



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

THIS IS THE BEGINNING OF MUR # 4570

DATE FILMED 3/25/78 CAMERA NO. 2

CAMERAMAN EES

98043863068

Ralph C. Wunder
Washington, D.C. • Beverly Hills, CA.

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

Nov 5 12 11 PM '96

(310) 640-1955
421 N. Rodeo Drive #15
Beverly Hills, CA. 90210

MUR 4570

Mr. Lawrence Noble
Chief Counsel
Federal Election Commission
999 E Street NW Room 657
Washington, D.C. 20463

October 30, 1996

Dear Mr. Noble:

I am writing to encourage an investigation by the Federal Election Commission of the same charges already now being examined by the U.S. Attorney's Office and the Federal Bureau of Investigation based on evidence and my first-hand knowledge of willful, criminal violations of federal election laws by Congresswoman Andrea Seastrand and her then taxpayer-funded Assembly staff during her 1994 Congressional campaign.

I know there was criminal intent that can be readily established, and I've already discussed the circumstances with a Federal Election Committee attorney in the recent past, as well as with my personal attorney. The essence of the charges --for which there is a preponderance of documentary evidence and corroborating testimony by the campaign's Finance Director and others-- is that with the Congresswoman's full knowledge, consent, complicity, and direction, her Assembly staff illegally used taxpayer money on an ongoing basis to advance her personal political agenda during the 1994 Congressional campaign.

These violations were systemic, on-going, and deliberate violations done at considerable expense to taxpayers, and executed in a conspiratorial manner with the full knowledge and consent of the candidate herself as well as the other participating offenders. These were not occasional and minor. They were deliberate and daily. Some of them were also felonies.

Please contact me at your earliest convenience that I may express to you in more detail what the U.S. Attorney's Office and FBI have already begun looking into.

I've taken the liberty to enclose a copy of my bio for your perusal. I've had a hand, as you can see, in electing several Members of Congress as a paid advisor, as

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well as serving on the staffs of several Members of Congress and a Committee.

I've been involved in public service at the White House appointment level, and helped plan the national media coverage of Day One of Senator Dole's announcement tour for President last year. These days, I am the owner of a small, but successful television production company based in Santa Barbara.

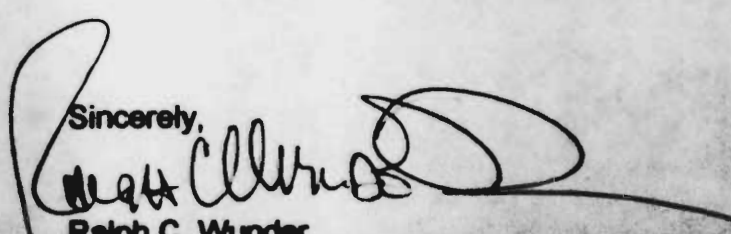
I will reserve discussing further names and circumstances until I am contacted by your office.

I am best reached at:

(805) 966-4770 - direct
(800) 691-9667 - pager
(805) 895-5300 - cellular phone
(310) 640-1955 - voice mail

Thank you. I await to hear from you.

Sincerely,


Ralph C. Wunder



SUBSCRIBED AND SWORN TO BEFORE ME
THIS 30th DAY OF October 1996
by Ralph C. Wunder
Pamela Mendez
NOTARY PUBLIC

9804386307C



FEDERAL ELECTION COMMISSION

Washington, DC 20463

November 12, 1996

Ralph C. Wunder
421 N. Rodeo Drive #15
Beverly Hills, CA 90210

RE: MUR 4570

Dear Mr. Wunder:

This letter acknowledges receipt on November 5, 1996, of the complaint you filed alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). The respondent(s) will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 4570. Please refer to this number in all future communications. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

A handwritten signature in dark ink, appearing to read "Colleen T. Scalander", is written over the word "Sincerely".

Colleen T. Scalander, Attorney
Central Enforcement Docket

Enclosure
Procedures

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FEDERAL ELECTION COMMISSION
Washington, DC 20463

November 12, 1996

Pete Agalos, Treasurer
Friends of Andrea Seastrand for Congress
626 Evans Road
San Luis Obispo, CA 93401

RE: MUR 4570

Dear Mr. Agalos:

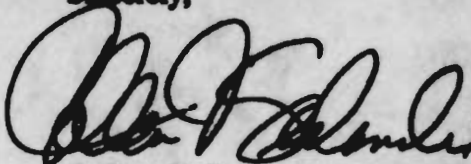
The Federal Election Commission received a complaint which indicates that Friends of Andrea Seastrand for Congress ("Committee") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4570. Please refer to this number in all future correspondence.

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

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

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

Sincerely,



Colleen T. Sealander, Attorney
Central Enforcement Docket

Enclosures

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

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FEDERAL ELECTION COMMISSION
Washington, DC 20463

November 12, 1996

The Honorable Andrea H. Scastrand
320 Ebbtide Way
Pismo Beach, CA 93449

RE: MUR 4570

Dear Ms. Scastrand:

The Federal Election Commission received a complaint which indicates that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4570. Please refer to this number in all future correspondence.

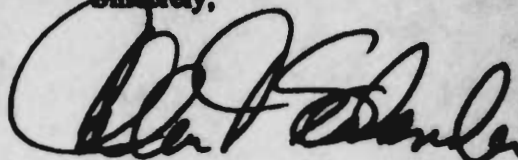
Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under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

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

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

Sincerely,



Colleen T. Sealander, Attorney
Central Enforcement Docket

Enclosures

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

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RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

NOV 23 2 26 PM '96
JOHN RONCA
MATTHEW S. KENNEDY

RONCA & KENNEDY

772 SANTA ROSA STREET
SAN LUIS OBISPO, CALIFORNIA 95001
(805) 544-0885 FAX (805) 544-1672

SANTA MARIA OFFICE
201 E. Miller, Suite 200
Santa Maria, CA 95404
(805) 348-7900

CARMENA OFFICE
(805) 927-0011

*Respond to the San
Luis Obispo Office

November 25, 1996

VIA FACSIMILE
[202] 219-3923
HARD COPY VIA U.S. MAIL
CERTIFIED MAIL P 294 359 845

Federal Election Commission
Att: Colleen T. Sealander, Attorney
General Counsel's Office
999 E Street NW
Washington, D.C. 20463

Re: MUR 4570
Congresswoman Andrea Seastrand

Dear Ms. Sealander:

As I have previously notified you in my letter dated November 8, 1996 in regards to MUR 4523, please be advised that this office represents Congresswoman Andrea Seastrand in regards to MUR 4570. Enclosed please find the *Statement of Designation of Counsel* signed by the Congresswoman for this matter. We are in receipt of your November 12, 1996 letter regarding the above referenced matter. My client received the same on or about November 14, 1996.

We have reviewed Mr. Wunder's letter complaint dated October 30, 1996. Mr. Wunder fails to set out any specific example of an alleged violation, and we are not able to discern what Mr. Wunder is referring to in regards to the alleged violations of law. We know of no facts that would be applicable to such allegations. Accordingly, the allegations of Mr. Wunder are denied entirely by Congresswoman Seastrand.

The Congresswoman takes such allegations seriously, and we would greatly appreciate more specific information regarding the allegations of Mr. Wunder. If Mr. Wunder has provided anything further that the Congresswoman can respond to, please forward the same to this office for further response, otherwise, and unless you advise us to the contrary, we will consider this matter resolved and closed. Please contact the undersigned in writing as to whether or not your office will concur with the Congresswoman's position in this regard.

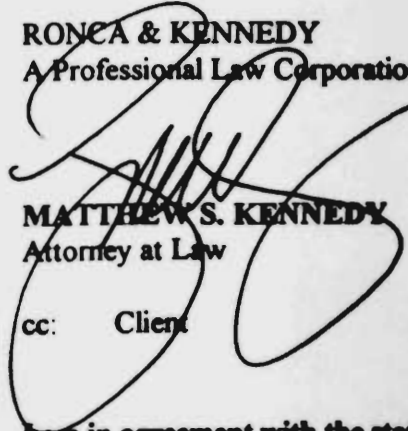
November 25, 1996

Page 2

Thank you for your anticipated cooperation. If you have any questions or comments concerning the foregoing, please do not hesitate to contact me.

Very truly yours,

RONCA & KENNEDY
A Professional Law Corporation


MATTHEW S. KENNEDY
Attorney at Law

cc: Client

I am in agreement with the statements of my counsel as found in this letter. The allegations by Mr. Wunder as found in his letter dated October 30, 1996, are categorically denied. I request that the Committee take no further action on this matter. I declare under penalty of perjury that the foregoing is true and correct. Executed this 26 day of November, 1996, at San Luis Obispo, State of California.


Andrea Seastrand

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STATEMENT OF DESIGNATION OF COUNSEL

MUR 4570

NAME OF COUNSEL: JOHN A. RONCA, JR. AND MATTHEW S. KENNEDY

FIRM: RONCA & KENNEDY, A PROFESSIONAL LAW CORPORATION

ADDRESS: 772 SANTA ROSA STREET

SAN LUIS OBISPO, CA 93401

TELEPHONE: (805) 544-8355

FAX: (805) 544-1672

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.

11/21/96
Date

Andrea Seastrand
Signature

RESPONDENT'S NAME: ANDREA SEASTRAND

ADDRESS: 320 JUSTICE WAY

PISMO BEACH, CA 93449

TELEPHONE: HOME (805) 773-9307

BUSINESS (805) 682-7870

980043863078

November 25, 1996

VIA Facsimile
(202) 219-3923
Hard Copy via U.S. Mail

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
DEC 9 10 49 AM '96

Federal Election Commission
Att: Colleen T. Sealander, Attorney
General Counsel's Office
999 E Street NW
Washington, DC 20463

Re: MUR 4570
Congresswoman Andrea Seastrand
Ralph C. Wunder letter dated October 30, 1996

Dear Ms. Sealander:

Please allow this letter to respond to your letter to me dated November 12, 1996. I understand that a similar letter, with the same attachments was sent to the Congresswoman.

I have read Mr. Wunder's October 30, 1996, letter to Mr. Lawrence Noble. I am unable to identify a single specific allegation to which Mr. Wunder bases his statements regarding an alleged violation, and I am not aware of any facts that would be applicable to Mr. Wunder's general statements. Therefore, I deny any such statements or implications by Mr. Wunder as found in his October 30, 1996, letter. I request that the Committee take no further action.

If Mr. Wunder has provided your office with any more specifics, please forward the same to the current treasurer, Mrs. Betty Presley, Treasurer, Friends of Andrea Seastrand for Congress, 1251 E. Dyer Road, 100, Santa Ana, CA 92705, for further investigation and comment; otherwise, and unless you advise us to the contrary, I will assume that this response is sufficient, and I need do nothing further.

Please respond to me in writing as to whether or not your office will need anything further from me in this regard.

Thank you for your anticipated cooperation. If you have any questions or comments concerning this foregoing, please do not hesitate to contact me.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 25th day of November 1996, at San Luis Obispo, State of California.

Sincerely,



Pete Agalos
626 Evans Road
San Luis Obispo, CA 93401

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

CASE CLOSURES UNDER
ENFORCEMENT PRIORITY

GENERAL COUNSEL'S REPORT

I. INTRODUCTION.

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

II. CASES RECOMMENDED FOR CLOSURE

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

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

Closing cases permits the Commission to focus its limited resources on more important cases presently

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

B. Stale Cases

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

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

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

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

³ These cases are: MUR 4350 (Republican Party of Minnesota); MUR 4355 (Aqua-Lessure Industries, Inc.); MUR 4372 (Nebraska Democratic Party); MUR 4394 (Americans for Term Limits); MUR 4472 (Committee to Elect Winston); MUR 4483 (Nebraska Democratic State Central Committee); MUR 4504 (NH Democratic State Party Committee); MUR 4507 (People for Bochnetz); MUR 4509 (Villstone for Senate); MUR 4565 (Bell for Congress); MUR 4570 (Congresswoman Andrea Semadeni); MUR 4571 (Seydri for Congress Committee); MUR 4572 (Friends of Dick B. Durbin); MUR 4575 (Dana Corrington); MUR 4585 (Hughes for Congress Committee); MUR 4589 (Congressman Bart Gordon); MUR 4592 (Howe Public Television); MUR 4593 (Public Interest Institute); MUR 4599 (Bruce W. Haymonick); MUR 4601 (Charter Nation of Oklahoma); MUR 4602 (WFSS-TV Channel 3); MUR 4604 (Dana Corrington); MUR 4605 (Christian Coalition); Pre-MUR 346 (Coalition of Politically Active Christians); RAD 96NF-09 (O'Sullivan for Congress); RAD 96L-12 (Alaska Democratic Party); and RAD 97NF-02 (Zien for Congress).

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

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

III. RECOMMENDATIONS.

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

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

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

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

2/1/98
Date

Lawrence M. Noble
General Counsel


98043863083



FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

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

DATE: FEBRUARY 19, 1998

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

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

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

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

This matter will be placed on the meeting agenda for
Tuesday, February 24, 1998.

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

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) Agenda Document
Case Closures Under) No. X98-13
Enforcement Priority)

CERTIFICATION

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

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

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

2. Decided by a vote of 5-0 to

A. Decline to open a MUR, close the file effective March 2, 1998, and approve the appropriate letters in the following matters:

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

(continued)

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

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

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

Attest:

2-25-98
Date

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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 2, 1998

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Ralph C. Wunder
421 N. Rodeo Drive #15
Beverly Hills, CA 90210

RE: MUR 4570

Dear Mr. Wunder:

On November 5, 1997, the Federal Election Commission received your complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act").

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

The Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437(g)(1)(B).

Sincerely,

A handwritten signature in dark ink, appearing to read "F. Andrew Tufley", is written over a horizontal line.

F. Andrew Tufley
Supervisory Attorney
Central Enforcement Docket

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 2, 1998

Ms. Betty Presley, Treasurer
Friends of Andrea Seastrand for Congress
P.O. Box 14002
San Luis Obispo, CA 93406

RE: MUR 4570

Dear Ms. Presley:

On November 12, 1996, the Federal Election Commission notified Pete Agalos, former treasurer, of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

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

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

If you have any questions, please contact Alva E. Smith on our toll-free telephone number, (800) 424-9530. Our local telephone number is (202) 694-1650.

Sincerely,

A handwritten signature in dark ink, appearing to read "F. Andrew Tarley", is written over a horizontal line.

F. Andrew Tarley
Supervisory Attorney
Central Enforcement Docket

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 2, 1998

Mr. John A. Ronca, Jr., Esquire
Mr. Matthew S. Kennedy, Esquire
Ronca & Kennedy
772 Santa Rosa Street
San Luis Obispo, CA 93401

RE: MUR 4570
The Honorable Andrea Seastrand

Dear Messrs. Ronca and Kennedy:

On November 12, 1996, the Federal Election Commission notified your client of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

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

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

If you have any questions, please contact Alva E. Smith on our toll-free telephone number, (800) 424-9530. Our local telephone number is (202) 694-1650.

Sincerely,

A handwritten signature in black ink, appearing to read "F. Andrew Turley", is written over a horizontal line.

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket

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FEDERAL ELECTION COMMISSION
WASHINGTON D C 20463

THIS IS THE END OF MUR # 4570

DATE FILMED 3/25/98 CAMERA NO. 2

CAMERAMAN EES

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20541

Date: 4/15/98

☒ Microfilm

☐ Press

THE ATTACHED MATERIAL IS BEING ADDED TO CLOSED MUR 4570

98040601029



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 14, 1998

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Ralph C. Wunder
701 Main Street, #307
Stroudsburg, PA 18360

RE: MUR 4570

Dear Mr. Wunder:

Enclosed, pursuant to our telephone conversation on April 8, 1998, is a copy of the complaint you filed dated October 30, 1996, and the acknowledgment letter we mailed to you on November 12, 1996. Also enclosed is the letter we mailed to your previous address informing you that the above-captioned Matter Under Review closed on March 2, 1998. As stated in our telephone conversation, that letter was returned to us because it could not be delivered as addressed.

Your letter dated October 30, 1996, was accepted and processed as a formal complaint under the Federal Election Campaign Act (FECA), 2 U.S.C. 439g, and our governing regulations, 11 C.F.R. Part 111. Your letter was in writing, signed and sworn to before a notary, contained a clear and concise recitation of facts which described one or more violations of the FECA, and clearly identified one or more persons alleged to have committed these violations. Your complaint was processed in accordance with specific procedures required by the FECA and by regulation. Once a matter has closed, 11 C.F.R. § 111.20 requires us to make public such action and the bases therefor no later than 30 days from the date the action was taken. All information from the case file not exempt from disclosure under the Freedom of Information Act, 5 U.S.C. 552, is available upon request from our Public Records office.

CLOSED

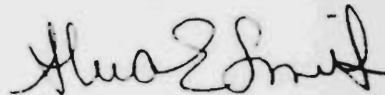
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Page 2

Mr. Ralph C. Wunder

If you wish to obtain a copy of the complete file, please contact Public Records at 1 (800) 424-9530. I may also be reached at that telephone number if you have additional questions.

Sincerely,



Alva E. Smith, Paralegal
Central Enforcement Docket

Enclosures

9804366031



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 2, 1998

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Ralph C. Wundler
4211 W. Rutheo Drive #15
Beverly Hills, CA 90210

RE MUR 4570

Dear Mr. Wundler:

On November 5, 1997, the Federal Election Commission received your complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act").

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

The Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437(g)(a)(8).

Sincerely,

F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket



FEDERAL ELECTION COMMISSION

Washington, DC 20463

November 12, 1996

Ralph C. Wunder
421 N. Rodeo Drive #15
Beverly Hills, CA 90210

RE: MUR 4670

Dear Mr. Wunder:

This letter acknowledges receipt on November 5, 1996, of the complaint you filed alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). The respondent(s) will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 4670. Please refer to this number in all future communications. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Colleen T. Sealander, Attorney
Central Enforcement Division

Enclosure
Procedures

Ralph C. Wunder
Washington, D.C. • Beverly Hills, CA.

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF THE CLERK

Nov 5 12 11 PM '96

(310) 840-1955
421 N. Rodeo Drive #15
Beverly Hills, CA. 90210

MUR 4570

Mr. Lawrence Noble
Chief Counsel
Federal Election Commission
999 E Street NW Room 657
Washington, D.C. 20463

October 30, 1996

Dear Mr. Noble:

I am writing to encourage an investigation by the Federal Election Commission of the same charges already now being examined by the U.S. Attorney's Office and the Federal Bureau of Investigation based on evidence and my first-hand knowledge of willful, criminal violations of federal election laws by Congresswoman Andrea Seastrand and her then taxpayer-funded Assembly staff during her 1994 Congressional campaign.

I know there was criminal intent that can be readily established, and I've already discussed the circumstances with a Federal Election Committee attorney in the recent past, as well as with my personal attorney. The essence of the charges --for which there is a preponderance of documentary evidence and corroborating testimony by the campaign's Finance Director and others-- is that with the Congresswoman's full knowledge, consent, complicity, and direction, her Assembly staff illegally used taxpayer money on an ongoing basis to advance her personal political agenda during the 1994 Congressional campaign.

These violations were systemic, on-going, and deliberate violations done at considerable expense to taxpayers, and executed in a conspiratorial manner with the full knowledge and consent of the candidate herself as well as the other participating offenders. These were not occasional and minor. They were deliberate and daily. Some of them were also felonies.

Please contact me at your earliest convenience that I may express to you in more detail what the U.S. Attorney's Office and FBI have already begun looking into.

I've taken the liberty to enclose a copy of my bio for your perusal. I've had a hand, as you can see, in electing several Members of Congress as a paid advisor, as

9 8 0 4 3 6 0 3 4

well as serving on the staffs of several Members of Congress and a Committee.

I've been involved in public service at the White House appointment level, and helped plan the national media coverage of Day One of Senator Dole's announcement tour for President last year. These days, I am the owner of a small, but successful television production company based in Santa Barbara.

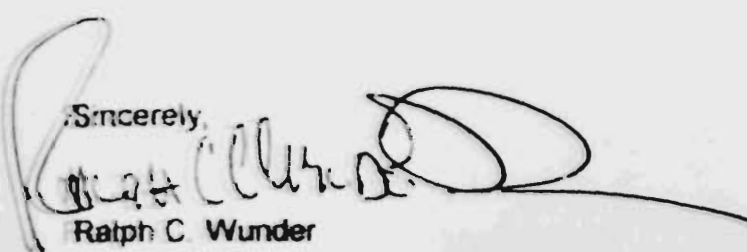
I will reserve discussing further names and circumstances until I am contacted by your office.

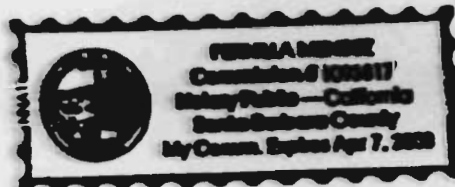
I am best reached at:

(805) 966-4770 - direct
(800) 691-9667 - pager
(805) 895-5300 - cellular phone
(310) 640-1955 - voice mail

Thank you. I await to hear from you.

Sincerely,


Ralph C. Wunder



Subscribed and sworn to before me
this 3rd DAY of October 1996
by Ralph C. Wunder
Patricia Mendez
NOTARY PUBLIC



FEDERAL ELECTION COMMISSION
Washington, D.C. 20468

Date: 3-30-98

MEMORANDUM

TO: A. Smith

FROM: The District Assistant

SUBJECT: Returned Letters

The following MUR 4570 letter was returned. If you wish to resend the letter, Please furnish ADDRESSED ENVELOPE(s) and/or green card(s), also, please write the corrected address in the space below.

ession

CERTIFIED

Old Address: _____

P 423 2nd St

MAIL

NOT DELIVERABLE
AS ADDRESSED
UNABLE TO RETURN

Not At This Mailbox
Return To Sender

Not At This Mailbox
Return To Sender

NOT DELIVERABLE
AS ADDRESSED
UNABLE TO RETURN

New Address: _____

Letter re-mailed: 4/14/98

701 Main Street #307

Stearnsburg, PA 15360

NOTES:

Called all telephone #s listed on complaint
no return call 4/14/98 - not in his search

called again 4/16

805 9166-41170 #

310 640-1955

4/18 He called back

#15 717 420-1111