



California Fair Political Practices Commission

September 26, 1989

James W. March, Esq.
AmBase Corporation of New York
59 Maiden Lane
New York, New York 10038

Re: Your Request For Advice
Our File No. A-89-520

Dear Mr. March:

You have requested confirmation of telephone advice provided to you on behalf of AmBase's California and Federal Political Action Committees concerning the campaign disclosure provisions of the Political Reform Act.

Your letter, dated August 31, 1989, correctly summarizes the advice I provided to you. A copy of your letter is enclosed for your convenience.

If you have any additional questions, please contact me at (916) 322-5662.

Sincerely,

Kathryn E. Donovan
General Counsel

By: Alice Hughes
Political Reform Consultant

Enclosure

54 Maiden Lane
New York NY 10038
212 530 6800

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AMBASE

August 31, 1989

Ms. Alice Hughes
State of California
Fair Political Practices Commission
428 J Street
Sacramento, CA 95814

Dear Ms. Hughes:

In accordance with our recent conversation, enclosed is my letter to Cindy Durham of the "Pete Wilson for Governor" campaign staff along with a copy of the check for the \$2,500 contribution to "Pete Wilson for Governor." Please note that the check was issued by AmBase's California Registered Political Action Committee (AmBase Political Action Committee of California). This contribution was made after we received reimbursement from the Wilson campaign of the \$2,500 contribution made by our Federal Political Action Committee (AmBase Corporation Political Action Committee).

The reimbursement to our Federal PAC and subsequent \$2,500 contribution by our California PAC completes the unwinding of a process that began with the \$2,500 contribution made to Pete Wilson from our Federal PAC in May, 1989. Shortly after this contribution was made, you informed me that a Federal PAC could contribute only \$1,000 to a candidate for state office in California. As noted in my correspondence of July 12, and in accordance with our earlier discussion, we attempted to correct this error by having our California PAC reimburse our Federal PAC for the \$2,500 contribution it made to Pete Wilson.

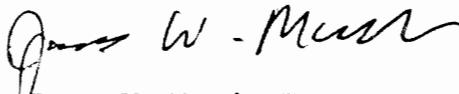
In late July, I asked Stephanie Fitzgerald of the Federal Elections Commission (FEC) how the \$2,500 contribution should be reported in our semi-annual FEC filing. Ms. Fitzgerald informed me that we should not have reimbursed our Federal PAC since FEC regulations prohibit transfers from non-federal accounts. Although Ms. Fitzgerald understood that the transfer was not made to circumvent the FEC rule, she strongly advised that we transfer the money back to the California PAC. We followed Ms. Fitzgerald's advice and on August 9, 1989 our Federal PAC issued a \$2,500 check to our California PAC.

Ms. Alice Hughes
August 31, 1989
Page 2

The \$2,500 Federal PAC contribution and the \$2,500 transfer from the California PAC to the Federal PAC both took place prior to July 1, 1989 and were therefore reported in the Form 420 semi-annual filing covering the January 1, 1989 - June 30, 1989 period. The reimbursement by Wilson of the \$2,500 Federal PAC contribution and the \$2,500 contribution by the California PAC to Wilson were made after July 1, 1989 and will therefore be reported in the next Form 420 semi-annual statement, to be submitted by January 31, 1990. Please advise if we should submit any other official report of these post July 1, 1989 transactions.

On behalf of the AmBase Corporation, I thank you for your patience and understanding. Your assistance has been invaluable.

Sincerely,



James W. March, Esq.

JWM:lr

cc: Carol McCluskey - 27
Robert Thomson - 27

AMBASE

August 31, 1989

Ms. Cindy Durham
Pete Wilson for Governor
2551 San Diego Avenue
Suite B200
San Diego, CA 92110

Re: Political Contribution

Dear Ms. Durham:

We have received the reimbursement of the \$2,500 contribution made by our Federal Political Action Committee (AmBase Corporation Political Action Committee) and enclose a \$2,500 contribution made by our California Political Action Committee (AmBase Political Action Committee of California).

On behalf of AmBase Corporation, I apologize for any inconvenience we may have caused and thank you for your patience and understanding.

Sincerely,



James W. March

JWM:lr

Enclosure

cc: C. McCloskey - 27
R. Thomson - 27

AMBASE CORP.
POLITICAL ACTION COMMITTEE OF CALIFORNIA
("AMBASE CAL PAC")
59 MAIDEN LN.
NEW YORK, NY 10038

No. 2001

August 25 19 89

1-8
21035

PAY
TO THE ORDER OF Pete Wilson for Governor - 1990

\$ 2,500.00

Two thousand five hundred and no/100 ----- DOLLARS

Citibank, N.A. Br. #35 **CITICORP** **CITIBANK**
107 William Street at John Street
New York, N.Y.
10038

Robert E. Brown
James W. Maddy

FOR _____

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57 Madison Lane
New York, NY 10038
212 30 6800

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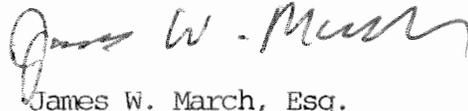
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On behalf of the AmBase Corporation, I thank you for your patience and understanding. Your assistance has been invaluable.

Sincerely,

A handwritten signature in dark ink, appearing to read "James W. March". The signature is fluid and cursive, with a large initial "J" and "M".

James W. March, Esq.

JWM:lr

cc: Carol McCluskey - 27
Robert Thomson - 27

AMBASE

August 31, 1989

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Pete Wilson for Governor
2551 San Diego Avenue
Suite B200
San Diego, CA 92110

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James W. March

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Robert G. Brown
James W. Mally

FOR _____

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California Fair Political Practices Commission

September 6, 1989

James W. March
AmBase Corporation of New York
59 Maiden Lane
New York, NY 10038

Re: Letter No. 89-520

Dear Mr. March:

Your letter requesting advice under the Political Reform Act was received on September 1, 1989 by the Fair Political Practices Commission. If you have any questions about your advice request, you may contact me directly at (916) 322-5662.

We try to answer all advice requests promptly. Therefore, unless your request poses particularly complex legal questions, or more information is needed, you should expect a response within 21 working days if your request seeks formal written advice. If more information is needed, the person assigned to prepare a response to your request will contact you shortly to advise you as to the information needed. If your request is for informal assistance, we will answer it as quickly as we can. (See Commission Regulation 18329 (2 Cal. Code of Regs. Sec. 18329).)

You also should be aware that your letter and our response are public records which may be disclosed to the public upon receipt of a proper request for disclosure.

Very truly yours,

Jeanne Pritchard
Jeanne Pritchard
Chief Technical Assistance
and Analysis Division

JP:plh