central Committee</b>	<b>10/3/04</b>	<b>\$2,000.00</b>
<b>3334 State St. "g"</b>	<b>Disbursement for: Secretary Treasurer Other (specify):</b>	<b>10/11/04</b>	<b>1,000.00</b>
<b>Santa Barbara, CA 93101</b>			
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: Secretary Treasurer Other (specify):		
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: Secretary Treasurer Other (specify):		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: Secretary Treasurer Other (specify):		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: Secretary Treasurer Other (specify):		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: Secretary Treasurer Other (specify):		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: Secretary Treasurer Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: Secretary Treasurer Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: Secretary Treasurer Other (specify):		
<b>SUBTOTAL of Disbursements This Page (add only)</b>			
<b>TOTAL This Period from page this line number only</b>			<b>\$3,000.00</b>

23  
 93033460229



**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

**BQ-1**

**Mellie Koart, Treasurer**  
**Santa Barbara County Lincoln Club**  
**P.O. Box 30100**  
**Santa Barbara, CA 93130-0349**

**JAN 30 1985**

**Identification Number: C90178160**

**Reference: Statement of Organization (3/1/84)**

**Dear Ms. Koart:**

This letter is prompted by the Commission's preliminary review of your Statement of Organization. The review raised questions concerning certain information contained in the Statement. An itemization follows:

-Any affiliated or connected organization must be identified on your Statement of Organization. Please clarify your relationship, if any with Santa Barbara County Republican Central Committee which appears to be an affiliated committee. For further guidance, please refer to 11 CFR 100.5(g) and 100.6. If there are no other committees or organizations with which you share control or financing, please indicate "None" on Line 6. If you do share control or financing with other committees or organizations, please list their names, addresses, and relationships on that line. 11 CFR 102.2.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

**Sincerely,**

A handwritten signature in cursive script, reading "Michael D. Butterfield".

**Michael D. Butterfield**  
**Reports Analyst**  
**Reports Analysis Division**

5033522798





**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

EO-2

Mellie Koart, Treasurer  
Santa Barbara County Lincoln Club  
P.O. Box 30100  
Santa Barbara, CA 93130-0349

FEB 13 1985

Identification Number: C00178160

Reference: October Quarterly (7/1/84-9/30/84) and 12 Day Pre-General (10/1/84-10/17/84) Reports

Dear Ms. Koart:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report discloses no payments for administrative expenses. Each committee utilizing separate Federal and non-Federal accounts is required to allocate any administrative expenses between the accounts in proportion to the amount of funds expended on Federal and non-Federal elections or on another reasonable basis. Administrative expenses are those day-to-day costs of operating the committee, including rent, utilities, salaries and other miscellaneous office expenses. The Federal account of the committee must pay its share of such expenses. 11 CFR 106.1(e) and 102.5(a)(1)(i).

If your organization has incurred such administrative costs and your non-Federal account has paid for all such costs, your Federal account must reimburse the non-Federal account for its portion of the expenses. The amount incurred by the Federal account should be disclosed as a debt or obligation owed to the non-Federal account on Schedule D supporting Line 10 of the Summary Page. When payments are made toward the debt, they should be reported on Schedule B supporting Line 19 of the Detailed Summary Page and the debt should be reduced by a corresponding amount.

MB. [-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Act]

MB  
precludes a committee from making contributions to another political committee in excess of \$5,000 per calendar year. (2 U.S.C. §441a(a)) If you have made an excessive contribution, the Commission recommends that you notify the recipient and request a refund of the amount in excess of \$5,000. Please inform the Commission immediately in writing of the refund and provide a photocopy of your refund request sent to the recipient. In addition, any refund should appear on Line 16 of Schedule A of your next report.

If the contribution(s) in question was incorrectly reported and/or you have additional information, you may wish to submit documentation for the public record.

Although the Commission may take further legal steps concerning the excessive contribution(s), your prompt action in obtaining a refund of the excessive amount will be taken into consideration.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

*Michael D. Butterfield*

Michael D. Butterfield  
Reports Analyst  
Reports Analysis Division



**lincoln club**  
of SANTA BARBARA COUNTY  
POST OFFICE BOX 20160  
SANTA BARBARA, CALIFORNIA 93120-0160  
PC 0017A160

05 FEB 20 12:48

Attachment 13

**OFFICERS**

James E. Campbell Sr. President  
Diane Klinger, Vice President  
Nellie Koart, Treasurer  
Phil Moore, Secretary

**DIRECTORS**

Holmes Tuttle  
A. Brooks Firestone  
J. William Beaver  
Elmer W. Koonce  
Eldon Haskell  
George Bliss  
Mabel Shultz  
Mark Smith  
Louis A. Lucas  
General S.W. Wells  
Clifford Sponsel  
Hazel Richardson  
Pat Roberts  
Gary Ricks  
Jennie Pettow  
Oswald Da Ros  
Steven Little  
John Van Wingerden

**PAST PRESIDENTS**

J. William Beaver  
A. Brooks Firestone  
Elmer W. Koonce  
George Castagnola

Michael D. Butterfield  
Federal Election Commission  
Washington, D.C. 20463

February 14, 1985

Re: Statement of Organization (3/1/84)  
FEC letter of January 30, 1984

Dear Mr. Butterfield:

This letter is to state that the Santa Barbara County Lincoln Club is in no way affiliated or connected to the Santa Barbara County Republican Central Committee.

On our Statement of Organization form, Line 6 should read "None".

Most sincerely,

*Nellie Koart*

Nellie Koart, Treasurer

930907615341890

ANALYST: Michael D. Butterfield

CONVERSATION WITH: Nellie Koart

COMMITTEE: Santa Barbara County Lincoln Club

DATE: 2/26/85

SUBJECT(S): Excessive Contributions and Administrative Expenses

88040713481  
Nellie Koart, treasurer, for the Santa Barbara County Lincoln Club called to ask questions about the RFAI that was sent to her attention. The RFAI inquired about reporting problems found in the October Quarterly and 12 Day Pre-General Reports. The treasurer stated that she was not aware of the limitations on contributions and asked for guidance on the matter. The Analyst asked if there was any possibility that her committee might be affiliated with the Santa Barbara County Central Committee to which the excessive contribution was made. The treasurer then stated that she was not sure of the conditions for affiliation, of which the analyst explained the basic criteria that should be met. The treasurer then asked if she could call the treasurer of the Santa Barbara County Republican Central Committee Evelyn Sullivan and call the analyst back on 2/27/85. The analyst then informed the treasurer that he would like to conduct further research of the matter.\*

Ms. Koart also informed the analyst that Administrative Expenses were minimal, mainly because the committee operated out of a P.O.Box and was staffed by volunteers.

The Analyst also informed the treasurer that the excessives made in 1983 would also have to be refunded.

\* The analyst spoke with RAD analyst J. HUNTER BRYAN, who had reviewed the reports for the Santa Barbara County Republican Central Committee. Mr. Bryan had made similar inquiries concerning the transactions between these two committees and also questioned if they might be affiliated. Both analysts agreed that affiliation was not noted on either Statement of Organization and that it would be the committees' responsibility to determine if they are affiliated.

ANALYST: Michael D. Butterfield

CONVERSATION WITH: Nellie Koart

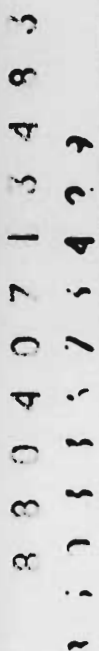
COMMITTEE: Santa Barbara County Lincoln Club

DATE: 2/27/85

SUBJECT(S): Excessive Contributions and Affiliation

Nellie Koart called to inform the analyst that the two committees are not affiliated. The analyst informed the treasurer that a copy of the letter requesting a refund should be sent to the Commission. The treasurer also stated that Santa Barbara County Central Committee did not have adequate funds in their account and would report the money owed to the Santa Barbara County Lincoln Club as a debt.

88040713482



35433 0 P12:34

**February 27, 1985**

James E. Campbell Sr. President  
 Don Klinger Vice President  
 Helen Robert Treasurer  
 Phil Moore Secretary

Michael D. Butterfield  
Federal Election Commission  
Washington, D.C. 20463

Re: Schedule B of October Quarterly (7/1/84 - 9/30/84) and  
12 Day Pre-General (10/1/84 - 10/17/84) Reports - Item 2

Holmes Tuttle  
 A Brooks Firestone  
 J William Brewer  
 Elmer W. Moore  
 Eldon Marshall  
 George Bliss  
 Melvil Shultz  
 Mark Smith  
 Louis A. Lucas  
 General S W Wells  
 Clifford Spencer  
 Hazel Richardson  
 Pat Roberts  
 Gary Ricks  
 Jennie Peterson  
 Oswald De Ren  
 Steven Little  
 John Van Wingerden

Dear Mr. Butterfield:

This letter is to confirm our telephone conversations of February 26 and 27, 1985, and to submit the following information:

Our committee was unaware that it could not give the Santa Barbara County Republican Central Committee funds in excess of \$5,000.00 per calendar year. Both the Lincoln Club and the Central Committee have not donated any monies to Federal candidates or causes. State, county and city candidates and causes are the recipients of their donations. We sincerely apologize for our misunderstanding in this matter, and will do our best to interpret the limits of the Act correctly from here on.

1 William Braver  
4 Abner Firestone  
Elmer W. Acker  
George Castagna

I have written the Central Committee (copy enclosed) a letter requesting the return of \$19,862.50 for 1983 and \$13,325.00 for 1984. Since they are without funds in their Federal Account at the moment, they will report a debt to us on their next report and we will report on Item # 9 of the Summary Page of our next report a debt to us of the \$33,187.50 total amount in question. They anticipate that they will be able to pay us back sometime in July after their yearly fundraiser. At such time, we will forward a copy of that check to you for your records.

In the future, the Lincoln Club's donations to the Central Committee, which are in excess of \$5,000.00, will be designated to their non-Federal Account. This will further insure that fact that the monies will not be used for Federal purposes.

Yours sincerely,

No. 14. 1887. 12.





**Lincoln Club**  
of SANTA BARBARA COUNTY  
POST OFFICE BOX 30100  
SANTA BARBARA, CALIFORNIA 93130-0100

February 27, 1985

**OFFICERS**

James E. Campbell Sr., President  
Diane Klinger, Vice President  
Nellie Koart, Treasurer  
Phil Moor, Secretary

Santa Barbara County Republican Central Committee  
3324 State Street, "C"  
Santa Barbara, CA 93105

**DIRECTORS**

Attention: Treasurer Evie Sullivan

Holmes Tuttle  
A. Brooks Firestone  
J. William Beaver  
Elmer W. Koonce  
Elden Haskell  
George Shes  
Mabel Shuts  
Mark Smith  
Louis A. Lucas  
General S.W. Wells  
Clifford Spence  
Hazel Richardson  
Pat Roberts  
Gory Richs  
James Petlow  
Oswald De Ros  
Steven Little  
John Van Wingerden

Dear Evie:

The Federal Election Commission has brought to my attention the fact that we donated funds to your committee in excess of their \$5,000.00 per calendar year limit during the 1983 and 1984 years. I was unaware that this limit pertained to our committees.

Please arrange to refund to our committee as soon as possible the following amounts:

1983 -	\$19,862.50
1984 -	13,325.00
Total -	\$33,187.50

**PAST PRESIDENTS**

J. William Beaver  
A. Brooks Firestone  
Elmer W. Koonce  
George Castagnola

I offer you our most sincere apologies with regard to this inconvenience to your committee.

Yours truly,

*Nellie Koart*  
Nellie Koart, Treasurer



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-5

APR 19 1985

Nellie Koart, Treasurer  
Santa Barbara County Lincoln Club  
P.O. Box 30100  
Santa Barbara, CA 93130-0349

Identification Number: C00178160

Reference: 1983 Year End Report (7/1/83-12/31/83)

Dear Ms. Koart:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Act precludes a committee from making contributions to another political committee in excess of \$5,000 per calendar year. (2 U.S.C. §441a(a))

The Commission recognizes that you have notified the recipient and requested a refund of the amount in excess of \$5,000.

Although the Commission may take further legal steps concerning the excessive contribution(s), your prompt action in obtaining a refund of the excessive amount will be taken into consideration.

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

A handwritten signature in cursive script that reads "Michael D. Butterfield".

Michael D. Butterfield  
Reports Analyst  
Reports Analysis Division

8 3 0 4 0 7 1 3 4 8 5

ANALYST: MICHAEL BUTTERFIELD

CONVERSATION WITH: NELIE KOART

COMMITTEE: SANTA BARBARA COUNTY LINCOLN CLUB

DATE: 5/9/85

SUBJECT(S): 1983 YEAR END EXCESSIVES

Nelie Koart, treasurer for the Santa Barbara County Lincoln Club, called to discuss an informational notice she received concerning excessive contributions made during the 1983 Year End Report. I informed Ms. Koart that even though she was aware of the apparent excessive contributions the letter was sent primarily as notification for her and that we needed to have it put on public record as required by law. I also stated that the Commission had received a letter from Ms. Koart that her committee had made efforts to remedy the situation.

88040713486

**Lincoln Club**  
SANTA BARBARA, CALIFORNIA 93101-0000  
P O BOX 70100

Attachment 19

May 10, 1983

**OFFICERS**

James E. Campbell Sr., President  
Diane Klinger, Vice President  
Nellie Koart, Treasurer  
Ed Moore, Secretary

**DIRECTORS**

Malcolm Tuttle  
A. Brooks Firestone  
J. William Beaver  
Elmer W. Koonce  
Edna Marshall  
George Elms  
Michael Shabo  
Mark Smith  
Louis A. Lucas  
General E.W. Wells  
Clifford Spence  
Hazel Richardson  
Pat Roberts  
Gary Hicks  
Jennie Feltus  
Oswald De Ros  
Steven Little  
John Van Wingen

**PAST PRESIDENTS**

J. William Beaver  
A. Brooks Firestone  
Elmer W. Koonce  
George Castagnole

Michael D. Butterfield  
Federal Election Commission  
Washington, D. C. 20463

Re: Schedule B of 1983 Pre-Registration Report (7/1/83-12/31/83)

Dear Mr. Butterfield:

This letter is to confirm our telephone conversation of May 9, 1983 and to submit the following information:

Our committee is now aware of the fact that it cannot make donations in excess of \$5,000.00 per calendar year to another political committee. We have, as you know, taken steps to remedy the situation. You have in your files copies of our communications with the Santa Barbara Republican Central Committee. That committee assures us that they will repay the amount in question after they hold their annual fundraiser at the end of June. We are in constant communication with them with regard to this matter, and we will notify you immediately when it is resolved.

Thank you for your understanding, help and patience in this situation.

Most sincerely,

*Nellie Koart*  
Nellie Koart, Treasurer



## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

21 June 1985

MEMORANDUM

TO: CHARLES N. STEELE  
GENERAL COUNSEL

THROUGH: JOHN C. SURINA  
STAFF DIRECTOR

FROM: JOHN D. GIBSON  
ASSISTANT STAFF DIRECTOR  
REPORTS ANALYSIS DIVISION

SUBJECT: REFERRAL OF THE SANTA BARBARA COUNTY REPUBLICAN  
CENTRAL COMMITTEE

This is a referral of the Santa Barbara County Republican Central Committee ("the Committee") for failing to file the 1983 Year End Report of Receipts and Disbursements by Election Day, November 6, 1984.

The Committee also accepted apparent excessive contributions totalling \$19,862.50 in 1983 and \$14,978.36 in 1984. Upon notification by the Reports Analysis Division ("RAD"), the Committee transferred-out a partial amount to its non-Federal account. The remaining amount in excess is being disclosed as an outstanding debt and is expected to be refunded with proceeds from a July 1985 fundraiser.

In addition, the Committee received a total of \$6,135 in funds from organizations not registered with the Commission. To remedy the matter, the Committee transferred-out the funds to its non-Federal account.

For your information, a companion referral is being submitted for the Santa Barbara County Lincoln Club. If you have any questions on this matter, please contact J. Hunter Bryan at 523-4048.

Attachment



**REPORTS ANALYSIS REFERRAL**

**TO**

**OFFICE OF GENERAL COUNSEL**

**DATE:** 21 June 1985

**ANALYST:** J. Hunter Bryan

**I. COMMITTEE:** Santa Barbara County Republican  
Central Committee (C00174334)  
Evelyn E. Sullivan, Treasurer  
3324-G State Street  
Santa Barbara, CA 93105

**II. RELEVANT STATUTE:** 2 U.S.C. §434(a)(4)(A)(iv)  
11 CFR 104.5(c)(2)(i)(B)  
2 U.S.C. §441a(f)  
11 CFR 102.5 and 2 U.S.C. §441b

**III. BACKGROUND:**

**A. Failure to Timely File the 1983 Year End Report**  
- 2 U.S.C. §434(a)(4)(A)(iv)  
11 CFR 104.5(c)(2)(i)(B)

The Santa Barbara County Republican Central Committee ("the Committee") failed to file the 1983 Year End Report by Election Day, November 6, 1984. The Committee registered with the Commission as a party committee on January 3, 1984 (Attachment 2). The first report filed by the Committee, the 1984 April Quarterly Report, disclosed an initial cash-on-hand figure of \$57,091.07 (Attachment 3).

A Request for Additional Information ("RFAI") was sent to the Committee on January 30, 1985, questioning the source of initial cash (Attachment 4). Ms. Evelyn E. Sullivan, the Committee's treasurer, called to discuss the matter on February 6, 1985. The Reports Analysis Division ("RAD") analyst advised Ms. Sullivan to provide memo schedules for the Committee's cash-on-hand at the time of registration (Attachment 5). The Committee responded on February 12, 1985, by submitting a 1983 Year End Report disclosing activity from July 1, 1983 through December 31, 1983 (Attachment 6).

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SANTA BARBARA COUNTY REPUBLICAN  
CENTRAL COMMITTEE  
REPORTS ANALYSIS OGC REFERRAL  
PAGE 2

B. Receipt of Excessive Contributions - 2 U.S.C. §441a(f)

The Committee's 1983 Year End Report disclosed the receipt of \$20,737.50 in contributions from the Santa Barbara County Lincoln Club ("the Club") between July 20 and December 30, 1983 (See Chart A and Attachment 6). Based on the Committee's reported aggregate year-to-date total of \$24,862.50 in contributions received from the Club and communications with the Committee and the Club, it appears that the Committee received an additional \$4,125 from the Club prior to July 20, 1983. This resulted in the receipt of apparent excessive contributions totalling \$19,862.50 from the Club (a non-party committee) in 1983.

The Committee's 1984 July Quarterly, October Quarterly, and 30 Day Post-General Reports disclosed the receipt of \$29,978.36 in contributions between April 4 and November 7, 1984 from the Club, the John Carpenter Committee (an unregistered organization), and Islay Investments (a partnership) (See Chart B and Attachments 7, 8, and 9). This resulted in the receipt of apparent excessive contributions totalling \$14,978.36 in 1984.

An RFAI was sent on January 30, 1985 for the apparent excessive in-kind contribution from Islay Investments, and the contribution from the John Carpenter Committee which were disclosed on the Committee's 1984 30 Day Post-General Report (Attachment 10). The RFAI advised the Committee that the Act precluded a committee from receiving contributions from a person in excess of \$5,000 per calendar year. The Committee was asked to either refund or transfer-out the amount in excess of \$5,000. Notification of the apparent excessive contributions from the Santa Barbara County Lincoln Club ("the Club"), however, was held pending clarification of possible affiliation between the committees.

On February 6, Ms. Sullivan called the Commission to discuss the matters raised in the RFAIs (Attachment 5). She was advised to refund or transfer-out the excessive portion of the contributions from Islay Investments and the John Carpenter Committee. After the remaining items raised in the January 30, 1985 RFAIs were addressed, the RAD analyst asked Ms. Sullivan about possible affiliation with the Club. She stated the Committee was under the impression that the Club was also a party committee and therefore transfers between the two committees were unlimited. The RAD analyst stated that the Commission was attempting to determine whether the Club was an affiliated party committee; and if it was not, the Committee would be in receipt of excessive contributions.

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SANTA BARBARA COUNTY REPUBLICAN  
CENTRAL COMMITTEE  
REPORTS ANALYSIS OGC REFERRAL  
PAGE 3

The Commission received a letter via certified mail from Ms. Sullivan on February 12, 1985, acknowledging the receipt of the excessive amounts from Islay Investments and the John Carpenter Committee (Attachment 11, pages 2 and 3). The Committee's response included identification of Islay Investments' partners, and a copy of two (2) checks totalling \$6,768.36 for the transfer-out to the Committee's non-Federal account on February 11, 1985 (Attachment 11, pages 4, 6, and 7).

An RFAI was sent to the Committee on February 13, 1985 for accepting \$13,325 in apparent excessive contributions from the Club, as disclosed on the Committee's 1984 October Quarterly and 30 Day Post-General Reports (Attachment 12). The RFAI advised the Committee that the Act precluded a committee from receiving contributions from another committee in excess of \$5,000 per calendar year. The Committee was asked to either refund or transfer-out the amount in excess of \$5,000.

On February 19, 1985, Ms. Sullivan called the RAD analyst to discuss the RFAI (Attachment 13). She stated that the funds should have been deposited in the Committee's non-Federal account, since it had only been used to support non-Federal candidates. The RAD analyst advised Ms. Sullivan to refund or transfer-out the excessive amount. Ms. Sullivan responded that the Committee would not have funds available until after its 1985 July fundraiser. The RAD analyst recommended that the Committee disclose the excess portion as a debt owed to the Club.

On February 21, 1985, the Commission received a letter from Mrs. Sullivan which acknowledged the receipt of \$13,325 in excessive contributions from the Club in 1984 (Attachment 14). The response explained that the Committee had believed the Club to be a party organization, but that it was now aware that the Club does not qualify as a party organization. The Committee stated its intention to transfer-out the excessive funds to a non-Federal account in July of 1985 with funds that the Committee expects to raise from its annual fundraiser.

Upon examination of the Committee's 1983 Year End Report, which was received on February 12, 1985, the RAD analyst called Ms. Sullivan on February 26, 1985 to inform her that \$15,737.50 in apparent excessive contributions had been received from the Club during 1983. Ms. Sullivan stated that she would also include the \$4,125 of unitemized receipts in the total amount received from the Club in 1983. Based upon the Committee's financial status, the RAD analyst recommended that the outstanding debt owed to the Club include the 1983 excessive contributions (Attachment 15).

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SANTA BARBARA COUNTY REPUBLICAN  
CENTRAL COMMITTEE  
REPORTS ANALYSIS OGC REFERRAL  
PAGE 4

A Second Notice for the 1984 October Quarterly and 30 Day Post-General Reports was sent to the Committee on March 7, 1985 (Attachment 16). The notice referenced the Committee's February 21, 1985 response and requested that the Committee provide a debt schedule to disclose the debt owed to its non-Federal account.

On March 7, 1985, the Commission received a letter (dated March 3, 1985) sent via certified mail on March 4, 1985 from Ms. Sullivan which explained that

Our Committee was under the erroneous impression that we could accept unlimited transfers from the Santa Barbara County Lincoln Club, believing they had registered with the Federal Election Commission as a party organization.

The Committee stated that it had decided on a different course of action than it had previously stated in its February 21, 1985 response. Instead of transferring the excessive funds to its non-Federal account, the Committee stated that it now intended to repay the Club with receipts from their annual fundraiser in July, since it does not have funds available at this time. In addition, the Committee submitted an amended 1984 Year End Report disclosing a \$33,187.50 debt owed to the Club and a copy of a letter to the Club acknowledging the excessive contributions (Attachment 17).

Written notification regarding receipt of the apparent excessive contributions disclosed on the 1983 Year End Report was sent on March 13, 1985, in order to inform the Committee that the Commission may take further legal action (Attachment 18).

On March 14, 1985, Ms. Sullivan called the RAD analyst to discuss the March 7, 1985 Second Notice that the Committee had received (Attachment 19). A letter was received from Ms. Sullivan on March 21, 1985, indicating that the information requested had been previously provided in the Committee's response dated March 3, 1985 (Attachment 20).

On March 25, 1985, the Commission received a letter from Ms. Sullivan which referenced the March 13, 1985 notification concerning the apparent excessive contributions on the Committee's 1983 Year End Report (Attachment 21). The response stated that the Committee had responded to this request in its March 3, 1985 response.

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SANTA BARBARA COUNTY REPUBLICAN  
CENTRAL COMMITTEE  
REPORTS ANALYSIS OGC REFERRAL  
PAGE 5

C. Federal and Non-Federal Activity  
- 11 CFR 102.5 and 2 U.S.C. §441b

The Committee's 1984 October Quarterly and 30 Day Post-General Reports disclosed \$6,135 in funds received between September 5 and November 7, 1984 from four (4) organizations not registered with the Commission (See Chart C and Attachments 8 and 9).

RFAI's for the 1984 October Quarterly and 30 Day Post-General Reports were sent on January 30, 1985. Each RFAI advised the Committee that under 11 CFR 102.5(b), organizations which are not registered with the Commission must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution. The Committee was asked to clarify whether the contributions received from these organizations were permissible (Attachments 10 and 22).<sup>1/</sup> Ms. Sullivan called the RAD analyst on February 6, 1985 and was advised to refund or transfer-out any impermissible funds (Attachment 5).

On February 12, 1985, the Commission received a letter from Ms. Sullivan and copies of two checks for \$6,135 in transfers-out to the Committee's non-Federal account on February 11, 1985 (Attachment 11, pages 2, 3, 5, and 6).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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<sup>1/</sup> California allows unlimited corporate, labor, and individual contributions (See Campaign Finance Law 84, Federal Election Commission, page CA-1).

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## CHART A

## Apparent Excessive Contributions Received in 1983

NAME OF CONTRIBUTOR	AMOUNT AND DATE OF RECEIPT	AMOUNT IN EXCESS	AMOUNT AND DATE OF REFUND OR TRANSFER-OUT
Santa Barbara Lincoln Club	\$ 4,125.00 <sup>1/</sup> 8,150.00 - 07/20/83 9,575.00 - 10/13/83 3,012.50 - 12/30/83	\$ 7,275.00 9,575.00 3,012.50	Listed as debt on Schedule D <sup>2/</sup>
TOTAL	\$24,862.50	\$19,862.50	

<sup>1/</sup> Based on the reported aggregate year-to-date figure and correspondence received from the Committee and the Club, it appears that the Committee received \$4,125 in contributions from the Club prior to July 20, 1983. A RFAI requesting that the Committee provide a schedule itemizing this receipt will be sent to the Committee.

<sup>2/</sup> The Committee intends to refund the excessive amounts; however, due to a lack of funds, the Committee has disclosed the apparent excessive contributions as an outstanding obligation on Schedule D.

## CHART B

## Apparent Excessive Contributions Received in 1984

NAME OF CONTRIBUTOR	AMOUNT AND DATE OF RECEIPT	AMOUNT IN EXCESS	AMOUNT AND DATE OF REFUND OR TRANSFER-OUT
Santa Barbara Lincoln Club	\$ 2,075.00 - 04/04/84 1,350.00 - 07/30/84 11,000.00 - 09/21/84 2,000.00 - 10/10/84 1,900.00 - 10/18/84	\$ 9,425.00 2,000.00 1,900.00	Listed as debt on Schedule D <sup>1/</sup>
John Carpenter Committee	\$ 6,000.00 - 11/07/84	\$ 1,000.00	\$6,000.00 - 02/11/85
Islay Investments <sup>2/</sup>	\$ 1,027.76 - 04/01/84 708.00 - 05/01/84 708.00 - 06/01/84 708.00 - 07/01/84 708.00 - 08/01/84 708.00 - 09/01/84 708.00 - 10/01/84 377.60 - 11/01/84	\$ 275.76 377.60	\$ 275.76 - 02/11/85 377.60 - 02/11/85
TOTAL	\$29,978.36	\$14,978.36	

<sup>1/</sup> The Committee intends to refund the excessive amounts; however, due to a lack of funds, the Committee has disclosed the apparent excessive contributions as an outstanding obligation on Schedule D.

<sup>2/</sup> All contributions are in-kind.

8 8 0 4 0 7 1 3 4 9 6

CHART C

Receipts from Unregistered Organizations in 1984

NAME OR ORGANIZATION	AMOUNT AND DATE OF RECEIPT	AMOUNT AND DATE OF TRANSFER-OUT
John Carpenter Committee	\$6,000.00 - 11/07/84	\$6,000.00 - 02/11/85
Lompac Valley Republican Women, Federated	\$ 15.00 - 10/26/84	\$ 15.00 - 02/11/85
Santa Maria Valley Republican Women, Fed.	\$ 100.00 - 10/31/84	\$ 100.00 - 02/11/85
Young Republicans of Santa Barbara County	\$ 20.00 - 09/05/84	\$ 20.00 - 02/11/85
TOTAL	\$6,135.00	

PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
SANTA BARBARA COUNTY REPUBLICAN CENTRAL COMMITTEE				PARTY NON-QUALIFIED		ID #C00174334
CONNECTED ORGANIZATION: CALIFORNIA STATE CENTRAL COMMITTEE						
1983	YEAR-END	57,091	-	1JUL83 -31DEC83	12	85FEC/366/2397
	YEAR-END - AMENDMENT	57,091	-	1JUL83 -31DEC83	3	85FEC/367/3721
	YEAR-END - AMENDMENT	-	-	1JUL83 -31DEC83	2	85FEC/369/0097
	REQUEST FOR ADDITIONAL INFORMATION			1JUL83 -31DEC83	3	85FEC/368/0502
1984	STATEMENT OF ORGANIZATION			3JAN84	2	83FEC/290/0354
	STATEMENT OF ORGANIZATION - AMENDMENT			2MAR84	2	84FEC/297/4653
	APRIL QUARTERLY	1,815	12,599	1JAN84 -31MAR84	11	84FEC/308/2308
	APRIL QUARTERLY - AMENDMENT	1,815	12,599	1JAN84 -31MAR84	4	85FEC/366/2409
	APRIL QUARTERLY - AMENDMENT	1,815	12,599	1JAN84 -31MAR84	3	85FEC/367/3718
	REQUEST FOR ADDITIONAL INFORMATION			1JAN84 -31MAR84	1	85FEC/362/2922
	JULY QUARTERLY	25,658	33,713	1APR84 -30JUN84	13	84FEC/321/4135
	JULY QUARTERLY - AMENDMENT	25,658	33,713	1APR84 -30JUN84	5	84FEC/341/3198
	JULY QUARTERLY - AMENDMENT	-	-	1APR84 -30JUN84	2	85FEC/366/2413
	JULY QUARTERLY - AMENDMENT	-	-	1APR84 -30JUN84	1	85FEC/366/2702
	JULY QUARTERLY - AMENDMENT	25,658	33,713	1APR84 -30JUN84	3	85FEC/367/3715
	REQUEST FOR ADDITIONAL INFORMATION			1APR84 -30JUN84	3	85FEC/362/2924
	OCTOBER QUARTERLY	75,981	80,404	1JUL84 -30SEP84	22	84FEC/341/3352
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL84 -30SEP84	4	85FEC/366/2415
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL84 -30SEP84	1	85FEC/366/2703
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL84 -30SEP84	3	85FEC/367/0411
	OCTOBER QUARTERLY - AMENDMENT	75,981	80,404	1JUL84 -30SEP84	3	85FEC/367/3712
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL84 -30SEP84	2	85FEC/368/4152
	REQUEST FOR ADDITIONAL INFORMATION			1JUL84 -30SEP84	6	85FEC/362/2928
	REQUEST FOR ADDITIONAL INFORMATION			1JUL84 -30SEP84	4	85FEC/366/0320
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL84 -30SEP84	2	85FEC/367/3924
	PRE-GENERAL	-	-	1OCT84 -17OCT84	1	85FEC/359/1199
	POST-GENERAL	18,766	31,092	1OCT84 -26NOV84	15	84FEC/354/2118
	POST-GENERAL - AMENDMENT	-	-	1OCT84 -26NOV84	1	85FEC/366/2704
	POST-GENERAL - AMENDMENT	-	-	1OCT84 -26NOV84	3	85FEC/366/2419
	POST-GENERAL - AMENDMENT	-	-	1OCT84 -26NOV84	1	85FEC/367/0651
	POST-GENERAL - AMENDMENT	-	-	1OCT84 -26NOV84	1	85FEC/368/5046
	POST-GENERAL - AMENDMENT	18,766	31,092	27NOV84 -31DEC84	3	85FEC/367/3709
	REQUEST FOR ADDITIONAL INFORMATION			1OCT84 -26NOV84	4	85FEC/362/2917
	REQUEST FOR ADDITIONAL INFORMATION			1OCT84 -26NOV84	1	85FEC/366/0867
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT84 -26NOV84	1	85FEC/367/4533
	YEAR-END	2,788	10,065	27NOV84 -31DEC84	14	85FEC/364/1287
	YEAR-END - AMENDMENT	2,588	9,865	27NOV84 -31DEC84	4	85FEC/366/2379
	YEAR-END - AMENDMENT	2,588	9,865	27NOV84 -31DEC84	7	85FEC/367/3702
	YEAR-END - AMENDMENT	-	-	27NOV84 -31DEC84	3	85FEC/368/2102
	YEAR-END - AMENDMENT	-	-	27NOV84 -31DEC84	4	85FEC/370/0301
	YEAR-END - AMENDMENT	-	-	27NOV84 -31DEC84	2	85FEC/372/3070
	REQUEST FOR ADDITIONAL INFORMATION			27NOV84 -31DEC84	3	85FEC/367/4055
TOTAL		181,899	0 167,673	0	185	TOTAL PAGES

All reports have been reviewed.

Ending cash on hand as of 12/31/84 = \$14,224.24

Debts owed by committee = \$36,629.50

Debts owed to committee = \$0





64-2312-911-41  
AUG 1964

1. Name of Committee (In Full)

4. TYPE OF REPORT (Check appropriate boxes)

☐ Check here if address is different than previously reported

2. FEC Identification Number

Coc174334

3. ☐ This committee qualified as a multicandidate committee during the Reporting Period on \_\_\_\_\_ (Date)

**(b) Is this Report an Amendment?**

☐ YES ☒ NO

## SUMMARY

B. Covering Period 1/1/84 through 3/31/84

**COLUMN A**  
**This Period**

**COLUMN B**  
**Calendar Year-to-Date**

6. (a) Cash on hand January 1, 19 84

57,091.07

(b) Cash on Hand at Beginning of Reporting Period

57,091 c7

(c) Total Receipts (from Line 18)

1815-72

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)

18 56.906.71

7 Total Disbursements (from Line 28)

$$8 \quad 12,549 \div 6$$

8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

8 46 306 19

**9 Debts and Obligations Owed TO The Committee**  
(Itemize all on Schedule C or Schedule D)

8 3000 c

**10 Debts and Obligations Owed BY the Committee**  
(Itemize all on Schedule C or Schedule D)

8 4

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

**For further information contact:**

EVELYN E SULLIVAN

Page 2 of 2 - Cont.

Type or Print Name of Treasurer \_\_\_\_\_

Y01 6-000000 4249430

**SIGNATURE OF TREASURER**

**Dew**

Submitting false, misleading or incomplete information may subject the person signing this report to the penalties of 18 U.S.C. 1001.

Loc. 20. 5.3 4054

All previous versions of PEC FORM 3 and PEC FORM 2a are obsolete and should no longer be used.

REC'D HAN 28 3 40



**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

HQ-2

Evelyn E. Sullivan, Treasurer  
Santa Barbara County Republican  
Central Committee  
3324-G State Street  
Santa Barbara, CA 93105

JAN 30 1985

Identification Number: C00174334

Reference: April Quarterly Report (1/1/84-3/31/84)

Dear Ms. Sullivan:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Political committees which have cash on hand at the time of registration must disclose the source of the funds. The balance is assumed to be composed of those contributions most recently received by the committee prior to registration. Please identify the source of these contributions on a memo Schedule A. 11 CFR 104.12.

-Please provide the Column B totals for the Summary and Detailed Summary Pages.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

*J. Hunter Bryan*

J. Hunter Bryan  
Reports Analyst  
Reports Analysis Division

88040713500  
22922

ANALYST: Bryan

CONVERSATION WITH: Evelyn E. Sullivan

COMMITTEE: Santa Barbara County Republican Central Committee

DATE: 2/6/85

SUBJECT(S): Matters raised in the 1/30/85 RFAIs

1) 1984 April Quarterly Report

- disclosure of the source of funds at the time of registration.

Advised to submit schedules itemizing receipts.

2) 1984 July Quarterly Report

- possible allocation of expenditures and awards among federal candidates.
- allocation among partners for Islay Investments.

Advised to state percentage of ownership among partners, no expenditures were for specifically identified federal candidates.

3) 1984 October Quaterly Report

- acceptance of contributions from organizations not registered with the Commission.
- possible allocation of expenditures for phone bank and printing among federal candidates.
- apparent corporate contribution.

Advised to refund or transfer-out impermissible funds, no expenditures were for specifically identified federal candidates.

4) 1984 30-Day Post-General Report

- possible allocation of expenditures for media, awards, and phone bank salary among federal candidates.
- acceptance of contributions from organizations not registered with the Commission.
- acceptance of excessive contributions from Islay Investments.

Advised to refund or transfer-out impermissible funds, no expenditures were for specifically identified federal candidates.

Other matters requiring clarification

Ms. Sullivan was asked about possible affiliation with the Santa Barbara Lincoln Club. She stated that she was under the impression that the SBLC was a party committee and that transfers were therefore unlimited. I advised Ms. Sullivan that, upon clarification of the SBLC's committee type, their committee could be in receipt of excessive contributions.

98040713501

**REPORT OF RECEIPTS AND DISBURSEMENTS**  
For a Political Committee Other Than an Authorized Committee

(Summary Page)

ALIGN AREA

ALIGN AREA

1. Name of Committee (In Full)

*San Barbara County Republican  
Central Committee*

Address (Number and Street)

*3324-G State Street*

City, State and ZIP Code

*San Barbara, CA 93105*



Check here if address is different than previously reported.

2. POC Identification Number

*C00174334*

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_

4. TYPE OF REPORT (Check appropriate boxes)

*Pre Registration Activity*

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report

☐ July 15 Quarterly Report ☒ January 31 Year End Report

☐ July 31 Mid Year Report (Non-Election Year Only)

☐ Monthly Report for \_\_\_\_\_

☐ Twelfth day report preceding \_\_\_\_\_

(Type of Election)

election on \_\_\_\_\_ in the State of \_\_\_\_\_

☐ Thirtieth day report following the General Election

on \_\_\_\_\_ in the State of \_\_\_\_\_

☐ Termination Report

(b) Is this Report an Amendment?

☐ YES

☒ NO

**SUMMARY Pre Registration Activity**

5. Covering Period *7/1/83* through *12/31/83*

6. (a) Cash on hand January 1, 19 \_\_\_\_\_

(b) Cash on Hand at Beginning of Reporting Period \_\_\_\_\_

(c) Total Receipts (from Line 10) \_\_\_\_\_

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and  
Lines 6(b) and 6(c) for Column B)

7. Total Disbursements (from Line 28) \_\_\_\_\_

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) \_\_\_\_\_

9. Debts and Obligations Owed TO The Committee \_\_\_\_\_

(Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee \_\_\_\_\_

(Itemize all on Schedule C or Schedule D)

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

*Evelyn E Sullivan*

Type or Print Name of Treasurer

*Joshyn J. Jackson*

Signature of Treasurer

*2/11/85*

Date

For further information contact:

Federal Election Commission

Toll Free 800 424 9510

Local 202 523 4088

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 USC § 437a.

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

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FEC FORM 3X 13 80

DETAILED SUMMARY I.  
of Receipts and Disbursements  
Page 2, PFC FORM 3X1

Pre-Registration Activity

Name of Committee (See Page 1)		Report Covering the Period	
Santa Barbara County Republican Central Committee		From 7/1/83	To 12/31/83
		COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
<b>I. RECEIPTS</b>			
<b>11. CONTRIBUTIONS (other than loans) FROM:</b>			
(a) Individuals/Persons Other Than Political Committees			
(b) Political Party Committees			
(c) Other Political Committees			
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))			
<b>12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES</b>			
<b>13. ALL LOANS RECEIVED</b>			
<b>14. LOAN REPAYMENTS RECEIVED</b>			
<b>15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)</b>			
<b>16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b>			
<b>17. OTHER RECEIPTS (Dividends, Interest, etc.)</b>			
<b>18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)</b>			
<b>II. DISBURSEMENTS</b>			
<b>19. OPERATING EXPENDITURES</b>			
<b>20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES</b>			
<b>21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b>			
<b>22. INDEPENDENT EXPENDITURES (see Schedule E)</b>			
<b>23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 641 (a)(1)) (Use Schedule F)</b>			
<b>24. LOAN REPAYMENTS MADE</b>			
<b>25. LOANS MADE</b>			
<b>26. REFUNDS OF CONTRIBUTIONS TO:</b>			
(a) Individuals/Persons Other Than Political Committees			
(b) Political Party Committees			
(c) Other Political Committees			
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))			
<b>27. OTHER DISBURSEMENTS</b>			
<b>28. TOTAL DISBURSEMENTS (Add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)</b>			
<b>III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES</b>			
<b>29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)</b>			
<b>30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)</b>			
<b>31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)</b>			
<b>32. TOTAL OPERATING EXPENDITURES from Line 19</b>			
<b>33. OFFSETS TO OPERATING EXPENDITURES from Line 15</b>			
<b>34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)</b>			



Page 1 of 1 for  
LINE NUMBER 112  
(Use separate schedule for each  
category of the Detailed  
Summary Page)

SCHEDULE A

ITEMIZED RECEIPTS

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for  
any other purpose, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full) — County		Receipt For		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Santa Barbara Republican Central Committee		C00174334				
A. Full Name, Mailing Address and ZIP Code		Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date — \$	
California Republican Party 402 W. Burbank Blvd. Burbank, CA 91505 # 810163					10/1/83 10/24/83 11/29/83	170.00 299.00 57.00
B. Full Name, Mailing Address and ZIP Code		Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date — \$	
Santa Barbara County Lincoln Club P.O. Box 30100 Santa Barbara, CA 93105					7/20/83 10/13/83 11/30/83	8150.00 9575.00 3012.50
C. Full Name, Mailing Address and ZIP Code		Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date — \$	
D. Full Name, Mailing Address and ZIP Code		Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date — \$	
E. Full Name, Mailing Address and ZIP Code		Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date — \$	
F. Full Name, Mailing Address and ZIP Code		Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date — \$	
G. Full Name, Mailing Address and ZIP Code		Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date — \$	
SUBTOTAL of Receipts This Page (optional)						
TOTAL: This Period (last page this line number only)						21,265.50

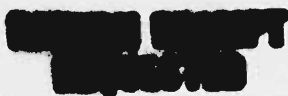
83040713504  
83033562496

88040713505  
33562419

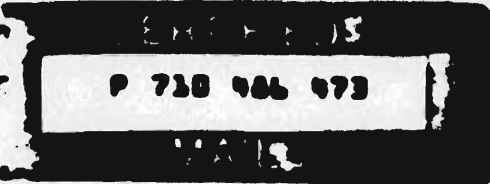
SANTA BARBARA COUNTY  
REPUBLICAN CENTRAL COMMITTEE



1200 STATE STREET, SUITE C  
SANTA BARBARA, CALIFORNIA 93101



NO RECEIPT REQUESTED



Mr. J. Hunter Bryan  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D. C. 20463

**REPORT OF RECEIPTS AND DISBURSEMENTS**  
For a Political Committee Other Than an Authorized Committee

24 JUL 84 P 5: 44

(Summary Page)

ALIGN AREA

ALIGN AREA

1. Name of Committee (In Full)

C00174334 840411  
MRS EVELYN E SULLIVAN  
SANTA BARBARA COUNTY REPUBLICAN  
CENTRAL COMMITTEE  
3324-G STATE STREET  
SANTA BARBARA CA 93105

4. TYPE OF REPORT (Check appropriate boxes)

- (a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report  
☒ July 15 Quarterly Report ☐ January 31 Year End Report  
☐ July 31 Mid Year Report (Non-Election Year Only)  
☐ Monthly Report for \_\_\_\_\_  
☐ Twelfth day report preceding \_\_\_\_\_ (Type of Election)

election on \_\_\_\_\_ in the State of \_\_\_\_\_

☐ Thirtieth day report following the General Election

on \_\_\_\_\_ in the State of \_\_\_\_\_

☐ Termination Report

(b) Is this Report an Amendment?

☐ YES ☒ NO

☐ Check here if address is different than previously reported

2. FEC Identification Number

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_ (Date)

**SUMMARY**

5. Covering Period 4/1/84 through 6/30/84

6. (a) Cash on hand January 1, 19 84

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 28)

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

9. Debts and Obligations Owed TO The Committee  
(Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee  
(Itemize all on Schedule C or Schedule D)

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

**EVELYN E. SULLIVAN**

Type or Print Name of Treasurer

SIGNATURE OF TREASURER

Date

7/10/84

For further information contact:

Federal Election Commission

Washington, D.C. 20543

Local 707 523 4088

NOTE: Submission of false, erroneous or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 437.

All previous versions of FEC FORM 2 and FEC FORM 3a are obsolete and should no longer be used

FEC FORM 2X (3-84)





**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 3 of 4  
LINE NUMBER 112  
Use separate schedule(s) for each category of the "Detailed Summary Page"

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee

Name of Committee (in Full)  
**Santa Barbara County Republican Central Committee C00174334**

<b>A. Full Name, Mailing Address and ZIP Code</b> <b>Michael J. Bossio</b> <b>116 Asco de la Concha 49</b> <b>Redondo Beach, CA 90277</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self</b>  <b>Occupation</b> <b>Historian</b> <b>Aggregate Year-to-Date-\$ 225.00</b>	<b>Date (month, day, year)</b> <b>6/18/84</b>	<b>Amount of Each Receipt This Period</b> <b>225.00</b>
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>Islay Investments</b> <b>800 Garden Street</b> <b>Santa Barbara, CA 93101</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Occupation</b> <b>Real Estate</b> <b>owner/leasing</b> <b>Aggregate Year-to-Date-\$ 2447.76</b>	<b>Date (month, day, year)</b> <b>4/1/84</b> <b>5/1/84</b> <b>6/1/84</b>	<b>Amount of Each Receipt This Period</b> <b>1027.76</b> <b>708.00</b> <b>708.00</b> <b>in-kind (office space)</b>
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>Ruth Koerner Oliver</b> <b>1705 Lasuen Road</b> <b>Santa Barbara, CA 93103</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Retired</b>  <b>Occupation</b>	<b>Date (month, day, year)</b> <b>5/21/84</b>	<b>Amount of Each Receipt This Period</b> <b>250.00</b>
<b>D. Full Name, Mailing Address and ZIP Code</b> <b>Rudolf R. Schulte</b> <b>928 Garden Street</b> <b>Santa Barbara CA 93101</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self</b> <b>Schulte Ranches</b>  <b>Occupation</b> <b>farmer/investor</b> <b>Aggregate Year-to-Date-\$ 225.00</b>	<b>Date (month, day, year)</b> <b>6/27/84</b>	<b>Amount of Each Receipt This Period</b> <b>225.00</b>
<b>E. Full Name, Mailing Address and ZIP Code</b> <b>Thad W. Seligman</b> <b>3230 Serena Avenue</b> <b>Carpinteria, CA 93013</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Self</b> <b>Jodi Investment Enterprises</b>  <b>Occupation</b> <b>Commercial real estate</b> <b>Aggregate Year-to-Date-\$ 250.00</b>	<b>Date (month, day, year)</b> <b>6/11/84</b>	<b>Amount of Each Receipt This Period</b> <b>250.00</b>
<b>F. Full Name, Mailing Address and ZIP Code</b> <b>Don E. Smith</b> <b>888 Lilac Drive</b> <b>Santa Barbara, CA 93108</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>City of Orange</b>  <b>Occupation</b> <b>City Councilman</b> <b>Aggregate Year-to-Date \$ 225.00</b>	<b>Date (month, day, year)</b> <b>6/29/84</b>	<b>Amount of Each Receipt This Period</b> <b>225.00</b>
<b>G. Full Name, Mailing Address and ZIP Code</b> <b>Paul W. Trousdale</b> <b>500 South Sepulveda Blvd.</b> <b>Los Angeles, CA 90049</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b> <b>Trousdale Estates</b>  <b>Occupation</b> <b>real estate development</b> <b>Aggregate Year-to-Date \$ 500.00</b>	<b>Date (month, day, year)</b> <b>6/4/84</b>	<b>Amount of Each Receipt This Period</b> <b>500.00</b>
<b>SUBTOTAL of Receipts This Page (optional)</b>			<b>4112.76</b>
<b>TOTAL for this Period (last page this line number only)</b>			<b>4</b>



LARGE PRINTED  
(Use separate schedule for each category of the Donor's Summary Page)

## ITEMIZED RECEIPTS

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in full)

Santa Barbara County Republican Central Committee C00174334

A. Full Name, Mailing Address and ZIP Code

Santa Barbara County Lincoln Club  
P.O. Box 30100  
Santa Barbara, CA 93130-0309

Name of Employer

Date (month,  
day, year)

9/4/84

Amount of Each  
Receipt This Period

2,075.00

Occupation

Receipt For

☐ Primary☐ General☐ Other (specify):

Aggregate Year-to-Date-\$ 2,075.00

B. Full Name, Mailing Address and ZIP Code

Committee to Re-elect Congressman Lagomarcino  
P.O. Box 6088  
Ventura, CA 93006 C0002428

Name of Employer

Date (month,  
day, year)

9/11/84

Amount of Each  
Receipt This Period

1,000.00

Occupation

Receipt For

☐ Primary☐ General☐ Other (specify):

Aggregate Year-to-Date-\$

C. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)Amount of Each  
Receipt This Period

Occupation

Receipt For

☐ Primary☐ General☐ Other (specify):

Aggregate Year-to-Date-\$

D. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)Amount of Each  
Receipt This Period

Occupation

Receipt For

☐ Primary☐ General☐ Other (specify):

Aggregate Year-to-Date-\$

E. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)Amount of Each  
Receipt This Period

Occupation

Receipt For

☐ Primary☐ General☐ Other (specify):

Aggregate Year-to-Date-\$

F. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)Amount of Each  
Receipt This Period

Occupation

Receipt For

☐ Primary☐ General☐ Other (specify):

Aggregate Year-to-Date-\$

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,  
day, year)Amount of Each  
Receipt This Period

Occupation

Receipt For

☐ Primary☐ General☐ Other (specify):

Aggregate Year-to-Date-\$

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

3075.00

31033:14139

**REPORT OF RECEIPTS AND DISBURSEMENTS**  
For a Political Committee Other Than an Authorized Committee

(Summary Page)

01 OCT 18 AM 11:42

ALIGN AREA

1 Name of Committee (In Full)

001170334  
445 EVELYN SULLIVAN  
SANTA BARBARA COUNTY ASSOCIATION  
1 CENTRAL COUNCIL  
3324-N STATE STREET  
SANTA BARBARA CA 93101

City, State and Zip Code

4 TYPE OF REPORT (Check appropriate boxes)

- (a) ☐ April 15 Quarterly Report ☒ October 15 Quarterly Report  
☐ July 15 Quarterly Report ☐ January 31 Year End Report  
☐ July 31 Ninth Year Report (In Election Year Only)  
☐ Monthly Report for  
☐ Twelfth day report preceding  
election on \_\_\_\_\_ in the State of \_\_\_\_\_  
☐ Thirtieth day report following the General Election  
on \_\_\_\_\_ in the State of \_\_\_\_\_  
☐ Termination Report

☐ Check here if address is different than previously reported

2 FEC Identification Number

3 ☐ This committee qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_ (Date)

(b) Is this Report an Amendment?

☐ YES ☒ NO

**SUMMARY**

5 Covering Period 7/1/84 through 7/30/84

6 (a) Cash on hand January 1, 19 84

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal for 3 Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B

7 Total Disbursements (from Line 28)

8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

9 Debts and Obligations Owed TO The Committee

(Itemize all on Schedule C or Schedule D)

10 Debts and Obligations Owed BY the Committee

(Itemize all on Schedule C or Schedule D)

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

For further information contact

Evelyn E. Sullivan

Type or Print Name of Treasurer

Evelyn E. Sullivan

SIGNATURE OF TREASURER

10/13/84

Date

NOTE: This form is to be filed with the Federal Election Commission (FEC) and the State Election Administration. It is not to be used for any other purpose.

All previous versions of FEC FORM 3 and FEC FORM 2a are obsolete and should no longer be used

DETAILED SUMMARY PAGE  
of Receipts and Disbursements  
(Page 2, FEC FORM 3X)

Name of Committee (see Page 1)

Santa Barbara County Republican Central Committee

Report for the calendar year ending 12/31/84  
COLUMB. A  
Total This Period  
COLUMB.  
Calendar Year to Date

I. RECEIPTS

11. CONTRIBUTIONS (other than loans) FROM

(a) Individuals/Persons Other Than Political Committees

(Memo Entry Unitemized \$ 18,340.26)

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))

12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES

13. ALL LOANS RECEIVED

14. LOAN REPAYMENTS RECEIVED

15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)

16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES  
AND OTHER POLITICAL COMMITTEES

17. OTHER RECEIPTS (Dividends, Interest, etc.)

18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)

H. DISBURSEMENTS

19. OPERATING EXPENDITURES

20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES

21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND  
OTHER POLITICAL COMMITTEES

22. INDEPENDENT EXPENDITURES (use Schedule E)

23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES  
(2 USC § 441a(d)) (use Schedule F)

24. LOAN REPAYMENTS MADE

25. LOANS MADE

26. REFUNDS OF CONTRIBUTIONS TO

(a) Individuals/Persons Other Than Political Committees

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))

27. OTHER DISBURSEMENTS

28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)

III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES

29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)

30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)

31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)

32. TOTAL OPERATING EXPENDITURES from Line 19

33. OFFSETS TO OPERATING EXPENDITURES from Line 15

34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)

COLUMB. A Total This Period	COLUMB. Calendar Year to Date	
57,341.16	78,475.17	11(a)
15,840.00	19,466.00	11(b)
73,135.16	17,935.17	11(c)
		11(d)
		12
		13
		14
975.21	475.21	15
		16
1807.32	4545.12	17
75,481.47	107,455.50	18
50,279.35	88,753.59	19
	2789.65	20
		21
		22
		23
		24
		25
125.00	125.00	26(a)
		26(b)
		26(c)
125.00	125.00	26(d)
		27
50,404.35	126,718.24	28
73,135.16	17,935.17	29
		30
		31
		32
		33
		34

88040713534

Page 3 of 6 for  
LINE NUMBER 11.2  
(Use separate schedule for each  
category of the Detailed  
Summary Page)

SCHEDULE A

ITEMIZED RECEIPTS

Any information required from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in full)

Santa Barbara County Republican Central Committee

Rec: 174344

A. Full Name, Mailing Address and ZIP Code

Senator Ed Davis (Campaign Committee)  
1145 Tampa Ave #21-B  
Northridge, CA 91326

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period  
425.00

Occupation

7/9/84

in Kind  
(auction item - fundraiser)

Receipt For: Primary General  
Other (specify)

Aggregate Year-to-Date \$ 425.00

B. Full Name, Mailing Address and ZIP Code

Freddie Audrey DeFlourant  
3201 S Maryland Parkway  
Las Vegas, Nevada 89109

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period  
550.00

Occupation  
Investments

7/9/84

in Kind  
(auction item - fundraiser)

Receipt For: Primary General  
Other (specify)

Aggregate Year-to-Date \$ 550.00

C. Full Name, Mailing Address and ZIP Code

George & Lyn Emerson  
4771 Calle Camarada  
Santa Barbara, CA 93110

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period  
1,900.00

Occupation  
First Pacific Financial Serv.

7/9/84

in Kind  
(auction item - fundraiser)

Receipt For: Primary General  
Other (specify)

Aggregate Year-to-Date \$ 1,950.00

D. Full Name, Mailing Address and ZIP Code

Elden Haskell  
1224 Coast Village Road  
Santa Barbara, CA 93108

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period  
500.00

Occupation  
Investments

7/9/84

in Kind  
(auction item - fundraiser)

Receipt For: Primary General  
Other (specify)

Aggregate Year-to-Date \$

E. Full Name, Mailing Address and ZIP Code

Donald Hughes  
4445 Viera Drive  
Santa Barbara, CA 93110

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period  
2,000.00

Occupation  
Auto Detailing

7/9/84

in Kind  
(auction item - fundraiser)

Receipt For: Primary General  
Other (specify)

Aggregate Year-to-Date \$ 2,000.00

F. Full Name, Mailing Address and ZIP Code

Islay Investments  
800 Garden Street  
Santa Barbara, CA 93101

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period  
708.00

Occupation

7/1/84

708.00

7/1/84

708.00

Receipt For: Primary General  
Other (specify)

Aggregate Year-to-Date \$ 4,567.76

G. Full Name, Mailing Address and ZIP Code

Jedlicki's  
2605 DeKline Street  
Santa Barbara, CA 93105

Name of Employer

Date (month, day, year)

Amount of Each Receipt This Period  
250.00

Occupation

7/9/84

in Kind  
(auction item - fundraiser)

Receipt For: Primary General  
Other (specify)

Aggregate Year-to-Date \$ 2,500.00

SUBTOTAL (Receipts from Page 1000.00)

7,747.76

TOTAL



Page 1 of 1  
LINE NUMBER 112  
Use separate schedule for each category of the Donor's Summary Page

SCHEDULE A

ITEMIZED RECEIPTS

Any information required from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions for commercial purposes, either than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in full)  
**Santa Barbara County Republican Central Committee** C00174334

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
<b>California Republican Party</b> 4002 W Burbank Blvd. Burbank, CA 91505		8/24/84	138.00
		8/27/84	575.00
		9/10/84	259.00
		9/28/84	602.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation	Aggregate Year to Date: \$ 2,115.00	
<b>B. Full Name, Mailing Address and ZIP Code</b> Santa Barbara County Lincoln Club P.O. Box 30100 Santa Barbara, CA 93130-0349		7/30/84	1,350.00
		9/21/84	11,000.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation	Aggregate Year to Date: \$ 14,425.00	
<b>C. Full Name, Mailing Address and ZIP Code</b> Committee to Reelect Congressman Lagomarsino PO Box 6088 Ventura, CA 93006		9/5/84	1,900.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation	Aggregate Year to Date: \$ 2,900.00	
<b>D. Full Name, Mailing Address and ZIP Code</b> Young Republicans of Santa Barbara County 3324 S State Street Santa Barbara, CA 93105	102.5	9/5/84	20.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation	Aggregate Year to Date: \$ 20.00	
<b>E. Full Name, Mailing Address and ZIP Code</b>	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation	Aggregate Year to Date: \$	
<b>F. Full Name, Mailing Address and ZIP Code</b>	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation	Aggregate Year to Date: \$	
<b>G. Full Name, Mailing Address and ZIP Code</b>	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation	Aggregate Year to Date: \$	
<b>SUBTOTAL</b>			
<b>TOTAL</b>			

31033113351



**REPORT OF RECEIPTS AND DISBURSEMENTS**  
For a Political Committee Other Than an Authorized Committee

(Summary Page)

ALIGN AREA

84DEC 10 1984

1. Name of Committee (in Full)

000174336 840920  
MRS EVELYN E SULLIVAN  
SANTA BARBARA COUNTY REPUBLICAN  
N CENTRAL COMMITTEE  
3324-G STATE STREET  
SANTA BARBARA CA 93105

4. TYPE OF REPORT (Check appropriate below)

- (a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report  
☐ July 15 Quarterly Report ☐ January 31 Year End Report  
☐ July 31 Mid Year Report (Non-Election Year Only)  
☐ Monthly Report for \_\_\_\_\_  
☐ Twelfth day report preceding \_\_\_\_\_  
election on \_\_\_\_\_ the State of \_\_\_\_\_

☒ Thirtieth day report following the General Election

on 11/6/84 in the State of CA

☐ Termination Report

(b) Is this Report an Amendment?

☐ YES ☒ NO

☐ Check here if address is different than previously reported

2. FEC Identification Number

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_

**SUMMARY**

5. Covering Period 10/1/84 through 11/26/84

6. (a) Cash on hand January 1, 1984

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 28)

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

9. Debts and Obligations Owed TO The Committee  
(Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee  
(Itemize all on Schedule C or Schedule D)

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

Evelyn E. Sullivan

Type or Print Name of Treasurer

Evelyn E. Sullivan

SIGNATURE OF TREASURER

12/3/84

Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 437g

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

For further information contact

Federal Election Commission

Toll Free 800 424 9530

Local 202 723 4205

FEC FORM 3X (3/80)

DISBURSED SUMMARY PAGE  
Receipts and Disbursements  
(Use Schedule B, Form 3X)

Name of Committee or Fund  
**Santa Barbara County Republican Central Committee**

Report Covering the Period

From **10/1/84**

To **11/26/84**

COLUMN A  
Total This Period

COLUMN B  
Calendar Year To-Date

**I. RECEIPTS**

**11. CONTRIBUTIONS (other than loans) FROM:**

(a) Individuals/Persons Other Than Political Committees

(Name Entry Unaudited \$ **22,179.96**)

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))

**39,555.66**

**82,430.78**

11(b)

**0**

**0**

11(b)

**14,589.00**

**33,849.00**

11(b)

**18,344.56**

**116,279.73**

11(d)

**12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES**

**0**

**0**

12

**13. ALL LOANS RECEIVED**

**0**

**0**

13

**14. LOAN REPAYMENTS RECEIVED**

**0**

**0**

14

**15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)**

**0**

**475.21**

15

**16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES**

**0**

**0**

16

**17. OTHER RECEIPTS (Donations, Interest, etc.)**

**421.55**

**4966.67**

17

**18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)**

**18,766.11**

**122,221.61**

18

**II. DISBURSEMENTS**

**19. OPERATING EXPENDITURES**

**18,114.50**

**106,868.09**

19

**20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES**

**4,978.00**

**7,767.65**

20

**21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES**

**0**

**0**

21

**22. INDEPENDENT EXPENDITURES (see Schedule E)**

**0**

**0**

22

**23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 9441 a(d)) (Use Schedule F)**

**0**

**0**

23

**24. LOAN REPAYMENTS MADE**

**0**

**0**

24

**25. LOANS MADE**

**0**

**0**

25

**26. REFUNDS OF CONTRIBUTIONS TO**

(a) Individuals/Persons Other Than Political Committees

**0**

**125.00**

26(a)

(b) Political Party Committees

**0**

**0**

26(b)

(c) Other Political Committees

**0**

**0**

26(c)

(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))

**0**

**125.00**

26(d)

**27. OTHER DISBURSEMENTS**

**8,000.00**

**43,050.00**

27

**28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)**

**31,092.50**

**157,810.74**

28

**III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES**

**29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)**

**18,344.56**

**116,279.73**

29

**30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)**

**0**

**125.00**

30

**31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)**

**18,344.56**

**116,404.73**

31

**32. TOTAL OPERATING EXPENDITURES from Line 19**

**18,114.50**

**106,868.09**

32

**33. OFFSETS TO OPERATING EXPENDITURES from Line 15**

**0**

**475.21**

33

**34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)**

**18,114.50**

**117,843.30**

34

84033:42120  
00049713515

## STANDARD RECEIPTS

LINE NUMBER 117  
(Use number when referring to a specific category of the Detailed Summary Page)

Any information received from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions, or for commercial purposes, other than under the name and address of any political committee to solicit contributions from such committee.

Name of Contributor (in Full)		C00174334	
<b>Sanja Barbary County Republican Central Committee</b> <b>A. Full Name, Mailing Address and ZIP Code</b> <b>Hughes Active Citizenship Fund</b> <b>75 Coronar Drive 11 741884</b> <b>Colata, CA 90177</b>		<b>Name of Employer</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date - \$ 652.00</b>	<b>Date (month, day, year)</b> <b>10/18/84</b> <b>Amount of Each Receipt This Period</b> <b>652.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>Isky Investments</b> <b>800 Garden Street</b> <b>Santa Barbara, CA 93101</b>		<b>Name of Employer</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date - \$ 8653.36</b>	<b>Date (month, day, year)</b> <b>10/1/84</b> <b>11/1/84</b> <b>Amount of Each Receipt This Period</b> <b>708.00</b> <b>372.60</b> <b>in Kind</b> <b>(other than cash)</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
<b>C. Full Name, Mailing Address and ZIP Code</b>   <b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Name of Employer</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date - \$</b>	<b>Date (month, day, year)</b>  <b>Amount of Each Receipt This Period</b>
<b>D. Full Name, Mailing Address and ZIP Code</b>   <b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Name of Employer</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date - \$</b>	<b>Date (month, day, year)</b>  <b>Amount of Each Receipt This Period</b>
<b>E. Full Name, Mailing Address and ZIP Code</b>   <b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Name of Employer</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date - \$</b>	<b>Date (month, day, year)</b>  <b>Amount of Each Receipt This Period</b>
<b>F. Full Name, Mailing Address and ZIP Code</b>   <b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Name of Employer</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date - \$</b>	<b>Date (month, day, year)</b>  <b>Amount of Each Receipt This Period</b>
<b>G. Full Name, Mailing Address and ZIP Code</b>   <b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Name of Employer</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date - \$</b>	<b>Date (month, day, year)</b>  <b>Amount of Each Receipt This Period</b>
<b>SUBTOTAL of Receipts This Page (optional)</b>			
<b>TOTAL This Period (last page this line number only)</b>			

SCHEDULE A

ITEMIZED RECEIPTS

Use separate sheets for each category of the Schedule Summary Page

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)		C 00174394	
<b>A. Full Name, Mailing Address and ZIP Code</b> <b>California Republican Party</b> <b>4002 W. Burbank Blvd.</b> <b>Burbank, CA 91505</b>		<b>Name of Employer</b>  <b>Occupation</b>	<b>Date (month, day, year)</b> <b>10/26/84</b>  <b>Amount of Each Receipt This Period</b> <b>4188.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Aggregate Year-to-Date-\$ 6255.00</b>	
<b>B. Full Name, Mailing Address and ZIP Code</b> <b>John Carpenter Committee</b> <b>3324-L State Street</b> <b>Santa Barbara CA 93103</b>		<b>Name of Employer</b> <b>102.5E</b>  <b>Occupation</b> <b>441a</b>	<b>Date (month, day, year)</b> <b>11/7/84</b>  <b>Amount of Each Receipt This Period</b> <b>6000.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Aggregate Year-to-Date-\$ 6000.00</b>	
<b>C. Full Name, Mailing Address and ZIP Code</b> <b>Committee to Re-elect Congressman Lagomastro</b> <b>P.O. Box 6018</b> <b>Ventura, CA 93006</b>		<b>Name of Employer</b>  <b>Occupation</b>	<b>Date (month, day, year)</b> <b>10/15/84</b>  <b>Amount of Each Receipt This Period</b> <b>236.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Aggregate Year-to-Date-\$ 3136.00</b>	
<b>D. Full Name, Mailing Address and ZIP Code</b> <b>Lompoc Valley Republican Women, Federated</b> <b>Wanda Livingston, Treasurer</b> <b>44 Stanford Circle</b> <b>Lompoc CA 93436</b>		<b>Name of Employer</b> <b>102.5</b>  <b>Occupation</b>	<b>Date (month, day, year)</b> <b>10/26/84</b>  <b>Amount of Each Receipt This Period</b> <b>1500</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Aggregate Year-to-Date-\$ 15.00</b>	
<b>E. Full Name, Mailing Address and ZIP Code</b> <b>Santa Barbara County Lincoln Club</b> <b>Maria Kneit Treasurer</b> <b>P.O. Box 30100</b> <b>Santa Barbara CA 93130-0349</b>		<b>Name of Employer</b>  <b>Occupation</b>	<b>Date (month, day, year)</b> <b>10/10/84</b> <b>10/15/84</b>  <b>Amount of Each Receipt This Period</b> <b>2000.00</b> <b>1900.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Aggregate Year-to-Date-\$ 18,325.00</b>	
<b>F. Full Name, Mailing Address and ZIP Code</b> <b>Santa Maria Valley Republican Women, Fed.</b> <b>Jean Osburn, Treasurer</b> <b>309 S. Lincoln</b> <b>Santa Maria, CA 93454</b>		<b>Name of Employer</b> <b>102.5</b>  <b>Occupation</b>	<b>Date (month, day, year)</b> <b>10/24/84</b>  <b>Amount of Each Receipt This Period</b> <b>100.00</b>
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Aggregate Year-to-Date-\$ 100.00</b>	
<b>G. Full Name, Mailing Address and ZIP Code</b>   <b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		<b>Name of Employer</b>  <b>Occupation</b>	<b>Date (month, day, year)</b>   <b>Amount of Each Receipt This Period</b>
<b>SUBTOTAL of Receipts This Page (optional):</b>		<b>14,389.00</b>	
<b>TOTAL This Period (last page this line number only)</b>		<b>14,389.00</b>	





FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20543

20-2

Evelyn E. Sullivan, Treasurer  
Santa Barbara County Republican  
Central Committee  
3324-G State Street  
Santa Barbara, CA 93105

JAN 30 1985

Identification Number: C00174334

Reference: 30 Day Post-General Report (10/1/84-11/26/84)

Dear Ms. Sullivan:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please clarify all expenditures made for media, awards and phone bank salary. If a portion or all of these expenditures were made on behalf of specifically identified Federal candidates, they should be disclosed on Schedule B or F for Line 21 or 23 and include the amount, name, address and office sought by each candidate. 11 CFR 104.3(b) and 106.1.

-Schedule A of your report (pertinent portion(s) attached) discloses contributions from organizations which are not political committees registered with the Commission. Under 11 CFR 102.5(b), organizations which are not political committees under the Act must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

Please clarify whether the contributions received from these organizations are permissible, as required by 11 CFR 102.5(a). To the extent that your committee has received funds which are not permissible, the amounts should be either refunded to the organizations or transferred out to a non-Federal account. Please inform the Commission in writing and provide a photocopy of your check(s) for the refund(s) or transfer(s)-out. Contributions which are refunded

JB

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9503322917



should be disclosed on Schedule B for Line 26a of your next report; those which are transferred-out should be disclosed on Schedule B for Line 20 or Line 27, as appropriate.

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Act precludes a committee from receiving contributions from another political committee or a person in excess of \$5,000 per calendar year. (2 U.S.C. §441a(f)) If you have received a contribution that exceeds the limits, the Commission recommends that you refund to the donor, or transfer-out to a non-Federal account, the amount in excess of \$5,000. Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. In addition, the disbursement of the amount in excess should be disclosed on a supporting Schedule B for Line 26 or 27 of your next report.

If the contribution(s) in question was incorrectly reported and/or you have additional information, you may wish to submit documentation for the public record.

Although the Commission may take further legal steps concerning the acceptance of an excessive contribution(s), your prompt refund or transfer-out of the excessive amount will be taken into consideration.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4040.

Sincerely,

J. Hunter Bryan

J. Hunter Bryan  
Reports Analyst  
Reports Analysis Division

98040713519  
95033422018



SANTA BARBARA COUNTY REPUBLICAN CENTRAL COMMITTEE  
3324 State Street, G, Santa Barbara, California 93106  
(805) 964-3287

OFFICE P2:10

February 11, 1985

Mr. J. Hunter Bryan  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D. C. 20463

Identification Number: C00174334

Reference: April Quarterly Report (1/1/84-3/31/84)  
July Quarterly Report (4/1/84-6/30/84)  
October Quarterly Report (7/1/84-9/30/84)  
30 Day Post-General Report (10/1/84-11/26/84)

Dear Mr. Bryan:

This letter is in response to your inquiries by letters dated January 30, 1985.

In regard to the April Quarterly Report(1/1/84-3/31/84):

Item 1: I have provided a schedule disclosing those contributions most recently received by the Committee prior to registration. See Addendum A.

Item 2: I have provided the Column B totals for Summary and Detailed Summary Pages. See Addendum B.

In regard to the July Quarterly Report (4/1/84-6/30/84):

Item 1: Expenditures made for mailings and awards were not made on behalf of specifically identified Federal candidates.

Item 2: Please be be advised that Islay Investments (a partnership) is owned equally by Antonio R. Romasanta, Donald H. Harcourt and Marvin R. Trevilian. Please attribute these and future contributions by the percentage formula provided. See Addendum C.

In regard to the October Quarterly Report(7/1/84-9/30/84):

Item 1: The contribution from the Senator Ed Davis

88040713520  
9503362397



**SANTA BARBARA COUNTY REPUBLICAN CENTRAL COMMITTEE**  
1324 State Street, G, Santa Barbara, California 93103 (805) 964-3287

Mr. J. Hunter Bryan

February 11, 1985  
Page 2

Campaign Committee was erroneously reported. This contribution should have been disclosed as an in-kind contribution from State Senator Ed Davis, not his Campaign Committee.

In regard to the contribution from Young Republicans of Santa Barbara County, we have transferred out \$20.00 to our non-Federal account. Enclosed is a photocopy of our check. We are aware that this should be reported on our next report as a transfer out (line 27). See Addendum D.

Item 2: None of the expenditures for phone bank and printing were made for specifically identified Federal candidates.

Item 3: We have transferred out \$500.00 to our non-Federal account. Enclosed is a photocopy of our check. We are aware that this should be reported as a transfer out (line 27) on our next report. See Addendum E.

Item 4: In regard to Islay Investments, please refer to Item 2, July Quarterly Report. Please see Addendum C.

In regard to Jedlicka's, we have transferred out \$250.00 to our non-Federal account. We are aware that this should be reported on our next report as a transfer out (line 27). Enclosed is a photocopy of our check. See Addendum F.

In regard to the 30 Day Post-General Report(10/1/84-11/26/84):

Item 1: Please be advised that expenditures made for media, awards and phone bank salary were not on behalf of specifically identified Federal candidates.

Item 2: In regard to the John Carpenter Committee, Lompoc Valley Republican Women, Federated and Santa Maria Valley Republican Women, Federated, we have transferred out \$6,115.00 to our non-Federal account, representing the contributions

8 3 0 4 0 7 1 3 5 2 1  
R 3 7 3 3 6 2 3 0 8



SANTA BARBARA COUNTY REPUBLICAN CENTRAL COMMITTEE  
3924 State Street, G, Santa Barbara, California 93106  
(805) 964-3287

Mr. J. Hunter Bryan

Page 3

received from these three committees. Enclosed is a photocopy of our check. We are aware that this should be reported on our next report as a transfer out (line 27). See Addendum G.

Item 3: We are now aware that Islay Investments is limited to \$5,000 in contributions. We have transferred out the excess portion of \$653.36 to our non-Federal account. Enclosed is a photocopy of our check. We are aware that this should be reported on our next report as a transfer out (line 27). See Addendum H.

If you have any questions, please do not hesitate to call me. My office telephone number is (805) 963-0669.

Sincerely yours,

Evelyn E. Sullivan  
Treasurer

Enclosures

- Addendum A - Pre-Registration Activity
- Addendum B - Column B totals
- Addendum C - Islay Investments allocations
- Addendum D - Photocopy of check - \$20.00
- Addendum E - Photocopy of check - \$500.00
- Addendum F - Photocopy of check - \$250.00
- Addendum G - Photocopy of check - \$6,115.00
- Addendum H - Photocopy of check - \$653.36

Certified Mail  
P 710 486 473

8804071752  
9503362399



SANTA BARBARA COUNTY REPUBLICAN CENTRAL COMMITTEE  
3324 State Street, G, Santa Barbara, California 93106  
(805) 964-9267

2011/12 PM:11

ADDENDUM C

July Quarterly Report (4/1/84-6/30/84)  
Item 2

Islay Investments, a partnership

800 Garden Street

Santa Barbara, CA 93101

contributed in-kind office space

4/1/84	1,027.76
5/1/84	708.00
6/1/84	708.00
	<u>2,443.76</u>

owned equally by:

Antonio R. Romasanta

800 Garden Street

Santa Barbara, CA 93101

occupation: Legal Partner, Islay Investments

1/3 interest:

4/1/84	342.58
5/1/84	236.00
6/1/84	236.00

aggregate Year-to-Date: 814.58

Donald H. Harcourt

800 Garden Street

Santa Barbara, CA 93101

occupation: Financial Partner, Islay Investments

1/3 interest:

4/1/84	342.59
5/1/84	236.00
6/1/84	236.00

aggregate Year-to-Date: 814.59

Marvin R. Trevilian

800 Garden Street

Santa Barbara, CA 93101

occupation: Managing Partner, Islay Investments

1/3 interest:

4/1/84	342.59
5/1/84	236.00
6/1/84	236.00

aggregate Year-to-Date: 814.59

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9303362413



ADDENDUM D

October Quarterly Report (7/1/84-9/30/84)  
Item 1

SANTA BARBARA COUNTY  
REPUBLICAN CENTRAL COMMITTEE  
2824-G STATE STREET 800-661-2227  
SANTA BARBARA, CA 93103

1195

PAY  
TO THE  
ORDER OF

*San L. Barbara County Republican Central Comm. - Corporate Fund*

*Feb. 11* *vol 5*

NO. 2472  
1195

*\$ 20.00*

*Twenty and 00/100*

DOLLARS



The Bank of Montecito  
222 STATE STREET  
SANTA BARBARA, CALIFORNIA 93101

FOR *Depositor's Federal re YR 85*

*George S. Jackson*  
*Phyllis J. Morse*

⑆001195⑆ ⑆122234783⑆ 192-006627⑆

9 5 0 3 3 6

ADDENDUM G

30 Day Post-General Report (10/1/84-11/26/84)

Item 2

SANTA BARBARA COUNTY  
REPUBLICAN CENTRAL COMMITTEE  
2204-B STATE STREET 804-804-2227  
SANTA BARBARA, CA 93106

1199

PAY  
TO THE  
ORDER OF

*Santa Barbara County Republican Central Committee - Campaign Fund.*

*26 11*

22-2472  
11/27

*Sixty-one Hundred Eighteen and 00/100*

*6115.00*

DOLLARS



The Bank of Montecito  
1000 STATE STREET  
SANTA BARBARA, CALIFORNIA 93101

POSTAL TO AIR-MAIL 6-11, 15, 1984

*Sandra L. Luchessa*  
*Phyllis J. Moore*

⑈001199⑈ ⑆122234783⑆ 192-006620⑈

9 3 0 4 0 7 1 2 3 4 5 6 7 8 9

ADDENDUM R

30 Day Post-General Report (10/1/84-11/26/84)

Item 3

SANTA BARBARA COUNTY  
REPUBLICAN CENTRAL COMMITTEE  
3224-G STATE STREET 805-944-3287  
SANTA BARBARA, CA 93106

1200

PAY  
TO THE  
ORDER OF

*Santa Barbara County Republican Central Comm. - Congress Unit*  
*Six Hundred Fifty-Three and 36/100*

*Feb 11 1985* *90-2478*  
*1222*

*\$ 653.36*

DOLLARS



The Bank of Montecito  
1000 STATE STREET  
SANTA BARBARA, CALIFORNIA 93101

FOR DEPOSIT TO THE ORDER OF THE  
FOR DEPOSIT TO THE ORDER OF THE

*Philip J. Moore*

⑈001200⑈ ⑆122234783⑆ 192⑈00662⑈

83040713526  
257336

88040713527

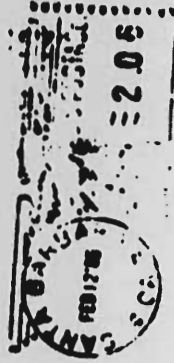
SANTA BARBARA COUNTY  
REPUBLICAN CENTRAL COMMITTEE



3324 STATE STREET, SUITE G  
SANTA BARBARA, CALIFORNIA 93105

RETURN RECEIPT  
REQUESTED

RETURN RECEIPT REQUESTED



Mr. J. Hunter Bryan  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D. C. 20463



**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

NO-2

Evelyn E. Sullivan, Treasurer  
Santa Barbara County Republican  
Central Committee  
3324-G State Street  
Santa Barbara, CA 93105

FEB 13 1985

Identification Number: C00174334

Reference: October Quarterly (7/1/84-9/30/84) and 30 Day Post-General (10/1/84-11/26/84) Reports

Dear Ms. Sullivan:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your reports (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Act precludes a committee from receiving contributions from another political committee or a person in excess of \$5,000 per calendar year. (2 U.S.C. §441a(f)) If you have received a contribution that exceeds the limits, the Commission recommends that you refund to the donor, or transfer-out to a non-Federal account, the amount in excess of \$5,000. Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. In addition, the disbursement of the amount in excess should be disclosed on a supporting Schedule B for Line 26 or 27 of your next report.

If the contribution(s) in question was incorrectly reported and/or you have additional information, you may wish to submit documentation for the public record.

Although the Commission may take further legal steps concerning the acceptance of an excessive contribution(s), your prompt refund or transfer-out of the excessive amount will be taken into consideration.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission

88040713528  
93033361320

JB



within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,



Carol Caldwell  
Reports Analyst  
Reports Analysis Division

88040713520

3373367321

ANALYST: Carol Caldwell

CONVERSATION WITH: Evelyn Sullivan

COMMITTEE: Santa Barbara County Republican County Committee

DATE: 2/19/85

SUBJECT(S): Receipt of Excessive Contributions

On 2/20/85, Ms. Sullivan, treasurer of the Santa Barbara County Republican Central Committee (the "Committee"), called me concerning an RFAI she had received. Between 7/1/84 - 11/26/84, the Committee received a total of \$16,250 from the Santa Barbara County Lincoln Club, bringing their AYTD to \$18,325. \$13,325 needed to be refunded to the County Lincoln Club.

Ms. Sullivan informed me that this money should have been deposited in the non-Federal account and was used only for non-Federal candidates. In addition, she stated that the Committee would not have the money to refund to the Santa Barbara County Lincoln Club until their July fundraiser. I advised her that she should refund the money as soon as possible, and until that time, the excess contribution should be disclosed as a debt to the Santa Barbara Lincoln Club.

88040713530

05 FEB 25 P 2: 32

**SANTA BARBARA COUNTY REPUBLICAN CENTRAL COMMITTEE**  
3324 State Street, S. Santa Barbara, California 93103 (805) 964-3257

February 21, 1985

Ms. Carol Caldwell  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D. C. 20463

Identification Number: C00174334

Reference: October Quarterly Report (7/1/84-9/30/84)  
30 Day Post-General Report (10/1/84-11/26/84)

Dear Ms. Caldwell:

This letter is in response to your inquiry by letter dated February 13, 1985.

The subject of your inquiry concerns the contributions received from the Santa Barbara County Lincoln Club in excess of \$5,000.

We had believed this organization to be a party organization and that we could, therefore, accept unlimited contributions. However, we are now aware that they do not qualify as a party organization.

As I discussed with you during our telephone conversation on February 19, 1985, our Committee did not make any contributions to a specified Federal candidate during 1984. It is our intention to transfer out of our Federal account, the excess contribution received totalling \$13,325 to a non-Federal account. At this time, we do not have sufficient funds in our Federal account to meet this obligation. We hold our annual fundraiser in July of every year.

With your approval, we propose to reflect a debt of \$13,325 on our mid-year report. As soon as adequate funds are received in July, we will transfer out to our non-Federal account the excess contribution received of \$13,325. We will report this transfer out on the following report (line 27). We will also forward a photocopy of our check to document the transfer.

88040713531  
93033570411



**SANTA BARBARA COUNTY REPUBLICAN CENTRAL COMMITTEE**  
1234 State Street, E, Santa Barbara, California 93101  
(805) 964-5257

**Mrs. Carol Caldwell**

**February 21, 1985**  
**Page 3**

**Our Committee hopes that the Commission will accept this proposal to correct the receipt of the excessive contribution from the Santa Barbara County Lincoln Club.**

**Sincerely yours,**

**(Mrs.) Evelyn E. Sullivan**  
**Treasurer**

**Certified Mail**  
**Return Receipt Requested**  
**P 710 486 476**

38040713532  
95733570412

## TELECON

**ANALYST:** Bryan  
**CONVERSATION WITH:** Evelyn E. Sullivan  
**COMMITTEE:** Santa Barbara County Republican Central Committee  
**DATE:** 2/26/85  
**SUBJECT(S):** Recipt of excessive contributions disclosed on the  
1983 YE

---

Ms. Sullivan was called and informed that the Committee was responsible for refunding only that portion received in excess after registration (the itemized \$15,737.50). She replied that she would consider the (other) \$4,125 as excessive also and include the total received during 1983 (minus the \$5,000 limit) as excessive. I advised her to list the excessive amount received during 1983 as a debt as well as the 1984 excessive amount.

08040713533





**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

**BQ-3**

**March 7, 1985**

**Evelyn E. Sullivan, Treasurer  
Santa Barbara County Republican  
Central Committee  
3324-G State Street  
Santa Barbara, CA 93103**

**Identification Number: C90174334**

**Reference: October Quarterly (7/1/84-9/30/84) and 30 Day Post-  
General (10/1/84-11/25/84) Reports**

**Dear Ms. Sullivan:**

On February 13, 1985 you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Your February 21, 1985 response is incomplete because you have not provided all the requested information. For this response to be considered adequate, the following information is still required.

-You have indicated your intention to transfer the excessive contributions totalling \$13,325 to a non-Federal account, at a time when your committee has sufficient funds. However, you have not provided a debt schedule (Schedule D) and amended the Summary Page, Line 10, to disclose this transaction as a debt owed by your committee.

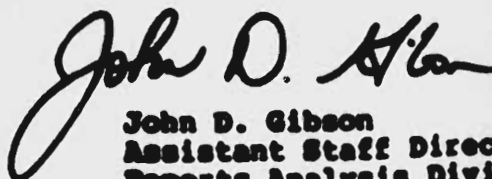
Although the Commission may take further legal steps concerning the acceptance of these excessive contributions, your prompt refund or transfer-out of the excessive amount will be taken into consideration.

If this information is not received by the Commission within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

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If you should have any questions related to this matter,  
please contact Carol Caldwell on our toll-free number (800) 424-  
9330 or our local number (202) 523-6048.

Sincerely,



John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

88040713535  
95933925

65 MAR 7 12:10



**SANTA BARBARA COUNTY REPUBLICAN CENTRAL COMMITTEE**  
1024 State Street, E, Santa Barbara, California 93105 (805) 964-3897

**March 3, 1965**

95033573702  
95040713536

Identification Number: C00174334

**Reference: Problems with all filed reports  
for election cycle**

**Dear Mr. Bryan:**

**This letter is in response to inquiries by letter and telephone concerning excess contributions received from the Santa Barbara County Lincoln Club during 1983, totalling \$19,862.50, and 1984, totalling \$13,325.00.**

Our Committee was under the erroneous impression that we could accept unlimited transfers from the Santa Barbara County Lincoln Club, believing they had registered with the Federal Election Commission as a party organization.

According to the Campaign Guide for Political Party Committees, March 1984, Page 5, Transfers to Other Party Committees: "A party committee or organization may make unlimited transfers to other committees and organizations of the same political party; the funds are not considered expenditures. However, the transfer may trigger registration requirements for a party organization (see page 7). 102.6(a)(1)(ii) and (a)(2); 110.2(c)."

We have just been made aware of the fact that these funds are considered excessive due to the fact that the Santa Barbara County Lincoln Club registered as a non-connected committee.

**After a full discussion of alternate methods to solve this problem, we have decided on a different course than previously stated in our response to Ms. Caldwell on February 21, 1985. Please disregard this previously stated intention.**



**SANTA BARBARA COUNTY REPUBLICAN CENTRAL COMMITTEE**  
2324 State Street, G, Santa Barbara, California 93106  
(805) 964-1287

Mr. J. Hunter Bryan

-2-

March 3, 1985

We have received a letter from the Santa Barbara County Lincoln Club, dated February 27, 1985, requesting the entire excess portion of their contribution be refunded to their committee, and it is our intent to so comply. We also enclose a copy of our reply to the Santa Barbara County Lincoln Club.

Upon notification that we had received excess contributions, we are going to amend our reports to reflect the excess portion of the contributions received from the Santa Barbara County Lincoln Club, totalling \$33,187.50, as a debt owed on Schedule D.

The reason we are listing the excess contribution received as a debt, at this time, is that we do not have cash available to reimburse the Santa Barbara County Lincoln Club immediately, and also due to obligations of income taxes payable by March 15, 1985.

Our intent is to reimburse the Santa Barbara County Lincoln Club with receipts from our annual fundraiser in July, to clear the debt of excess contributions received in 1983, of \$19,682.50, and of the excess contribution received during 1984, of \$13,325.00, for a total of \$33,187.50. A photocopy of our check clearing this debt owed will be furnished to the Commission.

We are concerned that the Commission know of our wish to remedy the situation of having accepted excess contributions in our Federal account. At no time has our Committee made any contribution to a specified Federal candidate. The purpose of our committee is to support all candidates by very active precinct/registration work, and in addition, we do make specified contributions to non-Federal candidates.

As stated in their letter of February 27, 1985, the Lincoln Club will monitor their donations to our committee, and we will now accept only \$5,000 for our Federal account; additional contributions will be clearly allocated for deposit into our non-Federal account.

Amendments to all filed reports for the election cycle

950335703



SANTA BARBARA COUNTY REPUBLICAN CENTRAL COMMITTEE  
2534 State Street, E, Santa Barbara, California 93108  
(805) 964-3287

Mr. J. Hunter Bryan

-3-

March 3, 1985

are enclosed.

If you have any questions concerning this matter, please  
call me at my office, (805) 963-0669.

Sincerely yours,

Evelyn E. Sullivan  
Treasurer

Enclosures:

Copy of letter to Santa Barbara  
County Lincoln Club

Amendments to: January 31 Year-End Report  
(Pre-Registration) 7/1/83-12/31/83  
April Quarterly Report (1/1-3/31/84)  
July Quarterly Report (4/1-6/30/84)  
October Quarterly Report (7/1-9/30/84)  
30-Day Post-General Report (10/1-11/26)  
Year-End Report (11/27-12/31/84)

Certified Mail  
P710 486 478

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**REPORT OF RECEIPTS AND DISBURSEMENTS**  
For a Political Committee Other Than an Authorized Committee

JIN FEC

(Summary Page)

85 MAR 7 12:10  
ALIGN AREA

ALIGN AREA

1. Name of Committee (No Full)

Santa Barbara County Republican  
Central Committee

Address (Number and Street)

3324 - G State Street

City, State and ZIP Code

Santa Barbara, CA 93105

☐ Check here if address is different than previously reported.

2. FEC Identification Number

C 00174934

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_

4. TYPE OF REPORT (Check appropriate boxes)

- (a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report  
☐ July 15 Quarterly Report ☒ January 31 Year End Report  
☐ July 31 Mid Year Report (Non-Election Year Only)  
☐ Monthly Report for \_\_\_\_\_  
☐ Twelfth day report preceding \_\_\_\_\_  
 election on \_\_\_\_\_ in the State of \_\_\_\_\_  
☐ Thirtieth day report following the General Election  
 on \_\_\_\_\_ in the State of \_\_\_\_\_  
☐ Termination Report

(b) Is this Report an Amendment?

☒ YES ☐ NO

**SUMMARY**

5. Covering Period 11/27/84 through 12/31/84

6. (a) Cash on hand January 1, 19 84

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 10)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and  
Lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 2B)

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

9. Debts and Obligations Owed TO The Committee  
(Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee  
(Itemize all on Schedule C or Schedule D)

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

Evelyn E. Sullivan  
Type or Print Name of Treasurer

Sue Lyn J. Sullivan  
Signature of Treasurer

3/3/85  
Date

For further information contact

Federal Election Commission

Toll Free 800-426-6530

Local 202-673-4888

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 437e

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

FEC FORM 3X (3/80)

9 5 0 3 3 5 7 3 7 0 6

**SCHEDULE D**  
(Revised 2/88)

**DEBTS AND OBLIGATIONS**  
Excluding Loans

Page 1 of 1 to  
LINE NUMBER 11  
Use separate schedules  
for each numbered line

Name of Creditor (in Full)	Outstanding Balance Beginning This Period	Amount Received This Period	Payments This Period	Outstanding Balance at Close of This Period
<b>Santa Barbara County Republican Central Committee</b>				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor <b>Santa Barbara County Lincoln Club P.O. Box 30100 Santa Barbara CA 93130-0109</b>	39,187.50	0	0	39,187.50
Nature of Debt (Purpose): To refund excess contribution received				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor <b>Internal Revenue Service Fresno, CA 93822</b>	0	2840.00	0	2840.00
Nature of Debt (Purpose): Income tax due on interest earned and rent income				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor <b>Franchise Tax Board Sacramento, CA 95857</b>	0	602.00	0	602.00
Nature of Debt (Purpose): Income tax due on interest earned and rent income				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional) .....				
2) TOTAL This Period (last page this line only) .....				36,629.50
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only) .....				0
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only) .....				36,629.50

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93033573707



**SANTA BARBARA COUNTY REPUBLICAN CENTRAL COMMITTEE**  
3324 State Street, G, Santa Barbara, California 93106  
(805) 964-3267

85 MAR 7

PR: 10

March 3, 1985

Mrs. Nellie Hoart, Treasurer  
Santa Barbara County Lincoln Club  
P.O. Box 30100  
Santa Barbara, CA 93130-0349

Dear Nellie:

This will acknowledge receipt of your letter of February 27, 1985, calling to our attention the excess contributions made to our committee as follows:

1983	\$19,862.50
1984	<u>13,325.00</u>
	\$33,187.50

We will comply with your request to refund these amounts as soon as possible.

As you know, there are only minimal funds available in our Federal account at this time. We will be in a position to refund the \$33,187.50 in July 1985, after holding our annual fundraiser.

Sincerely yours,

Evelyn E. Sullivan  
Treasurer

cc: Mr. J. Hunter Bryan

88040713541  
93033371793



**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

EQ-2

**Evelyn E. Sullivan, Treasurer**  
**Santa Barbara County Republican**  
**Committee**  
3324-G State Street  
Santa Barbara, CA 93105

MAR 13 1983

**Identification Number: C00174334**

**Reference: Year End Report (7/1/83-12/31/83)**

**Dear Ms. Sullivan:**

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Act precludes a committee from receiving contributions from another political committee or a person in excess of \$5,000 per calendar year. (2 U.S.C. §441a(f)) If you have received a contribution that exceeds the limits, the Commission recommends that you refund to the donor, or transfer-out to a non-Federal account, the amount in excess of \$5,000. Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. In addition, the disbursement of the amount in excess should be disclosed on a supporting Schedule B for Line 26 or 27 of your next report.

If the contribution(s) in question was incorrectly reported and/or you have additional information, you may wish to submit documentation for the public record.

Although the Commission may take further legal steps concerning the acceptance of an excessive contribution(s), your prompt refund or transfer-out of the excessive amount will be taken into consideration.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission

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within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 434-9530. My local number is (202) 523-4040.

Sincerely,

*J. Hunter Bryan*

J. Hunter Bryan  
Reports Analyst  
Reports Analysis Division

88040713543

85033480503



ANALYST: Carol Caldwell

CONVERSATION WITH: Ms. Evelyn Sullivan

COMMITTEE: Santa Barbara County Republican Central Committee

DATE: March 14, 1985

SUBJECT(S): RFAIs

On March 14, 1985, Ms. Sullivan called regarding RFAIs and her response. I informed her that I had discussed her response with Mr. Hunter Bryan and that all further questions should be made directly to him.

88040713544



SANTA BARBARA COUNTY REPUBLICAN CENTRAL COMMITTEE  
3324 State Street, G, Santa Barbara, California 93106  
(805) 964-3287

85 MAR 11 1985

AG: [illegible]

March 10, 1985

Mr. John D. Gibeon  
Assistant Staff Director  
Reports Analysis Division  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D. C. 20463

Identification Number: C00174334

Reference: October Quarterly Report (7/1/84-9/30/84)  
30 Day Post-General Report (10/1/84-11/26/84)

Dear Mr. Gibeon:

This letter is in response to your inquiry dated March 7, 1985.

The information requested has been furnished the Commission, by letter dated March 3, 1985 to Mr. J. Hunter Bryan. Mr. Bryan and Ms. Caldwell were involved with matters pertaining to our Committee.

I spoke with Ms. Caldwell on March 14, 1985, to discuss your inquiry letter and our response. Ms. Caldwell is aware of the fact that Mr. Bryan has received our response.

Sincerely yours,

Evelyn E. Sullivan  
Treasurer

88040713545  
95033504192

APR 11 1985

85 MAR 25 4 9: 42



SANTA BARBARA COUNTY REPUBLICAN CENTRAL COMMITTEE  
4141 State Street, P.O. Box 110, Santa Barbara, California 93110  
(805) 964-9287

March 19, 1985

Mr. J. Hunter Bryan  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D. C. 20463

Identification Number: C00174334

Reference: Year End Report (7/1/83-12/31/83)

Dear Mr. Bryan:

In response to your inquiry dated March 13, 1985, please be advised that we have responded to this matter by our letter to you dated March 3, 1985.

In our letter of March 3, 1985, we addressed problems with "all filed reports for election cycle".

Should you have any questions, please call me at my office number (805) 963-0669.

Sincerely yours,

Evelyn E. Sullivan  
Treasurer

EES

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9503369007



**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20543

EQ-2

Evelyn E. Sullivan, Treasurer  
Santa Barbara County Republican  
Central Committee  
3324-G State Street  
Santa Barbara, CA 93105

JAN 30 1985

Identification Number: C00174334

Reference: October Quarterly Report (7/1/84-9/30/84)

Dear Ms. Sullivan:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses contributions from organizations which are not political committees registered with the Commission. Under 11 CFR 102.5(b), organizations which are not political committees under the Act must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

Please clarify whether the contributions received from these organizations are permissible, as required by 11 CFR 102.5(a). To the extent that your committee has received funds which are not permissible, the amounts should be either refunded to the organizations or transferred out to a non-Federal account. Please inform the Commission in writing and provide a photocopy of your check(s) for the refund(s) or transfer(s)-out. Contributions which are refunded should be disclosed on Schedule B for Line 26a of your next report; those which are transferred-out should be disclosed on Schedule B for Line 20 or Line 27, as appropriate.

-Please clarify all expenditures made for phone bank and printing. If a portion or all of these expenditures were made on behalf of specifically

JB

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**SANTA BARBARA COUNTY REPUBLICAN  
CENTRAL COMMITTEE  
PAGE 2**

identified Federal candidates, they should be disclosed on Schedule B or F for Line 21 or 23 and include the amount, name, address and office sought by each candidate. 11 CFR 104.3(b) and 106.1.

-Your report discloses an apparent contribution(s) from a corporation(s) (pertinent portion attached). You are advised that a contribution from a corporation is prohibited by the Act, unless made from a separate segregated fund established by the corporation. (2 U.S.C. §441b(a)) If you have received a corporate contribution(s), the Commission recommends that you refund the full amount to the donor(s) or transfer the funds to a non-Federal account. Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. In addition, the disbursement should be disclosed on a supporting Schedule B for Line 26 or 27 of your next report.

If the contribution(s) in question was incorrectly reported and/or you have additional information, you may wish to submit documentation for the public record.

Although the Commission may take further legal steps concerning the acceptance of a prohibited contribution, prompt action by your committee to refund or transfer-out the amount will be taken into consideration.

-You have received contributions from Islay Investments and Jedlicka's, which appear to be unincorporated proprietorships or partnerships. Generally, these types of contributions are to be attributed to each person based on their percentage ownership in the firm, however, any other accepted formula may be used. Each person who has contributed in excess of \$200 since January 1 should be identified by name, address, occupation, name of employer, amount of contribution, and aggregate total on Schedule A. 11 CFR 110.1(e).

If your committee has made at least one effort per solicitation, either by a written request or by an oral request documented in writing to obtain this information from the contributors, your committee may have exercised "best efforts." If you believe that your committee satisfies the "best efforts" provision, you should provide a copy of your solicitation or an explanation of the method(s) used to obtain contributor information. 11 CFR 104.3(a)(4)(i) and 11 CFR 104.7.

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**SANTA BARBARA COUNTY REPUBLICAN  
CENTRAL COMMITTEE  
PAGE 3**

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

*J. Hunter Bryan*

**J. Hunter Bryan  
Reports Analyst  
Reports Analysis Division**

88040713549  
93733622930



## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

17 July 1985

MEMORANDUM

TO: CHARLES N. STEELE  
GENERAL COUNSEL

ATTENTION: SHELLEY E. GARR

THROUGH: JOHN C. SURINA  
STAFF DIRECTOR

FROM: *[Signature]* JOHN D. GIBSON  
ASSISTANT STAFF DIRECTOR  
REPORTS ANALYSIS DIVISION

SUBJECT: REFERRAL UPDATE OF THE SANTA BARBARA COUNTY  
REPUBLICAN CENTRAL COMMITTEE - 85L-24b

The following is an update to the referral of the Santa Barbara County Republican Central Committee ("the Committee").

The Committee was referred for accepting apparent excessive contributions from the Santa Barbara Lincoln Club ("the Club") totalling \$33,187.50. The treasurer, Ms. Evelyn E. Sullivan, had informed the Commission on February 19, 1985 that the Committee would not have funds available to refund the excessive amount until after its 1985 July fundraiser.

On July 16, 1985, a letter was received by the Commission from Ms. Sullivan stating "we have held our annual fundraiser, and in compliance with our statement of intent, we have issued a check to the [Club], in the amount of \$33,187.50 to clear the debt owed due to excess contributions received." The response also included a photocopy of the refund check and the letter to the Club (Attachments 1, 2, and 3).

If you have any questions regarding this matter, please contact J. Hunter Bryan at 523-4048.

Attachment

83040713550



SANTA BARBARA COUNTY REPUBLICAN CENTRAL COMMITTEE  
3324 State Street, G, Santa Barbara, California 93105  
(805) 964-3287

Attachment 1

RECEIVED AT THE FEC

85 JUL 16 P 1:43

July 11, 1985

Mr. J. Hunter Bryan  
Reports Analyst  
Reports Analysis Division  
1325 K Street, N.W.  
Washington, D. C. 20463

Identification Number: C00174334

Reference: Problems with all filed reports for  
election cycle - 1984

Dear Mr. Bryan:

This letter follows up our letter to you dated March 3, 1985, in which we responded to inquiries concerning excess contributions received from the Santa Barbara County Lincoln Club during 1983, totalling \$19,862.50, and 1984, totalling \$13,325.00.

Due to the fact that we did not have cash available to make a refund to the Santa Barbara County Lincoln Club at that time, we advised you that it was our intent to refund the \$33,187.50 with receipts from our annual fundraiser in July.

We have held our annual fundraiser, and in compliance with our statement of intent, we have issued a check to the Santa Barbara County Lincoln Club, in the amount of \$33,187.50 to clear the debt owed due to excess contributions received. A photocopy of our check, clearing the debt owed, and a photocopy of our letter to the Santa Barbara County Lincoln Club are enclosed. JB

We trust that you will find that our Committee has fulfilled its obligation to refund the excess contributions received. We wish to thank the Commission for allowing us to make this refund after holding our annual fundraiser.

Sincerely yours,

Evelyn E. Sullivan  
Treasurer

Enclosures

8503379135231  
88040713551



SANTA BARBARA COUNTY REPUBLICAN CENTRAL COMMITTEE  
3324 State Street, G, Santa Barbara, California 93105  
(805) 964-3287

Attachment 2

July 11, 1985

Mrs. Nellie Koart, Treasurer  
Santa Barbara County Lincoln Club  
P.O. Box 30100  
Santa Barbara, CA 93130-0349

Dear Nellie:

On March 3, 1985, we acknowledged by letter the receipt of excess contributions from the Santa Barbara County Lincoln Club in our Federal account as follows:

1983	\$19,862.50
1984	<u>13,325.00</u>
	\$33,187.50

Having held our annual fundraiser, we are now in a position to refund the excess contribution received.

We are pleased to enclose our check in the amount of \$33,187.50, representing a refund of the excess contributions received during 1983 and 1984.

Sincerely yours,

Evelyn E. Sullivan  
Treasurer

Enclosure  
cc: Mr. J. Hunter Bryan

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**SANTA BARBARA COUNTY  
REPUBLICAN CENTRAL COMMITTEE**  
3324-G STATE STREET 805-984-3287  
SANTA BARBARA, CA 93105

1226

90-3478  
1222

PAY  
TO THE  
ORDER OF

*Santa Barbara County Lincoln Club*

*July 11* 19

\$ *33,187.50*

*Thirty-Three Thousand One Hundred Eighty-seven and 50/100* DOLLARS



**The Bank of Montecito**  
1000 STATE STREET  
SANTA BARBARA, CALIFORNIA 93101

FOR *refund excess cont. mail 1983/84*

*Sue F. Sullivan*  
*Phyllis J. Moore*

⑈001226⑈ ⑆122234783⑆ 192⑈00662⑈



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

RECEIVED  
**SENSITIVE**

FIRST GENERAL COUNSEL'S REPORT 85 NOV 7 P4:52

DATE AND TIME OF TRANSMITTAL  
BY OGC TO THE COMMISSION

85L-24a  
STAFF MEMBER  
Shelley Garr

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

RESPONDENT'S NAME: Santa Barbara County Lincoln Club  
Nellie Koart, Treasurer

RELEVANT STATUTE: 2 U.S.C. § 434(a)(4)(A)(iv)  
2 U.S.C. § 441a(a)(1)(C)

INTERNAL REPORTS  
CHECKED:

FEC Disclosure Documents

FEDERAL AGENCIES  
CHECKED:

N/A

**GENERATION OF MATTER**

The Santa Barbara County Lincoln Club ("the Club") was referred to the Office of General Counsel by the Reports Analysis Division for failing to file a 1983 Year End Report by Election Day, November 6, 1984, and for making apparent excessive contributions totalling \$19,862.50 in 1983 and \$13,325 in 1984 to the Santa Barbara County Republican Central Committee ("the Committee").

**SUMMARY OF ALLEGATIONS**

The Club registered with the Commission as a non-party-related committee on March 1, 1984, and filed its first report, the 1984 April Quarterly, on April 16, 1984.

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On February 12, 1985, the Committee filed its 1983 Year End Report which disclosed the receipt of funds from the Club between 7/20/83 and 12/30/83 which totalled \$20,737.50.<sup>1/</sup>

Since Commission records disclosed that the Club had contributed \$20,737.50 to the Committee in 1983, a Non-Filer Notice was sent to the Club on March 8, 1985. On March 22, 1985, the Club filed a 1983 Year End Report, 416 days late. The report, which included activity from 7/1/83-12/31/83, disclosed \$20,737.50 in contributions to the Committee.<sup>2/</sup>

The Club's 1984 July and October Quarterly Reports and 12 Day Pre-General Report also disclosed contributions of \$18,825 made to the Committee between April 2 and October 11, 1984, or \$13,325 in apparent excessive contributions to the Committee in 1984.

#### LEGAL AND FACTUAL ANALYSIS

Pursuant to 2 U.S.C. § 434(a)(4)(A)(iv) all political committees other than authorized committees of a candidate shall file in a non-election year a report covering the period beginning January 1 and ending June 30 which shall be filed no later than July 31 and a report covering the period beginning

<sup>1/</sup> Based on the Committee's reported aggregated year-to-date total of \$24,862.00, it appears that the Club contributed an additional \$4,125 to the Committee prior to July 20, 1983, thus resulting in \$19,862.50 in apparent excessive contributions made to the Committee by the Club in 1983.

<sup>2/</sup> In response to a questions raised by RAD regarding possible affiliation between the Club and Committee, Ms. Koarts has advised that there is no affiliation. This office believes there is no evidence to suggest otherwise.

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July 1 and ending December 31 which shall be filed no later than January 31 of the following calendar year.

Additionally, pursuant to 2 U.S.C. § 441a(a)(1)(C), no person or committee shall make a contribution to any other political committee in any calendar year which, in the aggregate, exceeds \$5,000.

Because the Club failed to file its Year End Report in a timely manner, and because the Club contributed in excess of its \$5,000 limitation per calendar year to the Santa Barbara County Republican Central Committee, it is the recommendation of the Office of General Counsel that the Commission find reason to believe that the Santa Barbara County Lincoln Club violated 2 U.S.C. §§ 434(a)(4)(A)(iv) and 441a(a)(1)(C).

#### RECOMMENDATION

It is the recommendation of the Office of General Counsel that the Commission:

1. Open a MUR.
2. Find reason to believe that the Santa Barbara County Lincoln Club and Nellie Koart, as Treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(iv) and 441a(a)(1)(C).

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3. Approve the attached letter and legal and factual analyses.

November 4, 1985  
Date

Charles N. Steele  
General Counsel

BY:

Kenneth A. Gross  
Kenneth A. Gross  
Associate General Counsel

Attachments:

Referral

Letter and Legal and Factual Analysis

SG #1

88040713557



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL  
FROM: MARJORIE W. EMMONS/ CHERYL A. FLEMING *Catch*  
DATE: NOVEMBER 13, 1985  
SUBJECT: OBJECTION - RAD Ref. 85L-24a: First General  
Counsel's Report

8 The above-named document was circulated to the  
5 Commission on Friday, November 8, 1985, 2:00.

3 Objections have been received from the Commissioners  
1 as indicated by the name(s) checked:

8  
3  
0  
4  
0  
7  
1  
3  
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5  
8  
Commissioner Aikens X  
Commissioner Elliott             
Commissioner Harris             
Commissioner Josefiak             
Commissioner McDonald             
Commissioner McGarry           

This matter will be placed on the Executive Session  
agenda for Tuesday, November 19, 1985.



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Santa Barbara County Lincoln Club  
Nellie Koart, Treasurer

(m2102)  
RAD 85L-24a

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the  
Federal Election Commission executive session of  
November 19, 1985, do hereby certify that the Commission  
decided by a vote of 5-1 to take the following actions  
in the above-captioned matter:

1. Open a MUR.
2. Find reason to believe that the Santa  
Barbara County Lincoln Club and Nellie  
Koart, as Treasurer, violated 2 U.S.C.  
§§ 434(a)(4)(A)(iv) and 441a(a)(1)(C).
3. Approve the letter and legal and factual  
analysis attached to the General Counsel's  
report dated November 4, 1985.

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

Attest:

11-21-85

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

8 3 0 4 0 7 1 3 5 5 9



**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

December 16, 1985

Ms. Nellie Koart, Treasurer  
Santa Barbara County Lincoln Club  
P.O. Box 30100  
Santa Barbara, California 93130-0349

RE: MUR 2102  
Santa Barbara County  
Lincoln Club

Dear Ms. Koart:

On November 19, 1985, the Federal Election Commission determined that there is reason to believe that the Santa Barbara County Lincoln Club and you, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(iv) and 441a(a)(1)(C), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials, within fifteen days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be

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pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable conciliation after briefs on probable cause have been mailed to the respondent will not be entertained.

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

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

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

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Shelley Garr, the staff member assigned to this matter, at (202) 423-4143.

Sincerely,



John Warren McGarry  
Chairman

Enclosures

General Counsel's Factual and Legal Analysis  
Procedures  
Designation of Counsel Statement

SG #1

38040713561

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

RECEIVED  
OFFICE OF THE FEC  
COMMISSION SECRETARY

**FIRST GENERAL COUNSEL'S REPORT**

**SENSITIVE**

DATE AND TIME OF TRANSMITTAL  
BY OGC TO THE COMMISSION:

85L-24b  
STAFF MEMBER  
Shelley Garr

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

RESPONDENT'S NAME: Santa Barbara County Republican  
Central Committee  
Evelyn E. Sullivan, Treasurer

RELEVANT STATUTE: 2 U.S.C. §§ 434(a)(4)(A)(iv), 441a  
and 441b  
11 CFR § 102.5

INTERNAL REPORTS  
CHECKED: FEC Disclosure Documents

FEDERAL AGENCIES  
CHECKED: N/A

**GENERATION OF MATTER**

The Santa Barbara County Republican Central Committee ("the Committee") was referred to OGC by RAD for failing to file the 1983 Year End Report by Election Day, November 6, 1984, and for accepting apparent excessive contributions totalling \$19,862 in 1983 and \$14,978.36 in 1984.

**SUMMARY OF ALLEGATIONS**

The Committee registered with the Commission as a committee on January 3, 1984. Its first report, the 1984 April Quarterly, disclosed an initial cash-on-hand amount of \$57,091.07. As a result of an RFAI which questioned the source of the initial cash, the Committee filed a 1983 Year End Report on February 12, 1985, which disclosed activity from 7/1/83-12/31/83. The report

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disclosed the receipt of \$20,737.50 in contributions from the Santa Barbara County Lincoln Club ("the Club"). Based on the Committee's aggregate year-to-date total of \$24,862.50 in contributions from the Club, it appears that the Committee received an additional \$4,125 from the Club prior to that reporting period, thus resulting in the receipt of apparent excessive contributions totalling \$19,862.50 in 1983.

Additionally, the Committee's 1984 July and October Quarterly Reports and 30 Day Post General Report disclosed \$29,978 in contributions from: the Club, \$18,325; the John Carpenter Committee, \$6,000; and Islay Investments, \$5,653.36.<sup>1/</sup> The result is the receipt of apparent excessive contributions of \$13,325 from the Club; \$1,000 from the John Carpenter Committee; and \$653.36 from Islay Investments, totalling \$14,978 in excessive contributions.

An RFAI, sent to the Committee on January 30, 1985, questioned the contributions from Islay Investments (\$5,653.36), the John Carpenter Committee (\$6,000), and three additional organizations not registered with the Commission (\$135). The Commission questioned whether these contributions were

<sup>1/</sup> The John Carpenter Committee is an unregistered committee. Islay investments is an unincorporated partnership.

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permissible pursuant to 2 U.S.C. § 441b and 11 C.F.R. § 102.5.<sup>3/</sup>  
The Commission advised the Committee to either refund or transfer-out the amounts in excess of \$5,000. The Committee's response, dated February 12, 1985, includes copies of two checks dated February 11, 1985, which represented transfers-out to the Committee's non-federal account for the John Carpenter Committee contribution (\$6,000), the Islay Investments' contribution (\$653.36), and the other unregistered committees (\$135).

#### FACTUAL AND LEGAL ANALYSIS

Pursuant to 2 U.S.C. § 434(a)(4)(A)(iv), all political committees other than authorized committees of a candidate are required to file, in any year in which a regularly scheduled election is not held, a report covering the period beginning January 1 and ending June 30, which shall be filed no later than July 31, and a report covering the period July 1 and ending December 31, which shall be filed no later than January 31 of the following calendar year. The Committee filed its 1983 Year End Report on February 12, 1985, 380 days late. The Committee's failure to file a 1983 Year End Report in a timely manner is a violation of 2 U.S.C. § 434(a)(4)(A)(iv).

Pursuant to 2 U.S.C. § 441a(f) no multicandidate political committee shall knowingly accept any contribution from a person in excess of the limitations imposed by the provisions of the

<sup>3/</sup> California permits unlimited corporate, labor, and individual contributions.

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Act. The Committee's acceptance of contributions aggregating in excess of the \$5000 limitation imposed by 2 U.S.C.

§§ 441a(a)(2)(C) from the Santa Barbara County Lincoln Club and 441a(a)(1)(c) from Islay Investments is, in the General Counsel's view, a violation of 2 U.S.C. § 441a(f).

Further, Islay Investment's contribution to the committee which exceeded the \$5,000 limitation imposed by the Act, is, in the General Counsel's view, a violation of 2 U.S.C.

§ 441a(a)(1)(C).

Pursuant to 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a), a political committee is prohibited from knowingly accepting or receiving contributions from any corporation or labor organization. Further, any committee which finances political activity in connection with both federal and non-federal elections shall only deposit funds subject to the prohibitions and limitations of the Act into its federal account. Thus, the John Carpenter Committee's \$6,000 contribution to the Committee and the Committee's acceptance of the contribution; which may have contained corporate and/or labor organization funds in accordance with California state law are, in the General

4/ See companion 1st General Counsel's Report for 85L-24a regarding the Office of General Counsel's recommendations with respect to the Santa Barbara County Lincoln Club.

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Counsel's view, violations of 2 U.S.C. § 441b and 11 CFR§ 102.5(a). This Office, however, recommends that the Commission find reason to believe and take no further action with respect to the John Carpenter Committee (See MUR 2093).

We note that the Committee transferred the funds in accordance with the Commission's January 30, 1985 RFAI. Consistent with the handling of the Democratic National Committee in MUR 1730, we are not requiring that a refund be made in the absence of a specific requirement by the Commission. Although we believe the appropriate remedy is a refund, in view of the Commission's action in MUR 1730, we will accept the transfer of funds to the nonfederal account as a mitigating factor in remedying the violation.

#### RECOMMENDATION

It is the recommendation of the Office of General Counsel that the Commission:

1. Open a MUR.
2. Find reason to believe that the Santa Barbara County Republican Central Committee and Evelyn E. Sullivan, as Treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(iv), 441a(f), 441b, and 11 C.F.R. § 102.5.
3. Find reason to believe that the John Carpenter Committee violated 2 U.S.C. § 441b and take no further action.

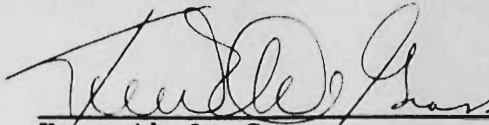
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4. Find reason to believe that Islay Investments violated 2 U.S.C. § 441a(a)(1)(C) and take no further action.
5. Merge this MUR with the MUR which this office recommends be opened with regard to 85L-24a.
6. Approve the attached letters and legal and factual analyses.

Charles N. Steele  
General Counsel

*November 5, 1985*

BY:

  
Kenneth A. Gross  
Associate General Counsel

Attachments:

Proposed Letters and Legal and Factual Analyses  
Referral

SG #1

88040713567



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL  
FROM: MARJORIE W. EMMONS/CHERYL A. FLEMING *CAT*  
DATE: NOVEMBER 13, 1985  
SUBJECT: OBJECTION - RAD Ref. 85L-24b: First General  
Counsel's Report

The above-named document was circulated to the  
Commission on Friday, November 8, 1985, 2:00.

Objections have been received from the Commissioners  
as indicated by the name(s) checked:

Commissioner Aikens	<u>X</u>
Commissioner Elliott	<u></u>
Commissioner Harris	<u></u>
Commissioner Josefiak	<u>X</u>
Commissioner McDonald	<u></u>
Commissioner McGarry	<u></u>

This matter will be placed on the Executive Session  
agenda for Tuesday, November 19, 1985.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Santa Barbara County Republican ) RAD 85L-24b  
Central Committee )  
Evelyn E. Sullivan, Treasurer )

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of November 19, 1985, do hereby certify that the Commission took the following actions with respect to the above-captioned matter:

1. Decided by a vote of 4-1 to open a Matter Under Review.

Commissioners Elliott, Harris, Josefiak, and McDonald voted affirmatively for the decision; Commissioner Aikens dissented. Commissioner McGarry was not present at the time of the vote.

2. Failed in a vote of 2-2 to pass a motion to find reason to believe that the Santa Barbara County Republican Central Committee and Evelyn E. Sullivan, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(iv) and 441a(f).

Commissioners Elliott and Josefiak voted affirmatively for the motion; Commissioners Harris and McDonald dissented; Commissioner Aikens abstained; Commissioner McGarry was not present.

(continued)

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3. Decided by a vote of 4-0 to find reason to believe that the Santa Barbara County Republican Central Committee and Evelyn E. Sullivan, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(iv) and 441a(f) and 11 C.F.R. § 102.5.

Commissioners Elliott, Harris, Josefiak, and McDonald voted affirmatively for the decision. Commissioner Aikens abstained. Commissioner McGarry was not present.

4. Decided by a vote of 4-1 not to find reason to believe that the John Carpenter Committee violated 2 U.S.C. § 441b.

Commissioners Aikens, Elliott, Josefiak, and McDonald voted affirmatively for the decision; Commissioner Harris dissented. Commissioner McGarry was not present.

5. Decided by a vote of 4-0 to

- a) Find reason to believe that Islay Investments violated 2 U.S.C. § 441a(a)(1)(C) and take no further action.
- b) Merge this MUR with the MUR which the Office of General Counsel will open with regard to 85L-24a.

Commissioners Elliott, Harris, Josefiak, and McDonald voted affirmatively for the decision. Commissioner Aikens abstained. Commissioner McGarry was not present.

(continued)

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Federal Election Commission  
Certification for RAD85L-24b  
November 19, 1985

Page 3

6. Decided by a vote of 4-0 to direct the  
Office of General Counsel to send the  
appropriate letters and factual and legal  
analyses.

Commissioners Elliott, Harris, Josefiak,  
and McDonald voted affirmatively.  
Commissioner Aikens abstained.  
Commissioner McGarry was not present.

Attest:

11-21-85

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

38040713571



**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

December 16, 1985

Ms. Evelyn E. Sullivan, Treasurer  
Santa Barbara County Republican Central Committee  
3324-G State Street  
Santa Barbara, California 93105

RE: MUR 2102  
Santa Barbara County  
Republican Central  
Committee

Dear Ms. Sullivan:

On November 19, 1985, the Federal Election Commission determined that there is reason to believe that the Santa Barbara County Republican Central Committee and you, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(iv) and 441a(f), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act") and 11 C.F.R. § 102.5(a). The General Counsel's factual and legal analysis, which formed a basis for the Commission's findings, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials, within fifteen days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be

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pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable conciliation after briefs on probable cause have been mailed to the respondent will not be entertained.


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

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

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

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Shelley Garr, the staff member assigned to this matter, at (202) 423-4143.

Sincerely,



John Warren McGarry  
Chairman

**Enclosures**

General Counsel's Factual and Legal Analysis  
Procedures  
Designation of Counsel Statement

SG #1

3 3 0 4 0 7 1 3 5 7 3





**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

December 16, 1985

Islay Investments  
800 Garden Street  
Santa Barbara, California 93101

RE: MUR 2102

Dear Sir or Madame:

On November 19, 1985, the Commission found reason to believe that the Islay Investments had violated 2 U.S.C. § 441a(a)(1)(C), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") by making excessive contributions totalling \$5,653.36 to the Santa Barbara County Republican Central Committee in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that contributions in excess of \$5,000 by Islay Investments nevertheless appears to be a violation of 2 U.S.C. § 441a(a)(1)(C) and you should take immediate steps to insure that this activity does not occur in the future.

The General Counsel's Factual and Legal analysis which formed a basis for the Commission's finding is attached for your information.

If you have any questions, please direct them to Shelley Garr, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,

A handwritten signature in dark ink, reading "John Warren McGarry".  
John Warren McGarry  
Chairman

89040713574



*Sarr*  
*Personal files*  
*1-6-86*  
RECEIVED  
OFFICE OF THE  
GENERAL COUNSEL  
SANTA BARBARA COUNTY REPUBLICAN CENTRAL COMMITTEE  
3324 State Street, G, Santa Barbara, California 93105  
(805) 964-3287  
000#9373

06 JAN 6 1985  
January 15, 1985

OFFICERS

Mrs. Phil Moore, *Chairman*  
Diane Kilger, *Vice Chairman*  
Evelyn Sullivan, *Treasurer*  
Doris Lahr, *Secretary*

Mr. John Warren McGarry, *Chairman*  
General Counsel's Department  
Federal Election Commission  
999 E Street, N.W.  
Washington, D. C. 20463

Re: MUR 2102  
Santa Barbara County Republican  
Central Committee  
C00174334

Dear Mr. McGarry:

Your letter dated December 16, 1985, was received by the undersigned on December 30, 1985.

You state that we may submit any factual material which we believe as relevant to the Commission's consideration of the determination that provisions of the Federal Election Campaign Act of 1971, as amended, may have been violated.

I believe that no action should be taken against me, or the Santa Barbara County Republican Central Committee (the Committee).

The Summary of Allegations state that we received contributions from the Santa Barbara County Lincoln Club (the Club) of \$19,862.50 in 1983, and \$18,325.00 in 1984, representing excessive contributions of \$33,187.50. Reference is also made to excessive contributions received from the John Carpenter Committee (\$6,000), and Islay Investments (\$5,653.36), and acknowledges our response by letter of February 12, 1985, including copies of checks representing the transfers-out to our Committee's nonfederal account for the Carpenter Committee contribution (\$6,000), Islay Investments' contribution (\$653.50) and other unregistered contributions (\$135).

No reference has been made on the balance of our file, which reveals the following: (A) Our letter dated March 3, 1985,

RECEIVED  
OFFICE OF THE  
GENERAL COUNSEL  
06 JAN 8 10:53

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SANTA BARBARA COUNTY REPUBLICAN CENTRAL COMMITTEE  
3324 State Street, G, Santa Barbara, California 93105  
(805) 964-3287

Mr. John Warren McGarry, Chairman

January 2, 1986  
Page 2

OFFICERS

Mrs. Phil Moore, *Chairman*  
Diane Klinger, *Vice Chairman*  
Evelyn Sullivan, *Treasurer*  
Doris Lahr, *Secretary*

written upon receipt of FEC advice that the Club was not a party committee, stating that the Committee would refund the excess contribution of \$33,187.50 to the Club, a copy of said letter is enclosed. (B) Our letter dated July 11, 1985, enclosing a photocopy of our check to the Club in the amount of \$33,187.50, refunding the excess contribution received, and our letter to the Club of July 11, 1985, copies of which are enclosed.

Under your Factual and Legal Analysis you state that our Committee filed its 1983 year-end report on February 12, 1985, 380 days late, thereby being in violation of 2 U.S.C. §434 (a)(4)(A)(iv). The Committee did not file with the FEC in 1983; we filed a Statement of Organization on January 1, 1984. On February 12, 1985, we filed an amendment to the January 31 year-end report (11/27/84-12/31/84).

Referring to the violation of 11 C.F.R. §102.5, we transferred out to the Committee's nonfederal account the contribution received from the John Carpenter Committee, upon inquiry by the Commission, and you conclude your statement: "...we will accept the transfer of funds to the nonfederal account as a mitigating factor in remedying the violation".

Several attempts have been made to contact Shelly Garr, to discuss our reply, and I was advised today that she is out of the office this entire week.

Upon review of this response, I trust that you will find that I, and the Committee, are not in violation of any provision of the Federal Election Campaign Act and look forward to a prompt and favorable reply.

Sincerely yours,

Evelyn E. Sullivan  
Treasurer

Enclosures:

Letter to FEC dated 3/3/85

Letter to FEC dated 7/11/85

with enclosures

January 31 Year End Report (11/27/84-12/31/84) filed 2/12/85

CERTIFIED MAIL #P710 489 631

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**SANTA BARBARA COUNTY REPUBLICAN CENTRAL COMMITTEE**  
3324 State Street, G, Santa Barbara, California 93105 (805) 964-3287

March 3, 1985

Mr. J. Hunter Bryan  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D. C. 20463

Identification Number: C00174334

Reference: Problems with all filed reports  
for election cycle

Dear Mr. Bryan:

This letter is in response to inquiries by letter and telephone concerning excess contributions received from the Santa Barbara County Lincoln Club during 1983, totalling \$19,862.50, and 1984, totalling \$13,325.00.

Our Committee was under the erroneous impression that we could accept unlimited transfers from the Santa Barbara County Lincoln Club, believing they had registered with the Federal Election Commission as a party organization.

According to the Campaign Guide for Political Party Committees, March 1984, Page 5, Transfers to Other Party Committees: "A party committee or organization may make unlimited transfers to other committees and organizations of the same political party; the funds are not considered expenditures. However, the transfer may trigger registration requirements for a party organization (see page 7). 102.6(a)(1)(ii) and (a)(2); 110.2(c)."

We have just been made aware of the fact that these funds are considered excessive due to the fact that the Santa Barbara County Lincoln Club registered as a non-connected committee.

After a full discussion of alternate methods to solve this problem, we have decided on a different course than previously stated in our response to Ms. Caldwell on February 21, 1985. Please disregard this previously stated intention.

88040713577



**SANTA BARBARA COUNTY REPUBLICAN CENTRAL COMMITTEE**  
3324 State Street, G, Santa Barbara, California 93105  
(805) 964-3287

Mr. J. Hunter Bryan

-2-

March 3, 1985

We have received a letter from the Santa Barbara County Lincoln Club, dated February 27, 1985, requesting the entire excess portion of their contribution be refunded to their committee, and it is our intent to so comply. We also enclose a copy of our reply to the Santa Barbara County Lincoln Club.

Upon notification that we had received excess contributions, we are going to amend our reports to reflect the excess portion of the contributions received from the Santa Barbara County Lincoln Club, totalling \$33,187.50, as a debt owed on Schedule D.

The reason we are listing the excess contribution received as a debt, at this time, is that we do not have cash available to reimburse the Santa Barbara County Lincoln Club immediately, and also due to obligations of income taxes payable by March 15, 1985.

Our intent is to reimburse the Santa Barbara County Lincoln Club with receipts from our annual fundraiser in July, to clear the debt of excess contributions received in 1983, of \$19,682.50, and of the excess contribution received during 1984, of \$13,325.00, for a total of \$33,187.50. A photocopy of our check clearing this debt owed will be furnished to the Commission.

We are concerned that the Commission know of our wish to remedy the situation of having accepted excess contributions in our Federal account. At no time has our Committee made any contribution to a specified Federal candidate. The purpose of our committee is to support all candidates by very active precinct/registration work, and in addition, we do make specified contributions to non-Federal candidates.

As stated in their letter of February 27, 1985, the Lincoln Club will monitor their donations to our committee, and we will now accept only \$5,000 for our Federal account; additional contributions will be clearly allocated for deposit into our non-Federal account.

Amendments to all filed reports for the election cycle

88040713578





**SANTA BARBARA COUNTY REPUBLICAN CENTRAL COMMITTEE**  
3324 State Street, G, Santa Barbara, California 93105  
(805) 964-3287

Mr. J. Hunter Bryan

-3-

March 3, 1985

are enclosed.

If you have any questions concerning this matter, please  
call me at my office, (805) 963-0669.

Sincerely yours,

Evelyn E. Sullivan  
Treasurer

**Enclosures:**

Copy of letter to Santa Barbara  
County Lincoln Club

Amendments to: January 31 Year-End Report  
(Pre-Registration) 7/1/83-12/31/83  
April Quarterly Report (1/1-3/31/84)  
July Quarterly Report ( 4/1-6/30/84)  
October Quarterly Report (7/1-9/30/84)  
30-Day Post-General Report (10/1-11/26)  
Year-End Report (11/27-12/31/84)

Certified Mail  
P710 486 478

88040713579



SANTA BARBARA COUNTY REPUBLICAN CENTRAL COMMITTEE  
3324 State Street, G, Santa Barbara, California 93105  
(805) 964-3287

March 3, 1985

Mrs. Nellie Koart, Treasurer  
Santa Barbara County Lincoln Club  
P.O. Box 30100  
Santa Barbara, CA 93130-0349

Dear Nellie:

This will acknowledge receipt of your letter of February 27, 1985, calling to our attention the excess contributions made to our committee as follows:

1983	\$19,862.50
1984	<u>13,325.00</u>
	\$33,187.50

We will comply with your request to refund these amounts as soon as possible.

As you know, there are only minimal funds available in our Federal account at this time. We will be in a position to refund the \$33,187.50 in July 1985, after holding our annual fundraiser.

Sincerely yours,

Evelyn E. Sullivan  
Treasurer

cc: Mr. J. Hunter Bryan

8804071358C



**SANTA BARBARA COUNTY REPUBLICAN CENTRAL COMMITTEE**  
3324 State Street, G, Santa Barbara, California 93105 (805) 964-3287

July 11, 1985

Mr. J. Hunter Bryan  
Reports Analyst  
Reports Analysis Division  
1325 K Street, N.W.  
Washington, D. C. 20463

Identification Number: C00174334

Reference: Problems with all filed reports for  
election cycle - 1984

Dear Mr. Bryan:

This letter follows up our letter to you dated March 3, 1985, in which we responded to inquiries concerning excess contributions received from the Santa Barbara County Lincoln Club during 1983, totalling \$19,862.50, and 1984, totalling \$13,325.00.

Due to the fact that we did not have cash available to make a refund to the Santa Barbara County Lincoln Club at that time, we advised you that it was our intent to refund the \$33,187.50 with receipts from our annual fundraiser in July.

We have held our annual fundraiser, and in compliance with our statement of intent, we have issued a check to the Santa Barbara County Lincoln Club, in the amount of \$33,187.50, to clear the debt owed due to excess contributions received. A photocopy of our check, clearing the debt owed, and a photocopy of our letter to the Santa Barbara County Lincoln Club are enclosed.

We trust that you will find that our Committee has fulfilled its obligation to refund the excess contributions received. We wish to thank the Commission for allowing us to make this refund after holding our annual fundraiser.

Sincerely yours,

Evelyn E. Sullivan  
Treasurer

Enclosures

8  
3  
5  
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8  
3



SANTA BARBARA COUNTY REPUBLICAN CENTRAL COMMITTEE  
3324 State Street, G, Santa Barbara, California 93105  
(805) 964-3287

July 11, 1985

Mrs. Nellie Koart, Treasurer  
Santa Barbara County Lincoln Club  
P.O. Box 30100  
Santa Barbara, CA 93130-0349

Dear Nellie:

On March 3, 1985, we acknowledged by letter the receipt of excess contributions from the Santa Barbara County Lincoln Club in our Federal account as follows:

1983	\$19,862.50
1984	<u>13,325.00</u>
	\$33,187.50

Having held our annual fundraiser, we are now in a position to refund the excess contribution received.

We are pleased to enclose our check in the amount of \$33,187.50, representing a refund of the excess contributions received during 1983 and 1984.

Sincerely yours,

Evelyn E. Sullivan  
Treasurer

Enclosure  
cc: Mr. J. Hunter Bryan

88040713582

**SANTA BARBARA COUNTY  
REPUBLICAN CENTRAL COMMITTEE**

3324-G STATE STREET 805-984-3287  
SANTA BARBARA, CA 93105

1226

90-3478  
1222

PAY  
TO THE  
ORDER OF

*Santa Barbara County Lincoln Club*

*July 11* 19\_\_

\$ *33,187.50*

*Thirty-Three Thousand One Hundred Eighty-Seven and 50/100* — DOLLARS



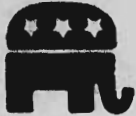
**The Bank of Montecito**  
1000 STATE STREET  
SANTA BARBARA, CALIFORNIA 93101

FOR *to refund excess cont. paid 1983/84*

*Sachin P. Suleman*  
*Phillip J. Moore*

⑈001226⑈ ⑆122234783⑆ 192⑈00662⑈





SANTA BARBARA COUNTY REPUBLICAN CENTRAL COMMITTEE  
3324 State Street, G, Santa Barbara, California 93105 (805) 964-3287

February 12, 1985

Mr. J. Hunter Bryan  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D. C. 20463

Identification Number: C00174334

Reference: January 31 Year End Report (11/27/84-12/31/84)

Dear Mr. Bryan:

Enclosed for filing is an Amendment (corrected Summary Page and Detailed Summary Page) to our January 31 Year End Report originally submitted January 28, 1985.

This Amendment deletes an in-kind receipt erroneously reported on Detailed Summary Page line 11(c), and deletes an in-kind disbursement erroneously reported on Detailed Summary Page, line 27.

The purpose for this correction is due to the initial reporting of an in-kind receipt from an unregistered organization on Schedule A, which was also itemized as an expenditure on Schedule B.

If you have any questions concerning this matter, please call me at my office, (805) 963-0669.

Sincerely yours,

Evelyn E. Sullivan  
Treasurer

Enclosure

88040713584

# REPORT OF RECEIPTS AND DISBURSEMENTS

For ☐ Committee Other Than an Authorized ☐ Candidate

(Summary Page)

<div style="border: 1px solid black; padding: 5px;"> <div style="display: flex; justify-content: space-between; border-bottom: 1px solid black;"> <span>ALIGN AREA</span> <span>ALIGN AREA</span> </div> <div style="margin-bottom: 10px;"> <p>1. Name of Committee (In Full)</p> <p style="font-size: 1.2em; margin-top: 10px;">Santa Barbara County Republican Central Committee</p> </div> <div style="margin-bottom: 10px;"> <p>Address (Number and Street)</p> <p style="font-size: 1.2em; margin-top: 10px;">3324 -G State Street</p> </div> <div style="margin-bottom: 10px;"> <p>City, State and ZIP Code</p> <p style="font-size: 1.2em; margin-top: 10px;">Santa Barbara, CA 93105</p> </div> <div style="margin-bottom: 10px;"> <p><input type="checkbox"/> Check here if address is different than previously reported.</p> </div> <div style="margin-bottom: 10px;"> <p>2. FEC Identification Number</p> <p style="font-size: 1.2em; margin-top: 10px;">C00174334</p> </div> <div> <p>3. <input type="checkbox"/> This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)</p> </div> </div>	<div style="border: 1px solid black; padding: 5px;"> <p>4. TYPE OF REPORT (Check appropriate boxes)</p> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div> <p>(a) <input type="checkbox"/> April 15 Quarterly Report</p> <p><input type="checkbox"/> July 15 Quarterly Report</p> <p><input type="checkbox"/> July 31 Mid Year Report (Non-Election Year Only)</p> <p><input type="checkbox"/> Monthly Report for _____</p> <p><input type="checkbox"/> Twelfth day report preceding _____ (Type of Election)</p> <p>election on _____ in the State of _____</p> <p><input type="checkbox"/> Thirtieth day report following the General Election</p> <p>on _____ in the State of _____</p> <p><input type="checkbox"/> Termination Report</p> </div> <div> <p><input type="checkbox"/> October 15 Quarterly Report</p> <p><input checked="" type="checkbox"/> January 31 Year End Report</p> </div> </div> <p>(b) Is this Report an Amendment?</p> <p style="text-align: center;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> </div>
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SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>11/27/84</u> through <u>12/31/84</u>		
6. (a) Cash on hand January 1, 19 <u>84</u>		\$ 57,091.07
(b) Cash on Hand at Beginning of Reporting Period	\$ 21,501.94	
(c) Total Receipts (from Line 18)	\$ 2588.07	\$ 124,809.68
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 24,090.01	\$ 181,900.75
7. Total Disbursements (from Line 28)	\$ 9865.77	\$ 167,676.51
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 14,224.24	\$ 14,224.24
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	\$ 3000.00	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ 3442.00	

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

Evelyn E. Sullivan  
Type or Print Name of Treasurer

Evelyn E. Sullivan  
SIGNATURE OF TREASURER

2/12/85  
Date

For further information contact  
Federal Election Commission  
Toll Free 800-424-9530  
Local 202-523-4068

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 437c.

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

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FEC FORM 3X (3/80)

38040713580

**DETAILED SUMMARY PAGE  
of Receipts and Disbursements  
(Page 2, FEC FORM 3X)**

Name of Committee

60017434

Santa Barbara County Republican Central Committee

Report Covering the Period

From 11/27/84

To 12/31/84

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
<b>I. RECEIPTS</b>			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees . . . . .	1262.00	83,692.73	11(a)
(Memo Entry Unitemized \$ <u>62.00</u> )			
(b) Political Party Committees . . . . .	0	0	11(b)
(c) Other Political Committees . . . . .	0	33,849.00	11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c)) . . . . .	1262.00	117,541.73	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES . . . . .	0	0	12
13. ALL LOANS RECEIVED . . . . .	0	0	13
14. LOAN REPAYMENTS RECEIVED . . . . .	0	0	14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.) . . . . .	1203.55	2178.76	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES . . . . .	0	0	16
AND OTHER POLITICAL COMMITTEES			
17. OTHER RECEIPTS (Dividends, Interest, etc.) . . . . .	122.52	5089.19	17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17) . . . . .	2588.07	124,809.68	18
<b>II. DISBURSEMENTS</b>			
19. OPERATING EXPENDITURES . . . . .	3539.77	110,407.86	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES . . . . .	6326.00	14,093.65	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND . . . . .	0	0	21
OTHER POLITICAL COMMITTEES			
22. INDEPENDENT EXPENDITURES (use Schedule E) . . . . .	0	0	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES . . . . .	0	0	23
(2 U.S.C. § 441 a(d)) (Use Schedule F)			
24. LOAN REPAYMENTS MADE . . . . .	0	0	24
25. LOANS MADE . . . . .	0	0	25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees . . . . .	0	125.00	26(a)
(b) Political Party Committees . . . . .	0	0	26(b)
(c) Other Political Committees . . . . .	0	0	26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c)) . . . . .	0	125.00	26(d)
27. OTHER DISBURSEMENTS . . . . .	0	43,050.00	27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27) . . . . .	9865.77	167,676.51	28
<b>III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES</b>			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d) . . . . .	1262.00	117,541.73	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d) . . . . .	0	125.00	30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29) . . . . .	1262.00	117,666.73	31
32. TOTAL OPERATING EXPENDITURES from Line 19 . . . . .	3539.77	110,407.86	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15 . . . . .	1203.55	2178.76	33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32) . . . . .	2336.22	108,229.10	34

98040713583



# Lincoln club

of SANTA BARBARA COUNTY  
POST OFFICE BOX 30100  
SANTA BARBARA, CALIFORNIA 93130-0349

# C 00178160

RECEIVED AT THE FEC  
... CCC# 9390  
88 JAN 9 P 1:07

## OFFICERS

General S.W. Wells, President  
Diane Klinger, Vice President  
Nellie Koart, Treasurer  
Hazel Richardson, Secretary

## DIRECTORS

Holmes Tuttle  
A. Brooks Firestone  
J. William Beaver  
Elmer W. Koonce  
James E. Campbell, Sr.  
Eldon Haskell  
George Bliss  
Mabel Shults  
Mark J. Smith  
Louis A. Lucas  
Clifford W. Sponsel  
Pat Roberts  
Gary Ricks  
Richard Whiston  
Oswald Da Ros  
Steven Little  
John Van Wingerden

## CENTRAL COMMITTEE CHAIRMAN

Phyllis J. Moore

## PAST PRESIDENTS

James E. Campbell, Sr.  
J. William Beaver  
A. Brooks Firestone  
Elmer W. Koonce  
George Castagnola

January 6, 1986

Mr. John Warren McGarry, Chairman  
Federal Election Commission  
1325 K Street  
Washington, D.C. 20463

Re: MUR 2102

Dear Mr. McGarry:

Your communication of December 16, 1985 was received by me on January 3, 1986 due to my being out of the country for Thanksgiving, Christmas and the New Year. I apologize for the delay in answering you, but it was unavoidable.

Needless to say, I was very disappointed to receive your letter, as I thought that the problems of which you spoke had already been resolved last July 12, 1985. With the great assistance of your Reports Analyst, Michael Butterfield, through many telephone conversations and letters, I promptly and earnestly complied with all requests and suggestions. The Santa Barbara County Republican Central Committee Treasurer, Evie Sullivan, and I have been most eager to comply with the rules of "the Act" and to correct our mistakes. We have worked diligently together and on the aforementioned July 12, 1985 date, the Central Committee refunded the \$33, 187.50 which your commission stated that we had donated in excess of the allowed amount for 1983 and 1984. At that time, I forwarded the commission a copy of the check. (Second copy enclosed)

Mrs. Sullivan and I are volunteers for our committees. We each have full time jobs in other fields. This is our first experience in filing with the F.E.C. and I realize that "ignorance is no excuse of the law", but mistakes made by us were completely unintentional and done because of our lack of experience and understanding of your regulations. Neither committee donated money to Federal Candidates and therefore, none of the money in question was used for any Federal purposes. It was a matter of money being donated and deposited by our respective committees using our Federal accounts when we should have used our non-Federal accounts. Now that we understand the proper procedure, we are complying with the law and this problem will not arise again. We do not feel that we have done anything

36 JAN 9 P 2:20  
RECEIVED  
OFFICE OF THE  
GENERAL COUNSEL

serious enough to warrant action against us. We were alerted to our problems, we promptly took steps to correct the problems, and indeed believed that everything was already resolved.

I sincerely apologize for my short-comings as Treasurer, I am still learning. I have always responded to your requests with speed and cooperation. I am doing my best. I want to comply with your regulations. I want to resolve this situation as soon as possible.

Please be so kind as to send me a letter stating how I can straighten everything out to the Commission's satisfaction. The Lincoln Club has a good reputation. It is made up of the leaders of our county, and it stands for honesty, integrity, and forthrightness. We want to make it right with you.

Looking forward to your answer, I am

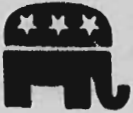
Sincerely yours,

Nellie Koart, Treasurer

Enclosure

88040713588





SANTA BARBARA COUNTY REPUBLICAN CENTRAL COMMITTEE  
3324 State Street, G, Santa Barbara, California 93105  
(805) 964-3287

July 11, 1985

Mrs. Nellie Koart, Treasurer  
Santa Barbara County Lincoln Club  
P.O. Box 30100  
Santa Barbara, CA 93130-0349

Dear Nellie:

On March 3, 1985, we acknowledged by letter the receipt of excess contributions from the Santa Barbara County Lincoln Club in our Federal account as follows:

1983	\$19,862.50
1984	<u>13,325.00</u>
	\$33,187.50

Having held our annual fundraiser, we are now in a position to refund the excess contribution received.

We are pleased to enclose our check in the amount of \$33,187.50, representing a refund of the excess contributions received during 1983 and 1984.

Sincerely yours,

Evelyn E. Sullivan  
Treasurer

Enclosure

cc: Mr. J. Hunter Bryan

SANTA BARBARA COUNTY  
REPUBLICAN CENTRAL COMMITTEE

3324-G STATE STREET 805-964-3287  
SANTA BARBARA, CA 93105

1226

90-3478  
1222

PAY  
TO THE  
ORDER OF

*Santa Barbara County Lincoln Club*

*July 11* 1985

\$ 33,187.50

DOLLARS

*Thirty-Three Thousand One Hundred Eighty-seven and 50/100*



The Bank of Montecito  
1000 STATE STREET  
SANTA BARBARA, CALIFORNIA 93101

FOR *refund excess cont. rec'd 1983/84*

*Evelyn E. Sullivan*  
*Phyllis J. Moore*

⑈001226⑈ ⑆122234783⑆ 192⑈00662⑈⑈

**SENSITIVE**



**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

July 24, 1986

**MEMORANDUM**

**TO:** The Commission  
**FROM:** Charles N. Steele  
General Counsel *CS*  
**SUBJECT:** MUR # 2102

00 JUL 24 P 5:14

Attached for the Commission's review are briefs stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. Copies of these briefs and letters notifying the respondents of the General Counsel's intent to recommend to the Commission findings of probable cause to believe were mailed on July 24, 1986. Following receipt of the Respondents' replies to these notices, this Office will make a further report to the Commission.

**Attachments**

1. Briefs
2. Letters to Respondents

8804071359C



## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 24, 1986

**Nellie Koart, Treasurer**  
**Santa Barbara County Lincoln Club**  
**P.O. Box 30100**  
**Santa Barbara, California 93130-0349**

RE: MUR 2102  
Santa Barbara County Lincoln  
Club  
Nellie Koart, Treasurer

**Dear Ms. Koart:**

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by you the Federal Election Commission, notified you on December 16, 1985, that it had found reason to believe that the Santa Barbara County Lincoln Club and you, as treasurer, had violated 2 U.S.C. §§ 434(a)(4)(A)(iv) and 441a(a)(1)(C) and instituted an investigation in this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

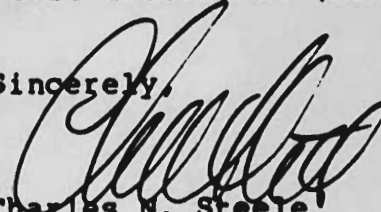
Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extensions beyond 20 days.

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety, days to settle this matter through a conciliation agreement.

Should you have any questions, please contact Shelley Garr, the staff member assigned to handle this matter, at (202) 376-8200.

Sincerely,

  
Charles N. Steele  
General Counsel

Enclosure  
Brief

38040713592

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Santa Barbara County ) MUR 2102  
Lincoln Club )  
 )  
Nellie Koarts, Treasurer )

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On December 19, 1985, the Commission notified the Santa Barbara County Lincoln Club ("Club") and Nellie Koart, as treasurer that it had found reason to believe it had violated 2 U.S.C. §§ 434(a)(4)(A)(iv) and 441a(a)(1)(C) by failing to file a 1983 Year End Report in a timely manner and by contributing in excess of \$5,000 per calendar year to the Santa Barbara County Republican Central Committee. These findings were based on the following information.

The Santa Barbara County Lincoln Club (the "Club") registered with the Commission as a non-party-related committee on March 1, 1984, and filed its first report, the 1984 April Quarterly, on April 16, 1984.

On February 12, 1985, the Santa Barbara County Republican Central Committee (the "Committee") filed its 1983 Year End Report which disclosed the receipt of funds from the Club between 7/20/83 and 12/30/83 which totalled \$20,737.50.<sup>1/</sup>

<sup>1/</sup> Based on the Committee's reported aggregated year-to-date total of \$24,862.00, it appears that the Club contributed an additional \$4,125 to the Committee prior to July 20, 1983, thus resulting in \$19,862.50 in apparent excessive contributions made to the Committee by the Club in 1983.

83040713593



Because the Committee's report disclosed that the Club had contributed \$20,737.50 to the Committee in 1983, a Non-Filer Notice was sent to the Club on March 8, 1985. On March 22, 1985, the Club filed a 1983 Year End Report, 416 days late. The report, which included activity from 7/1/83-12/31/83, disclosed \$20,737.50 in contributions to the Committee.

The Club's 1984 July and October Reports and 12 Day Pre-General Report also disclosed contributions of \$18,825 made to the Committee between April 2 and October 11, 1984, or \$13,325 in apparent excessive contributions to the Committee in 1984. Combined excessive contributions to the Committee for 1983 and 1984 totalled \$33,187.50.

In her response to the Commission's finding, Nellie Koart, treasurer of the Club, explained that she was "most eager to comply with the rules of 'the Act'", that she had been working with Evelyn Sullivan, and that on July 12, 1985, the Committee refunded the \$33,187.50 on which the 2 U.S.C. § 441a(a)(1)(C) violation is based.

#### LEGAL AND FACTUAL ANALYSIS

Pursuant to 2 U.S.C. § 434(a)(4)(A)(iv) all political committees other than authorized committees of a candidate may elect to file in a non-election year a report covering the period beginning January 1 and ending June 30 which shall be filed no later than July 31 and a report covering the period beginning July 1 and ending December 31 which shall be filed no later than January 31 of the following calendar year.

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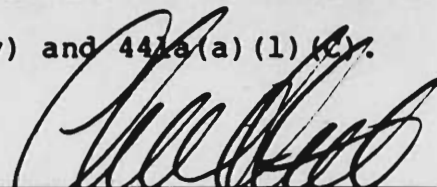
Additionally, pursuant to 2 U.S.C. § 441a(a)(1)(C), no person or committee shall make a contribution to any other political committee in any calendar year which, in the aggregate, exceeds \$5,000.

It is the view of the Office of General Counsel that because the Club failed to file its Year End Report in a timely manner, and because the Club contributed in excess of its \$5,000 limitation per calendar year to the Santa Barbara County Republican Central Committee, there is probable cause to believe that the Santa Barbara County Lincoln Club violated 2 U.S.C. §§ 434(a)(4)(A)(iv) and 441a(a)(1)(C).

**RECOMMENDATION**

It is the recommendation of the Office of General Counsel that the Commission find probable cause to believe that the Santa Barbara County Lincoln Club and Nellie Koart, as Treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(iv) and 441a(a)(1)(C).

24 July 1986  
Date

  
Charles N. Steele  
General Counsel

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**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

July 24, 1986

Evelyn Sullivan, Treasurer  
Santa Barbara County  
Republican Central Committee  
3324-G State Street  
Santa Barbara, California 93105

RE: MUR 2102  
Santa Barbara County  
Republican Central Committee  
Evelyn Sullivan, Treasurer

Dear Ms. Sullivan:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by you the Federal Election Commission, on December 16, 1985, notified you that it had found reason to believe that the Santa Barbara County Republican Central Committee and you, as treasurer, had violated 2 U.S.C. §§ 434(a)(4)(A)(iv) and 441a(f) and 11 C.F.R. § 102.5(a) and instituted an investigation in this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

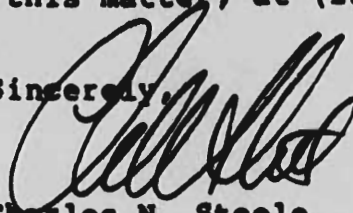
If you are unable to file a responsive brief within 15 days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extensions beyond 20 days.

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A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety, days to settle this matter through a conciliation agreement.

Should you have any questions, please contact Shelley Garr, the staff member assigned to handle this matter, at (202) 376-8200.

Sincerely,



Charles N. Steele  
General Counsel

Enclosure  
Brief

88040713597

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of )  
 )  
Santa Barbara County ) MUR 2102  
Republican Central Committee )  
 )  
Evelyn Sullivan, Treasurer )

**GENERAL COUNSEL'S BRIEF**

**I. STATEMENT OF THE CASE**

On December 19, 1985, the Commission notified the Santa Barbara County Republican Central Committee ("Committee") and Evelyn E. Sullivan, as treasurer that it had found reason to believe it violated 2 U.S.C. §§ 434(a)(4)(A)(iv) and 441a(f) by failing to file a 1983 Year End Report in a timely manner and by accepting contributions aggregating in excess of \$5,000 from the Santa Barbara County Lincoln Club, respectively. The Commission also found reason to believe that the Committee violated 11 C.F.R. § 102.5 by accepting a contribution from an unregistered committee which may have contained corporate and/or labor organization funds. These findings were based on the following information.

The Committee registered with the Commission as a committee on January 3, 1984. Its first report, the 1984 April Quarterly, disclosed an initial cash-on-hand amount of \$57,091.07. As a result of an RFAI which questioned the source of the initial cash, the Committee filed a 1983 Year End Report on February 12, 1985, which disclosed activity from 7/1/83-12/31/83 including the receipt of \$20,737.50 in contributions from the Santa Barbara County Lincoln Club ("the Club"). Based on the Committee's aggregate year-to-date total of \$24,862.50 in contributions from

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the Club, it appears that the Committee received an additional \$4,125 from the Club prior to that reporting period, thus resulting in the receipt of apparent excessive contributions totalling \$19,862.50 in 1983.

Additionally, the Committee's 1984 July and October Quarterly Reports and 30 Day Post General Report disclosed \$18,325 in contributions from the Club and \$6,000 in contributions from the John Carpenter Committee (an unregistered committee), which resulted in the receipt of \$13,325 and \$1,000 in excessive contributions from the Club and the John Carpenter Committee, respectively.

In her response to the Commission's findings, Evelyn Sullivan, Treasurer of the Committee, addressed three issues:

First, reference was made to her March 3, 1985, letter to RAD "written upon receipt of FEC advice that the Club should refund the excessive contribution of \$33,187.50 to the Club."

Enclosed was a photocopy of the Committee's \$33,187.50 check to the Club, dated July 11, 1985. This refund represents the following contributions:

	<u>Amount and Date of Receipt</u>	<u>Amount in Excess</u>
1983:	\$ 4,125 Received prior of 7/20/83)	
	8,150 (7/20/83)	\$ 7,275
	9,575 (10/13/83)	9,575
	3,012.50 (12/30/83)	3,012.50

	<u>Amount and Date of Receipt</u>	<u>Amount in Excess</u>
1984:	\$ 2,075 (4/4/84)	
	1,350 (7/30/84)	
	11,000 (9/21/84)	9,425
	2,000 (10/10/84)	2,000
	1,000 (10/18/84)	1,900
Total	43,187.50	33,187.50

Thus, the excess contributions were refunded between 722 and 267 days after receipt by the Committee.<sup>1/</sup>

Second, Mrs. Sullivan argues that although the Commission found reason to believe that the Committee violated 2 U.S.C. § 434(a)(4)(A)(i) for filing its 1983 Year End Report on February 12, 1985, (380 days late), the Committee filed a Statement of Organization on January 1, 1984, and that "an amendment to the January 31 Year End Report (11/27/84-12/31/84)" was filed on February 12, 1985.

A review of the Committee's disclosure documents reveals that on 2/12/85 the Committee filed with the Commission a "January 31 Year End Report" which covered the period 7/1/83-12/31/83. Under question 4(b) of the Summary Page ("Is this Report an Amendment?"), the Committee checked off "NO". The Summary Page also contains the penned-in notation "Pre-Registration Activity."

Third, Ms. Sullivan commented on the 11 C.F.R. § 102.5 violation, which is based on the Committee's acceptance of a

<sup>1/</sup> It should be noted that on April 1, 1986, a Request for Additional Information was sent to the Committee with respect to another excessive contribution, totalling \$6,151 which the Committee reported on its 1985 Year End Report.

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\$6,000 contribution from the John Carpenter Committee, an unregistered committee located in California. Ms. Sullivan advised that because the funds were transferred out to the Committee's nonfederal account and because the Commission's Legal and Factual Analysis concluded that "... we will accept the transfer of funds to the non-federal account as a mitigating factor in remedying the violation", no violation should be found.<sup>2/</sup>

#### LEGAL ANALYSIS

Pursuant to 11 C.F.R. § 102.5(a), a political committee is prohibited from knowingly accepting contributions from any corporation or labor organization. Further, any committee which finances political activity in connection with federal and non-federal elections shall only deposit funds subject to the limitations of the Act into its federal account.

The Commission concluded that the Committee's acceptance of a \$6,000 contribution from the John Carptenter Committee (an unregistered California committee) may have contained corporate and/or labor union funds, thus in violation of 11 C.F.R. § 102.5(a). Further, although the Committee reported receiving the contribution on 11/2/84, the transfer-out was not completed until 2/11/85, 101 days later. The Commission's conclusion

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that the transfer of funds to the non-federal account was a "mitigating factor in remedying the violation" was never intended to absolve or obviate the violation.

Pursuant to 2 U.S.C. § 434(a)(4)(A)(iv) all political committees other than authorized committees of a candidate may elect to file in a non-election year a report covering the period beginning January 1 and ending June 30 which shall be filed no later than July 31 and a report covering the period beginning July 1 and ending December 31 which shall be filed no later than January 31 of the following calendar year. It is the view of the Office of General Counsel that because the Committee failed to file its Year End Report in a timely manner, there is probable cause to believe that the Committee violated of 2 U.S.C. § 434(a)(4)(A)(iv).

Additionally, pursuant to 2 U.S.C. § 441a(f), no multicandidate political committee shall knowingly accept any contribution from a person in excess of the limitations imposed by the provisions of the Act. Because the Committee accepted contributions aggregating in excess of the \$5,000 limitation imposed by 2 U.S.C. §§ 441a(a)(2)(C) from the Santa Barbara County Lincoln Club, it is the view of the Office of General Counsel that there is probable cause to believe that the Committee violated 2 U.S.C. § 441a(f).

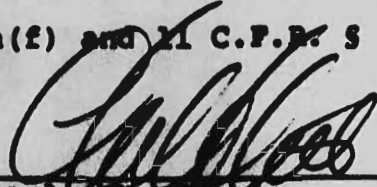
#### RECOMMENDATION

The Office of General Counsel recommends that the Commission find probable cause to believe that the Santa Barbara County

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Republican Central and Evelyn Sullivan, as treasurer, violated  
2 U.S.C. §§ 434(a)(4)(A)(iv) and 441a(f) and 11 C.F.R. § 102.5.

24 July 1966  
Date

  
\_\_\_\_\_  
Charles W. Steele  
General Counsel

8904071360.





**Lincoln club**  
of SANTA BARBARA COUNTY  
POST OFFICE BOX 30100  
SANTA BARBARA, CALIFORNIA 93130-0349

RECEIVED AT THE FEC  
QCC#1100  
86 AUG 4 9:34

**OFFICERS**

General S.W. Wells, President  
Diane Klinger, Vice President  
Nellie Koart, Treasurer  
Hazel Richardson, Secretary

July 31, 1986

Federal Election Commission  
Washington, D.C. 20463

**DIRECTORS**

Holmes Tuttle  
A. Brooks Firestone  
J. William Beaver  
Elmer W. Koonce  
James E. Campbell, Sr.  
Eldon Haskell  
George Bliss  
Mabel Shults  
Mark J. Smith  
Louis A. Lucas  
Clifford W. Sponsel  
Pat Roberts  
Gary Ricks  
Richard Whiston  
Oswald Da Ros  
Steven Little  
John Van Wingerden

Attention: Shelley Garr

Re: MUR 2102, Communication and Brief of 7/24/86

Dear Ms. Garr:

As per our telephone conversation today, I am conveying the following information:

I am very sorry that the Commission has decided to try to find probable cause to believe that I have committed violations. I really felt that our errors and problems had all been satisfactorily and expeditiously solved. Since our By-Laws and past years of activity prove that we do not support Federal candidates or causes, I feel that registering with the F.E.C. was really unnecessary.

I have designated Mr. Jan Baran of Wiley & Rein, in Washington, D.C. as my legal counsel in this matter. You will be hearing from him shortly and he will most likely be asking for an extension of time to allow for our communications to travel between Santa Barbara and Washington, D.C.

Thank you for your telephone courtesy.

Most sincerely,

*Nellie Koart*  
Nellie Koart, Treasurer

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OFFICE OF THE  
GENERAL COUNSEL

86 AUG 4 4:08

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# Lincoln club

of SANTA BARBARA COUNTY  
POST OFFICE BOX 30100  
SANTA BARBARA, CALIFORNIA 93130-0349

August 6, 1986

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QCC#1188  
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FEC

## OFFICERS

General S.W. Wells, President  
Hazel Richardson, Vice President  
Nellie Koart, Treasurer  
Phyllis J. Moore, Secretary

## DIRECTORS

J. William Beaver  
George Bliss  
James E. Campbell, Sr.  
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Barney Klinger  
Elmer W. Koonce  
Steven Little  
Louis A. Lucas  
Gary Ricks  
Pat Roberts  
Mabel Shults  
Mark J. Smith  
Clifford W. Sponsel  
Holmes Tuttle  
Richard Whiston  
John Van Wingerden

## CENTRAL COMMITTEE CHAIRMAN

Phyllis J. Moore

## PAST PRESIDENTS

James E. Campbell, Sr.  
J. William Beaver  
A. Brooks Firestone  
Elmer W. Koonce  
George Castagnola

Federal Election Commission  
Washington, D. C. 20463

Attn: Shelly Garr

Re: MUR 2102, Communication and Brief of 7/24/86

Dear Ms. Garr:

As per our telephone conversation of August 7, 1986  
I am writing to formally request an extension of  
time for filing our brief until September 5, 1986.

The reason we are requesting such an extension is  
because our designated attorney Mr. Jan Baran of  
Weiley & Rein is out of his office all this week  
and is unavailable to us.

Thank you for your courtesy.

Sincerely,

*Nellie Koart*

Nellie Koart, Treasurer

*Elmer W. Koonce*  
*Asst. Treas.*

86 AUG 12 19:58

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GENERAL COUNSEL

FELL, MARKING, ABKIN & MONTGOMERY  
ATTORNEYS AT LAW

DOUGLAS E. FELL  
PHILIP W. MARKING  
JOSEPH D. ABKIN  
FREDERICK W. MONTGOMERY  
CRAIG S. GRANET  
JAMIE FORREST RANEY

222 EAST CARRILLO STREET  
POST OFFICE BOX U  
SANTA BARBARA, CALIFORNIA 93104  
TELEPHONE (805) 963-0755

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GCC# 1187  
86 AUG 11 PM 12:38

August 8, 1968

Charles N. Steele, Esq.  
General Counsel  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 2101  
Santa Barbara County Republican  
Central Committee  
Evelyn Sullivan, Treasurer

36 AUG 12 49:59  
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OFFICE OF THE  
GENERAL COUNSEL

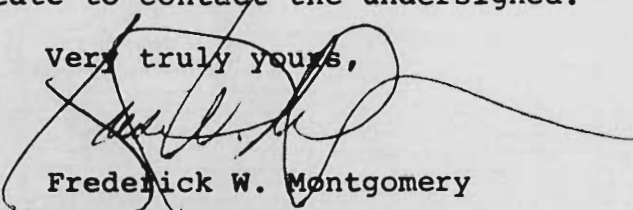
Dear Mr. Steele:

Enclosed is the designation form signed by my client Evelyn Sullivan authorizing me to act on her behalf in the above-captioned matter.

This letter will further confirm the substance of my recent telephone conversation with Shelly Garr confirming our representation and Mrs. Sullivan's election and desire to commence the conciliation process. To that end, under separate cover I will send some further explanation of the events that have formed the basis of the commission's current complaint.

In the meantime, if you should have any further questions, please do not hesitate to contact the undersigned.

Very truly yours,

  
Frederick W. Montgomery

FWM:mcv

enclosure

cc: Ms. Evelyn Sullivan (w/o encl.)

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SANTA BARBARA COUNTY REPUBLICAN CENTRAL COMMITTEE  
3324 State Street, G, Santa Barbara, California 93105  
(805) 964-3287

August 1, 1986

Charles N. Steele, Esq.  
General Counsel  
Federal Election Commission  
Washington, D. C. 20463

Re: MUR 2102  
Santa Barbara County Republican  
Central Committee  
Evelyn Sullivan, Treasurer

Dear Mr. Steele:

I hereby designate Frederick W. Montgomery, of the law firm of Fell, Marking, Abkin & Montgomery, 222 East Carrillo Street, Santa Barbara, CA 93101 (805) 963-0755, to represent me as the legal counsel in connection with the inquiries of the Federal Election Commission concerning the captioned matter.

Sincerely yours,

*Evelyn Sullivan*  
Evelyn Sullivan  
Treasurer

88040713607

**STATEMENT OF DESIGNATION OF COUNSEL**

**MUR** 2102

**NAME OF COUNSEL:** Frederick W. Montgomery

**ADDRESS:** 222 East Carrillo Street  
Santa Barbara, CA 93101

**TELEPHONE:** (805) 963-0755

The above-named individual is hereby designated as my  
counsel and is authorized to receive any notifications and other  
communications from the Commission and to act on my behalf before  
the Commission.

August 1, 1986  
**Date**

Evelyn Sullivan  
**Signature**

**RESPONDENT'S NAME:** Evelyn Sullivan

**ADDRESS:** Santa Barbara County Republican Central Committee  
3324-G State Street

Santa Barbara, CA 93105

**HOME PHONE:** (805) 687-3707

**BUSINESS PHONE:** (805) 963-0669

88040713602





**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

August 27, 1986

Nellie Koart, Treasurer  
Lincoln Club of Santa  
Barbara County  
P.O. Box 30100  
Santa Barbara, California 93130-0349

Re: MUR 2102  
Lincoln Club of Santa Barbara  
County Nellie Koart, Treasurer

Dear Ms. Koart:

This is in reference to your letter dated August 6, 1986, requesting an extension of time, until September 5, 1986, to respond to the Commission's Brief. After considering the circumstances presented in your letter, the Commission has determined to grant you your requested extension. Accordingly, your response will be due on September 5, 1986.

If you have any questions, please contact Shelley Garr, the staff member assigned to this matter at (202) 376-8200.

Sincerely,

Charles N. Steele  
General Counsel

By: Lawrence M. Noble  
Deputy General Counsel

98040713609

CCC#1615

FELL, MARKING, ABKIN & MONTGOMERY

ATTORNEYS AT LAW

DOUGLAS E. FELL  
PHILIP W. MARKING  
JOSEPH D. ABKIN  
FREDERICK W. MONTGOMERY  
CRAIG S. GRANET  
JAMIE FORREST RANEY

222 EAST CARRILLO STREET  
POST OFFICE BOX U  
SANTA BARBARA, CALIFORNIA 93102  
TELEPHONE (805) 963-0755

September 22, 1968

Charles N. Steele, Esq.  
General Counsel  
Federal Election Commission  
Washington, D.C. 20463

Attention: Ms. Shelly Garr

Re: MUR ~~2101~~ 2102  
Santa Barbara County Republican  
Central Committee  
Evelyn Sullivan, Treasurer

Dear Mr. Steele:

At the time of my last correspondence to you, I asked Mrs. Sullivan to respond point by point to the problems in the various reports. She does so in the three pieces of correspondence that I enclose. I thought at the time that I had forwarded these to you, but discovered that I apparently, by inadvertence, failed to get them to you at the time of their preparation. I apologize for the delay.

After you have had an opportunity to review their content, I would appreciate the opportunity to discuss these matters with you in greater detail.

As I noted in our last conversation, I believe that it is important to keep in mind that all of the evidence indicates that Mrs. Sullivan attempted to satisfy the requirements as she understood them. Certainly all of the evidence reflects immediate action taken to correct any deficiencies as soon as they were brought to her attention. If there were violations they can be classified only as "technical" and that the spirit of attempted good faith compliance has always been exhibited by Mrs. Sullivan. As she points out in her letters, she is a volunteer for this position, working unpaid, in an attempt to perform what many of us talk about, but very few of us do -- volunteer public service.

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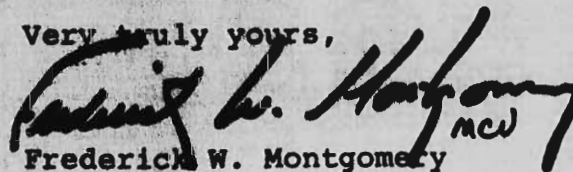
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GENERAL COUNSEL

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Charles N. Steele, Esq.  
Page 2  
September 22, 1986

Your understanding and attention to this matter and  
these circumstances are appreciated.

Very truly yours,

  
Frederick W. Montgomery

FWM:mcv  
(dictated but not read)  
enclosures

cc: Ms. Evelyn Sullivan (w/o encl.)

38040713611

Response to FEC statement re: "...failing to file a 1983 Year End Report in a timely manner...filing on 2/12/85, (380 days late)."

On December 30, 1983, the Santa Barbara County Republican Central Committee filed its Statement of Organization as of January 1, 1984, receiving its current FEC identification number C00174334.

The Committee was not registered with the FEC during 1983. Due to the fact that 1984 was a presidential election year, all California central committees were advised by the California Republican Party to register with the FEC in 1984.

Since this was to be my first filing, I made several telephonic inquiries of the FEC office as to procedure. On April 3, 1984, I spoke with Larry Boyle concerning our beginning bank balance. We were starting the period with a balance in excess of \$57,000. Mr. Boyle advised me to review the last \$57,000+ received, extracting any corporate funds. If he stated that a summary of these contributions should be attached, I did not make a notation of this fact. My first filing for the period 1/1/84-3/31/84, therefore reflected our opening balance, but did not disclose the source of the balance.

Upon receipt of inquiries dated 1/30/85 from Mr. J. Hunter Bryan of the Commission, I immediately telephoned him on February 6, 1985; we discussed the Commission's inquiries. Mr. Bryan advised me that the source of funds had to be disclosed, and we discussed the manner of response. Accordingly, I prepared a Memo Schedule A, marking the report "Pre-Registration Activity", which covered contributions received from 7/1-12/31/83, totalling the amount of our beginning bank balance. This report had a cover sheet marked "Addendum A. April Quarterly Report (1/1/84-3/31/84), January 31 Year End Report, Pre-Registration Activity", and was referred to and enclosed in my letter to Mr. Bryan of 2/11/85.

Another response was made to the Commission by my letter to Mr. Bryan of 2/12/85. The 2/12/85 letter and enclosure referred to the January 31 Year End Report (11/27/84-12/31/84). The 2/12/84 Amendment deleted an in-kind receipt and disbursement erroneously reported on the Detail Summary Page, lines 11(c) and 27.

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Response to FEC statement re: "...failing to file a 1983 Year End Report in a timely manner...filing on 2/12/85, (380 days late)."

As a matter of information to the Commission, I would like to state that I have been a member of the Santa Barbara County Republican Central Committee since June 1979. After our treasurer resigned in 1981, the committee asked several members to serve in this capacity. I was asked to serve as treasurer and accepted the responsibility in the fall of 1981. I had no prior political reporting experience; my work background involved either handling or overseeing the bookkeeping functions in a law firm for over 25 years. The position of treasurer for the Committee is unpaid.

While I am a full-time employee of a law firm, I have kept the books for the Committee, personally taking care of every phase of recordkeeping including the preparation of internal reports, payroll tax returns, State (FPPC) reports, FEC reports, and numerous other matters.

The 1/1/84-3/31/84 report was my first report filed with the FEC, and I have been and am doing the best that I can.

This fall, I will have been treasurer for five years; at the end of 1986, I will be resigning the position of treasurer.

*Frederick S. Sullivan*

August 4, 1986

88040713612



Response to FEC's advice that accepting unlimited contributions from the Santa Barbara County Lincoln Club was in violation of the code.

Upon receipt of monies from the Santa Barbara County Lincoln Club, I did not contact them inquiring how they had registered with the FEC. The Club is well-known in our community, and by its bylaws, one-half of the \$300 annual dues charged to its members is donated to the Santa Barbara County Republican Central Committee. The contribution to our Committee is to be used to cover overhead expenses and/or used in any way that the Committee determines. Under the circumstances, it came as a surprise to learn from the Commission that the Club had registered as a "non-connected committee".

Immediately upon being advised that the amounts over \$5,000 were considered excess contributions, I was in telephone contact with Mr. J. Hunter Bryan and Ms. Carol Caldwell. There were many discussions with Mr. Hunter, who in turn discussed this matter with his supervisors, until we could resolve the manner in which to correct the receipt of \$33,197.50 in excess contributions.

After receiving verbal approval, I wrote the Commission on 3/3/85 proposing that the Committee reflect the \$33,197.50 as a debt owed on our report, as we did not have cash available to reimburse the Lincoln Club at that time, and advising that upon receipt of adequate funds from our yearly fundraiser in July, we would refund the excess contributions received. We complied by writing and forwarding to the Commission on 7/11/85, a copy of the refund check to the Lincoln Club.

An important fact to consider is that we have not, at any time, made a contribution to a specified Federal candidate. This was mentioned in our letter of 3/3/85, further advising the Commission that the purpose of our Committee is to support all candidates by very active precinct/registration work.

After the numerous discussions had concerning the receipt of the Lincoln Club excess contribution, and our letter explaining our wish to comply and in finally refunding the monies, I sincerely believed that the Commission understood our wish to comply to its rules.

*Wally J. Friedman*

August 4, 1986

8804071361

Response to: "...The Commission concluded that the Committee's acceptance of \$6,000 from the John Carpenter Committee...may have contained corporate and/or labor union funds...although the Committee reported receiving the contribution on 11/2/84, the transfer-out was not completed until 2/11/85, 101 days later."

The Commission has emphasized the fact that the transfer-out of \$6,000 received from the John Carpenter Committee was not completed until 2/11/85, 101 days later.

On February 5, 1985, advice was received from Mr. J. Bryan Hunter (his letter of 1/30/85), of the fact that the deposit of the John Carpenter Committee funds was in violation of the Code.

On February 6, 1985, I immediately discussed this matter with Mr. Bryan, and FIVE DAYS LATER forwarded our letter to Mr. Bryan containing a photocopy of the Committee's check transferring out the said \$6,000 to our Non-Federal account.

Therefore, within five days of being advised of this problem, the matter was corrected.

*Thelma Sullivan*

August 13, 1986

88040713612

GCC 1401

RECEIVED AT THE FEC

BEFORE THE FEDERAL ELECTION COMMISSION

86 SEP 3 11:29

In the Matter of )  
 )  
Santa Barbara County ) MUR 2102  
Lincoln Club )  
 )  
Nellie Koart, Treasurer )

86 SEP 3 4:05

RECEIVED  
OFFICE OF THE  
GENERAL COUNSEL

SANTA BARBARA COUNTY LINCOLN CLUB'S BRIEF

STATEMENT OF FACTS

The Santa Barbara Lincoln Club (hereinafter referred to as "the Club") collects dues from its members in accordance with its bylaws, remits one-half of said dues to the Santa Barbara County Republican Central Committee (hereinafter referred to as "the Committee") for use in party building activities and on behalf of local and statewide candidates and causes. At no time was it the intention of the Club that any sums so given were to be used by the Committee on behalf of any Federal Campaign or Federal Election.

LEGAL AND FACTUAL ANALYSIS

It is the contention of the Club that the Committee erred in reporting the Club's contribution to the Federal Election Committee.

The Club contends that it should not have been compelled to register with the Commission as a non-party-related committee or in any other capacity as the Club did not make its contributions knowingly to a committee.

All sums erroneously reported have now been refunded by the Committee to the Club.

In response to the Federal Election Commission's assertion that the Club failed to file its Year-End Report in a timely manner, the Club asserts the defense that having made no contributions, knowingly, to a committee required to file with the Federal Election Commission, the Club has violated no U.S.C. laws.

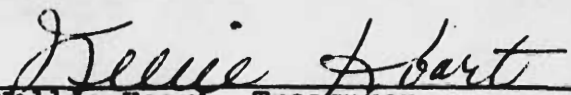
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The Club wishes to rescind the so-called late filing and hereby requests permission so to do.

CONCLUSION

The Club and Nellie Koart, Treasurer, deny having violated either intentionally, or unintentionally, 2 U.S.C. Sections 434 (a) (4) (A) (iv) and 441a (a) (1) (C).

Dated: August 29, 1986

  
Nellie Koart, Treasurer  
In Pro Per for the  
Santa Barbara County Lincoln Club

38040713617





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
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SECRETARIAT

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SENSITIVE

December 7, 1987

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble *[Signature]*  
Acting General Counsel

SUBJECT: MUR # 2102

Attached for the Commission's review are supplemental briefs stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. Copies of these supplemental briefs and a letter notifying the respondents of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe in connection with the Santa Barbara County Central Committee, and no probable cause in connection with the Santa Barbara County Lincoln Club were mailed on December 4, 1987. Following receipt of the Respondents' replies to this notice, this Office will make a further report to the Commission.

Attachments

1. Briefs
2. Letters to Respondents

88040713618





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 4, 1987

Frederick W. Montgomery, Esquire  
Fell, Marking, Abkin, and Montgomery  
222 E. Carrillo Street  
P.O. Box U  
Santa Barbara, CA 93102

RE: MUR 2102  
Santa Barbara County  
Republican Central  
Committee  
Evelyn E. Sullivan,  
as treasurer

Dear Mr. Montgomery:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on December 19, 1985, found reason to believe that the Santa Barbara County Republican Central Committee and Evelyn Sullivan, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(iv) and 441a(f) and 11 C.F.R. § 102.5 and instituted an investigation in this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel submitted to the Committee its Brief recommending that the Commission find probable cause to believe that the violation had occurred.

After reviewing your response brief, which included the response of Evelyn Sullivan, the Office of the General Counsel hereby submits a General Counsel's Supplemental Brief. While this Office has not altered the recommendations in this supplemental brief, the legal analysis supporting the recommendations has been revised to incorporate information contained in your response. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a response (10 copies if possible) stating your position on the issues and replying to the supplemental brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's supplemental brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

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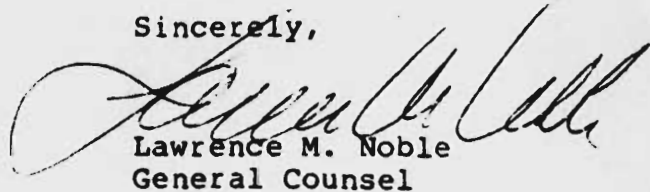
Letter to Frederick W. Montgomery, Esquire  
Page 2

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Shelley Garr, the staff member assigned to handle this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble  
General Counsel

Enclosure  
Brief

88040713620

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Santa Barbara County ) MUR 2102  
Republican Central Committee )  
Evelyn E. Sullivan, as )  
treasurer )

GENERAL COUNSEL'S SUPPLEMENTAL BRIEF

I. STATEMENT OF THE CASE

On December 19, 1985, the Commission notified the Santa Barbara County Republican Central Committee ("Committee") and Evelyn E. Sullivan, as treasurer, that it had found reason to believe it violated 2 U.S.C. §§ 434(a)(4)(A)(iv) and 441a(f) by failing to file a 1983 Year End Report in a timely manner and by accepting contributions aggregating in excess of \$5,000 from the Santa Barbara County Lincoln Club ("Club"). The Commission also found reason to believe that the Committee violated 11 C.F.R. § 102.5 by accepting a contribution from the John Carpenter Committee, an unregistered committee, which may have contained corporate and/or labor organization funds.<sup>1/</sup>

The General Counsel's Brief was forwarded to the Committee on July 24, 1986. Counsel for the Committee responded on September 25, 1986, and included in his response copies of correspondence received from the Committee's treasurer, Evelyn Sullivan, referencing the alleged violations. Based on information provided by Ms. Sullivan, which was not originally

<sup>1/</sup> John Carpenter was a candidate for the California State Assembly.

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available to the Commission, this Office proposes this Supplemental Brief.

Ms. Sullivan stated that during election year 1984, all California central committees were advised by the California Republican Party to register with the Commission. After consulting with the Reports Analysis Division and on the advice of its staff, she continued, the Committee reported to the Commission, as an opening balance, all funds in its account, minus any corporate funds. On February 2, 1985, the Committee filed an amended report which included all pre-registration activity from July 1, 1983-December 31, 1983, and which included \$20,737.50 in contributions from the Club.<sup>2/</sup>

In an effort to comply with Commission regulations and in response to a request by the Club to refund all funds donated in excess of its \$5000/year limit for 1983 and 1984, the Committee refunded the entire amount of the Club's excessive funds, \$33,197.50 and notified the Commission of its actions. A copy of the refund check was included. Ms. Sullivan stressed, however, that at no time did the Committee make any contributions to specified Federal candidates. The purpose of the Committee "is to support all candidates by very active precinct/registration work." The Committee has been in existence for several years;

<sup>2/</sup> According to the Club's treasurer, the Club remits to the Committee one-half of all dues collected, in accordance with its by-laws "for use in party-building activities on behalf of local and state-wide candidates and causes."

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Mrs. Sullivan has been a member of the Committee since 1979 and has served as treasurer since late 1981. This is the first instance where the Committee has been involved in Federal reporting.

Finally, Ms. Sullivan asserted that because the \$6,000 transfer-out of the John Carpenter Committee (an unregistered entity) contribution took place five days after the Committee was notified by the Commission that it might be in violation of the Act, the turn-around time of 101 days (from receipt to transfer-out) cited in the General Counsel's Brief is erroneous.<sup>3/</sup>

## II. LEGAL ANALYSIS

As outlined in the General Counsel's Brief to the Committee, this Office intended to recommend that the Commission find probable cause to believe that the Committee violated 2 U.S.C. §§ 441a(f), 434(a)(4)(A)(iv), and 11 C.F.R. § 102.5. In light of the Committee's subsequent response that it engaged solely in city, local, and State elections and not in Federal election campaigns, this Office submits the following legal analysis.<sup>4/</sup>

<sup>3/</sup> The Commission's RFAI was sent on January 30, 1985. It should be noted that the contribution was received on November 2, 1984, as reported on the Committee's 1984 30 Day Post General Election Report, and transferred out on February 11, 1985, 101 days later.

<sup>4/</sup> Although the Committee and Club argue that they have not engaged in any activity relating to a specifically identified Federal candidate, all activities were conducted at a time when both the Club and the Committee maintained separate Federal and non-Federal accounts.

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Pursuant to 2 U.S.C. § 431(4)(C) and 11 C.F.R. § 100.5(c) the term "political committee" is defined to include any local committee of a political party which receives contributions in excess of \$5,000, or makes payments exempted from the definition of contribution or expenditure aggregating in excess of \$5,000 during a calendar year,<sup>5/</sup> or makes contributions or expenditures aggregating in excess of \$1,000 during a calendar year.<sup>6/</sup> A committee need only meet one of these standards to qualify as a "political committee" as defined by the Act. The Act further defines expenditure to include "any purchase, payment, distribution, loan, advance, deposit, or gift of money or anything of value, made by any person for the purpose of influencing any election for Federal office." 2 U.S.C. § 431(9)(A)(i). Similarly, a contribution is defined as "any gift, subscription, loan, advance, or deposit of money for the purpose of influencing any election for Federal office." 2 U.S.C. § 431(8)(A)(i).

Finally, pursuant to 11 C.F.R. § 102.5(a)(1)(i), all organizations which finance political activity in connection with

5/ A local party committee may engage in certain activities which benefit candidates but which are excluded from the definitions of contribution or expenditure. These activities include the distribution of slate cards or sample ballots, payment for grassroots campaign materials (pins, bumper stickers, **handbills or brochures**), and the **conducting of voter registration drives** on behalf of the Party's presidential nominee. 2 U.S.C. §§ 431(8)(B) and 431(9)(B).

6/ Activities which apply toward the \$1,000 threshold include: 1) a local party organization's contributions to or expenditures made on behalf of political committees; 2) coordinated party expenditures; and 3) the transfer of funds to a Federal account of a party committee.

both federal and non-federal elections may elect to establish separate federal accounts pursuant to the requirements of 11 C.F.R. §§ 102 and 104. Only funds subject to the prohibitions and limitations of the Act shall be deposited into such federal accounts. Further, no transfers may be made to such federal accounts from any other account(s) maintained by such organization for the purpose of financing activity in connection with non-federal elections.

A. 2 U.S.C. §§ 434(a)(4)(A)(iv) and 441a(f)<sup>7/</sup>

The initial issue is whether the Committee ever met the threshold requirements established at 2 U.S.C. § 431(4)(C) and 11 C.F.R § 100.5(c) to qualify as a political committee, notwithstanding the fact that it registered as a Federal political committee on April 14, 1984.

In the present instance, the Committee reported the receipt of \$57,092 in contributions in 1983. In 1984, receipts totalled \$125,009 and disbursements \$167,876. Of these amounts, the Committee reported \$24,862 in contributions from the Club in

<sup>7/</sup> 2 U.S.C. § 434(a)(4)(A)(iv) requires all political committees other than authorized committees of a candidate to file a year end report no later than January 31 of the following calendar year. 2 U.S.C. § 441a(f) in part, prohibits any political committee from knowingly accepting any contribution which violates the limitations established by 2 U.S.C. § 441a.

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1983, and \$18,825 from the Club in 1984; these contributions had been designated specifically for State and local elections.<sup>8/</sup>

It appears that these Club funds were not actually contributions under the Act because the evidence indicates that they were intended for the Committee's non-Federal account. However, the Committee also reported the receipt of \$33,741.40 in contributions from individuals between July 31 and December 31, 1983, and \$83,692.73 in 1984. Therefore, the Committee apparently met the threshold of more than \$5,000 in contributions received which is required for political committee status.

The Committee's reports also reveal that in 1984, the Committee made disbursements totalling \$13,583 for "registration awards." Ms. Sullivan has indicated, in the Committee's response to the Commission's reason to believe finding, that the purpose of the Committee is "to support all candidates by very active precinct/registration work." (Emphasis added).<sup>9/</sup> There were races in California in 1984 for both the U.S. House of Representatives and the U.S. Senate. Therefore, it appears that

<sup>8/</sup> In response to the General Counsel's Brief, the Club's Treasurer stated that "at no time was it the intention of the Club that any funds so given [for use in Party-building activities and on behalf of local and Statewide candidates] were to be used by the Committee on behalf of any Federal Campaign or Federal Election."

<sup>9/</sup> Note that in Ms. Sullivan's February 11, 1985, response to RFAs concerning the Committee's 1984 reports, she explained that the Committee's expenditures for mailings, phone banks, printing, and media "were not made on behalf of specifically identified Federal candidates." (Emphasis added).

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the Committee made expenditures for voter-registration activities related to Federal candidates exempted from the definition of contribution in excess of \$5,000 in a calendar year, again satisfying the definition of "political committee" established at 2 U.S.C. § 431(4)(C) and 11 C.F.R. § 100.5(C).

Once the Committee met the definition of political committee, all monies in its Federal account at that time became subject to the Act's reporting requirements. Thus, it is the recommendation of the Office of the General Counsel that the Commission find probable cause to believe that the Committee violated 2 U.S.C. § 434(a)(4)(A)(iv) by failing to file a 1983 Year End Report in a timely manner to show the sources of funds on hand at the time of registration with the Commission.

Further, the Club has indicated that it did not intend for its contributions to be used in Federal elections, but rather that they be used solely for State and local activity. It appears, therefore, that the Committee did not accept an excessive contribution from the Club, but instead erroneously deposited the Club's State contributions into the Committee's Federal account rather than its State account.<sup>10/</sup> This Office, then, recommends that the Commission find no probable cause to believe that the Committee violated 2 U.S.C. § 441a(f).

<sup>10/</sup> The Committee maintained a non-Federal account at the same time it registered as a Federal political committee.

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B. 11 C.F.R. § 102.5

Pursuant to 11 C.F.R. § 102.5, where an organization has established both a Federal and non-Federal account, "only funds subject to the prohibitions and limitations of the Act shall be deposited into such separate Federal account."

11 C.F.R. § 102.5(a)(1)(i). In the present instance, the Club has asserted that it never intended its contributions to the Committee to be used for anything other than State and local activity. The Club's request for and subsequent receipt of a refund from the Committee of the entire excessive amount indicates that the Club's funds were erroneously deposited in the Committee's Federal account rather than its non-Federal account. Further, the Committee's acceptance of a \$6,000 contribution from the John Carpenter Committee, an unregistered committee whose funds may have contained corporate and/or labor organization funds also appear to have been deposited into the Committee's Federal account, in violation of 11 C.F.R. § 102.5.<sup>11/</sup> The Office of General Counsel, then, recommends that the Commission find probable cause to believe that the Committee violated 11 C.F.R. § 102.5.

<sup>11/</sup> The Committee has provided no evidence to show that the contribution from the John Carpenter Committee was not misdeposited into the Federal account.

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### III. RECOMMENDATIONS

1. Find probable cause to believe that the Santa Barbara County Republican Central Committee violated 11 C.F.R. § 102.5 and 2 U.S.C. § 434(a)(4)(A)(iv); and
2. Find no probable cause to believe that the Santa Barbara County Republican Central Committee violated 2 U.S.C. § 441a(f).

Date

12/3/87

Lawrence M. Noble  
General Counsel

380407136229



**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

December 4, 1987

**Nellie Koart  
P.O. Box 30100  
Santa Barbara, California 93130-0349**

**RE: MUR 2102  
Santa Barbara County  
Lincoln Club,  
Nellie Koart, as  
treasurer**

**Dear Ms. Koart:**

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by you, the Federal Election Commission, on November 19, 1985, found reason to believe that the Santa Barbara County Lincoln Club and you, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(iv) and 441a(a)(1)(C), and instituted an investigation in this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel submitted to the Club its Brief recommending that the Commission find probable cause to believe that the violation had occurred.

After reviewing your response brief, the Office of the General Counsel hereby submits a General Counsel's Supplemental Brief. The legal analysis contained in the supplemental brief has been revised to incorporate additional information contained in your response and to change the recommendations contained in the original brief. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the supplemental brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's supplemental brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five

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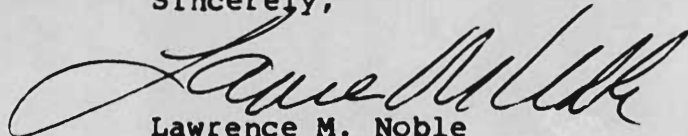
Letter to Nellie Koart  
Page 2

days prior to the due date and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Shelley Garr, the staff member assigned to handle this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble  
General Counsel

Enclosure  
Brief

88040713631

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Santa Barbara County ) MUR 2102  
Lincoln Club )  
Nellie Koart, as treasurer )

GENERAL COUNSEL'S SUPPLEMENTAL BRIEF

I. STATEMENT OF THE CASE

On December 19, 1985, the Commission notified the Santa Barbara County Lincoln Club ("Club") and Nellie Koart, as treasurer that it had found reason to believe the Club violated 2 U.S.C. §§ 434(a)(4)(A)(iv) and 441a(a)(1)(C) by failing to file a 1983 Year End Report in a timely manner and by contributing in excess of \$5,000 to the Santa Barbara County Republican Central Committee ("Committee").<sup>1/</sup>

The General Counsel's Brief was forwarded to the Club on July 24, 1986. In her response on behalf of the Club, Ms. Koart explained that, in accordance with the Club's by-laws, one-half of all dues collected from its members are designated for the Committee "for use in party building activities and on behalf of local and statewide candidates and causes." "At no time," she continued, "was it the intention of the Club that any sums so given were to be used by the Committee on behalf of any Federal

<sup>1/</sup> The 2 U.S.C. §§ 441a(f) and 441a(a)(1)(C) findings were based on the Santa Barbara County Republican Central Committee's ("Committee") reported receipt of \$24,862.50 in contributions from the Club in 1983 and its receipt of \$18,825 in contributions from the Club in 1984. Combined apparent excessive contributions from the Club, then, totalled \$33,187.50 for 1983 and 1984.

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Campaign or Federal Election." Further, she explained that the Committee was incorrect in reporting the Club's contribution and that all sums "erroneously" reported have been refunded by the Committee to the Club.<sup>2/</sup>

## II. LEGAL ANALYSIS

As outlined in a Brief to the Club, this Office intended to recommend that the Commission find probable cause to believe that the Club violated 2 U.S.C. §§ 434(a)(4)(A)(iv) and 441a(a)(1)(C). In light of the Club's subsequent response that it engaged solely in city, local, and State elections and not in Federal election campaigns, this Office submits the following legal analysis.<sup>3/</sup>

Pursuant to 2 U.S.C. § 431(4)(C) and 11 C.F.R. § 100.5(c) the term "political committee" is defined to include any local committee of a political party which receives contributions aggregating in excess of \$5,000, or makes payments exempted from the definition of contribution or expenditure aggregating in

<sup>2/</sup> Upon the advice of the Reports Analysis Division and in response to a request by the Club to refund all funds donated in excess of its \$5000/year limit for 1983 and 1984, the Committee refunded the entire amount of the Club's excessive funds, \$33,197.50 on July 11, 1985, and notified the Commission of its actions.

<sup>3/</sup> Although the Club argues that it has not engaged in any activity relating to a Federal election, all activities here at issue were conducted at a time when the Club maintained separate Federal and non-Federal accounts.

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excess of \$5,000 during a calendar year,<sup>4/</sup> or makes contributions or expenditures aggregating in excess of \$1,000 during a calendar year.<sup>5/</sup> A committee need only meet one of these standards to qualify as a "political committee" as defined by the Act. The Act further defines expenditure to include "any purchase, payment, distribution, loan, advance, deposit, or gift of money or anything of value, made by any person for the purpose of influencing any election for Federal office." 2 U.S.C.

§ 431(9)(A)(i). Similarly, a contribution is defined as "any gift, subscription, loan, advance, or deposit of money for the purpose of influencing any election for Federal office."

2 U.S.C. § 431(8)(A)(i).

The initial issue is whether the Club ever met the threshold requirements established at 2 U.S.C. § 431(4)(C) and 11 C.F.R § 100.5(c) to qualify as a political committee, notwithstanding the fact that it registered as a Federal political committee on March 1, 1984.

4/ A local party committee may engage in certain activities which benefit candidates but which are excluded from the definition of contribution or expenditure. These activities include the distribution of slate cards or sample ballots, payment for grassroots campaign materials (pins, bumper stickers, handbills or brochures), and the conducting of voter registration drives on behalf of the Party's presidential nominee. 2 U.S.C. §§ 431(8)(B) and 431(9)(B).

5/ Activities which apply toward the \$1,000 threshold include: 1) a local party organization's contributions to or expenditures made on behalf of political committees; 2) coordinated party expenditures; and 3) the transfer of funds to a Federal account of a party committee.

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In the present instance, the Committee reported the receipt of \$24,862 in contributions from the Club in 1983, and \$18,825 from the Club in 1984, which, the Club has stated, were designated specifically for State and local elections and not for use in Federal elections. It appears, therefore, that the Committee erroneously deposited the Club's State contributions into the Committee's Federal account rather than its State account.<sup>6/</sup> Given the Club's intention to support only the Committee's local and State election- related activities, it appears that its payment to the Committee would not have constituted "contributions" or "expenditures" under the Act. In addition, there is no evidence that the Club received contributions aggregating in excess of \$5,000, nor is there evidence that it made payments in excess of \$5000 for exempt activity given the intended non-Federal uses of the Club's monies. It would follow, then, that the Club did not satisfy the definitional requirements of "political committee" pursuant to 2 U.S.C. § 431(4)(C) and 11 C.F.R. § 100.5(C), and thus was not required to comply with the Act's registration and reporting requirements.

Further, the Club's intent to support only non-Federal activity would also make the contribution limitations of the Act inapplicable.

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<sup>6/</sup> The Committee maintained a non-Federal account at the time it registered as a Federal political committee.

This Office recommends that the Commission find no probable cause to believe that the Club violated 2 U.S.C.

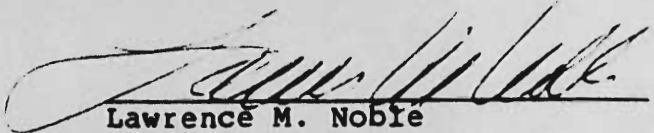
§§ 441a(a)(1)(C) and 434(a)(4)(A)(i).

**III. RECOMMENDATION**

1. Find no probable cause to believe that the Santa Barbara County Lincoln Club violated 2 U.S.C. §§ 441a(a)(1)(C) and 434(a)(4)(A)(iv).

Date

12/3/57

  
Lawrence M. Noble  
General Counsel

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FELL, MARKING, ABKIN & MONTGOMERY  
ATTORNEYS AT LAW

87 DEC 23 AM 9:25

DOUGLAS E. FELL  
PHILIP W. MARKING  
JOSEPH D. ABKIN  
FREDERICK W. MONTGOMERY  
CRAIG S. GRANET  
JAMIE FORREST RANEY  
JOHN R. NELSON  
CLARE H. MACDONALD

222 EAST CARRILLO STREET  
POST OFFICE BOX U  
SANTA BARBARA, CALIFORNIA 93102  
TELEPHONE (805) 963-0755  
TELECOPIER (805) 965-7237

December 18, 1987

Lawrence M. Noble, Esq.  
General Counsel  
Federal Election Commission  
Washington, D.C. 20463

Attention: Ms. Shelley Garr

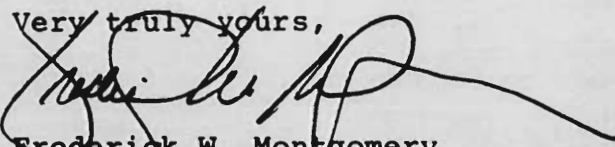
Re: MUR 2102  
Santa Barbara County  
Republican Central Committee  
Evelyn E. Sullivan,  
Treasurer

Dear Ms. Garr:

Enclosed pursuant to our earlier conversation is Ms. Sullivan's response to the General Counsel's Supplemental Brief.

She has attempted to address the issues that she feels will give those reviewing this matter a better understanding of the facts and circumstances of this case. However, should there be any questions concerning the matters presented in her response or any issues that she failed to address on which additional information would be helpful, please advise us and we would be happy to submit an additional written response.

Very truly yours,

  
Frederick W. Montgomery

FWM:mcv

enclosures

cc: Ms. Evelyn E. Sullivan (w/encl.)

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
87 DEC 23 AM 10:26

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Re: MUIR 2102; Santa Barbara County Republican Central Committee;  
Evelyn E. Sullivan, as Treasurer

I accepted the position of Treasurer in late 1981, after the resignation of three individuals within the year. The Committee was desperate for a member to serve in this position. All that I knew about the responsibilities of the Treasurer was that deposits were made, checks written and reconciled, and monthly reports were made to the Committee. I did not know anything out the procedure for political reporting, and had to acquaint myself with the State manual.

I am a public-spirited volunteer; this is not a salaried position. I am single and I work full time as a receptionist.

At the end of 1983, a general memorandum was received from the State Republican Central Committee advising that all central committees register with the FEC for 1984 (as it was a Presidential election year). I suspect that the recommendation was made as a result of their expectation that we would contribute to the Presidential campaign, which we did not.

I telephoned the Commission several times asking for information as to procedures upon registering. Because we had a bank balance of some \$57,000 as of January 1, 1984, I was told to go back into 1983 until I could account for donations to this beginning balance, extracting any corporate funds from the last \$57,000 received. To do this, I had to go back to the beginning of July, 1983.

I am still trying to understand the Federal reporting laws; I now understand them better than I did in 1984. In 1984 and 1985, I was totally inexperienced and had no one available to teach me anything at all about the Federal Act and its requirements.

To this day I feel that we were ill-advised to register with the Commission because it is my understanding that a Committee is required to register only if it influences a Federal candidate and/or election -- something we have never done.

For your information, I am itemizing by category, our expenses during the year 1983, which totalled \$41,453, as follows: Operating Expenses \$21,185, Capital Improvements \$3,867, Fundraising \$10,232, and Precinct/Registration \$6,169 (\$5,887 of which was salary paid to an office coordinator).

During the year 1984, our expenses were as follows: Operating \$33,719, Fundraising \$14,683, Capital Improvements \$14,683 (purchase of computer of \$10,975), Precinct/Registration \$32,877 (including phone bank salaries, telephone, media, office supplies,

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awards -- not on behalf of any specifically identified Federal candidate), Contributions \$42,000 (to Non-Federal candidates: John Carpenter for Assembly \$31,000, Eric Seastrand for Assembly \$10,000, and Cathie Wright for Assembly \$1,000), and Other \$5,307 (including expenses to Dallas National Convention \$2,000, local reapportionment issue \$1,170, etc.) These expenses totalled \$142,981.

In December, 1986, I called the Commission and was connected with Ed Ryan. I gave him general information after which he asked me why our Committee was filing. Admitted he did not know all the details of our activities, but nevertheless, he commented that he believed we did not influence any Federal candidates, our Committee thus did not have to register with the Commission, and consequently suggested that we try to terminate. This did seem to be a common sense consideration.

The only activity that our Committee engages in that would possibly fall under the Federal consideration, is our voter registration, and I did not, nor do not, understand that this constitutes influencing Federal elections or candidates. Our Committee is the only Republican organization in the entire County that is in charge of registration. The California Republican Party forwards us \$1.00 for each Republican voter registered, and we in turn give this plus an additional \$1.00, to Republican clubs, not individuals, to stimulate this activity.

Re: MUIR 2102; Santa Barbara County Republican Central Committee; Evelyn E. Sullivan, as Treasurer

Concerning the deposit of \$6,000 received from the John Carpenter Committee, after his unsuccessful campaign for Assembly, had I known the deposit was a mistake, I would have corrected it immediately. However, I was unaware of the mistake until being notified by letter of January 30, 1985. Once the mistake was called to my attention, I immediately transferred the \$6,000 out of the improper account, reporting the fact by letter within five days.

John Carpenter was a State candidate, and it was a mistake to deposit the funds in our Federal account. However, the Committee's expenditures were only in connection with State campaigns, not any Federal election. A summary of the Committee's expenditures for 1984 is noted above.

In several inquiries received from Mr. J. Hunter Bryan, he has stated concerning deposits to the Federal account: "Although the Commission may take further legal steps concerning the acceptance of a prohibited contribution, prompt action by your Committee to refund or transfer out the amount will be taken into consideration."

Because I gave "prompt action" to all inquiries and fully satisfied them by either explanation, transfer out or refund, I had expected that this would be sufficient to fully satisfy the Commission.

BEFORE THE FEDERAL ELECTION COMMISSION

MAY 10 AM 9:27

In the Matter of )  
 )  
Santa Barbara County )  
Republican Central Committee )  
Evelyn E. Sullivan, as )  
treasurer )  
 )  
Santa Barbara County )  
Lincoln Club )  
Nellie Koart, as treasurer )

MUR 2102

**SENSITIVE**  
**EXECUTIVE SESSION**  
**MAY 17 1988**

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On December 19, 1985, the Commission notified the Santa Barbara County Republican Central Committee Federal Account ("Committee") and Evelyn E. Sullivan, as treasurer, that it had found reason to believe the Committee had violated 2 U.S.C. §§ 434(a)(4)(A)(iv) and 441a(f) by failing to file a 1983 Year End Report in a timely manner and by accepting contributions aggregating in excess of \$5,000 from the Santa Barbara County Lincoln Club. The Commission also found reason to believe that the Committee had violated 11 C.F.R. § 102.5 by accepting a contribution from the John Carpenter Committee, an unregistered committee, which may have contained corporate and/or labor organization funds.<sup>1/</sup>

The Commission also notified the Santa Barbara County Lincoln Club ("Club") and Nellie Koart, as treasurer that it had found reason to believe the Club had violated 2 U.S.C. §§ 434(a)(4)(A)(iv) and 441a(a)(1)(C) by failing to file a 1983

<sup>1/</sup> John Carpenter was a candidate for the California State Assembly.

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Year End Report in a timely manner and by contributing in excess of \$5,000 to the Committee.<sup>2/</sup>

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The General Counsel's Briefs were forwarded to the Committee and to the Club on July 24, 1986. Counsel for the Committee responded on September 25, 1986, and included in his response copies of correspondence received from the Committee's treasurer, Evelyn Sullivan, referencing the alleged violations. On September 3, 1986, the Commission received Ms. Koart's response on behalf of the Club. Based on information provided in both responses, which was not originally available to the Commission, this Office revised its analysis and sent both the Committee and the Club Supplemental Briefs on December 7, 1987, which contained recommendations of this Office that the Commission find probable cause to believe in connection with the Committee and no probable cause to believe in connection with the Club.

Counsel again responded to the Supplemental Brief with an attached statement by Ms. Sullivan on December 23, 1987 (Attachment I). Ms. Sullivan reiterated her earlier statements that the Committee was established pursuant to the directions of the State Republican Central Committee with the "expectation that we would contribute to the Presidential campaign, which we did not." (emphasis in original) and that she had contacted the

<sup>2/</sup> The 2 U.S.C. §§ 441a(f) and 441a(a)(1)(C) findings were based on the Santa Barbara County Republican Central Committee's ("Committee") reported receipt of \$24,862.50 in contributions from the Club in 1983 and its receipt of \$18,825 in contributions from the Club in 1984.



Commission "asking for information as to procedures upon registering." Additionally, Ms. Sullivan provided a breakdown of the Committee's expenses for 1983 and 1984 and a discussion of the Committee's voter registration program. Finally, she discussed the \$6,000 contribution from the John Carpenter Committee. As of this date, this Office has received no response from the Club.

## II. LEGAL ANALYSIS

Pursuant to 2 U.S.C. § 431(4)(C) and 11 C.F.R. § 100.5(c) the term "political committee" is defined to include any local committee of a political party which receives contributions in excess of \$5,000, or makes payments exempted from the definition of contribution or expenditure aggregating in excess of \$5,000 during a calendar year,<sup>3/</sup> or makes contributions or expenditures aggregating in excess of \$1,000 during a calendar year.<sup>4/</sup> A committee need only meet one of these standards to qualify as a "political committee" as defined by the Act. The Act further defines expenditure to include "any purchase, payment,

<sup>3/</sup> A local party committee may engage in certain activities which benefit candidates but which are excluded from the definitions of contribution or expenditure. These activities include the distribution of slate cards or sample ballots, payment for grassroots campaign materials (pins, bumper stickers, handbills or brochures), and the conducting of voter registration drives on behalf of the Party's presidential nominee. 2 U.S.C. §§ 431(8)(B) and 431(9)(B).

<sup>4/</sup> Activities which apply toward the \$1,000 threshold include: 1) a local party organization's contributions to or expenditures made on behalf of political committees; 2) coordinated party expenditures; and 3) the transfer of funds to a Federal account of a party committee.

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distribution, loan, advance, deposit, or gift of money or anything of value, made by any person for the purpose of influencing any election for Federal office." 2 U.S.C.

§ 431(9)(A)(i). Similarly, a contribution is defined as "any gift, subscription, loan, advance, or deposit of money for the purpose of influencing any election for Federal office."

2 U.S.C. § 431(8)(A)(i).

Finally, pursuant to 11 C.F.R. § 102.5(a)(1)(i), an organization which finances political activity in connection with both Federal and non-Federal elections may elect to establish a separate Federal account which shall be treated as a separate Federal political committee and which shall comply with the requirements of the Act including the registration and reporting requirements of 11 C.F.R. §§ 102 and 104. Only funds subject to the prohibitions and limitations of the Act shall be deposited into such Federal account. Further, no transfers may be made to such Federal account from any other account(s) maintained by such organization for the purpose of financing activity in connection with non-Federal elections.

A. Santa Barbara County Republican Central Committee

1) 2 U.S.C. §§ 434(a)(4)(A)(iv) and 441a(f)<sup>5/</sup>

The initial issue is whether the Committee ever met the

<sup>5/</sup> 2 U.S.C. § 434(a)(4)(A)(iv) requires all political committees other than authorized committees of a candidate to file a year end report no later than January 31 of the following calendar year. 2 U.S.C. § 441a(f) in part, prohibits any political committee from knowingly accepting any contribution which violates the limitations established by 2 U.S.C. § 441a.

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threshold requirements established at 2 U.S.C. § 431(4)(C) and 11 C.F.R § 100.5(c) to qualify as a political committee, notwithstanding the fact that it registered as a Federal political committee on April 14, 1984.

In the present instance, the Committee reported the receipt of \$57,092 in contributions in 1983. In 1984, receipts totalled \$125,009 and disbursements \$167,876. Of these amounts, the Committee reported \$24,862 in contributions from the Club in 1983, and \$18,825 from the Club in 1984; these contributions had been designated specifically for State and local elections.<sup>6/</sup>

It appears that these Club funds were not actually contributions under the Act, because the evidence indicates that they were intended for the Committee's non-Federal account. However, the Committee also reported the receipt of \$33,741.40 in contributions from individuals between July 31 and December 31, 1983, and \$83,692.73 in 1984. Therefore, the Committee apparently met the threshold of more than \$5,000 in contributions received which is required for political committee status.

The Committee's reports also reveal that in 1984, the Committee made disbursements totalling \$13,583 for "registration awards." Although, in her February 11, 1985, response to RFAs concerning the Committee's 1984 reports, Ms. Sullivan explained

<sup>6/</sup> In response to the General Counsel's Brief, the Club's treasurer stated that "at no time was it the intention of the Club that any funds so given [for use in Party-building activities and on behalf of local and Statewide candidates] were to be used by the Committee on behalf of any Federal Campaign or Federal Election."

that the Committee's expenditures for mailings, phone banks, printing, and media "were not made on behalf of specifically identified Federal candidates," she later stated in her response to the Commission's reason to believe finding, that the purpose of the Committee is "to support all candidates by very active precinct/registration work." There were races in California in 1984 for both the U.S. House of Representatives and the U.S. Senate. Therefore, it appears that the Committee made expenditures for voter-registration activities related to elections for Federal office exempted from the definition of contribution in excess of \$5,000 in a calendar year, again satisfying the definition of "political committee" established at 2 U.S.C. § 431(4)(C) and 11 C.F.R. § 100.5(C).

Once the Committee met the definition of political committee, all monies in its Federal account at that time became subject to the Act's reporting requirements. Thus, it is the recommendation of the Office of the General Counsel that the Commission find probable cause to believe that the Committee violated 2 U.S.C. § 434(a)(4)(A)(iv) by failing to file a 1983 Year End Report in a timely manner to show the sources of funds on hand at the time of registration with the Commission.

Further, the Club has indicated that it did not intend for its contributions to be used in Federal elections, but rather that they be used solely for State and local activity. It appears, therefore, that the Committee did not accept an excessive contribution from the Club, but instead erroneously deposited the Club's contributions into the Committee's Federal

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account rather than its State account. This Office, then, recommends that the Commission find no probable cause to believe that the Committee violated 2 U.S.C. § 441a(f).

2) 11 C.F.R. § 102.5

Pursuant to 11 C.F.R. § 102.5, where an organization has established both a Federal and non-Federal account, "only funds subject to the prohibitions and limitations of the Act shall be deposited into such separate Federal account." 11 C.F.R. § 102.5(a)(1)(i). Further, 11 C.F.R. § 102.5(a)(2) provides that only contributions that are designated for a Federal account, that result from a solicitation explicitly stating that the contribution is to be used in connection with a Federal election, and that are from contributors who are informed that the contribution is subject to the prohibitions and limitations of the Act, may be deposited into a Federal account. In the present instance the Committee accepted \$43,741.40 from the Club, which the Club has stated was not intended for Federal activity.<sup>7/</sup> The Committee also accepted \$6,000 from the John Carpenter Committee, an unregistered committee whose receipts did not meet the criteria established at 11 C.F.R. § 102.5. Therefore, the deposit of funds from both the Club and the John Carpenter

<sup>7/</sup> When the Club found out that the funds had been deposited into the Federal account, it requested a refund, and the Committee refunded \$33,741.40. Based on the presumption that the Club was a political committee within the meaning of the Act, the RAD analyst advised the Committee that it should repay all but \$10,000. Because the Club, however, did not become a political committee, the \$5,000/year contribution limitation is inapplicable.

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Committee into the Committee's Federal account, is in violation of 11 C.F.R. § 102.5. The Office of General Counsel, therefore, recommends that the Commission find probable cause to believe that the Committee violated 11 C.F.R. § 102.5.

B. Santa Barbara County Lincoln Club

As in the case of the Committee, the initial question is whether the Club ever met the threshold requirements established at 2 U.S.C. § 431(4)(C) and 11 C.F.R. § 100.5(c) to qualify as a political committee, notwithstanding the fact that it registered as a Federal political committee on March 1, 1984.

In the present instance, the Committee reported the receipt of \$24,862 in contributions from the Club in 1983, and \$18,825 from the Club in 1984, which, the Club has stated, were designated specifically for State and local elections and not for use in Federal elections. It appears, therefore, that the Committee erroneously deposited the Club's State contributions into the Committee's Federal account rather than its State account. Given the Club's intention to support only the Committee's local and State election-related activities, it appears that its payment to the Committee would not have constituted "contributions" or "expenditures" under the Act. In addition, there is no evidence that the Club received contributions aggregating in excess of \$5,000, nor is there evidence that it made payments in excess of \$5000 for exempt activity given the intended non-Federal uses of the Club's

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monies. It would follow, then, that the Club did not satisfy the definitional requirements of "political committee" pursuant to 2 U.S.C. § 431(4)(C) and 11 C.F.R. § 100.5(C), and thus was not required to comply with the Act's registration and reporting requirements.

Further, because the Club did not make "contributions" under the Act, limitations of Section 441a did not apply to its activity. This Office, then, recommends that the Commission find no probable cause to believe that the Club and Nellie Koart, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(iv) and 441a(a)(1)(C).

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

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IV. RECOMMENDATIONS

1. Find probable cause to believe that the Santa Barbara County Republican Central Committee violated 11 C.F.R. § 102.5 and 2 U.S.C. § 434(a)(4)(A)(iv);
2. Find no probable cause to believe that the Santa Barbara County Republican Central Committee violated 2 U.S.C. § 441a(f);
3. Find no probable cause to believe that the Santa Barbara County Lincoln Club and Nellie Koart, as treasurer, violated 2 U.S.C. §§ 441a(a)(1)(C) and 434(a)(4)(A)(iv); and
4. Approve and sent the attached conciliation agreement and letters.

Date

5/9/88

Lawrence M. Noble (70)  
Lawrence M. Noble  
General Counsel

Attachments

1. Response of Santa Barbara County Republican Central Committee
2. Conciliation Agreement
3. Proposed Letters

Staff Person: Shelley Garr

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**MUR 2102**

Santa Barbara County Lincoln  
Club and Nellie Koart, as  
treasurer

## CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of May 17, 1988, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in MUR 2102:

1. Find probable cause to believe that the Santa Barbara County Republican Central Committee violated 11 C.F.R. § 102.5 and 2 U.S.C. § 434(a)(4)(A)(iv);
2. Find no probable cause to believe that the Santa Barbara County Republican Central Committee violated 2 U.S.C. § 441a(f);
3. Find no probable cause to believe that the Santa Barbara County Lincoln Club and Nellie Koart, as treasurer, violated 2 U.S.C. §§ 441a(a)(1)(C) and 434(a)(4)(A)(iv); and

(continued)

Federal Election Commission  
Certification for MUR 2102  
May 17, 1988

Page 2

4. Approve and send the conciliation agreement  
and letters attached to the General Counsel's  
May 9, 1988 report,

Commissioners Aikens, Elliott, Josefiak, McGarry, and  
Thomas voted affirmatively for the decision; Commissioner  
McDonald was not present during the time this matter was  
under consideration.

Attest:

5/18/88

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

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RECEIVED  
FEDERAL ELECTION COMMISSION

88 MAY 25 AM 10:42

FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

**SENSITIVE**

May 23, 1988

Memorandum

To: The Commission

From: Lawrence M. Noble  
General Counsel

SUBJECT: MUR 2102 -- Errata

The General Counsel's Report for MUR 2102, which was considered by the Commission during the May 17, 1988, Executive Session, inadvertently omitted from recommendations #1 and 2, (contained on page 11 of the report) the name of the treasurer for the Santa Barbara County Republican Central Committee. The letter and agreement which the Commission approved included the treasurer's name.

To remedy this oversight, in addition to the recommendations already approved by the Commission, this Office recommends that the Commission find probable cause to believe that Evelyn Sullivan, as treasurer of the Santa Barbara County Republican Central Committee violated 2 U.S.C. § 434(a)(4)(A)(iv) and 11 C.F.R. § 102.5 and find no probable cause to believe that Evelyn Sullivan, as treasurer of the Santa Barbara County Republican Central Committee, violated 2 U.S.C. § 441a(f).

Recommendations

1. Find probable cause to believe that Evelyn Sullivan, as treasurer of the Santa Barbara County Republican Central Committee, violated 2 U.S.C. § 434(a)(4)(A)(iv) and 11 C.F.R. § 102.5; and
2. Find no probable cause to believe that Evelyn Sullivan, as treasurer of the Santa Barbara County Republican Central Committee, violated 2 U.S.C. § 441a(f).

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Santa Barbara County Republican  
Central Committee and Evelyn  
Sullivan, as treasurer

MUR 2102

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal  
Election Commission, do hereby certify that on May 27,  
1988, the Commission decided by a vote of 6-0 to take  
the following actions in MUR 2102:

1. Find probable cause to believe that Evelyn Sullivan,  
as treasurer of the Santa Barbara County Republican  
Central Committee, violated 2 U.S.C. § 434(a) (4) (A)  
(iv) and 11 C.F.R. § 102.5; and
2. Find no probable cause to believe that Evelyn Sullivan,  
as treasurer of the Santa Barbara County Republican  
Central Committee, violated 2 U.S.C. § 441a(f).

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

Attest:

5-27-88

Date

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

Received in the Office of Commission Secretary: Wed., 5-25-88, 10:42  
Circulated on 48 hour tally basis: Wed., 5-25-88, 4:00  
Deadline for Vote: Fri., 5-27-88, 4:00

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 7, 1988

Nellie Koart  
P.O. Box 30100  
Santa Barbara, California 93130-0349

RE: MUR 2102  
Santa Barbara County Lincoln Club,  
Nellie Koart, as treasurer

Dear Ms. Koart:

This is to advise you that, on May 17, 1988, the Federal Election Commission found that there is no probable cause to believe that the Santa Barbara County Lincoln Club ("Club") and you, as treasurer, violated 2 U.S.C. §§ 441a(a)(1)(C) and 434(a)(4)(A)(iv). Accordingly, the file in this matter has been closed as it pertains to the committee and you, as treasurer.

This matter will become part of the public record within 30 days after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, please contact Shelley Garr, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lawrence M. Noble", is written over the typed name.  
Lawrence M. Noble  
General Counsel

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 7, 1988

Frederick W. Montgomery, Esquire  
Fell, Marking, Abkin, and Montgomery  
222 E. Carrillo Street  
P.O. Box U  
Santa Barbara, CA 93102

RE: MUR 2102  
Santa Barbara County  
Republican Central  
Committee  
Evelyn E. Sullivan,  
as treasurer

Dear Mr. Montgomery:

On May 17, 1988, the Federal Election Commission found that there is probable cause to believe your clients, the Santa Barbara County Republican Central Committee and Evelyn E. Sullivan, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv), a provision of the Federal Election Campaign Act of 1971, as amended, and 11 C.F.R. § 102.5. The Commission also found no probable cause to believe that they violated 2 U.S.C. § 441a(f).

The Commission has a duty to attempt to correct such violations for a period of 30 to 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement during that period, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty.

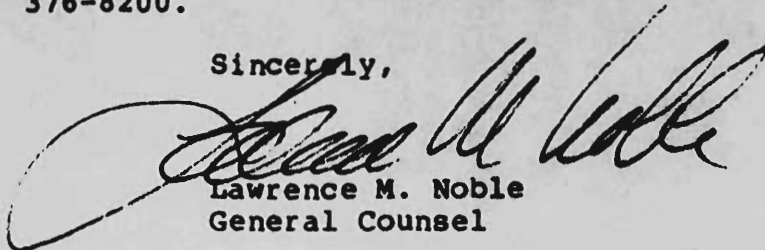
Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission within 10 days. I will then recommend that the Commission approve the agreement. Please make your check for the civil penalty payable to the Federal Election Commission.

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Letter to Frederick W. Montgomery, Esquire  
Page 2

If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Shelley Garr, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

A handwritten signature in dark ink, appearing to read "Lawrence M. Noble", is written over the typed name and title.

Lawrence M. Noble  
General Counsel

Enclosure  
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED  
FEDERAL ELECTION COMMISSION  
SECRETARY

88 JUN 29 AM 9:04

In the Matter of

Santa Barbara County Republican  
Central Committee  
Evelyn Sullivan, as treasurer

MUR 2102

**SENSITIVE**

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Evelyn Sullivan, treasurer of the Santa Barbara County Republican Central Committee (Attachment I). The agreement contains no changes from the agreement initially approved by the Commission on May 17, 1988. Payment of the civil penalty, however, has not yet been received.

II. RECOMMENDATION

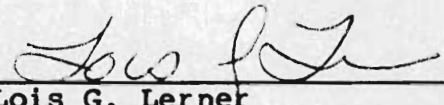
1. Accept the attached agreement with the Santa Barbara County Republican Central Committee and Evelyn Sullivan, as treasurer.
2. Close the file.
3. Approve the attached letter.

Lawrence M. Noble  
General Counsel

Date

6/28/88

By:

  
Lois G. Lerner  
Associate General Counsel

Attachments:

- 1) Conciliation agreement
- 2) Proposed letters to respondents (2)

Staff Person: Shelley Garr

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Santa Barbara County Republican  
Central Committee  
Evelyn Sullivan, as treasurer

)  
)  
) MUR 2102  
)  
)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal  
Election Commission, do hereby certify that on July 1,  
1988, the Commission decided by a vote of 6-0 to take  
the following actions in MUR 2102:

1. Accept the agreement with the Santa Barbara County  
Republican Central Committee and Evelyn Sullivan,  
as treasurer, as recommended in the General Counsel's  
Report signed June 28, 1988.
2. Close the file.
3. Approve the letter, as recommended in the General  
Counsel's Report signed June 28, 1988.

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

Attest:

7-1-88

Date

*Marjorie W. Emmons*

Marjorie W. Emmons  
Secretary of the Commission

Received in the Office of the Commission Secretary: Wed., 6-29-88, 9:04  
Circulated on a 48-hour tally basis: Wed., 6-29-88, 11:00  
Deadline for vote: Fri., 7-01-88, 11:00

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 12, 1988

Nellie Koart  
P.O. Box 30100  
Santa Barbara, California 93130-0349

RE: MUR 2102  
Santa Barbara County  
Lincoln Club,  
Nellie Koart, as treasurer

Dear Ms. Koart:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Shelley Garr, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel

BY: *Lois G. Lerner*  
Lois G. Lerner  
Associate General Counsel

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 12, 1988

Frederick W. Montgomery, Esquire  
Fell, Marking, Abkin, and Montgomery  
222 E. Carrillo Street  
P.O. Box U  
Santa Barbara, CA 93102

RE: MUR 2102  
Santa Barbara County Republican  
Central Committee  
Evelyn E. Sullivan, as treasurer

Dear Mr. Montgomery:

On July 1, 1988, the Federal Election Commission accepted the signed conciliation agreement which you submitted on behalf of your clients, the Santa Barbara County Republican Central Committee and Evelyn E. Sullivan, as treasurer, in settlement of violations of 2 U.S.C. § 434(a)(4)(A)(iv), a provision of the Federal Election Campaign Act of 1971, as amended and 11 C.F.R. § 102.5. Accordingly, the file has been closed. This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

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

Enclosed you will find a copy of the fully executed conciliation agreement for your file. If you have any questions, please contact Shelley Garr, the staff member assigned to this matter at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel

*Lois G. Lerner*  
*LS*

By: Lois G. Lerner  
Associate General Counsel

Enclosure  
Conciliation Agreement

226631074038



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Santa Barbara County Republican ) MUR 2102  
Central Committee, )  
Evelyn Sullivan, as treasurer )

CONCILIATION AGREEMENT

8040713663  
This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found probable cause to believe that the Santa Barbara County Republican Central Committee ("Committee") and Evelyn Sullivan, as treasurer ("Respondents") violated 2 U.S.C. § 434(a)(4)(A)(iv) by failing to timely file a 1983 Year End Report and 11 C.F.R. § 102.5 by accepting a contribution from an unregistered committee which may have contained corporate and/or labor organization funds.

NOW THEREFORE, the Commission and Respondents, having duly entered into conciliation pursuant to 2 U.S.C. § 437g(a)(4)(A)(i) do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents, and the subject matter of this proceeding.

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enter voluntarily into this agreement with the Commission.



IV. The pertinent facts in this matter are as follows:

1. Respondent Santa Barbara County Republican Central Committee is a political committee registered with the Federal Election Commission.

2. Evelyn Sullivan is the treasurer of the Committee.

3. Respondents filed a Statement of Organization on January 3, 1984.

4. Respondents filed its first report, the 1984 April Quarterly, on April 12, 1984. This report disclosed an initial cash-on-hand amount of \$57,091.07.

5. Respondents filed a 1983 Year End Report on February 12, 1985, which disclosed activity for the period 7/1/83-12/31/83. The report, which was filed 377 days late, disclosed the receipt of \$20,737.50 from the Santa Barbara County Lincoln Club ("Club"). Based on the Committee's aggregate year-to-date total of \$24,862.50 in funds from the Club, the Committee received an additional \$4,125 from the Club prior to the reporting period.

6. Respondents' 1984 July and October Quarterly Reports and 30 Day Post General Report disclosed the receipt of \$18,325 from the Club in 1984.

7. Respondents deposited the \$43,187.50 received from the Club in 1983 and 1984 into its Federal account. The Club contends that it intended these funds to be used for non-Federal elections.

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8. Respondents' 30 Day Post General Election Report disclosed the receipt of \$6,000 in contributions from the John Carpenter Committee, an unregistered committee located in California.

9. California State election law permits the acceptance of unlimited corporate and/or labor organization contributions.

10. Respondents transferred-out \$6,000 to the Committee's non-Federal account for the John Carpenter Committee contribution on February 11, 1985.

11. Respondents refunded \$33,187.50 to the Club on July 11, 1985.

V. Pursuant to 2 U.S.C. § 434(a)(4)(A)(iv), all political committees other than authorized committees of a candidate may elect to file in any year in which a regularly scheduled election is not held, a report covering the period beginning January 1 and ending June 30, which shall be filed no later than July 31, and a report covering the period July 1 and ending December 31, which shall be filed no later than January 31 of the following calendar year. The Committee filed its 1983 Year End Report on February 12, 1985, 377 days late.

VI. By failing to file a 1983 Year End Report in a timely manner, the Committee is in violation of 2 U.S.C. § 434(a)(4)(A)(iv).

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VII. Pursuant to 11 C.F.R. § 102.5(a), a political committee which finances political activity in connection with both Federal and non-Federal elections shall only deposit funds subject to the prohibitions and limitations of the Act into its Federal account.

VIII. By depositing into its Federal account the \$43,187.50 received from the Club, and the \$6,000 contribution from the John Carpenter Committee which may have contained corporate and/or labor organization funds in accordance with California State law, the Committee violated 11 C.F.R. § 102.5.

IX. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Two Thousand Five Hundred dollars (\$2,500.00) pursuant to 2 U.S.C. § 437g(a)(5)(A).

X. Respondents will repay to the Club \$10,000, which represents the remaining unrefunded balance of contributions received from the Club in 1983 and 1984.

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

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

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

XIV. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

FOR THE COMMISSION:

Lawrence M. Noble  
General Counsel

By:

Lois G. Lerner  
Lois G. Lerner  
Associate General Counsel

July 11, 1988  
Date

Evelyn Sullivan  
(Name)  
(Position) Treasurer  
Santa Barbara County Republican  
Central Committee

6/17/88  
Date

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FELL, MARKING, ABKIN & MONTGOMERY

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ATTORNEYS AT LAW

DOUGLAS E. FELL  
PHILIP W. MARKING  
JOSEPH D. ABKIN  
FREDERICK W. MONTGOMERY  
CRAIG S. GRANET  
JAMIE FORREST RANEY  
JOHN R. NELSON  
CLARE H. MACDONALD

222 EAST CARRILLO STREET  
POST OFFICE BOX U  
SANTA BARBARA, CALIFORNIA 93102  
TELEPHONE (805) 963-0755  
TELECOPIER (805) 965-7237

July 8, 1988

Lawrence M. Noble, Esq.  
General Counsel  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 2102  
Santa Barbara County  
Republican Central Committee  
Evelyn E. Sullivan,  
Treasurer

Dear Mr. Noble:

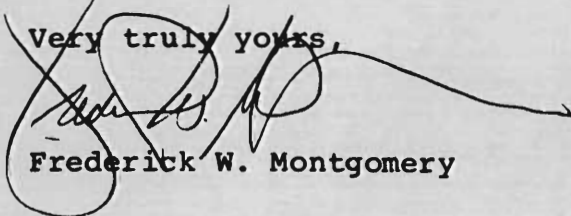
Enclosed please find the check of the Santa Barbara County Republican Central Committee, no. 1498, dated June 30, 1988 in the sum of \$2,500.00 made payable to the Federal Election Commission, pursuant to the Conciliation Agreement signed by Treasurer Evelyn E. Sullivan.

In addition, under the terms of the Conciliation Agreement, Ms. Sullivan has repaid to the Lincoln Club the sum of \$10,000.00. Enclosed please find copies of the check and Ms. Sullivan's letter to the Club, both dated June 30, 1988.

Pursuant to your letter of June 7, 1988, please now recommend that the Commission approve the Conciliation Agreement and send me a conformed copy.

Thank you for your attention to this matter.

Very truly yours,

  
Frederick W. Montgomery

FWM:gg  
Enclosure  
cc: Ms. Evelyn E. Sullivan (w/o encl.)

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SANTA BARBARA COUNTY REPUBLICAN CENTRAL COMMITTEE  
3324 State Street, G. Santa Barbara, California 93105 (805) 687-6766 687-7031

June 30, 1988

Mr. Louis Zeluck, Treasurer  
Lincoln Club of Santa Barbara County  
P.O. Box 30100  
Santa Barbara, CA 93105

Dear Lou:

The Federal Election Commission has reviewed the purpose of your contributions to our Committee during 1983 and 1984. Since it was your intent that the contributions be used solely for State and local activities, rather than Federal elections, the FEC now asks that we repay to you \$10,000 which represents the remaining unrefunded balance of contributions received in 1983 and 1984, which were deposited in our Federal account.

To comply with the Federal Election Commission's request, we enclose our check number 1497, dated June 30, 1988, in the amount of \$10,000, repaying the balance of contributions received in 1983 and 1984.

Sincerely yours,

Evelyn E. Sullivan  
Treasurer

Enclosure

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2102

DATE FILMED 8/24/88 CAMERA NO. 2

CAMERAMAN K.A.U.

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