



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mr. William J. Marvin, Treasurer  
Bill Morrow for Congress  
214 Avenida Las Brisas  
Oceanside, CA 92057

DEC 16 2000

RE: MUR 4971

Dear Mr. Marvin:

On February 17, 2000, the Federal Election Commission notified you 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 has determined to exercise its prosecutorial discretion and to take no action against Bill Morrow for Congress and you, as treasurer. See attached narrative. Accordingly, the Commission closed its file in this matter on October 25, 2000.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) 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 Donald E. Campbell 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 "Jeff S. Jordan", with a long horizontal flourish extending to the right.

Jeff S. Jordan  
Supervisory Attorney  
Central Enforcement Docket

Attachment: Narrative

MUR 4971

**BILL MORROW FOR CONGRESS**

Dale Neugebauer, Campaign Manager for Issa for Congress, alleged that the Bill Morrow for Congress committee ("the Committee") received prohibited contributions in the form of campaign work and consultant work for which the committee had not reported payments or, in the alternative, failed to itemize or report the disbursements in the 1999 Year End Report. Mr. Neugebauer was also concerned that the Committee showed insufficient expenditures for fundraising costs and candidate trips.

The Committee responded that the work done was on a contractual basis, with payment to be made at specific times for each consultant. Most of the payments were not due until after December 31, 1999, and therefore were not disclosed in the Year End Report. The Committee stated that the payments and debts were reported in a timely manner. As to the allegation that the Committee failed to disclose expenditures for fundraising costs and candidate travel, the Committee replied that most fundraising was done by way of personal meetings and phone calls. Therefore, the only expenditures for fundraising were to the phone company, as reported by the Committee in its Year End Report. Mr. Morrow paid for transportation to Washington with frequent flyer miles and did not request reimbursement. The value of this flight was less than \$1,000. Mr. Morrow paid for his lodging and submitted invoices for it, but decided against seeking reimbursement. Therefore, the Committee reported this as an in-kind contribution in its Pre-Election report, since Mr. Morrow submitted invoices after January 1, 2000.

Shortly after filing the complaint with the Commission, Mr. Neugebauer requested that the Commission cease its investigation based on review of subsequently filed reports, which appeared to resolve his concerns.

This matter is less significant relative to other matters pending before the Commission, and evidences no serious intent to violate FECA.