22037710538

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2002 AUG 23 A 10:59

Raytheon

Alfred C. Phillips
Senior Corporate Counsel
781 860 2506
FAX 781 860 3699

Raytheon Company
Office of the General Counsel
141 Spring Street
Lexington, Massachusetts
02421 USA

August 21, 2002
02-71-ACP

Mr. John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
Washington, D.C.

RE: Identification Number: C00097568
Reference: June Monthly Report (5/1/02-5/31/02)

Dear Mr. Gibson:

I am responding to your letter of August 15, 2002, enclosing a copy of an earlier letter, dated July 24, 2002, from Julie Perry, Reports Analyst, advising that the Commission's preliminary review of the Raytheon PAC's June monthly report, covering May 1, 2002 through May 31, 2002, disclosed that the PAC may have contributed more than $5,000 in the same election to a candidate for federal office. To the best of our knowledge, the June 24 letter did not reach the responsible parties and, consequently, there was no timely response to Ms. Perry's letter.

In any event, at issue is a contribution of $2,500 made on March 26, 2001 to Jane Harmon to retire debt incurred in the 2000 election and a check of $5,000 made on May 1, 2002 to the Jane Harmon (CA-36-D) campaign. Since these two contributions were made for separate elections, no violation of the contribution limits occurred. Our technical consultant advises us that the print engine previously used by the FEC was unable to record prior campaigns. Therefore, in the absence of a reference to the election for which the March 26, 2001 contribution was made Ms. Perry must have inferred that it was made in connection with the 2002 general election. Using the new print engine it is clear that the March 26, 2001 contribution was made for debt retirement in the 2000 general campaign.

Attached are: copies of the report filed by the PAC for each of the two contributions in question as submitted with Ms. Perry's letter of July 24, 2002 (Exhibits A and B); the PAC's records showing the checks (Exhibit C); and the March 26, 2001 contribution as obtained by our technical consultant from the FEC website using the new print engine (Exhibit D). We believe it is quite clear from this documentation that no violation of the contribution limits occurred. If you have any questions or need further information, please let me know. I can be reached at 781-860-2506 or by e-mail (alfred_c_phillips@raytheon.com).

Best regards,

A. C. Phillips

Alfred C. Phillips

ACP/mpo
Attachments
Cc: Julie Perry

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

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

FOR LINE NUMBER: (check only one)
☐ 21b ☐ 22 ☒ 23 ☐ 24 ☐ 25
☐ 26 ☐ 27 ☐ 28a ☐ 28b ☐ 28c ☐ 29

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NAME OF COMMITTEE (In Full)
Raytheon Company Political Action Committee

A. Full Name (Last, First, Middle Initial)
Friends of Jane Harman

Mailing Address
PO Box 843

City: Torrance State: CA Zip Code: 90508

Purpose of Disbursement
Debt Retirement

Candidate Name
Jane Harman (CA-36-D)

24K Category/Type

Office Sought: X House ☐ Senate ☐ President

State: CA District: 36

Disbursement For: ☐ Primary X General ☐ Other (specify)

Date of Disbursement: 03/26/2001

Amount of Each Disbursement this Period: 2500.00

Debt Retirement

Transaction ID: D842

B. Full Name (Last, First, Middle Initial)
Committee to Elect Lindsey Graham

Mailing Address
PO Box 1155

City: Seneca State: SC Zip Code: 29679

Purpose of Disbursement
Contribution: Lindsey O. Graham (SC-3-R)

Candidate Name
Lindsey O. Graham (SC-3-R)

24K Category/Type

Office Sought: X House ☐ Senate ☐ President

State: SC District: 3

Disbursement For: X Primary ☐ General ☐ Other (specify)

Date of Disbursement: 03/26/2001

Amount of Each Disbursement this Period: 1000.00

Contribution: Lindsey O. Graham (SC-3-R)

Transaction ID: D843

C. Full Name (Last, First, Middle Initial)
Committee For Guam's Voice In Congress

Mailing Address
PO Box 2631

City: Agana State: GU Zip Code: 96932

Purpose of Disbursement
Returned Check #5541 dated 10/23/2000 to

Candidate Name
Robert A. Underwood (GU-D)

24K Category/Type

Office Sought: X House ☐ Senate ☐ President

State: GU District: 0

Disbursement For: ☐ Primary X General ☐ Other (specify)

Date of Disbursement: 03/29/2001

Amount of Each Disbursement this Period: -500.00

Returned Check #5541 dated 10/23/2000

Transaction ID: D951

SUBTOTAL of Receipts This Page (optional) ▶ 3000.00

TOTAL This Period (last page this line number only) ▶

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

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

FOR LINE NUMBER: (check only one)
☐ 21b ☐ 22 ☒ 23 ☐ 24 ☐ 25
☐ 26 ☐ 27 ☐ 28a ☐ 28b ☐ 28c ☐ 29

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NAME OF COMMITTEE (In Full)
Raytheon Company Political Action Committee

A. Full Name (Last, First, Middle Initial)
Jo Ann Davis for Congress Committee

Mailing Address
PO Box 1834
City: Yorktown | State: VA | Zip Code: 23692

Purpose of Disbursement
Contribution: Jo Ann Davis (VA-1-R)

Candidate Name
Jo Ann Davis (VA-1-R)

Office Sought: X House / Senate / President
State: VA District: 1

Disbursement For: 2002 Primary X General Other (specify) ▼

Date of Disbursement: 05 / 01 / 2002

Amount of Each Disbursement this Period: 1000.00

Category/Type: Contribution: Jo Ann Davis (VA-1-R)

Transaction ID: D1425

B. Full Name (Last, First, Middle Initial)
Lipinski for Congress

Mailing Address
5838 S. Archer Avenue
City: Chicago | State: IL | Zip Code: 60638

Purpose of Disbursement
Contribution: William O. Lipinski (IL-3-

Candidate Name
William O. Lipinski (IL-3-D)

Office Sought: X House / Senate / President
State: IL District: 3

Disbursement For: 2002 Primary X General Other (specify) ▼

Date of Disbursement: 05 / 01 / 2002

Amount of Each Disbursement this Period: 1000.00

Category/Type: Contribution: William O. Lipinski (IL-3-D)

Transaction ID: D1426

C. Full Name (Last, First, Middle Initial)
Friends of Jane Harman

Mailing Address
PO Box 95
City: Torrance | State: CA | Zip Code: 90507

Purpose of Disbursement
Contribution: Jane Harman (CA-36-D)

Candidate Name
Jane Harman (CA-36-D)

Office Sought: X House / Senate / President
State: CA District: 36

Disbursement For: 2002 Primary X General Other (specify) ▼

Date of Disbursement: 05 / 01 / 2002

Amount of Each Disbursement this Period: 5000.00

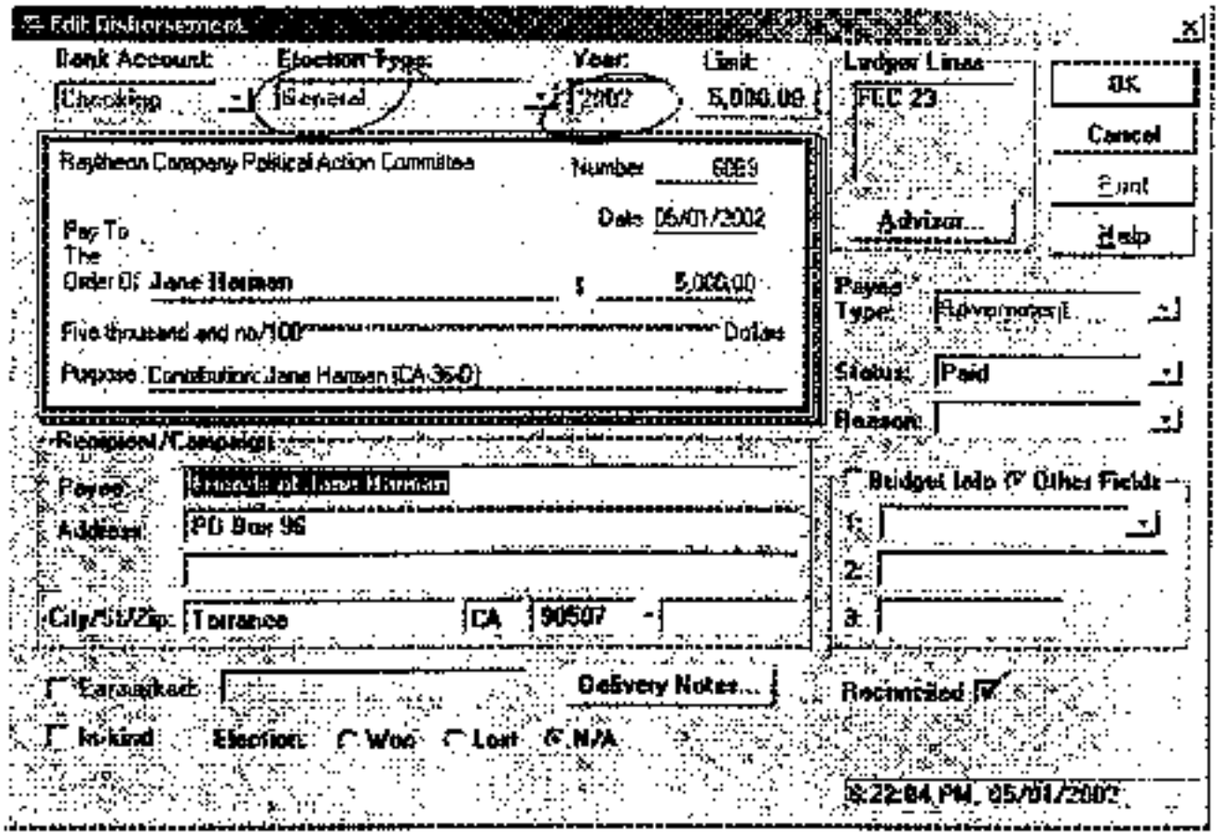
Category/Type: Contribution: Jane Harman (CA-36-D)

Transaction ID: D1427

SUBTOTAL of Disbursements This Page (optional) ▶ 7000.00

TOTAL This Period (last page this line number only) ▶

Exhibit C


Edit Disbursement
Bank Account:
Checking
Election Type:
General
Year:
2002
Limit:
5,000.00
Ledger Lines
FEC 23
OK
Cancel
Print
Help
Advisor...
Raytheon Company Political Action Committee
Number
6069
Date 05/01/2002
Pay To The Order Of Jane Harman
$ 5,000.00
Five thousand and no/100 Dollars
Purpose Contribution: Jane Harman (CA 36-D)
Payee Type:
Government
Status:
Paid
Reason:
Recipient/Campaign
Payee:
Friends of Jane Harman
Address:
PO Box 96
City/St/Zip:
Torrance
CA
90507
Budget Info
Other Fields
1:
2:
3:
Earmarked:
Delivery Notes...
Reconciled
In-kind
Election:
Won
Lost
N/A
8:22:04 PM, 05/01/2002

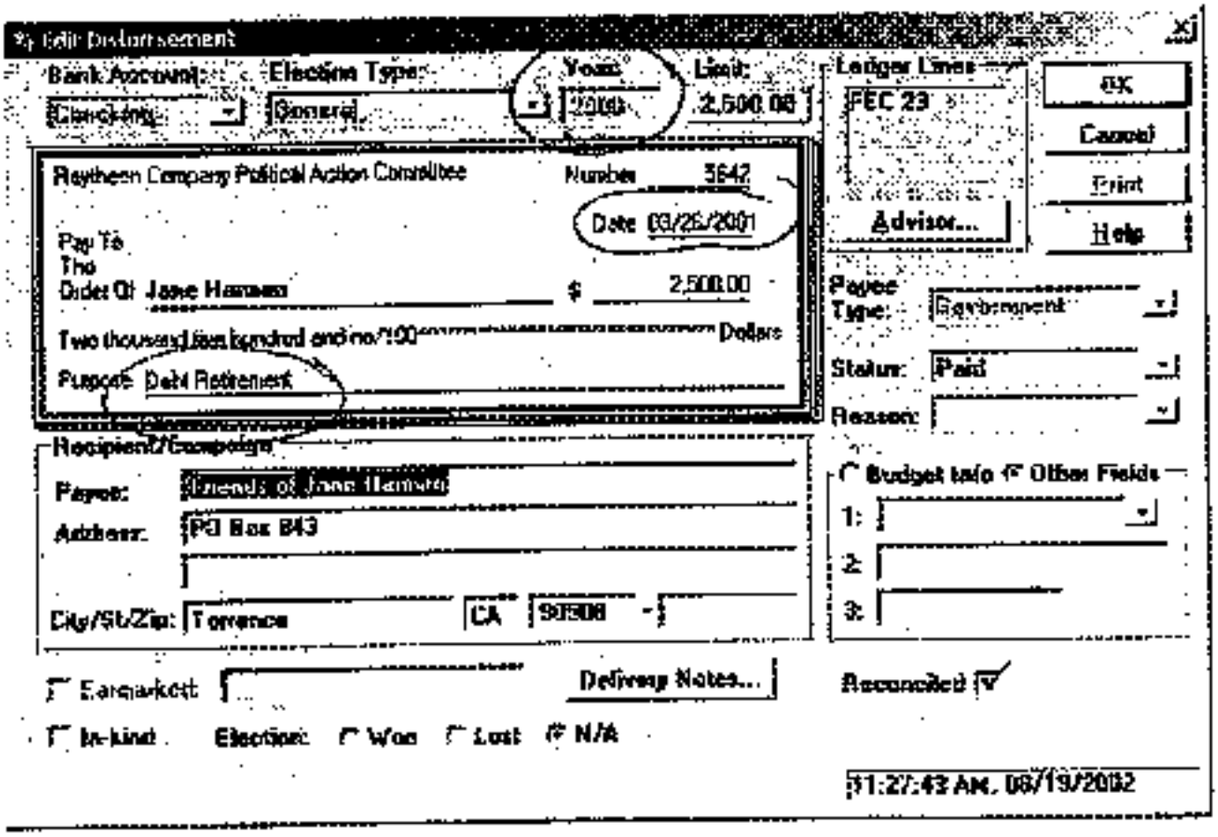

Edit Disbursement
Bank Account:
Checking
Election Type:
General
Year:
2000
Limit:
2,500.00
Ledger Lines
FEC 23
OK
Cancel
Print
Help
Advisor...
Raytheon Company Political Action Committee
Number
5642
Date 03/26/2001
Pay To The Order Of Jane Harman
$ 2,500.00
Two thousand five hundred and no/100 Dollars
Purpose Debt Retirement
Payee Type:
Government
Status:
Paid
Reason:
Recipient/Campaign
Payee:
Friends of Jane Harman
Address:
PO Box 843
City/St/Zip:
Torrance
CA
90508
Budget Info
Other Fields
1:
2:
3:
Earmarked:
Delivery Notes...
Reconciled
In-kind
Election:
Won
Lost
N/A
11:27:43 AM, 08/19/2002

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Exhibit D

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

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

FOR LINE NUMBER: (check only one) ☐ 21b ☐ 22 ☒ 23 ☐ 24 ☐ 25 ☐ 26 ☐ 27 ☐ 28a ☐ 28b ☐ 28c ☐ 29

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NAME OF COMMITTEE (In Full)
Raytheon Company Political Action Committee

A. Full Name (Last, First, Middle Initial)
Friends of Jane Harman

Mailing Address
PO Box 843

City: Torrance | State: CA | Zip Code: 90508

Purpose of Disbursement
Debt Retirement

Candidate Name
Jane Harman (CA-36-D)

Category/Type: 24K

Office Sought: X House ☐ Senate ☐ President
State: CA District: 36

Disbursement For: 2000 ☐ Primary X General ☐ Other (specify)

Date of Disbursement: 03 / 26 / 2001

Amount of Each Disbursement this Period: 2500.00

Debt Retirement

Transaction ID: D842

B. Full Name (Last, First, Middle Initial)
Committee to Elect Lindsey Graham

Mailing Address
PO Box 1156

City: Seneca | State: SC | Zip Code: 29679

Purpose of Disbursement
Contribution: Lindsey O. Graham (SC-3-R)

Candidate Name
Lindsey O. Graham (SC-3-R)

Category/Type: 24K

Office Sought: X House ☐ Senate ☐ President
State: SC District: 3

Disbursement For: 2002 X Primary ☐ General ☐ Other (specify)

Date of Disbursement: 03 / 26 / 2001

Amount of Each Disbursement this Period: 1000.00

Contribution: Lindsey O. Graham (SC-3-R)

Transaction ID: D843

C. Full Name (Last, First, Middle Initial)
Committee For Guam's Voice in Congress

Mailing Address
PO Box 2931

City: Agana | State: GU | Zip Code: 96932

Purpose of Disbursement
Returned Check #5541 dated 10/23/2000 to

Candidate Name
Robert A. Underwood (GU-D)

Category/Type: 24K

Office Sought: X House ☐ Senate ☐ President
State: GU District: 0

Disbursement For: 2000 ☐ Primary X General ☐ Other (specify)

Date of Disbursement: 03 / 26 / 2001

Amount of Each Disbursement this Period: -500.00

Returned Check #5541 dated 10/23/2000 for Robert A. Underwood (GU-D).

Transaction ID: D861

SUBTOTAL of Disbursements This Page (optional) ▶ 3000.00

TOTAL This Period (last page this line number only) ▶

FEC Schedule B (Revised 10/2001)

22037710543

Federal Election Commission

ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS

The Commission has added this page to the end of this filing to indicate how it was received.

☑	Hand Delivered	Date of Receipt 8-23-02
☐	First Class Mail	POSTMARKED
☐	Registered/Certified Mail	POSTMARKED (R/C)
☐	No Postmark	
☐	Postmark Illegible	
☐	Received from the House office of Records and Registration	Date of Receipt
☐	Received from the Senate Office of Public Records	Date of Receipt
☐	Other (Specify):	Postmarked _____ and/or Date of Receipt
☐	Electronic Filing	
PREPARER		DATE PREPARED 8-23-02

(6/2000)