



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-3

December 15, 1994

James A. Henry, Treasurer
J.G. Boswell Company Employees'
Political Action Committee
333 South Hope Street, Suite 4600
Los Angeles, CA 90071

Identification Number: C00082677

Reference: October Quarterly (7/1/94-9/30/94) and 12 Day
Pre-General (10/1/94-10/19/94) Reports

Dear Mr. Henry:

This letter is to inform you that as of December 14, 1994, the Commission has not received your response to our request for additional information, dated November 23, 1994. This notice request information essential to full public disclosure of your federal election campaign finances. To ensure compliance with provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Terry Reynolds on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,

A handwritten signature in cursive script, appearing to read "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

9403235436



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

8Q-2

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333 South Hope Street, Suite 4600
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NOV 23 1994

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Reference: October Quarterly (7/1/94-9/30/94) and 12 Day Pre-
General (10/1/94-10/19/94) Reports

Dear Mr. Henry:

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:

-On Schedule A, supporting Line 11(a)(i) of the Detailed Summary Page, your report disclosed contributions from numerous trust funds (pertinent portions attached). Please amend your report to include the full name of the contributor. (11 CFR §110.1(i)(2))

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Terry Reynolds

Terry Reynolds
Reports Analyst
Reports Analysis Division

9403953437

U.S. DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
Form 1099-INT (1994)
Interest Income Statement

A. Payer's Name (Print or Type) 1701 Elginville Blvd Concord, CA 94520	Payer's EIN	Payer's State	Payer's ZIP Code
B. Full Name, Mailing Address and ZIP Code Ernest M. Clark, Sr. 1101 Elginville Plaza, Suite D Concord, CA 94520	Name of Employer None	Date (month, day, year) 01/29/94	Amount of Cash Payments Made \$ 0.00
C. Full Name, Mailing Address and ZIP Code Ernest M. Clark, Sr. 1101 Elginville Plaza, Suite D Concord, CA 94520	Name of Employer None	Date (month, day, year) 01/29/94	Amount of Cash Payments Made \$ 2,576.00
D. Full Name, Mailing Address and ZIP Code Anderson D. Workin P. O. Box 1787 Gastonia, NC 28033	Name of Employer Private Mail President & CEO	Date (month, day, year) 01/29/94	Amount of Cash Payments Made \$ 500.00
E. Full Name, Mailing Address and ZIP Code Wallace A. Erickson 18801 Deepview Lane Contra Costa, CA 94734	Name of Employer None Fidelity	Date (month, day, year) 01/29/94	Amount of Cash Payments Made \$ 500.00
F. Full Name, Mailing Address and ZIP Code Susan W. Dahn P.O. River Ranch Road 8408 County Road Hillsboro, NC 27527	Name of Employer None Hollandsville	Date (month, day, year) 01/29/94	Amount of Cash Payments Made \$ 4,000.00
G. Full Name, Mailing Address and ZIP Code Joseph B. Larson 640 West Santa Ines Avenue Hillsborough, CA 94010	Name of Employer None Hollandsville	Date (month, day, year) 01/29/94	Amount of Cash Payments Made \$ 2,000.00

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SUBTOTAL of Receipts This Page (optional) \$13,982.00

TOTAL This Period (see page 10b for number only) \$13,982.00

9409273697

A. Recipient Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Received (See Form 1042-S)
James M. Minkley 5025 Ave 50th Phoenix, AZ 85044 Recipient for: <input type="checkbox"/> Primary <input type="checkbox"/> Spouse <input type="checkbox"/> Other (specify)	Minkley Law Firm Phoenix, AZ 85004 Aggregate Year-to-Date > 1 1,000.00	02/28/04	\$ 4,000.00
Allen P. Minkley 6726 N. 25th Avenue Phoenix, AZ 85018 Recipient for: <input type="checkbox"/> Primary <input type="checkbox"/> Spouse <input type="checkbox"/> Other (specify)	Minkley Phoenix, AZ 85004 Aggregate Year-to-Date > 1 1,000.00	02/28/04	\$ 1,000.00
Father-Son Trust 1101 Eugenia Place, Suite D Carpinteria, CA 93013 Recipient for: <input type="checkbox"/> Primary <input type="checkbox"/> Spouse <input type="checkbox"/> Other (specify)	Minkley Phoenix, AZ 85004 Aggregate Year-to-Date > 1 1,000.00	02/28/04	\$ 1,000.00
Ernest M. Clark, Jr. Trust 1101 Eugenia Place, Suite D Carpinteria, CA 93013 Recipient for: <input type="checkbox"/> Primary <input type="checkbox"/> Spouse <input type="checkbox"/> Other (specify)	Minkley Phoenix, AZ 85004 Aggregate Year-to-Date > 1 1,702.00	02/28/04	\$ 1,702.00
Michael-Nephew Trust 1101 Eugenia Place, Suite D Carpinteria, CA 93013 Recipient for: <input type="checkbox"/> Primary <input type="checkbox"/> Spouse <input type="checkbox"/> Other (specify)	Minkley Phoenix, AZ 85004 Aggregate Year-to-Date > 1 2,000.00	02/28/04	\$ 2,000.00
Father-Daughter Trust 1101 Eugenia Place, Suite D Carpinteria, CA 93013 Recipient for: <input type="checkbox"/> Primary <input type="checkbox"/> Spouse <input type="checkbox"/> Other (specify)	Minkley Phoenix, AZ 85004 Aggregate Year-to-Date > 1 1,000.00	02/28/04	\$ 1,000.00
Michael-Nephew Trust 1101 Eugenia Place, Suite D Carpinteria, CA 93013 Recipient for: <input type="checkbox"/> Primary <input type="checkbox"/> Spouse <input type="checkbox"/> Other (specify)	Minkley Phoenix, AZ 85004 Aggregate Year-to-Date > 1 2,000.00	02/28/04	\$ 2,000.00
GRAND TOTAL of Receipts This Page (colored)			\$11,004.00
TOTAL This Form (See page 610 for number 049)			

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 1
FOR LINE NUMBER 118

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)

J. G. Roswell Company Employees' Political Action Committee

93463395356402

A. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
James E. McInerney 180 Sequoia Drive Pasadena, CA 91105 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Day, Simonds & McInerney Insurance Broker Aggregate Year-to-Date > \$ 300.00	10/04/94	\$ 300.00
B. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Cynthia Dulin Hart 237 S. Spring Avenue LaGrange, IL 60525 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	None Housewife Aggregate Year-to-Date > \$ 300.00	10/04/94	\$ 300.00
C. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Cynthia Clark Mitchell Trust 1101 Eugenia Place, Suite D Cambridge, CA 93013 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	None Retired Aggregate Year-to-Date > \$ 6,000.00	10/04/94	\$6,000.00
D. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
None Voll Box 1747 Cambria, CA 93428-1747 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	None Retired Aggregate Year-to-Date > \$ 750.00	10/11/94	\$ 750.00
E. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Dave Coyns 9005 Montzedy Bakersfield, CA 93311 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	J. G. Roswell Company Branch Manager Aggregate Year-to-Date > \$ 300.00	10/04/94	\$ 300.00
F. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

\$6,550.00

(1) Contributions by spouses and minor children. (i) The limitations on contributions of this section shall apply separately to contributions made by each spouse even if only one spouse has income.

(ii) Minor children (children under 18 years of age) may make contributions to any candidate or political committee which in the aggregate do not exceed the limitations on contributions of this section. If—

(I) The donation to contribute is made knowingly and voluntarily by the minor child;

(ii) The funds, goods, or services contributed are owned or controlled exclusively by the minor child, such as income earned by the child, the proceeds of a trust for which the child is the beneficiary, or a savings account opened and maintained exclusively in the child's name; and

(iii) The contribution is not made from the proceeds of a gift, the purpose of which was to provide funds to be contributed, or is not in any other way controlled by another individual.

(j) Application of limitations to elections. (i) The limitations on contributions of this section shall apply separately with respect to each election as defined in 11 CFR 100.3, except that all elections held in a calendar year for the office of President of the United States (except a general election for that office) shall be considered to be one election.

(ii) An election in which a candidate is unopposed is a separate election for the purpose of the limitations on contributions of this section.

(iii) A primary or general election which is not held because a candidate is unopposed or received a majority of votes in a previous election is a separate election for the purpose of the limitations on contributions of this section. The date on which the election would have been held shall be considered to be the date of the election.

(iv) A primary election which is not held because a candidate was nominated by a caucus or convention with authority to nominate is not a separate election for the purpose of the limitations on contributions of this section.

(k) Joint contributions and reattributions. (i) Any contribution

made by more than one person, except for a contribution made by a partnership, shall include the signature of each contributor on the check, money order, or other negotiable instrument or in a separate writing.

(ii) If a contribution made by more than one person does not indicate the amount to be attributed to each contributor, the contribution shall be attributed equally to each contributor.

(iii) If a contribution to a candidate or political committee, either on its face or when aggregated with other contributions from the same contributor, exceeds the limitations on contributions set forth in 11 CFR 100.1(b), (c) or (d), as appropriate, the treasurer of the recipient political committee may ask the contributor whether the contribution was intended to be a joint contribution by more than one person.

(iv) A contribution shall be considered to be reattributed to another contributor if—

(A) The treasurer of the recipient political committee asks the contributor whether the contribution is intended to be a joint contribution by more than one person, and informs the contributor that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution; and

(B) Within sixty days from the date of the treasurer's receipt of the contribution, the contributor provides the treasurer with a written reattribution of the contribution, which is signed by each contributor, and which indicates the amount to be attributed to each contributor if equal attribution is not intended.

(l) Supporting evidence. (i) If a political committee receives a contribution designated in writing for a particular election, the treasurer shall retain a copy of the written designation, as required by 11 CFR 100.1(b)(4) or 100.3(b)(4), as appropriate. If the written designation is made on a check or other written instrument, the treasurer shall retain a full-size photocopy of the check or written instrument.

(ii) If a political committee receives a written redesignation of a contribution for a different election, the treasurer shall retain the written redesignation provided by the contributor, as re-

quired by 11 CFR 100.3(b)(4), as appropriate.

(ii) If a political committee writes reattribution of: to a different recipient or shall retain reattribution signed by contributor, as required by 11 CFR 100.3(b)(4).

(iii) If a political committee to rely on a postmark: the date on which a-see made, the treasurer shall envelope or a copy of the containing the postmark as being information.

(iv) If a political committee retain the written resignation required by 100.1(c)(2), the contributor considered to be design for a particular election: news of 11 CFR 100.3(b)(4)(ii) shall appropriate committee does not records concerning reattribution required 100.1(c)(2), (3) or (4), 1 or reattribution shall and the original design tion shall control.

(v) For each written reattribution of described in paragraph (k)(2) of this section committee shall retention demonstrating reattribution or written was received. Each shall consist of:

(i) A copy of the original postmark and the date or return address or address; or

(ii) A copy of the written or written reattribution date stamp indicating committee's receipt; or

(iii) A copy of the written or written reattribution the contributor.

(m) Contributions to delegate committees. (i) C delegates for the purpose their selection under 1 not subject to the limitations of this section.

(ii) Contributions to delegates under 11 CFR 1 to the limitations of this

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