



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20543

THIS IS THE END OF MUR # 2237

Date Filmed 9/26/86 Camera No. --- 2

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WUR 2237

5 Rationing slips (5); Memo from RAD - 2 copies (2);  
1 Objection slips (5); 1 Staff initial of letter (2);  
5 12 Day Report & Comment Sheets (5);  
p. 3 of AC report (2) File Content Sheet (5);

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

- |   |  |
|---|--|
| <u>      </u> (1) Classified Information                                | <u>      </u> (6) Personal privacy                             |
| <u>  X  </u> (2) Internal rules and practices                           | <u>      </u> (7) Investigatory files                          |
| <u>      </u> (3) Exempted by other statute                             | <u>      </u> (8) Banking information                          |
| <u>      </u> (4) Trade secrets and commercial or financial information | <u>      </u> (9) Well information (geographic or geophysical) |
| <u>  X  </u> (5) Internal Documents                                     |  |

Signed

Patty Rulij

Date

9/23/86

REC 9-21-77

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

September 12, 1986

James York, Treasurer  
Kilroy Industries Political  
Action Committee  
2250 East Imperial Highway  
El Segundo, CA 90245

RE: MUR 2237  
Kilroy Industries  
Political Action  
Committee and James York,  
as treasurer

Dear Mr. York:

On September 9, 1986, the Commission found reason to believe that Kilroy Industries Political Action Committee and you, as treasurer, had violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, on September 9, 1986, the Commission determined to take no further action and close its file. The General Counsel's Factual and Legal analysis which formed a basis for the Commission's finding is attached for your information.

The file in this matter 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 making contributions exceeding \$1,000 per election nevertheless appears to be a violation of 2 U.S.C. § 441a(a)(1)(A). You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to Patty Reilly, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

*Joan D. Aikens*

Joan D. Aikens  
Chairman

Enclosure  
Factual and Legal Analysis

86040513880

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Kilroy Industries Political ) RAD Referral 86L-16 <sup>M</sup>(2237)  
Action Committee and )  
James York, as treasurer )

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of September 9, 1986, do hereby certify that the Commission decided by a vote of 5-1 to take the following actions in RAD Referral 86L-16:

1. Open a Matter Under Review (MUR).
2. Find reason to believe the Kilroy Industries Political Action Committee and James York, as treasurer, violated 2 U.S.C. § 441a(a)(1)(A), but take no further action and close the file.
3. Approve and send the factual and legal analysis attached to the General Counsel's report dated August 29, 1986.
4. Direct the Office of General Counsel to send an appropriate letter pursuant to the above actions.

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

Attest:

9-10-86

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

86040513881



**SENSITIVE**

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

RECEIVED  
OFFICE OF THE FEC  
COMMISSION SECRETARY

86 AUG 29 P 3:56

**FIRST GENERAL COUNSEL'S REPORT**

DATE AND TIME OF TRANSMITTAL  
BY OGC TO THE COMMISSION \_\_\_\_\_

RAD: 86L-16  
STAFF MEMBER:  
Reilly

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

RESPONDENTS' NAMES: Kilroy Industries Political Action Committee  
and James York, as treasurer

RELEVANT STATUTES: 2 U.S.C. § 441a(a)(1)(A)  
2 U.S.C. § 441a(a)(4)

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

**GENERATION OF THE MATTER**

The Reports Analysis Division ("RAD") referred Kilroy Industries Political Action Committee and James York, as treasurer, ("the Committee") to the Office of the General Counsel on July 21, 1986.

**SUMMARY OF ALLEGATIONS**

The Committee allegedly made three \$5,000 contributions to two authorized political committees thereby exceeding the limitations of 2 U.S.C. § 441a(a)(1)(A).

**FACTUAL AND LEGAL ANALYSIS**

Based on a review of the Committee's 1986 April Quarterly Report, RAD determined that the Committee contributed \$10,000 to Californians for Senator Pete Wilson (\$5,000 to the 1988 primary and \$5,000 to the 1988 general) and \$5,000 to the Antonovich for Senate Committee (1986 primary). At the time of these

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8 6 0 4 0 5 1 3 8 8 3  
contributions the Committee had been in existence for nine months, had accepted 30 contributions from 19 individuals, and had made contributions to only three political committees. The contributions in question were made in January and March of 1986, and reported on the Committee's 1986 April Quarterly Report. RAD sent the Committee a request for additional information ("RFAI") on June 4, 1986 regarding these possible excessive contributions. In response to the RFAI the Committee submitted copies of two refund checks totaling \$13,000 (\$4,000 from the Antonovich Committee, \$9,000 from the Wilson Committee). The Committee reported receiving these refunds on June 10 and 11, 1986, and noted these refunds on its 1986 July Quarterly report.

The Act permits multicandidate committees to make contributions of \$5,000 per election to an authorized committee of a candidate. 2 U.S.C. § 441a(a)(2)(A). A political committee qualifies as a multicandidate committee if it has been registered with the Commission for at least six months, has received contributions from more than 50 persons, and, except any state party organization, has made contributions to five or more candidates for federal office. 2 U.S.C. § 441a(a)(4). A political committee that does not meet this definition is a person within the meaning of 2 U.S.C. § 431(11). The Act limits persons to contributing \$1,000 per election to an authorized committee of a candidate. 2 U.S.C. § 441a(a)(1)(A).

In the instant case the Committee made three election contributions of \$5,000 to two authorized committees at a time

when it was restricted to contributing \$1,000 per election to such committees. Accordingly, this Office recommends that the Commission find that there is reason to believe the Kilroy Industries Political Action Committee and James York, as treasurer, violated 2 U.S.C. § 441a(a)(1)(A).<sup>\*</sup>/

**RECOMMENDATIONS**


1. Open a MUR.
2. Find reason to believe the Kilroy Industries Political Action Committee and James York, as treasurer, violated 2 U.S.C. § 441a(a)(1)(A).
3. Approve the attached letter and factual and legal analysis.

Charles N. Steele  
General Counsel

Date

3/29/91

BY:

  
Lawrence M. Noble  
Deputy General Counsel

**Attachments**

1. RAD Referral
2. Factual and Legal Analysis
3. Letter

86040513884

**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

18 July 1986

**MEMORANDUM**

**TO:** CHARLES N. STEEL  
GENERAL COUNSEL

**THROUGH:** JOHN C. SURINA  
STAFF DIRECTOR

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

**SUBJECT:** REFERRAL OF THE KILROY INDUSTRIES POLITICAL ACTION  
COMMITTEE

This is a referral of the Kilroy Industries Political Action Committee ("KIPAC"). The 1986 April Quarterly Report disclosed apparent excessive contributions made by KIPAC totalling \$8,000 to the Californians for Senator Pete Wilson committee and \$4,000 to the Mike Antonovich for U.S. Senate committee prior to qualifying as a multicandidate committee. For your information

If you have any questions on this matter, please contact Tamara K. Rollins at 376-2480.

Attachment

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**REPORTS ANALYSIS REFERRAL**

**TO**

**OFFICE OF GENERAL COUNSEL**

**DATE: 18 July 1986**

**ANALYST: Tamara K. Rollins**

**I. COMMITTEE:** Kilroy Industries Political Action  
Committee (C00195495)  
James York, Treasurer  
2250 East Imperial Highway  
El Segundo, CA 90245

**II. RELEVANT STATUTE:** 2 U.S.C. §441a(a)(1)(A) and  
11 CFR 110.1(a)(1)

**III. BACKGROUND:**

**Apparent Excessive Contributions Made to Federal Candidates**

The 1986 April Quarterly Report filed by the Kilroy Industries Political Action Committee ("KIPAC"), disclosed two (2) \$5,000 contributions to the Californians for Senator Pete Wilson committee ("Wilson Committee") on January 10, 1986 (\$5,000 for the 1988 primary election and \$5,000 for the 1988 general election) and a \$5,000 contribution to the Mike Antonovich for U.S. Senate Committee ("Antonovich Committee")<sup>\*/</sup> on March 26, 1986 for the 1986 primary election (Attachment 2).

A Request for Additional Information ("RFAI") was sent to KIPAC on June 4, 1986 (Attachment 3). The RFAI advised KIPAC that an individual or political committee, other than a multicandidate committee, is prohibited from making a contribution to a candidate for federal office in excess of \$1,000 per election. KIPAC was asked to notify the recipient committees and request a refund of the amount in excess of \$1,000.

On June 10, 1986 the Reports Analysis Division ("RAD") analyst received a call from Mr. John Carlson, Vice President of Kilroy Industries (Attachment 4). Mr. Carlson asked why the Commission had sent a letter to KIPAC concerning the apparent excessive contributions. The RAD analyst stated that KIPAC had not yet reached multicandidate

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<sup>\*/</sup> On its reports, KIPAC uses the names Mike Antonovich for U.S. Senate and Antonovich for U.S. Senate when referring to the Antonovich Committee. The registered name is Antonovich for Senate.

**KILROY INDUSTRIES POLITICAL ACTION COMMITTEE  
REPORTS ANALYSIS OGC REFERRAL  
PAGE 2**

status and therefore could only contribute up to \$1,000 per election, per candidate. Mr. Carlson replied that KIPAC had more than fifty-one (51) contributors and had been registered with the Commission for over a year. The RAD analyst stated that, according to Commission records, KIPAC did not have fifty-one (51) contributors and had not made contributions to at least five (5) federal candidates by the time the apparent excessive contributions were made.

On June 23, 1986, KIPAC submitted a written response to the RFAI which stated that KIPAC had requested and received "... a refund from those two candidates involved for the amount exceeding \$1,000" and that it did not realize that it had to contribute to five federal candidates prior to qualifying as a multicandidate committee (Attachment 5). KIPAC also included photocopies of a \$4,000 refund check dated June 11, 1986 from the Antonovich Committee and a \$9,000 refund check dated June 10, 1986 from the Wilson Committee. Schedule A of KIPAC's 1986 July Quarterly Report disclosed the receipt of these refunds (Attachment 6).

**IV. OTHER PENDING MATTERS INITIATED BY RAD:**

None.

86040513887

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
KILROY INDUSTRIES POLITICAL ACTION COMMITTEE CONNECTED ORGANIZATION: KILROY INDUSTRIES						NON-PARTY NON-QUALIFIED ID #C00195495
1985	REQUEST FOR ADDITIONAL INFORMATION					1 85FEC/376/0795
	STATEMENT OF ORGANIZATION			23MAY85	2	85FEC/374/2759
	STATEMENT OF ORGANIZATION - AMENDMENT			11JUL85	3	85FEC/378/0606
	STATEMENT OF ORGANIZATION - AMENDMENT			27AUG85	2	85FEC/386/5382
	REQUEST FOR ADDITIONAL INFORMATION 2ND				2	85FEC/378/1709
	MID-YEAR REPORT	16,350	0	1MAR85 -30JUN85	6	85FEC/386/5384
	NOTICE OF FAILURE TO FILE			1JAN85 -30JUN85	1	85FEC/386/3173
	YEAR-END	5,070	177	1AUG85 -31DEC85	4	86FEC/374/0626
1986	APRIL QUARTERLY	2,225	16,000	1JAN86 -31MAR86	5	86FEC/407/1739
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN86 -31MAR86	7	86FEC/418/0944
	REQUEST FOR ADDITIONAL INFORMATION			1JAN86 -31MAR86	3	86FEC/416/1019
	JULY QUARTERLY	14,250	0	1APR86 -30JUN86	5	86FEC/420/0710
	TOTAL	37,895	0 16,177	0	41	TOTAL PAGES

All reports except the 1986 July Quarterly Report have received review.

Ending cash-on-hand as of 6/30/86: \$21,718

Outstanding debts as of 6/30/86: \$0

**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

ATTACHMENT 2

Use separate schedule for each category of the Detailed Summary Page

PAGE 1 OF 1  
FOR LINE NUMBER 21

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)

Kilroy Industries Political Action Committee

C00195495

1986 April Quarterly Rpt.

<p>A. Full Name, Mailing Address and ZIP Code  <b>Californians for Senator Pete Wilson</b>  <b>c/o Joyce Valdez &amp; Associates</b>  <b>811 W. 7th Street, #320</b>  <b>Los Angeles, CA 90017</b></p>	<p>Purpose of Disbursement  <b>Contribution to Pete Wilson,</b>  <b>Senate Candidate, CA</b>                      Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify) 1986</p>	<p>Date (month, day, year)  <b>1/10/86</b></p>	<p>Amount of Each Disbursement This Period  <b>\$5,000</b></p>
<p>B. Full Name, Mailing Address and ZIP Code  <b>Californians for Senator Pete Wilson</b>  <b>c/o Joyce Valdez &amp; Associates</b>  <b>811 W. 7th St., #320</b>  <b>Los Angeles, CA 90017</b></p>	<p>Purpose of Disbursement  <b>Contribution to Pete Wilson,</b>  <b>Senate Candidate, CA</b>                      Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General  <input type="checkbox"/> Other (specify) 1986</p>	<p>Date (month, day, year)  <b>1/10/86</b></p>	<p>Amount of Each Disbursement This Period  <b>\$5,000</b></p>
<p>C. Full Name, Mailing Address and ZIP Code  <b>Glenn Anderson Campaign Committee</b>  <b>P.O. Box 1426</b>  <b>Long Beach, CA 90801</b></p>	<p>Purpose of Disbursement  <b>Contribution to Glenn Anderson,</b>  <b>House Candidate, 32nd District, CA</b>                      Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify) 1986</p>	<p>Date (month, day, year)  <b>2/25/86</b></p>	<p>Amount of Each Disbursement This Period  <b>\$1,000</b></p>
<p>D. Full Name, Mailing Address and ZIP Code  <b>Mike Antonovich for U.S. Senate</b>  <b>c/o Hall of Administration</b>  <b>500 W. Temple St., #869</b>  <b>Los Angeles, CA 90012</b></p>	<p>Purpose of Disbursement  <b>Contribution to Mike Antonovich,</b>  <b>Senate Candidate, CA</b>                      Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General  <input type="checkbox"/> Other (specify) 1986</p>	<p>Date (month, day, year)  <b>3/26/86</b></p>	<p>Amount of Each Disbursement This Period  <b>\$5,000</b></p>
<p>E. Full Name, Mailing Address and ZIP Code</p>	<p>Purpose of Disbursement                      Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Disbursement This Period</p>
<p>F. Full Name, Mailing Address and ZIP Code</p>	<p>Purpose of Disbursement                      Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Disbursement This Period</p>
<p>G. Full Name, Mailing Address and ZIP Code</p>	<p>Purpose of Disbursement                      Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Disbursement This Period</p>
<p>H. Full Name, Mailing Address and ZIP Code</p>	<p>Purpose of Disbursement                      Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Disbursement This Period</p>
<p>I. Full Name, Mailing Address and ZIP Code</p>	<p>Purpose of Disbursement                      Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify)</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Disbursement This Period</p>

<p>Subtotal . . . . .</p>	<p><b>\$16,000</b></p>
<p>Total . . . . .</p>	<p><b>\$16,000</b></p>

115)





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2  
JUN 4 1986

James York, Treasurer  
Kilroy Industries Political  
Action Committee  
2250 East Imperial Highway  
El Segundo, CA 90245

Identification Number: C00195495

Reference: April Quarterly Report (1/1/86-3/31/86)

Dear Mr. York:

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 established by the Act. The Act precludes a political committee, other than a multicandidate committee, from making a contribution to a candidate for Federal office in excess of \$1,000 per election. (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 \$1,000. Please inform the Commission immediately in writing and provide a photocopy of your refund request sent to the recipient. In addition, any refund should appear on a supporting Schedule A for Line 16 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

ATTACHMENT 3  
page 2 of 2

assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

*Tammy Rollins*

Tammy Rollins  
Reports Analyst  
Reports Analysis Division

86040613891

1(7)

TELECON

ATTACHMENT 4

ANALYST: Tamara Rollins

CONVERSATION WITH: John Carlson, Vice President

COMMITTEE: Kilroy Industries PAC

DATE: June 10, 1986

SUBJECT(S): Unqualified Multicandidate Status in Relation to the Excessive Contributions Made by Kilroy Industries to Principal Campaign Committees

8 6 0 4 0 6 1 3 8 9 2  
Mr. Carlson called to ask about the letter the Commission had sent to his committee concerning the excessive contributions Kilroy Industries PAC made to two (2) candidate committees during the April Quarterly 1986 reporting period. He stated that he did not understand why he had received the letter advising his committee to seek refunds for the excessive contributions. I stated that according to our records Kilroy Industries had not yet attained multicandidate status and therefore could only contribute \$1,000 per election. He replied that his committee had more than 51 contributors and had been registered with the Commission for over a year. I stated that according to our records Kilroy Industries did not have 51 contributors and had not made contributions to at least five (5) federal candidates prior to making the excessive contributions.

Mr. Carlson said he would provide the list of contributors and give to one (1) more federal candidate in order that his committee could qualify for multicandidate status. I advised him to seek refunds for the excessives that his committee had already made and send the Commission photocopies of the checks. He replied that he would amend his report and provide all the necessary information that the Commission had requested.

1(8)





KILROY INDUSTRIES

36 JUN 23 12:10

John G. Carlson  
Vice President

June 18, 1986

Ms. Tammy Rollins  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

Reference: Identification No. C00193493

Dear Ms. Rollins:

This is in response to your letter of June 4, 1986 regarding our April Quarterly Report.

Your review of our Report expressed concern about our Political Action Committee making a contribution to a candidate for Federal office in excess of \$1,000 per election since we did not yet qualify as a multi-candidate committee. In our telephone conversation you explained that to qualify as a multi-candidate committee and to contribute up to \$5,000 per candidate per election, we first had to contribute to at least five federal candidates. Therefore, per your instructions, I have asked for and received a refund from those two candidates involved for the amount exceeding \$1,000. A photocopy of these refund checks is enclosed. As I mentioned on the phone, we plan to contribute to more than five candidates for Federal office this year but I did not realize that we had to have already contributed to five before we could qualify as a multi-candidate committee and exceed the \$1,000 limit. Thank you for clarifying this for me.

In summary, we have received the refunds you requested. A photocopy of these checks and an amended Schedule B is enclosed. We will, on our next report, file the names of the five candidates for Federal office we supported, thus qualifying us as a multi-candidate committee.

1(4)



Ms. Tammy Hollins  
Federal Election Committee  
June 18, 1986  
Page Two

Again, thank you for all your assistance.

Sincerely,

*John G. Carlson*

John G. Carlson

Enclosures

3603418091

1(10)

ANTONOVICH FOR U.S. SENATE  
100 E. HAVARD, STE. 200 010-020-1100  
GLENDALE, CA 91201

6006

PAY  
TO THE  
ORDER OF

KILSOY INDUSTRIES INC.

June 11, 1986

00 1000-122

4000.00

FOUR THOUSAND ONLY

DOLLARS



Valley National Bank

CLARENCE DRIVE  
200 N. GARDEN ST. GLENDALE, CA 91201-0000

FOR CONTRIBUTION REFUND

Debra Antonovich  
James E. Crow

⑈006008⑈ ⑆122218657⑆ 010-122332⑈

860405393895

1(1)

**MILLER/ROOS & CO.**  
POLITICAL REPORTING CONSULTANTS

Robert E. Miller, Jr., CPA  
C. Mary Roos, CPA

RECEIVED  
JUN 13 1986  
John G. Carlson

June 11, 1986

Kilroy Industries Political Action Committee  
2250 East Imperial Highway, #1200  
El Segundo, California 90245

Re: Contribution to Californians for Senator Pete Wilson

Attention: Mr. John Carlson

Gentlemen:

We enclose check #1960 in the amount of \$9,000 which represents a return of contribution, as you requested.

It is our understanding Kilroy Industries PAC did not qualify as a multi-candidate committee at the time the contribution was made, hence we are returning that portion which is not acceptable. As we discussed by telephone, the \$9,000 will again be contributed when the committee qualifies as a multi-candidate committee.

On behalf of Senator Pete Wilson we wish to thank you for your willingness to support his campaign effort.

Yours truly,

  
Robert E. Miller, Jr.  
Treasurer

REN/la

11(2)

CALIFORNIANS FOR SENATOR PETE WILSON  
1200 THIRD AVE., SUITE 200  
SAN DIEGO, CALIFORNIA 92101

DESCRIPTION	AMOUNT

01960

PAY

The sum of 9000.00

DOLLARS

TO THE ORDER OF	DATE	DESCRIPTION	CHECK NO.
<i>John Wilson</i>	<i>10/16</i>	<i>John Wilson</i>	<i>1960</i>

*2000 E. 1st St. San Diego, CA 92101*

BANK OF AMERICA  
300 N. 5th St. - San Diego, CA 92101

*John Wilson*

001960 61222358216 004-304053

15858480913897

1(13)



## SCHEDULE A

## ITEMIZED RECEIPTS

1986 JULY QUARTERLY REPORT

Use separate schedules for each category of the Detailed Summary Page

PAGE 1 OF 1  
FORM LINE NUMBER 16

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 cash. Excludes from such or 7/1/86.

NAME OF COMMITTEE (in Full)

Kilroy Industries Political Action Committee

C80195495

A. Full Name, Mailing Address and ZIP Code  
Californians for Senator Pete Wilson  
1200 Third Avenue, Suite 700  
San Diego, California 92101

Name of Employer

Not Applicable

Date (month, day, year)

6/10/86

Amount of Each Receipt this Period

\$9,000

Receipt For ☐ Primary ☐ General  
☒ Other (specify): Refund of Contribution

Occupation

Aggregate Year-to-Date &gt; \$ 9,000

B. Full Name, Mailing Address and ZIP Code  
Antonovich for U.S. Senate  
109 East Harvard, Suite 200  
Glendale, California 91205

Name of Employer

Not Applicable

Date (month, day, year)

6/11/86

Amount of Each Receipt this Period

\$4,000

Receipt For ☐ Primary ☐ General  
☒ Other (specify): Refund of Contribution

Occupation

Aggregate Year-to-Date &gt; \$ 4,000

C. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt this Period

Receipt For ☐ Primary ☐ General  
☐ Other (specify):

Occupation

Aggregate Year-to-Date &gt; \$

D. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt this Period

Receipt For ☐ Primary ☐ General  
☐ Other (specify):

Occupation

Aggregate Year-to-Date &gt; \$

E. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt this Period

Receipt For ☐ Primary ☐ General  
☐ Other (specify):

Occupation

Aggregate Year-to-Date &gt; \$

F. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt this Period

Receipt For ☐ Primary ☐ General  
☐ Other (specify):

Occupation

Aggregate Year-to-Date &gt; \$

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt this Period

Receipt For ☐ Primary ☐ General  
☐ Other (specify):

Occupation

Aggregate Year-to-Date &gt; \$

SUBTOTAL

11(4)

\$13,000

TOTAL

\$13,000

86040513893  
86034200713

**FEDERAL ELECTION COMMISSION  
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS**

MUR NO. \_\_\_\_\_  
STAFF MEMBER & TEL. NO. \_\_\_\_\_  
Patty Reilly  
(202) 376-8200

**RESPONDENTS:** Kilroy Industries Political Action Committee and  
James York, as treasurer

**SUMMARY OF ALLEGATIONS**

It is alleged that Kilroy Industries Political Action Committee and James York, as treasurer, ("the Committee") made three \$5,000 contributions to two political committees thereby exceeding the limitations of 2 U.S.C. § 441a(a)(1)(A).

**FACTUAL BASIS AND LEGAL ANALYSIS**

Based on a review of the Committee's 1986 April Quarterly Report, the Commission's Reports Analysis Division ("RAD") determined that the Committee contributed \$10,000 to Californians for Senator Pete Wilson (\$5,000 to the 1988 primary and \$5,000 to the 1988 general) and \$5,000 to the Antonovich for Senate Committee (1986 primary). At the time of these contributions the Committee had been in existence for nine months, had accepted 30 contributions from 19 individuals, and had made contributions to only three political committees. The contributions in question were made in January and March of 1986, and reported on the Committee's 1986 April Quarterly Report. RAD sent the Committee a request for additional information ("RFAI") on June 4, 1986 regarding these possible excessive contributions. In response to the RFAI the Committee submitted copies of two refund checks totaling \$13,000 (\$4,000 from the Antonovich Committee, \$9,000

ATTACHMENT #2(1)

86040513899

from the Wilson Committee). The Committee reported receiving these refunds on June 10 and 11, 1986 and noted these refunds on its 1986 July Quarterly report.

8  
6  
0  
4  
0  
3  
1  
3  
9  
0  
0  
The Act permits multicandidate committees to make contributions of \$5,000 per election to an authorized committee of a candidate. 2 U.S.C. § 441a(a)(2)(A). A political committee qualifies as a multicandidate committee if it has registered with the Commission for at least six months, has received contributions from more than 50 persons, and except any state party organization, has made contributions to five or more candidates for federal office. 2 U.S.C. § 441a(a)(4). A political committee that does not meet this definition is a person within the meaning of 2 U.S.C. § 431(11). The Act limits persons to contributing \$1,000 per election to an authorized committee of a candidate. 2 U.S.C. § 441a(a)(1)(A).

In the instant case the Committee made three election contributions of \$5,000 to two authorized committees at a time when it was restricted to contributing \$1,000 per election to such committees. Accordingly, this Office recommends that the Commission find that there is reason to believe the Kilroy Industries Political Action Committee and James York, as treasurer, violated 2 U.S.C. § 441a(a)(1)(A).



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

James York, Treasurer  
Kilroy Industries Political Action Committee  
2250 East Imperial Highway  
El Segundo, California 90245

RE: MUR  
Kilroy Industries Political  
Action Committee and James  
York, as treasurer

Dear Mr. York:

On , 1986, the Federal Election Commission determined that there is reason to believe the Kilroy Industries Political Action Committee and you, as treasurer, violated 2 U.S.C. § 441a(a)(1)(A), a provision 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. Statements should be submitted under oath.

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 pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so

ATTACHMENT # 341

86040513901



that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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 such 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 Patty Reilly, attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Joan D. Aikens  
Chairman

Enclosures

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

**FEDERAL ELECTION COMMISSION**

WASHINGTON, D C 20463

18 July 1986

**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 KILROY INDUSTRIES POLITICAL ACTION  
COMMITTEE

This is a referral of the Kilroy Industries Political Action Committee ("KIPAC"). The 1986 April Quarterly Report disclosed apparent excessive contributions made by KIPAC totalling \$8,000 to the Californians for Senator Pete Wilson committee and \$4,000 to the Mike Antonovich for U.S. Senate committee prior to qualifying as a multicandidate committee. For your information

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If you have any questions on this matter, please contact  
Tamara K. Rollins at 376-2480.

Attachment

86040513903

**REPORTS ANALYSIS REFERRAL**

**TO**

**OFFICE OF GENERAL COUNSEL**

**DATE:** 18 July 1986

**ANALYST:** Tamara K. Rollins

**I. COMMITTEE:** Kilroy Industries Political Action  
Committee (C00195495)  
James York, Treasurer  
2250 East Imperial Highway  
El Segundo, CA 90245

**II. RELEVANT STATUTE:** 2 U.S.C. §441a(a)(1)(A) and  
11 CFR 110.1(a)(1)

**III. BACKGROUND:**

**Apparent Excessive Contributions Made to Federal Candidates**

The 1986 April Quarterly Report filed by the Kilroy Industries Political Action Committee ("KIPAC"), disclosed two (2) \$5,000 contributions to the Californians for Senator Pete Wilson committee ("Wilson Committee") on January 10, 1986 (\$5,000 for the 1988 primary election and \$5,000 for the 1988 general election) and a \$5,000 contribution to the Mike Antonovich for U.S. Senate Committee ("Antonovich Committee")<sup>\*/</sup> on March 26, 1986 for the 1986 primary election (Attachment 2).

A Request for Additional Information ("RFAI") was sent to KIPAC on June 4, 1986 (Attachment 3). The RFAI advised KIPAC that an individual or political committee, other than a multicandidate committee, is prohibited from making a contribution to a candidate for federal office in excess of \$1,000 per election. KIPAC was asked to notify the recipient committees and request a refund of the amount in excess of \$1,000.

On June 10, 1986 the Reports Analysis Division ("RAD") analyst received a call from Mr. John Carlson, Vice President of Kilroy Industries (Attachment 4). Mr. Carlson asked why the Commission had sent a letter to KIPAC concerning the apparent excessive contributions. The RAD analyst stated that KIPAC had not yet reached multicandidate

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<sup>\*/</sup> On its reports, KIPAC uses the names Mike Antonovich for U.S. Senate and Antonovich for U.S. Senate when referring to the Antonovich Committee. The registered name is Antonovich for Senate.

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**KILROY INDUSTRIES POLITICAL ACTION COMMITTEE  
REPORTS ANALYSIS OGC REFERRAL  
PAGE 2**

status and therefore could only contribute up to \$1,000 per election, per candidate. Mr. Carlson replied that KIPAC had more than fifty-one (51) contributors and had been registered with the Commission for over a year. The RAD analyst stated that, according to Commission records, KIPAC did not have fifty-one (51) contributors and had not made contributions to at least five (5) federal candidates by the time the apparent excessive contributions were made.

On June 23, 1986, KIPAC submitted a written response to the RFAI which stated that KIPAC had requested and received "... a refund from those two candidates involved for the amount exceeding \$1,000" and that it did not realize that it had to contribute to five federal candidates prior to qualifying as a multicandidate committee (Attachment 5). KIPAC also included photocopies of a \$4,000 refund check dated June 11, 1986 from the Antonovich Committee and a \$9,000 refund check dated June 10, 1986 from the Wilson Committee. Schedule A of KIPAC's 1986 July Quarterly Report disclosed the receipt of these refunds (Attachment 6).

**IV. OTHER PENDING MATTERS INITIATED BY RAD:**

None.

86040613905



NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
KILROY INDUSTRIES POLITICAL ACTION COMMITTEE CONNECTED ORGANIZATION: KILROY INDUSTRIES				NON-PARTY NON-QUALIFIED ID #C00195495		
1985	REQUEST FOR ADDITIONAL INFORMATION					1 85FEC/376/0795
	STATEMENT OF ORGANIZATION			23MAY85	2	85FEC/374/2759
	STATEMENT OF ORGANIZATION - AMENDMENT			11JUL85	3	85FEC/378/0606
	STATEMENT OF ORGANIZATION - AMENDMENT			27AUG85	2	85FEC/386/5382
	REQUEST FOR ADDITIONAL INFORMATION 2ND				2	85FEC/378/1709
	MID-YEAR REPORT	16,350	0	1MAR85 -30JUN85	6	85FEC/386/5384
	NOTICE OF FAILURE TO FILE			1JAN85 -30JUN85	1	85FEC/386/3175
	YEAR-END	5,070	177	1AUG85 -31DEC85	4	86FEC/394/6626
1986	APRIL QUARTERLY	2,225	16,000	1JAN86 -31MAR86	5	86FEC/407/1739
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN86 -31MAR86	7	86FEC/418/0944
	REQUEST FOR ADDITIONAL INFORMATION			1JAN86 -31MAR86	3	86FEC/416/1019
	JULY QUARTERLY	14,250	0	1APR86 -30JUN86	5	86FEC/420/0710
	TOTAL	37,895	0 16,177	0	41	TOTAL PAGES

All reports except the 1986 July Quarterly Report have received review.

Ending cash-on-hand as of 6/30/86: \$21,718

Outstanding debts as of 6/30/86: \$0

**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

ATTACHMENT 2

Use separate schedule for each category of the Detailed Summary Page

PAGE 1 OF 1  
FOR LINE NUMBER 21

Any information on copies 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)

**Kilroy Industries Political Action Committee**

**C00195495**

**1986 April Quarterly Rpt.**

<p><b>A. Full Name, Mailing Address and ZIP Code</b>  <b>Californians for Senator Pete Wilson</b>  <b>c/o Joyce Valdez &amp; Associates</b>  <b>811 W. 7th Street, #320</b>  <b>Los Angeles, CA 90017</b></p>	<p><b>Purpose of Disbursement</b>  <b>Contribution to Pete Wilson,</b>  <b>Senate Candidate, CA</b>                      Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify) 1988</p>	<p><b>Date (month, day, year)</b>  <b>1/10/86</b></p>	<p><b>Amount of Each Disbursement This Period</b>  <b>\$5,000</b></p>
<p><b>B. Full Name, Mailing Address and ZIP Code</b>  <b>Californians for Senator Pete Wilson</b>  <b>c/o Joyce Valdez &amp; Associates</b>  <b>811 W. 7th St., #320</b>  <b>Los Angeles, CA 90017</b></p>	<p><b>Purpose of Disbursement</b>  <b>Contribution to Pete Wilson,</b>  <b>Senate Candidate, CA</b>                      Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General  <input type="checkbox"/> Other (specify) 1988</p>	<p><b>Date (month, day, year)</b>  <b>1/10/86</b></p>	<p><b>Amount of Each Disbursement This Period</b>  <b>\$5,000</b></p>
<p><b>C. Full Name, Mailing Address and ZIP Code</b>  <b>Glenn Anderson Campaign Committee</b>  <b>P.O. Box 1426</b>  <b>Long Beach, CA 90801</b></p>	<p><b>Purpose of Disbursement</b>  <b>Contribution to Glenn Anderson,</b>  <b>House Candidate, 32nd District, CA</b>                      Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify) 1986</p>	<p><b>Date (month, day, year)</b>  <b>2/25/86</b></p>	<p><b>Amount of Each Disbursement This Period</b>  <b>\$1,000</b></p>
<p><b>D. Full Name, Mailing Address and ZIP Code</b>  <b>Mike Antonovich for U.S. Senate</b>  <b>c/o Hall of Administration</b>  <b>500 W. Temple St., #869</b>  <b>Los Angeles, CA 90012</b></p>	<p><b>Purpose of Disbursement</b>  <b>Contribution to Mike Antonovich,</b>  <b>Senate Candidate, CA</b>                      Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General  <input type="checkbox"/> Other (specify) 1986</p>	<p><b>Date (month, day, year)</b>  <b>3/26/86</b></p>	<p><b>Amount of Each Disbursement This Period</b>  <b>\$5,000</b></p>
<p><b>E. Full Name, Mailing Address and ZIP Code</b></p>	<p><b>Purpose of Disbursement</b>                      Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify)</p>	<p><b>Date (month, day, year)</b></p>	<p><b>Amount of Each Disbursement This Period</b></p>
<p><b>F. Full Name, Mailing Address and ZIP Code</b></p>	<p><b>Purpose of Disbursement</b>                      Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify)</p>	<p><b>Date (month, day, year)</b></p>	<p><b>Amount of Each Disbursement This Period</b></p>
<p><b>G. Full Name, Mailing Address and ZIP Code</b></p>	<p><b>Purpose of Disbursement</b>                      Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify)</p>	<p><b>Date (month, day, year)</b></p>	<p><b>Amount of Each Disbursement This Period</b></p>
<p><b>H. Full Name, Mailing Address and ZIP Code</b></p>	<p><b>Purpose of Disbursement</b>                      Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify)</p>	<p><b>Date (month, day, year)</b></p>	<p><b>Amount of Each Disbursement This Period</b></p>
<p><b>I. Full Name, Mailing Address and ZIP Code</b></p>	<p><b>Purpose of Disbursement</b>                      Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify)</p>	<p><b>Date (month, day, year)</b></p>	<p><b>Amount of Each Disbursement This Period</b></p>

Subtotal of all items on this page

**\$16,000**

Total of all items on this page

**\$16,000**

357340717



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

ATTACHMENT 3  
page 1 of 2

RQ-2  
JUN 4 1986

James York, Treasurer  
Kilroy Industries Political  
Action Committee  
2250 East Imperial Highway  
El Segundo, CA 90245

Identification Number: C00195495

Reference: April Quarterly Report (1/1/86-3/31/86)

Dear Mr. York:

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 established by the Act. The Act precludes a political committee, other than a multicandidate committee, from making a contribution to a candidate for Federal office in excess of \$1,000 per election. (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 \$1,000. Please inform the Commission immediately in writing and provide a photocopy of your refund request sent to the recipient. In addition, any refund should appear on a supporting Schedule A for Line 16 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

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ATTACHMENT 3  
page 2 of 2

assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

*Tammy Rollins*

Tammy Rollins  
Reports Analyst  
Reports Analysis Division

86040513909



**ANALYST:** Tamara Rollins

**CONVERSATION WITH:** John Carlson, Vice President

**COMMITTEE:** Kilroy Industries PAC

**DATE:** June 10, 1986

**SUBJECT(S):** Unqualified Multicandidate Status in Relation to the Excessive Contributions Made by Kilroy Industries to Principal Campaign Committees

8 6 0 4 0 5 1 3 9 1 0

Mr. Carlson called to ask about the letter the Commission had sent to his committee concerning the excessive contributions Kilroy Industries PAC made to two (2) candidate committees during the April Quarterly 1986 reporting period. He stated that he did not understand why he had received the letter advising his committee to seek refunds for the excessive contributions. I stated that according to our records Kilroy Industries had not yet attained multicandidate status and therefore could only contribute \$1,000 per election. He replied that his committee had more than 51 contributors and had been registered with the Commission for over a year. I stated that according to our records Kilroy Industries did not have 51 contributors and had not made contributions to at least five (5) federal candidates prior to making the excessive contributions.

Mr. Carlson said he would provide the list of contributors and give to one (1) more federal candidate in order that his committee could qualify for multicandidate status. I advised him to seek refunds for the excessives that his committee had already made and send the Commission photocopies of the checks. He replied that he would amend his report and provide all the necessary information that the Commission had requested.



REC  
26 JUN 83 12:10

John G. Carlson  
Vice President

June 18, 1986

Ms. Tammy Rollins  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

Reference: Identification No. C00195495

Dear Ms. Rollins:

This is in response to your letter of June 4, 1986 regarding our April Quarterly Report.

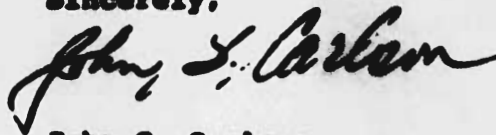
Your review of our Report expressed concern about our Political Action Committee making a contribution to a candidate for Federal office in excess of \$1,000 per election since we did not yet qualify as a multi-candidate committee. In our telephone conversation you explained that to qualify as a multi-candidate committee and to contribute up to \$5,000 per candidate per election, we first had to contribute to at least five federal candidates. Therefore, per your instructions, I have asked for and received a refund from those two candidates involved for the amount exceeding \$1,000. A photocopy of these refund checks is enclosed. As I mentioned on the phone, we plan to contribute to more than five candidates for Federal office this year but I did not realize that we had to have already contributed to five before we could qualify as a multi-candidate committee and exceed the \$1,000 limit. Thank you for clarifying this for me.

In summary, we have received the refunds you requested. A photocopy of these checks and an amended Schedule B is enclosed. We will, on our next report, file the names of the five candidates for Federal office we supported, thus qualifying us as a multi-candidate committee.

Ms. Tammy Rollins  
Federal Election Committee  
June 18, 1986  
Page Two

Again, thank you for all your assistance.

Sincerely,



John G. Carlson

Enclosures

36061FJCS

ANTONOVICH FOR U.S. SENATE  
100 E. HAYWARD, STE. 200 OAKLAND, CA 94612

6008

100-1227

PAY  
TO THE  
ORDER OF

KILBY INDUSTRIES INC.

June 11, 1988

\$4000.00

FOUR THOUSAND ONLY

DOLLARS



Valley National Bank

OAKLAND BRANCH  
200 E. HAYWARD, OAKLAND, CA 94612

FOR CONTRIBUTION REFINED

Debra L. Antonovich  
Debra L. Antonovich

⑆000008⑆ 41222186576 010-222338⑆

86040513913  
367541939:7



**MILLER/ROOS & CO.**  
**POLITICAL REPORTING CONSULTANTS**

Robert E. Miller, Jr., CPA  
C. Mary Roos, CPA

**RECEIVED**  
**JUN 13 1986**  
John G. Carlson

June 11, 1986

Kilroy Industries Political Action Committee  
2250 East Imperial Highway, #1200  
El Segundo, California 90245

Re: Contribution to Californians for Senator Pete Wilson

Attention: Mr. John Carlson

Gentlemen:

We enclose check #1960 in the amount of \$9,000 which represents a return of contribution, as you requested.

It is our understanding Kilroy Industries PAC did not qualify as a multi-candidate committee at the time the contribution was made, hence we are returning that portion which is not acceptable. As we discussed by telephone, the \$9,000 will again be contributed when the committee qualifies as a multi-candidate committee.

On behalf of Senator Pete Wilson we wish to thank you for your willingness to support his campaign effort.

Yours truly,

  
Robert E. Miller, Jr.  
Treasurer

REN/la

CALIFORNIANS FOR SENATOR PETE WILSON  
1200 THIRD AVE., SUITE 700  
SAN DIEGO, CALIFORNIA 92101

EXPLANATION	AMOUNT

01960

PAY

The sum of 9000.00 DOLLARS

DOLLARS

TO THE ORDER OF	DATE	DESCRIPTION	CHECK NO.
<i>Kelly Industries All California</i>	<i>8-4-86</i>	<i>Statement of Cash</i>	<i>1960</i>

CHECK AMOUNT

*2350 E. Imperial Highway  
Ch. Laguna Hills, CA 92653*

CASH ON HAND  
No and 6 Months - See Page 5a 5b

*John Carlson*

001960 0122235821 004-304063

15 21 29 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 00

## ATTACHMENT 6

## SCHEDULE A

## ITEMIZED RECEIPTS

1986 JULY QUARTERLY REPORT

Use separate schedule for each category of the Detailed Summary Page

PAGE 1 of 1  
FOR LINE BLANK 16

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 or trustees.

## NAME OF COMMITTEE (in Full)

Kilroy Industries Political Action Committee

C00195495

## A. Full Name, Mailing Address and ZIP Code

Californians for Senator Pete Wilson  
1200 Third Avenue, Suite 700  
San Diego, California 92101

## Name of Employer

Not Applicable

## Date (month, day, year)

6/10/86

## Amount of Each Receipt this Period

\$9,000

## Receipt For

☐ Primary☐ General☒ Other (specify): Refund of Contribution

## Occupation

Aggregate Year-to-Date &gt; \$ 9,000

## B. Full Name, Mailing Address and ZIP Code

Antonovich for U.S. Senate  
109 East Harvard, Suite 200  
Glendale, California 91205

## Name of Employer

Not Applicable

## Date (month, day, year)

6/11/86

## Amount of Each Receipt this Period

\$4,000

## Receipt For

☐ Primary☐ General☒ Other (specify): Refund of Contribution

## Occupation

Aggregate Year-to-Date &gt; \$ 4,000

## C. Full Name, Mailing Address and ZIP Code

## Name of Employer

## Date (month, day, year)

## Amount of Each Receipt this Period

## Receipt For

☐ Primary☐ General☐ Other (specify):

## Occupation

Aggregate Year-to-Date &gt; \$

## D. Full Name, Mailing Address and ZIP Code

## Name of Employer

## Date (month, day, year)

## Amount of Each Receipt this Period

## Receipt For

☐ Primary☐ General☐ Other (specify):

## Occupation

Aggregate Year-to-Date &gt; \$

## E. Full Name, Mailing Address and ZIP Code

## Name of Employer

## Date (month, day, year)

## Amount of Each Receipt this Period

## Receipt For

☐ Primary☐ General☐ Other (specify):

## Occupation

Aggregate Year-to-Date &gt; \$

## F. Full Name, Mailing Address and ZIP Code

## Name of Employer

## Date (month, day, year)

## Amount of Each Receipt this Period

## Receipt For

☐ Primary☐ General☐ Other (specify):

## Occupation

Aggregate Year-to-Date &gt; \$

## G. Full Name, Mailing Address and ZIP Code

## Name of Employer

## Date (month, day, year)

## Amount of Each Receipt this Period

## Receipt For

☐ Primary☐ General☐ Other (specify):

## Occupation

Aggregate Year-to-Date &gt; \$

SUBTOTAL

\$13,000

TOTAL

\$13,000

86040513916  
86034200713

86040513917



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 2237

Date Filmed 9/26/86 Camera No. --- 2

Cameraman AS