



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 1668

Date Filmed 1/10/85 Camera No. --- 2

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FEDERAL ELECTION COMMISSION

Routing cards & slips ; 12 Day Report &

Comments ; 12 Day Pre-Brief Report & Comments ;

(2) Conciliation reports ; Conciliation correspondence.

Commissioner's objection memo

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act; 5 U.S.C. Section 552(b):

- | | | | |
|-------------------------------------|---|--------------------------|--|
| <input type="checkbox"/> | (1) Classified Information | <input type="checkbox"/> | (6) Personal privacy |
| <input type="checkbox"/> | (2) Internal rules and practices | <input type="checkbox"/> | (7) Investigatory files |
| <input type="checkbox"/> | (3) Exempted by other statute | <input type="checkbox"/> | (8) Banking Information |
| <input type="checkbox"/> | (4) Trade secrets and commercial or financial information | <input type="checkbox"/> | (9) Well Information (geographic or geophysical) |
| <input checked="" type="checkbox"/> | (5) Internal Documents | | |

Signed George Deming
date 1/7/85

FEC 9-21-77

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 11, 1984

Lucy Blake
Executive Director
California League of Conservation Voters
942 Market Street, Suite 606
San Francisco, California 94102

RE: MUR 1668

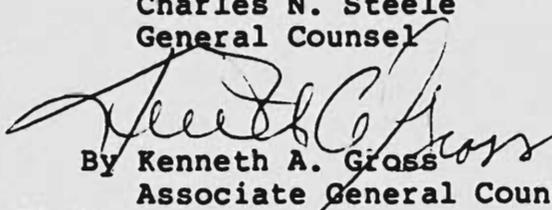
Dear Ms. Blake:

On December 7, 1984, the Commission accepted the conciliation agreement signed by your client, and a civil penalty in settlement of a violation of 2 U.S.C. § 434(a)(4)(A), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel


By Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

85040510467

RECEIVED AT THE FEC
GCC#5780
84 NOV 26 A 9: 09
NOV 26 12: 07
GENERAL COUNSEL

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
California League of) MUR 1668
Conservation Voters)
Nicholas L. Clinch, Treasurer)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the California League of Conservation Voters and Nicholas L. Clinch, as treasurer, ("CLCV" or "Respondent") violated 2 U.S.C. § 434(a)(4)(A) by failing to file five reports in a timely manner.

NOW, THEREFORE, the Commission and Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

- 1. Respondent, CLVC is a political committee within the meaning of 2 U.S.C. § 431(4)(A).
- 2. Nicholas L. Clinch is the treasurer of CLCV.

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3. Pursuant to 2 U.S.C. § 434(a)(4)(A), a political committee filing quarterly reports in a calendar year in which a regularly scheduled general election is held is required, through its treasurer, to file such reports no later than the 15th day after the last day of each calendar quarter; except that the report for the quarter ending on December 31 of such calendar year shall be filed no later than January 31 of the following calendar year. In addition, the committee is required, through its treasurer, to file a pre-election report no later than the 12th day before any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election. In any other calendar year, the committee is required, through its treasurer, to file a mid-year report no later than July 31 and a year end report no later than January 31 of the following calendar year.

4. Respondent's 1981 Mid-Year report was required to be filed on July 31, 1981. Respondent filed its 1981 Mid-Year report on February 16, 1982, which was 200 days late.

5. Respondent's 1981 Year-End report was required to be filed on January 31, 1982. Respondent filed its 1981 Year End Report on February 16, 1982, which was 16 days late.

6. Respondent's 1982 April Quarterly report was required to be filed on April 15, 1982. Respondent filed

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its 1982 April Quarterly report on July 14, 1982, which was 90 days late.

7. Respondent's 1982 12 Day Pre-General report was required to be filed on October 21, 1982. Respondent filed its 1982 12 Day Pre-General report on November 1, 1982, which was 11 days late.

8. Respondent's 1982 Year End report was required to be filed on January 31, 1983. Respondent filed its 1982 Year End report on February 16, 1983, which was 16 days late.

V. Respondent violated 2 U.S.C. § 434(a)(4)(A) by failing to file its 1981 Mid-Year Report, 1981 Year End report, 1982 April Quarterly report, 1982 12 Day Pre-General report, and 1982 Year End report in a timely manner.

VI. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of five hundred dollars (\$500), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondents agree that it shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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IX. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

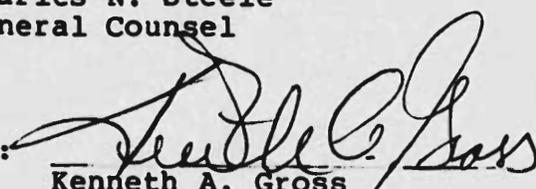
X. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

FOR THE COMMISSION:

Charles N. Steele
General Counsel

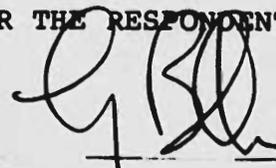
BY:


Kenneth A. Gross
Associate General Counsel

Date

Dec. 10, 1984

FOR THE RESPONDENT:



EXECUTIVE DIRECTOR
C.L.C.V.

Date

11/21/84

85040510471



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Lucy Blake
Executive Director
California League of Conservation Voters
942 Market Street, Suite 606
San Francisco, California 94102

RE: MUR 1668

Dear Ms. Blake:

On _____, the Commission accepted the conciliation agreement signed by your client, and a civil penalty in settlement of a violation of 2 U.S.C. § 434(a)(4)(A), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel

By Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

CS
12/10/84

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *CJ*
DATE: September 5, 1984
SUBJECT: MUR 1668 - Memorandum and General Counsel's Brief

The attached is submitted as an Agenda document
for the Commission Meeting of _____
Open Session _____
Closed Session _____

CIRCULATIONS

48 Hour Tally Vote []
Sensitive []
Non-Sensitive []
24 Hour No Objection []
Sensitive []
Non-Sensitive []
Information [x]
Sensitive [x]
Non-Sensitive []
Other []

DISTRIBUTION

Compliance [x]
Audit Matters []
Litigation []
Closed MUR Letters []
Status Sheets []
Advisory Opinions []
Other (see distribution below) []

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

84 SEP 5 AIO: 01

September 5, 1984

MEMORANDUM TO: The Commission

FROM: Charles N. Steele *CS*
General Counsel

SENSITIVE

SUBJECT: MUR 1668

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondent of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on September 5, 1984. Following receipt of the Respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Brief
2. Letter to Respondent

85040510474

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
 California League of) MUR 1668
 Conservation Voters)
 Nicholas Clinch, Treasurer)

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

The California League of Conservative Voters ("CLCV") failed to timely file five (5) Reports of Receipts and Disbursements for the 1981-82 election cycle. The filings were between 11 and 200 calendar days late. Listed below are the reports filed late, the date each was due, and the date each was filed.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
1981 Mid Year (1/1/81-6/30/81)	7/31/81	2/16/82
1981 Year End (7/1/81-12/31/81)	1/31/82	2/16/82
1982 April Quarterly ^{1/} (1/1/82-3/31/82)	4/15/82	7/14/82
1982 12 Day Pre-General ^{2/} (10/1/82-10/13/82)	10/21/82	11/1/82
1982 Year End (11/23/82-12/31/82)	1/31/83	2/16/83

A chronic late filing notice requesting reasons for the tardiness was sent to CLCV on December 14, 1983. On December 23, 1983, a response was received from Betty A. Mangual, CLCV's assistant treasurer. Ms. Mangual explained that she experienced some confusion when she became assistant treasurer. The 1982

^{1/} A separate 1982 April Quarterly Report was not filed; however, the 1982 "Mid-Year" Report included the activity for the period.

^{2/} This report was required, because CLCV made a \$5,000 contribution to a Federal candidate on October 5, 1982.

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Year End report was submitted late because she was ill. In the response, Ms. Mangual also mentioned that she mailed all reports return receipt requested, and that her records, although not entirely complete, support the timely filing of all original reports and amendments within the dates specified in letters from a phone conversation with the Reports Analyst.

The letter and phone conversations referred to by Ms. Mangual concern Requests for Additional Information on reporting problems. CLCV never received a notice regarding non-filing, nor was there any mention of non-filing or late filing during the phone conversation.

II. Legal Analysis

Pursuant to 2 U.S.C. § 434(a)(4)(A), a political committee filing quarterly reports in a calendar year in which a regularly scheduled general election is held is required, through its treasurer, to file such reports no later than the 15th day after the last day of each calendar quarter; except that the report for the quarter ending on December 31 of such calendar year shall be filed no later than January 31 of the following calendar year. In addition, the committee is required, through its treasurer, to file a pre-election report no later than the 12th day before any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election. In any other calendar year, the committee is required, through its treasurer, to file a mid year report no later than July 31 and a year end report no later than January 31 of the following

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calendar year.

On April 10, 1984, the Commission found reason to believe that CLCV and Nicholas B. Clinch, as treasurer, violated 2 U.S.C. § 434(a)(4)(A) by not timely filing reports.

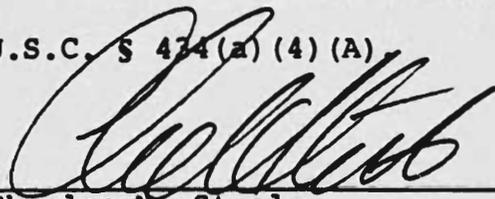
CLCV's response to the reason to believe finding restates its position. CLCV asks that the Commission take into consideration that CLCV's confusion concerning filing procedures was due to the hiring of a new assistant treasurer. After this initial confusion, CLCV points out that its reports were filed promptly.^{3/}

The violations in this case are clear. CLCV's explanation of "confusion" as to the reporting procedures is insufficient defense in light of the number of reports involved and the substantial financial activity covered in these reports. Accordingly, the Office of General Counsel recommends that the Commission find probable cause to believe that California League of Conservation Voters violated 2 U.S.C. § 434(a)(4)(A).

III. Recommendation

1. Find probable cause to believe that the California League of Conservation Voters and Nicholas B. Clinch, as treasurer, violated 2 U.S.C. § 434(a)(4)(A).

4 September 1984
Date



Charles N. Steele
General Counsel

^{3/} A review of the FEC Computer index indicates that CLCV's 1983 Mid-Year report was one day late, 1983 Year End report was three days late, 1984 April Quarterly report was one day late, and 1984 July Quarterly report was on time.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 5, 1984

Nicholas Clinch, Treasurer
California League of Conservation Voters
942 Market Street, Suite 606
San Francisco, California 94102

RE: MUR 1668

Dear Mr. Clinch:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by you the Federal Election Commission, on 1984, found reason to believe that the California League of Conservation Voters and you, as treasurer, had violated 2 U.S.C. § 434(a)(4)(A), and instituted an investigation in this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extensions beyond 20 days.

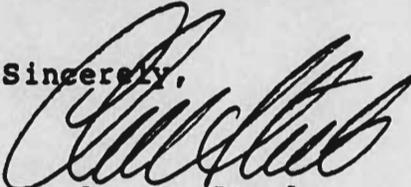
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Nicholas Clinch, Treasurer
Page 2

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety, days to settle this matter through a conciliation agreement.

Should you have any questions, please contact George Demougeot, the staff member assigned to handled this matter, at (202)523-4000.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief

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BOARD:

OFFICERS:

- Robert Girard
President
Stanford
- Charles Grace
Chairman of the Board
Santa Monica
- Bill Kortum
Northern Vice President
Petaluma
- Dorothy Green
Southern Vice President
Los Angeles
- George Wagner
Treasurer
Malibu
- Joan Jackson
Secretary
Carlsbad

MEMBERS

- Bettina Bancroft
Los Angeles
- Sen. Peter Behr
Inverness
- Maxine Brickman
Los Angeles
- Steve Boyle
Santa Barbara
- Nicholas B. Clinch
Palo Alto
- Sterling Franklin
Pasadena
- Dan Frost
Redding
- Ruth Galanter
Los Angeles
- Tom Graff
Berkeley
- Paul Growald
San Francisco
- Jane Hegedorn
Sacramento
- Tom Herbert
Los Angeles
- James Hoyt
Santa Monica
- Ira Laufer
Ventura
- Joann Leonard
Los Angeles
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- Dariene Mitchelltree
Playa Del Rey
- Mary Mitsui
San Raphael
- Larry Moss
Trinidad
- Judy Ortung
Riverside
- John Phillips
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- Bob Pownier
Los Angeles
- Bill Press
Inverness
- Carroll Pursell
Santa Barbara
- William Siri
Richmond
- Jeff Ward
San Diego
- John Zierold
Sacramento

STAFF

- Carl Pope
Oakland
- Lucy Blake
San Francisco
- Bill Plant
Los Angeles

May 1, 1984

Mr. George Demougeot
Federal Election Commission
Washington, DC 20463

*Mur 1668
Demougeot*

*MAY 14 1984
P.3:11*

Dear Mr. Demougeot:

The California League of Conservation Voters would like to request that the Federal Election Commission not find probable cause that CLCV has violated 2 U.S.C. 441b as suggested by the General Counsel's office.

We do not dispute the legal analysis of the General Counsel's office, nor do we dispute the factual findings as to the lateness of our report. However, we suggest that an overall review of the situation of the League during this period casts substantial doubt on the General Counsel's judgment that our explanation as to the reasons for our lateness is insufficient.

In order for an organization to file the required reports in a timely manner, it must have access to the information required in the reports. Ms. Mangual's predecessor as Financial Officer for the League, Ray Clark, was terminated in September, 1981, for his repeated inability to maintain the organization's books in an orderly manner and to prepare the required financial material for the Treasurer on the required schedule. Ms. Mangual inherited a financial house in great disorder, and made prompt efforts to rectify the situation. She had previously served as a full-service bookkeeper to a large commercial operation, and is the highest paid employee of CLCV, both of which are evidence of the seriousness of the organization attached to rectifying these problems.

Subsequent to her employment, Ms. Mangual has suffered significant health problems. This has on occasion complicated the task of preparing reports on a timely fashion. Both she and the organization have attempted to deal with these problems by handling the most important problems first. This is evidenced by the fact that when the Commission sent CLCV requests for additional information from the Reports Analyst, our records indicate, and the Commission does not disagree, the League responded in a timely fashion. At no point during these conversations and correspondence did the Commission staff indicate that the lateness of the filing was as serious a matter as is represented in the MUR. The League does not

THE POLITICAL ACTION ARM OF THE ENVIRONMENTAL COMMUNITY
942 MARKET STREET, SUITE 606, SAN FRANCISCO, CA 94102 (415) 397-7780
12217 SANTA MONICA BLVD., LOS ANGELES, CA 90025 (213) 826-8812
23-A MISSION STREET, SANTA BARBARA, CA 93101 (805) 682-4544
1800-A L STREET, SACRAMENTO, CA 95814 (916) 447-4371

assert that the Commission has an obligation to provide us with notice of this fact; we concede that the regulations require regular and timely filing of reports. But we believe the record indicates a good faith effort on our part, faced with a difficult situation, to comply to the best of our ability.

In addition, the League would like to point out that as Ms. Mangual corrected the situation she had inherited, our performance improved. After June 30, 1982, no report was more than 17 days late. The mid-year and annual reports for calendar 1983 were filed by the League in a prompt and timely manner. We believe that these facts indicate that the League has made substantial and good faith efforts to comply with the requirements of the Commission, and that there is thus insufficient basis to find probable cause that a violation has occurred.

Sincerely yours,

Nick Clinch

Nicholas Clinch Treasurer CLCV

85040510481

EXPRESS MAIL
NEXT DAY SERVICE

POST OFFICE TO ADDRESSEE

FROM:

Nicholas Clinch, Treas.
Cal. League of Conservation
Voters
942 Market St., Suite 606
San Francisco, CA 94102

Customer Number, if any:

TO:

Mr. George Demougeot
Federal Election Commission
Washington, DC 20463

ORIGIN:

Initials of
Receiving
Clerk:

P.O. ZIP

Date in:

Time in:

Weight:

Postage

1 Lbs

\$9 35

DESTINATION:

Date of
Delivery:

5-14

Time of
Delivery:

11:30

Initials of
Delivering Employee:

[Handwritten initials]

Signature of Addressee or Agent:

[Handwritten signature]

DELIVERY WAS ATTEMPTED

Date

Time:

Notice Left By:

EXPRESS MAIL SERVICE



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Nicholas B. Clinch, Treasurer
California League of Conservation Voters
942 Market Street, Suite 606
San Francisco, California 94102

RE: MUR 1668

Dear Mr. Clinch:

On 1984, the Federal Election Commission determined that there is reason to believe that the California League of Conservation Voters ("the Committee") and you, as treasurer, have violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), by not timely filing reports. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the Committee. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against you and the Committee, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe, if so desired. See 11 C.F.R. § 111.18(d).

If you and the Committee intend to be represented by counsel in this matter, please advise the Commission by completing the

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Letter to Nicholas B. Clinch
Page 2

enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you and the Committee notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

85040510484

GD
4/10/84



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

34 APR 11 P 3: 59

April 11, 1984

SENSITIVE

MEMORANDUM TO: The Commission
FROM: Charles N. Steele
General Counsel
By: Kenneth A. Gross
Associate General Counsel *KAG*
SUBJECT: RAD Referral 84NF-15

On April 10, 1984 the Commission approved the recommendation that the subject RAD Referral be made a MUR. Therefore, all documents which had previously been identified as RAD Referral 84NF-15 should now become MUR #1668.

Attachment
Copy of Certification

85040510435

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
California League of Conservation)	RAD Referral 84NF-15
Voters)	
Nicholas B. Clinch, Treasurer)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 10, 1984, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 84NF-15:

1. Open a MUR.
2. Find reason to believe the California League of Conservation Voters and Nicholas B. Clinch, as treasurer, violated 2 U.S.C. § 434(a)(4)(A).
3. Approve the letter and analysis as attached to the First General Counsel's Report dated April 5, 1984.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter.

Attest:

4-10-84

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:
Circulated on 48 hour tally basis:

4-5-84, 5:03
4-6-84, 2:00

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
California League of Conservation Voters)	RAD Referral 84NF-15
Nicholas B. Clinch, Treasurer)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 10, 1984, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 84NF-15:

1. Open a MUR.
2. Find reason to believe the California League of Conservation Voters and Nicholas B. Clinch, as treasurer, violated 2 U.S.C. § 434(a)(4)(A).
3. Approve the letter and analysis as attached to the First General Counsel's Report dated April 5, 1984.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter.

Attest:

4-10-84
Date

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

Received in Office of Commission Secretary:
Circulated on 48 hour tally basis:

4-5-84, 5:03
4-6-84, 2:00

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 13, 1984

Nicholas B. Clinch, Treasurer
California League of Conservation Voters
942 Market Street, Suite 606
San Francisco, California 94102

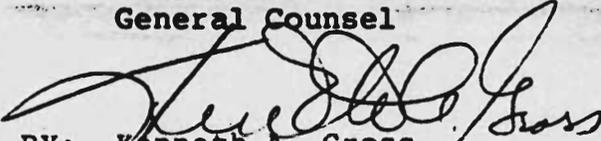
Dear Mr. Clinch:

Our letter of April 11, 1984, notifying you that the Federal Election Commission determined that there is reason to believe that the California League of Conservation Voters ("the Committee") and you, as treasurer, violated a provision of the Federal Election Campaign Act of 1971, as amended, contained an incorrect citation. The correct citation for not timely filing reports is 2 U.S.C. § 434(a)(4)(A).

If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202)523-4000.

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel

Enclosure

85040510488



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 11, 1984

Nicholas B. Clinch, Treasurer
California League of Conservation Voters
942 Market Street, Suite 606
San Francisco, California 94102

RE: MUR 1668

Dear Mr. Clinch:

On April 10, 1984, the Federal Election Commission determined that there is reason to believe that the California League of Conservation Voters ("the Committee") and you, as treasurer, have violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), by not timely filing reports. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the Committee. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against you and the Committee, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe, if so desired. See 11 C.F.R. § 111.18(d).

If you and the Committee intend to be represented by counsel in this matter, please advise the Commission by completing the

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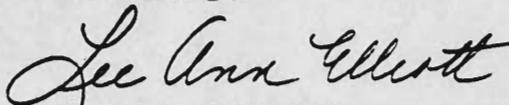
Letter to Nicholas B. Clinch
Page 2

enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you and the Committee notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202)523-4000.

Sincerely,



Lee Ann Elliott
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

85040510490

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR 1668
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: California League of Conservation Voters,
Nicholas B. Clinch, Treasurer

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

The California League of Conservation Voters ("CLCV") failed to timely file five (5) Reports of Receipts and Disbursements for the 1981-82 election cycle. The filings were between 11 and 200 calendar days late. Listed below are the reports filed late, the date each was due, and the date each was filed.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
Mid-Year (1/1/81-6/30/81)	7/31/81	2/16/82
Year End (7/1/81-12/31/81)	1/31/82	2/16/82
April Quarterly ^{1/} (1/1/82-3/31/82)	4/15/82	7/14/82
12 Day Pre-General ^{2/} (10/1/82-10/13/82)	10/21/82	11/1/82
Year End (11/23/82-12/31/82)	1/31/83	2/16/83

^{1/} A separate 1982 April Quarterly Report was not filed; however, the 1982 "Mid-Year" Report included the activity for the period.

^{2/} This report was required, because CLCV made a \$5,000 contribution to a Federal candidate on October 5, 1982.

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A chronic late filing notice requesting reasons for the tardiness was sent to CLVC on December 14, 1983. On December 23, 1983, a response was received from Betty A. Mangual, CLCV's assistant treasurer. Ms. Mangual explained that she experienced some confusion when she became assistant treasurer. The 1982 Year End Report was submitted late because she was ill. In the response, Ms. Mangual also mentioned that she mailed all reports return receipt requested, and that her records, although not entirely complete, support the timely filing of all original reports and amendments within the dates specified in letters from and phone conversations with the Reports Analyst.

The letter and phone conversations referred to by Ms. Mangual concern Requests for Additional Information on reporting problems. CLCV never received a notice regarding non-filing, nor was there ever any mention of non-filing or late filing during the phone conversations.

FACTUAL AND LEGAL ANALYSIS

Pursuant to 2 U.S.C. § 434(a)(4)(A), a political committee filing quarterly reports in a calendar year in which a regularly scheduled general election is held is required, through its treasurer, to file such reports no later than the 15th day after the last day of each calendar quarter; except that the report for the quarter ending on December 31 of such calendar year shall be filed no later than January 31 of the following calendar year. In addition, the committee is required, through its treasurer, to file a pre-election report no later than the 12th day before any

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election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election. In any other calendar year, the committee is required, through its treasurer, to file a mid year report no later than July 31 and a year end report no later than January 31 of the following calendar year.

In view of the fact that the Fund has continually failed to file its reports in a timely manner, and that its financial activity during the 1981-82 election cycle was substantial, we recommend that the Commission open a MUR and find reason to believe that reporting violations occurred. The Committee's explanation of "confusion" as to reporting procedures is insufficient defense in light of the number of reports involved.

85040510493

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
California League of Conservation)	RAD Referral 84NF-15
Voters)	
Nicholas B. Clinch, Treasurer)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 10, 1984, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 84NF-15:

1. Open a MUR.
2. Find reason to believe the California League of Conservation Voters and Nicholas B. Clinch, as treasurer, violated 2 U.S.C. § 434(a)(4)(A).
3. Approve the letter and analysis as attached to the First General Counsel's Report dated April 5, 1984.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter.

Attest:

4-10-84
Date

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

Received in Office of Commission Secretary:
Circulated on 48 hour tally basis:

4-5-84, 5:03
4-6-84, 2:00

85040510494



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *CW*
DATE: April 5, 1984
SUBJECT: RAD Referral 84NF-15: First General Counsel's Report

The attached is submitted as an Agenda document
for the Commission Meeting of _____
Open Session _____
Closed Session _____

CIRCULATIONS		DISTRIBUTION	
48 Hour Tally Vote	[X]	Compliance	[X]
Sensitive	[X]	Audit Matters	[]
Non-Sensitive	[]	Litigation	[]
24 Hour No Objection	[]	Closed MUR Letters	[]
Sensitive	[]	Status Sheets	[]
Non-Sensitive	[]	Advisory Opinions	[]
Information	[]	Other (see distribution below)	[]
Sensitive	[]		
Non-Sensitive	[]		
Other	[]		

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FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL,
BY OGC TO THE COMMISSION 4/5/84
5:00

RAD REF: 84NF-15 84 APR 5 P 5: 08
STAFF MEMBER(S)
George Demougeot

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SENSITIVE

RESPONDENTS' NAME: California League of Conservation Voters,
Nicholas B. Clinch, Treasurer

RELEVANT STATUTE: 2 U.S.C. § 434(a) (4) (A)

INTERNAL REPORTS CHECKED: RAD Referral

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

The California League of Conservation Voters ("CLCV") failed to timely file five (5) Reports of Receipts and Disbursements for the 1981-82 election cycle. The filings were between 11 and 200 calendar days late. Listed below are the reports filed late, the date each was due, and the date each was filed.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
Mid-Year (1/1/81-6/30/81)	7/31/81	2/16/82
Year End (7/1/81-12/31/81)	1/31/82	2/16/82
April Quarterly ^{1/} (1/1/82-3/31/82)	4/15/82	7/14/82
12 Day Pre-General ^{2/} (10/1/82-10/13/82)	10/21/82	11/1/82
Year End (11/23/82-12/31/82)	1/31/83	2/16/83

^{1/} A separate 1982 April Quarterly Report was not filed; however, the 1982 "Mid-Year" Report included the activity for the period.

^{2/} This report was required, because CLCV made a \$5,000 contribution to a Federal candidate on October 5, 1982.

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A chronic late filing notice requesting reasons for the tardiness was sent to CLVC on December 14, 1983. On December 23, 1983, a response was received from Betty A. Mangual, CLCV's assistant treasurer. Ms. Mangual explained that she experienced some confusion when she became assistant treasurer. The 1982 Year End Report was submitted late because she was ill. In the response, Ms. Mangual also mentioned that she mailed all reports return receipt requested, and that her records, although not entirely complete, support the timely filing of all original reports and amendments within the dates specified in letters from and phone conversations with the Reports Analyst.

The letter and phone conversations referred to by Ms. Mangual concern Requests for Additional Information on reporting problems. CLCV never received a notice regarding non-filing, nor was there ever any mention of non-filing or late filing during the phone conversations.

FACTUAL AND LEGAL ANALYSIS

Pursuant to 2 U.S.C. § 434(a)(4)(A), a political committee filing quarterly reports in a calendar year in which a regularly scheduled general election is held is required, through its treasurer, to file such reports no later than the 15th day after the last day of each calendar quarter; except that the report for the quarter ending on December 31 of such calendar year shall be filed no later than January 31 of the following calendar year. In addition, the committee is required, through its treasurer, to file a pre-election report no later than the 12th day before any

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election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election. In any other calendar year, the committee is required, through its treasurer, to file a mid year report no later than July 31 and a year end report no later than January 31 of the following calendar year.

In view of the fact that the Fund has continually failed to file its reports in a timely manner, and that its financial activity during the 1981-82 election cycle was substantial, we recommend that the Commission open a MUR and find reason to believe that reporting violations occurred. The Committee's explanation of "confusion" as to reporting procedures is insufficient defense in light of the number of reports involved.

RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe the California League of Conservation Voters and Nicholas B. Clinch, as treasurer, violated 2 U.S.C. § 434(a)(4)(A).
3. Approve the attached letter and analysis.

Charles N. Steele
General Counsel

April 5, 1984
Date

By: 
Kenneth A. Gross
Associate General Counsel

Attachments
I. RAD Referral
II. Proposed letter and analysis

85040510493

Attachment I

①

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 2 March 1984ANALYST: Tony Raymond

I. COMMITTEE: California League of Conservation Voters (C00012401)
Nicholas B. Clinch, Treasurer^{1/}
942 Market Street, Suite 606
San Francisco, CA 94102

II. RELEVANT STATUTE: 2 U.S.C. 434(a)(4)(A)
11 CFR 104.5(c)(1) and (2)

III. BACKGROUND:

Failure to Timely File Reports - 2 U.S.C. 434(a)(4)(A);
11 CFR 104.5(c)(1) and (2)

The California League of Conservation Voters ("CLCV") failed to timely file five (5) Reports of Receipts and Disbursements for the 1981-82 election cycle (Attachments 2a-e). The filings were between 11 and 200 calendar days late. Listed below are the reports filed late, the date each was due, and the date each was filed.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
Mid-Year (1/1/81-6/30/81)	7/31/81	2/16/82
Year End (7/1/81-12/31/81)	1/31/82	2/16/82
April Quarterly ^{2/} (1/1/82-3/31/82)	4/15/82	7/14/82

^{1/} The treasurer during 1981 and 1982 was Carl Pope. An amended Statement of Organization was received on June 24, 1983, which listed Nicholas B. Clinch as treasurer and Betty A. Mangual as assistant treasurer.

^{2/} A separate 1982 April Quarterly Report was not filed; however, the 1982 "Mid-Year" Report included the activity for the period.

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<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
12 Day Pre-General ^{3/} (10/1/82-10/13/82) Year End (11/23/82-12/31/82)	10/21/82 1/31/83	11/1/82 ^{4/} 2/16/83

A chronic late filing notice requesting reasons for the tardiness was sent to CLCV on December 14, 1983 (Attachment 3). On December 23, 1983, a response was received from Betty A. Mangual, CLCV's assistant treasurer. Ms. Mangual explained that she experienced some confusion when she became assistant treasurer. The 1982 Year End Report was submitted late because she was ill. In the response, Ms. Mangual also mentioned that she mailed all reports return receipt requested, and that her records, although not entirely complete, support the timely filing of all original reports and amendments within the dates specified in letters from and phone conversations with the Reports Analyst (Attachment 4).

The letters and phone conversations referred to by Ms. Mangual concern Requests for Additional Information on reporting problems. CLCV never received a notice regarding non-filing, nor was there ever any mention of non-filing or late filing during the phone conversations.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

^{3/} This report was required, because CLCV made a \$5,000 contribution to a Federal candidate on October 5, 1982.

^{4/} The report was sent certified on this date and received on November 4, 1982.

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NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
CALIFORNIA LEAGUE OF CONSERVATION VOTERS CONNECTED ORGANIZATION: NONE				NON-PARTY QUALIFIED		ID #C00012401
1981	MID-YEAR REPORT	14,902	16,298	1JAN81 -30JUN81	6	82FEC/223/4667
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN81 -30JUN81	7	83FEC/272/3921
	MID-YEAR REPORT - AMENDMENT	14,902	16,298	1JAN81 -30JUN81	9	83FEC/280/2983
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN81 -30JUN81	1	83FEC/282/3907
	MID-YEAR REPORT - AMENDMENT	14,902	16,298	1JAN81 -30JUN81	12	83FEC/289/4265
	REQUEST FOR ADDITIONAL INFORMATION			1JAN81 -30JUN81	1	83FEC/271/2924
	REQUEST FOR ADDITIONAL INFORMATION			1JAN81 -30JUN81	2	83FEC/282/1227
	REQUEST FOR ADDITIONAL INFORMATION			1JAN81 -30JUN81	1	84FEC/290/0409
	YEAR-END	8,170	8,156	1JUL81 -31DEC81	5	82FEC/223/4697
	YEAR-END - AMENDMENT	7,480	8,156	1JAN81 -31DEC81	4	83FEC/272/3897
	YEAR-END - AMENDMENT	7,480	8,156	1JUL81 -31DEC81	8	83FEC/280/2992
	YEAR-END - AMENDMENT	-	-	1JUL81 -31DEC81	1	83FEC/282/3908
	YEAR-END - AMENDMENT	7,480	8,156	1JUL81 -31DEC81	8	83FEC/289/4277
	YEAR-END - AMENDMENT	-	-	1JUL81 -31DEC81	1	83FEC/289/4442
	REQUEST FOR ADDITIONAL INFORMATION			1JAN81 -31DEC81	1	83FEC/274/4206
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN81 -31DEC81	1	83FEC/280/3599
	REQUEST FOR ADDITIONAL INFORMATION			1JUL81 -31DEC81	1	83FEC/282/1384
	REQUEST FOR ADDITIONAL INFORMATION			1JUL81 -31DEC81	1	84FEC/290/0410
1982	APRIL QUARTERLY - AMENDMENT	-	-	1JAN82 -31MAR82	1	83FEC/289/4443
	REQUEST FOR ADDITIONAL INFORMATION			1JAN82 -31MAR82	1	84FEC/290/0411
	MID-YEAR REPORT	12,141	12,215	1JAN82 -30JUN82	10	82FEC/238/4914
	MID-YEAR REPORT - AMENDMENT	13,266	12,215	1JAN82 -30JUN82	14	83FEC/266/5442
	MID-YEAR REPORT - AMENDMENT	13,366	-	1JAN82 -30JUN82	2	83FEC/266/5440
	MID-YEAR REPORT - AMENDMENT	12,141	12,215	1JAN82 -30JUN82	27	83FEC/272/3878
	MID-YEAR REPORT - AMENDMENT	12,141	12,215	1JAN82 -30JUN82	12	83FEC/280/3008
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN82 -30JUN82	5	83FEC/282/3663
	MID-YEAR REPORT - AMENDMENT	12,414	12,215	1JAN82 -30JUN82	14	83FEC/289/4289
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN82 -30JUN82	1	83FEC/289/4444
	REQUEST FOR ADDITIONAL INFORMATION			1JAN82 -30JUN82	2	83FEC/271/2926
	REQUEST FOR ADDITIONAL INFORMATION			1JAN82 -30JUN82	2	83FEC/274/4208
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN82 -30JUN82	4	83FEC/279/1397
	REQUEST FOR ADDITIONAL INFORMATION			1JAN82 -30JUN82	1	83FEC/282/1385
	OCTOBER QUARTERLY	16,943	14,750	10JUL82 -30SEP82	19	82FEC/248/4114
	OCTOBER QUARTERLY - AMENDMENT	16,943	14,750	1JUL82 -30SEP82	17	83FEC/266/5456
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL82 -30SEP82	1	83FEC/267/0438
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL82 -30SEP82	10	83FEC/272/3911
	OCTOBER QUARTERLY - AMENDMENT	17,092	14,750	1JUL82 -30SEP82	18	83FEC/280/3020
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL82 -30SEP82	1	83FEC/282/3909
	REQUEST FOR ADDITIONAL INFORMATION			1JUL82 -30SEP82	1	83FEC/271/2929
	REQUEST FOR ADDITIONAL INFORMATION			1JUL82 -30SEP82	1	83FEC/282/1386
	PRE-GENERAL	4,056	5,000	10CT82 -130CT82	10	82FEC/253/2879
	PRE-GENERAL - AMENDMENT	4,056	5,000	10CT82 -130CT82	10	83FEC/266/5473
	PRE-GENERAL - AMENDMENT	-	-	10CT82 -130CT82	1	83FEC/267/0437
	PRE-GENERAL - AMENDMENT	-	-	10CT82 -130CT82	4	83FEC/272/4088

3

STANLEY (MAY 1983)

FEDERAL ELECTION COMMISSION
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS (C) (81-82)
 8 5 0 4 0 5 1 0 5 0 ?
 NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
	PRE-GENERAL - AMENDMENT	4,056	5,000	10CT82 -130CT82	10	83FEC/280/3038
	PRE-GENERAL - AMENDMENT	-	-	10CT82 -130CT82	1	83FEC/282/3910
	PRE-GENERAL - AMENDMENT	4,056	5,000	10CT82 -130CT82	9	83FEC/289/4303
	PRE-GENERAL - AMENDMENT	-	-	10CT82 -130CT82	1	83FEC/289/4445
	1 ST LETTER INFORMATIONAL NOTICE	-	-	10CT82 -130CT82	1	83FEC/271/1890
	REQUEST FOR ADDITIONAL INFORMATION	-	-	10CT82 -130CT82	1	83FEC/282/1387
	REQUEST FOR ADDITIONAL INFORMATION	-	-	10CT82 -130CT82	1	84FEC/290/0412
	POST-GENERAL	19,730	20,534	140CT82 -22NOV82	19	82FEC/258/4014
	POST-GENERAL - AMENDMENT	19,730	20,534	140CT82 -22NOV82	18	83FEC/266/5483
	POST-GENERAL - AMENDMENT	-	-	140CT82 -22NOV82	1	83FEC/267/0436
	POST-GENERAL - AMENDMENT	19,730	20,534	140CT82 -22NOV82	24	83FEC/272/3854
	POST-GENERAL - AMENDMENT	19,530	20,534	140CT82 -22NOV82	20	83FEC/280/3048
	POST-GENERAL - AMENDMENT	-	-	140CT82 -22NOV82	1	83FEC/282/3911
	REQUEST FOR ADDITIONAL INFORMATION	-	-	140CT82 -22NOV82	2	83FEC/271/2931
	REQUEST FOR ADDITIONAL INFORMATION	-	-	140CT82 -22NOV82	1	83FEC/282/1388
	YEAR-END	2,930	1,984	23NOV82 -31DEC82	9	83FEC/266/5431
	YEAR-END - AMENDMENT	2,930	1,984	23NOV82 -31DEC82	13	83FEC/272/3928
	YEAR-END - AMENDMENT	2,930	1,984	23NOV82 -31DEC82	9	83FEC/280/3088
	YEAR-END - AMENDMENT	-	-	23NOV82 -31DEC82	1	83FEC/282/3912
	YEAR-END - AMENDMENT	2,930	1,984	23NOV82 -31DEC82	9	83FEC/289/4312
	YEAR-END - AMENDMENT	-	-	23NOV82 -31DEC82	1	83FEC/289/4446
	REQUEST FOR ADDITIONAL INFORMATION	-	-	23NOV82 -31DEC82	2	83FEC/271/2934
	REQUEST FOR ADDITIONAL INFORMATION	-	-	23NOV82 -31DEC82	1	83FEC/282/1389
	REQUEST FOR ADDITIONAL INFORMATION	-	-	23NOV82 -31DEC82	1	83FEC/289/0284
1983	MISCELLANEOUS REPORT	-	-	20MAY83 TO FEC	2	83FEC/272/3907
	MISCELLANEOUS REPORT	-	-	20MAY83 TO FEC	2	83FEC/272/3895
	MISCELLANEOUS REPORT	-	-	21DEC83 TO FEC	2	83FEC/289/4285
	MISCELLANEOUS REPORT	-	-	21DEC83 TO FEC	2	83FEC/289/4287
	TOTAL	78,404	0	78,937	0	423 TOTAL PAGES

All Reports Reviewed.

BUDGET CASH (12-31-82) : \$ 1,407

DEBTS (12-31-82) : \$ 14,731

(4)

RECEIVED 1 (PAGES 2 OF 3)

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
CALIFORNIA LEAGUE OF CONSERVATION VOTERS				NON-PARTY QUALIFIED		ID #C00012401
CONNECTED ORGANIZATION: NONE						
	1983 STATEMENT OF ORGANIZATION - AMENDMENT			24JUN83	2	83FEC/274/1951
	MID-YEAR REPORT	11,981	13,121	1JAN83 -30JUN83	12	83FEC/280/2626
	YEAR-END	0	243	1JUL83 -31DEC83	12	84FEC/295/2592
	TOTAL	11,981	0		26	TOTAL PAGES

No Reports Reviewed.
 ENDING CASH (12-31-83) : \$ 24
 DEBTS (12-31-83) : \$15,323

Attachment 1 (Pages 3 of 3)

5

REPORT OF RECEIPTS AND DISBURSEMENT
For a Political Committee Other Than an Authorized Committee

2 FEB 18 AM: 216

(Summary Page)

1. Name of Committee (in Full)
CALIFORNIA LEAG. OF
CONSERVATION VL 35

Address (Number and Street)
942 MARKET ST. Suite 606

City, State and ZIP Code
SAN FRANCISCO CA 94102

Check if address is different than previously reported.

2. FEC Identification Number
C 000 12401

3. This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

- (a) April 15 Quarterly Report
 - July 15 Quarterly Report
 - October 15 Quarterly Report
 - January 31 Year End Report
 - July 31 Mid Year Report (Non-election Year Only)
 - Monthly Report for _____
 - Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
 - Thirtieth day report following the General Election on _____ in the State of _____
 - Termination Report
- (b) Is this Report an Amendment?
 YES NO

SUMMARY

6. Covering Period 1/1/81 Through 6/30/81

6. (b) Cash on Hand January 1, 1981

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 1B)

(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 2B)

8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))

9. Debts and Obligations Owed TO the Committee (itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee (itemize all on Schedule C or Schedule D)

	Column A This Period	Column B Calendar Year-to-Date
6. (b) Cash on Hand January 1, 19 <u>81</u>	\$ 2,214.31	\$ 2,214.31
(b) Cash on Hand at Beginning of Reporting Period	\$ 2,214.31	\$ 2,214.31
(c) Total Receipts (from Line 1B)	\$ 14,902.61	\$ 14,902.61
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 17,116.92	\$ 17,116.92
7. Total Disbursements (from Line 2B)	\$ 16,298.02	\$ 16,298.02
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 818.90	\$ 818.90
9. Debts and Obligations Owed TO the Committee (itemize all on Schedule C or Schedule D)	\$	\$
10. Debts and Obligations Owed BY the Committee (itemize all on Schedule C or Schedule D)	\$	\$

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

For further information, contact:

Federal Election Commission
Toll Free 800-434-6530
Local 202-423-4988

CARL POPE

Type or Print Name of Treasurer

[Signature]

SIGNATURE OF TREASURER

Feb 8, 1981

Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

All previous versions of FEC FORM 3 and FEC FORM 3e are obsolete and should no longer be used.

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FEC FORM 3X (2/80)

95040595067

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

Attachment 2b

82 FEB 16 AM: 81

(Summary Page)

7

1. Name of Committee (in Full)
CALIFORNIA LEAGUE OF CONSERVATION VOTERS

Address (Number and Street)
942 MARKET ST. #606

City, State and ZIP Code
SAN FRANCISCO CA 94102

Check if address is different than previously reported.

2. FEC Identification Number
C 000 12401

3. This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)

4. TYPE OF REPORT (check appropriate boxes)

(a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Monthly Report for _____
 Twelfth day report preceding _____ (Type of Session) election on _____ in the State of _____
 Thirtieth day report following the General Election on _____ in the State of _____
 Termination Report

(b) Is this Report an Amendment?
 YES NO

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period	<u>7/1/81</u> Through <u>12/31/81</u>		
6. (a) Cash on Hand January 1, 19 <u>81</u>			\$ 2,214.31
(b) Cash on Hand at Beginning of Reporting Period		\$ 818.90	
(c) Total Receipts (from Line 10)		\$ 8170.13	\$ 23,072.74
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)		\$ 8989.03	\$ 25,287.05
7. Total Disbursements (from Line 20)		\$ 8156.42	\$ 24,454.44
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))		\$ 832.61	\$ 832.61
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)		\$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		\$	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

For further information, contact:

Federal Election Commission
Toll Free 800-424-9630
Local 202-623-4000

CARL POPE
Type or Print Name of Treasurer

[Signature]
SIGNATURE OF TREASURER

Feb 9, 1981
Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437c.

All previous versions of FEC FORM 2 and FEC FORM 2a are obsolete and should no longer be used.

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FEC FORM 2X (1980)

82032134597

JUL 14 1982

8

REGISTERED

REPORT OF RECEIPTS AND DISBURSEMENTS For a Political Committee Other Than an Authorized Committee

(Summary Page)

1. Name of Committee (in Full)
California League of Conservation Voters

Address (Number and Street)
942 Market St. Suite #606

City, State and ZIP Code
San Francisco, Ca. 94102

Check if address is different than previously reported.

2. FEC Identification Number
C 000 12401

3. This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Monthly Report for _____
 Twelfth day report preceding _____ election on _____ in the State of _____
 Thirtieth day report following the General Election on _____ in the State of _____
 Termination Report

(b) Is this Report an Amendment?
 YES NO

RECEIVED
FEDERAL ELECTION COMMISSION
JUL 15 1982
U.S. HOUSE OF REPRESENTATIVES

05040510506
02031104914

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period	1/01/82 Through 6/30/82		
6. (b) Cash on Hand January 1, 1982		\$ 142.61
(b) Cash on Hand at Beginning of Reporting Period	\$ 142.61	
(c) Total Receipts (from Line 18)	\$ 12,141.33	\$ 12,141.33
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 12,283.94	\$ 12,283.94
7. Total Disbursements (from Line 28)	\$ 12,215.70	\$ 12,215.70
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 68.24	\$ 68.24
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$ 850.00	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	

I certify that I have examined the Report and to the best of my knowledge and belief it is true, correct and complete.

For further information, contact:

Federal Election Commission
Toll Free 800-424-9630
Local 202-473-4068

Betty A. Mangual

Type or Print Name of Treasurer

7/12/82

SIGNATURE OF TREASURER

Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing the Report to the penalties of 2 U.S.C. §437e.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

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FEC FORM 3X (3/80)

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

92 NOV 4 P2: 23

9

(Summary Page)

<p>ALIGN AREA</p> <p>1. Name of Committee (In Full) California League of Conservation Voters</p> <hr/> <p>Address (Number and Street) 942 Market St. Suite #606</p> <hr/> <p>City, State and ZIP Code San Francisco, Ca. 94102</p> <p><input type="checkbox"/> Check here if address is different than previously reported.</p> <p>2. FEC Identification Number C 000 1241</p> <p>3. <input type="checkbox"/> This committee qualified as a multicandidate committee during this Reporting Period on <u>10/5/82</u></p>	<p>ALIGN AREA</p> <p>4. TYPE OF REPORT (Check appropriate boxes)</p> <p>(a) <input type="checkbox"/> April 15 Quarterly Report <input type="checkbox"/> October 15 Quarterly Report <input type="checkbox"/> July 15 Quarterly Report <input type="checkbox"/> January 31 Year End Report <input type="checkbox"/> July 31 Mid Year Report (Non Election Year Only) <input type="checkbox"/> Monthly Report for _____ <input checked="" type="checkbox"/> Twelfth day report preceding <u>General</u> _____ <small>(Type of Election)</small> election on <u>11/2/82</u> in the State of <u>California</u> <input type="checkbox"/> Thirtieth day report following the General Election on _____ in the State of _____ <input type="checkbox"/> Termination Report</p> <p>(b) Is this Report an Amendment? <input type="checkbox"/> YES <input type="checkbox"/> NO</p>
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05040510507

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>10/1/82</u> through <u>10/13/82</u>		
6. (a) Cash on hand January 1, 19 <u>82</u>		142.61
(b) Cash on Hand at Beginning of Reporting Period	\$ 2,261.74	
(c) Total Receipts (from Line 1B)	\$ 4,056.00	\$ 33,140.82
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 6,317.74	\$ 33,283.44
7. Total Disbursements (from Line 2B)	\$ 5,000.00	\$ 31,965.70
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 1,317.64	\$ 1,317.74
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Carl Pogg
Type or Print Name of Treasurer

Carl Pogg
SIGNATURE OF TREASURER

10/21/82
Date

For further information contact
Federal Election Commission
Tell Free 800 424 9630
Local 202 527 4088

NOTE: Submission of false, erroneous or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. 5431a

All previous versions of FEC FORM 3 and FEC FORM 2a are obsolete and should no longer be used

	FEC FORM 3X (3/80)
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RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

RECEIVED AT THE FES
Attachment
03 FEB 22 P 3: 44
19

(Summary Page)

ALIGN AREA

ALIGN AREA

1. Name of Committee (In Full)
California League of Conservation Voters

4. TYPE OF REPORT (Check appropriate boxes)

- (a) April 15 Quarterly Report October 15 Quarterly Report
 July 15 Quarterly Report January 31 Year End Report
 July 31 Mid Year Report (Non-Election Year Only)
 Monthly Report for _____
 Twelfth day report preceding _____ (Type of Service) _____
 election on _____ in the State of _____
 Thirtieth day report following the General Election
 on _____ in the State of _____
 Termination Report
 (b) Is this Report an Amendment?
 YES NO

Address (Number and Street)

942 Market St. Suite #606

City, State and ZIP Code

San Francisco, Ca. 94102

Check here if address is different than previously reported.

2. FEC Identification Number
C 000 1241

3. This committee qualified as a multicandidate committee during the Reporting Period on _____ (Date)

SUMMARY

5. Covering Period 11-23-82 through 12-31-82

6. (a) Cash on hand January 1, 19 82

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 1B)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 2B)

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on hand January 1, 19 82		\$ 142.61
(b) Cash on Hand at Beginning of Reporting Period	\$ 1,737.90	
(c) Total Receipts (from Line 1B)	\$ 2,930.00	\$ 57,025.83
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 4,667.90	\$ 57,168.44
7. Total Disbursements (from Line 2B)	\$ 1,984.01	\$ 54,484.55
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 2,683.89	\$ 2,683.89
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ 9,600.02	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete

Carl Pope/Betty A. Mangual

Type or Print Name of Treasurer

Betty A. Mangual
SIGNATURE OF TREASURER

2/16/83

Date

For further information contact

Federal Election Commission

Toll Free 800 426 9530

Local 707 573 6088

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. 6431c

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used

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FEC FORM 3X (3/80)

1 1 8 7 0 5 4 9 6 5 0 4 8 7 1



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2
14 December 1983

Nicholas B. Clinch, Treasurer
California League of Conservation
Voters
942 Market Street, Suite 606
San Francisco, CA 94102

Identification Number: C00012401

Reference: 1981-82 Election Cycle Reports

Dear Mr. Clinch:

This letter is prompted by the Commission's review of the reports filed by your committee for the 1981-82 election cycle. A review of the reports listed below indicates that your committee repeatedly failed to file reports in a timely manner. Timely filing is a specific requirement of the Federal Election Campaign Act and essential to fulfilling the public disclosure concept embodied in the law. The Commission views late filing as a serious violation of the Act.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
Mid-Year (1/1/81-6/30/81)	7/31/81	2/16/82
Year End (7/1/81-12/31/81)	1/31/82	2/16/82
April Quarterly (1/1/82-3/31/82)	4/15/82	7/16/82
12 Day Pre-General (10/1/82-10/13/82)	10/21/82	11/1/82
Year End (11/23/82-12/31/82)	1/31/83	2/16/83

This communication affords you the opportunity to present the reasons behind the late tenders noted above. Your response should be filed with the Federal Election Commission, 1325 K Street, NW, Washington, DC 20463 within fifteen (15) days of the date of this letter. The Commission will consider your response to this notice before taking action in this matter. If you need assistance or have any questions regarding this matter, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Michael B. Filler
Chief
Party/Non-Party Branch
Reports Analysis Division

85040510509



121

- BOARD OFFICERS:**
- Robert Olson
President
Stanford
- Charles Gray
Chairman of the Board
Santa Monica
- Bill Karkun
Northern Vice President
Pasadena
- Beverly Green
Southern Vice President
Los Angeles
- George Wagner
Treasurer
Berkeley
- Jean Jackson
Secretary
Oakland
- MEMBERS:**
- Bettina Baranoff
Los Angeles
- Sam Peter Blair
Sacramento
- Sharon Brickman
Los Angeles
- Steve Doyle
Santa Barbara
- William E. Clench
Palo Alto
- Shirley Fontaine
Pasadena
- Sam Frost
Reading
- Ruth Schuster
Los Angeles
- Tom Goff
Berkeley
- Paul Stewart
San Francisco
- Jane Hagadorn
Sacramento
- Tom Harbert
Los Angeles
- James Hoyt
Santa Monica
- Jo Lester
Ventura
- Charm Leonard
Los Angeles
- Jan Lundquist
Hawthorne
- Richard May
San Francisco
- Bertine Michelson
Playa Del Rey
- Elvy Mizel
San Raphael
- Larry Moss
Trinidad
- Judy Oring
Torrance
- John Phillips
Los Angeles
- Bob Pearson
Los Angeles
- Bill Price
Sacramento
- Carroll Purcell
Santa Barbara
- William Sui
Richmond
- Jeff Ward
San Diego
- John Zaroff
Sacramento
- STAFF:**
- Carl Pope
Oakland
- Lucy Blake
San Francisco
- Bill Platt
Los Angeles

20 December, 1983.

Michael B. Filler
 Chief-Party/WOa-Party Branch
 Reports Analyst Division
 1325 K St.
 Washington, D C. 20463

Identification Number: C00012401

Reference: 1981-1982 Election Cycle Reports

Dear Mr. Filler:

There seems to be some confusion between the filing of our original reports and the amendments that were filed at the request of Mr. Mark Kleinman. When I first became the assistant treasurer and the person responsible for the timely filing of our FEC reports, there was some confusion on my part as to certain procedures. Mr. Kleinman and I did finally resolve these and it was my understanding that all was well at this point.

There was some delay in filing the 1982 year-end report, because, I was out sick for the two weeks following the day all business at year end was completed.

I am in the habit of sending all reports return receipt requested, and my records, although not entirely completely, support the timely filing of all original reports and amendments within the dates specified by Mr. Kleinman in his letters and subsequent phone calls between the two of us.

Enclosed please find copies of most pertinent correspondence between us and I sincerely hope this will clear up any discrepancy in our attempt to comply with all FEC regulations.

Sincerely,
Betty A. Mangual
 Betty A. Mangual
 Assistant Treasurer
 California League of Conservation Voters

THE POLITICAL ACTION ARM OF THE ENVIRONMENTAL COMMUNITY
 842 MARKET STREET, SUITE 606, SAN FRANCISCO, CA 94102 (415) 397-7780
 12217 SANTA MONICA BLVD., LOS ANGELES, CA 90025 (213) 826-9812
 23-A MISSION STREET, SANTA BARBARA, CA 93101 (805) 687-4544
 1800-A L STREET, SACRAMENTO, CA 95816 (916) 447-4371

See Attached

13



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

EO-2
14 December 1983

Nicholas B. Clinch, Treasurer
California League of Conservation
Voters
942 Market Street, Suite 606
San Francisco, CA 94102

Identification Number: C00012401

Reference: 1981-82 Election Cycle Reports

Dear Mr. Clinch:

This letter is prompted by the Commission's review of the reports filed by your committee for the 1981-82 election cycle. A review of the reports listed below indicates that your committee repeatedly failed to file reports in a timely manner. Timely filing is a specific requirement of the Federal Election Campaign Act and essential to fulfilling the public disclosure concept embodied in the law. The Commission views late filing as a serious violation of the Act.

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8 5:19 0430259 100151 16 5

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
Mid-Year (1/1/81-6/30/81)	Made 7/31/81	2/16/82
Year End (7/1/81-12/31/81)	Made 1/31/82	2/16/82
April Quarterly (1/1/82-3/31/82)	Made 4/15/82	7/16/82
12 Day Pre-General (10/1/82-10/13/82)	11/20/21/82	11/1/82
Year End (11/23/82-12/31/82)	1/31/83	2/16/83

amendment in attached
amendment attached
amendment attached

This communication affords you the opportunity to present the reasons behind the late tenders noted above. Your response should be filed with the Federal Election Commission, 1325 K Street, NW, Washington, DC 20463 within fifteen (15) days of the date of this letter. The Commission will consider your response to this notice before taking action in this matter. If you need assistance or have any questions regarding this matter, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,
Michael B. Filler

Michael B. Filler
Chief
Party/Non-Party Branch
Reports Analysis Division

Attachment II

14



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Nicholas B. Clinch, Treasurer
California League of Conservation Voters
942 Market Street, Suite 606
San Francisco, California 94102

RE: MUR

Dear Mr. Clinch:

On 1984, the Federal Election Commission determined that there is reason to believe that the California League of Conservation Voters ("the Committee") and you, as treasurer, have violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), by not timely filing reports. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the Committee. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against you and the Committee, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe, if so desired. See 11 C.F.R. § 111.18(d).

If you and the Committee intend to be represented by counsel in this matter, please advise the Commission by completing the

85040510512

Letter to Nicholas B. Clinch
Page 2

15

enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you and the Committee notify the Commission in writing that you wish the investigation to be made public.

-For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202)523-4000.

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

85040510513

16

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RAD REF: 84NF-15
Staff Member(s) & Tel. No.
George Demougeot
(202) 523-4000

RESPONDENT: California League of Conservation Voters,
Nicholas B. Clinch, Treasurer

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

The California League of Conservation Voters ("CLCV") failed to timely file five (5) Reports of Receipts and Disbursements for the 1981-82 election cycle. The filings were between 11 and 200 calendar days late. Listed below are the reports filed late, the date each was due, and the date each was filed.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
Mid-Year (1/1/81-6/30/81)	7/31/81	2/16/82
Year End (7/1/81-12/31/81)	1/31/82	2/16/82
April Quarterly ^{1/} (1/1/82-3/31/82)	4/15/82	7/14/82
12 Day Pre-General ^{2/} (10/1/82-10/13/82)	10/21/82	11/1/82
Year End (11/23/82-12/31/82)	1/31/83	2/16/83

^{1/} A separate 1982 April Quarterly Report was not filed; however, the 1982 "Mid-Year" Report included the activity for the period.

^{2/} This report was required, because CLCV made a \$5,000 contribution to a Federal candidate on October 5, 1982.

85040510514

A chronic late filing notice requesting reasons for the tardiness was sent to CLVC on December 14, 1983. On December 23, 1983, a response was received from Betty A. Mangual, CLCV's assistant treasurer. Ms. Mangual explained that she experienced some confusion when she became assistant treasurer. The 1982 Year-End Report was submitted late because she was ill. In the response, Ms. Mangual also mentioned that she mailed all reports return receipt requested, and that her records, although not entirely complete, support the timely filing of all original reports and amendments within the dates specified in letters from and phone conversations with the Reports Analyst.

The letter and phone conversations referred to by Ms. Mangual concern Requests for Additional Information on reporting problems. CLCV never received a notice regarding non-filing, nor was there ever any mention of non-filing or late filing during the phone conversations.

FACTUAL AND LEGAL ANALYSIS

Pursuant to 2 U.S.C. § 434(a)(4)(A), a political committee filing quarterly reports in a calendar year in which a regularly scheduled general election is held is required, through its treasurer, to file such reports no later than the 15th day after the last day of each calendar quarter; except that the report for the quarter ending on December 31 of such calendar year shall be filed no later than January 31 of the following calendar year. In addition, the committee is required, through its treasurer, to file a pre-election report no later than the 12th day before any

8 5 0 4 0 5 1 0 5 1 5

election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election. In any other calendar year, the committee is required, through its treasurer, to file a mid year report no later than July 31 and a year end report no later than January 31 of the following calendar year.

In view of the fact that the Fund has continually failed to file its reports in a timely manner, and that its financial activity during the 1981-82 election cycle was substantial, we recommend that the Commission open a MUR and find reason to believe that reporting violations occurred. The Committee's explanation of "confusion" as to reporting procedures is insufficient defense in light of the number of reports involved.

85040510516

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 2 March 1984ANALYST: Tony Raymond

I. COMMITTEE: California League of Conservation Voters (C00012401)
 Nicholas B. Clinch, Treasurer^{1/}
 942 Market Street, Suite 606
 San Francisco, CA 94102

II. RELEVANT STATUTE: 2 U.S.C. 434(a)(4)(A)
 11 CFR 104.5(c)(1) and (2)

III. BACKGROUND:

Failure to Timely File Reports - 2 U.S.C. 434(a)(4)(A);
 11 CFR 104.5(c)(1) and (2)

The California League of Conservation Voters ("CLCV") failed to timely file five (5) Reports of Receipts and Disbursements for the 1981-82 election cycle (Attachments 2a-e). The filings were between 11 and 200 calendar days late. Listed below are the reports filed late, the date each was due, and the date each was filed.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
Mid-Year (1/1/81-6/30/81)	7/31/81	2/16/82
Year End (7/1/81-12/31/81)	1/31/82	2/16/82
April Quarterly ^{2/} (1/1/82-3/31/82)	4/15/82	7/14/82

^{1/} The treasurer during 1981 and 1982 was Carl Pope. An amended Statement of Organization was received on June 24, 1983, which listed Nicholas B. Clinch as treasurer and Betty A. Mangual as assistant treasurer.

^{2/} A separate 1982 April Quarterly Report was not filed; however, the 1982 "Mid-Year" Report included the activity for the period.

85040510517

CALIFORNIA LEAGUE OF CONSERVATION VOTERS
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
12 Day Pre-General ^{3/} (10/1/82-10/13/82)	10/21/82	11/1/82 ^{4/}
Year End (11/23/82-12/31/82)	1/31/83	2/16/83

A chronic late filing notice requesting reasons for the tardiness was sent to CLCV on December 14, 1983 (Attachment 3). On December 23, 1983, a response was received from Betty A. Mangual, CLCV's assistant treasurer. Ms. Mangual explained that she experienced some confusion when she became assistant treasurer. The 1982 Year End Report was submitted late because she was ill. In the response, Ms. Mangual also mentioned that she mailed all reports return receipt requested, and that her records, although not entirely complete, support the timely filing of all original reports and amendments within the dates specified in letters from and phone conversations with the Reports Analyst (Attachment 4).

The letters and phone conversations referred to by Ms. Mangual concern Requests for Additional Information on reporting problems. CLCV never received a notice regarding non-filing, nor was there ever any mention of non-filing or late filing during the phone conversations.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

^{3/} This report was required, because CLCV made a \$5,000 contribution to a Federal candidate on October 5, 1982.

^{4/} The report was sent certified on this date and received on November 4, 1982.

85040510518

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
CALIFORNIA LEAGUE OF CONSERVATION VOTERS CONNECTED ORGANIZATION: NONE				NON-PARTY QUALIFIED		ID #C00012401
1981	MID-YEAR REPORT	14,902	16,298	1JAN81 -30JUN81	6	82FEC/223/4667
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN81 -30JUN81	7	83FEC/272/3921
	MID-YEAR REPORT - AMENDMENT	14,902	16,298	1JAN81 -30JUN81	9	83FEC/280/2983
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN81 -30JUN81	1	83FEC/282/3907
	MID-YEAR REPORT - AMENDMENT	14,902	16,298	1JAN81 -30JUN81	12	83FEC/289/4265
	REQUEST FOR ADDITIONAL INFORMATION			1JAN81 -30JUN81	1	83FEC/271/2924
	REQUEST FOR ADDITIONAL INFORMATION			1JAN81 -30JUN81	2	83FEC/282/1227
	REQUEST FOR ADDITIONAL INFORMATION			1JAN81 -30JUN81	1	84FEC/290/0409
	YEAR-END	8,170	8,156	1JUL81 -31DEC81	5	82FEC/223/4697
	YEAR-END - AMENDMENT	7,480	8,156	1JAN81 -31DEC81	4	83FEC/272/3897
	YEAR-END - AMENDMENT	7,480	8,156	1JUL81 -31DEC81	8	83FEC/280/2992
	YEAR-END - AMENDMENT	-	-	1JUL81 -31DEC81	1	83FEC/282/3908
	YEAR-END - AMENDMENT	7,480	8,156	1JUL81 -31DEC81	8	83FEC/289/4277
	YEAR-END - AMENDMENT	-	-	1JUL81 -31DEC81	1	83FEC/289/4442
	REQUEST FOR ADDITIONAL INFORMATION			1JAN81 -31DEC81	1	83FEC/274/4206
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN81 -31DEC81	1	83FEC/280/3599
	REQUEST FOR ADDITIONAL INFORMATION			1JUL81 -31DEC81	1	83FEC/282/1384
	REQUEST FOR ADDITIONAL INFORMATION			1JUL81 -31DEC81	1	84FEC/290/0410
1982	APRIL QUARTERLY - AMENDMENT	-	-	1JAN82 -31MAR82	1	83FEC/289/4443
	REQUEST FOR ADDITIONAL INFORMATION			1JAN82 -31MAR82	1	84FEC/290/0411
	MID-YEAR REPORT	12,141	12,215	1JAN82 -30JUN82	10	82FEC/238/4914
	MID-YEAR REPORT - AMENDMENT	13,266	12,215	1JAN82 -30JUN82	14	83FEC/266/5442
	MID-YEAR REPORT - AMENDMENT	13,366	-	1JAN82 -30JUN82	2	83FEC/266/5440
	MID-YEAR REPORT - AMENDMENT	12,141	12,215	1JAN82 -30JUN82	27	83FEC/272/3878
	MID-YEAR REPORT - AMENDMENT	12,141	12,215	1JAN82 -30JUN82	12	83FEC/280/3008
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN82 -30JUN82	5	83FEC/282/3663
	MID-YEAR REPORT - AMENDMENT	12,414	12,215	1JAN82 -30JUN82	14	83FEC/289/4289
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN82 -30JUN82	1	83FEC/289/4444
	REQUEST FOR ADDITIONAL INFORMATION			1JAN82 -30JUN82	2	83FEC/271/2926
	REQUEST FOR ADDITIONAL INFORMATION			1JAN82 -30JUN82	2	83FEC/274/4208
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN82 -30JUN82	4	83FEC/279/1397
	REQUEST FOR ADDITIONAL INFORMATION			1JAN82 -30JUN82	1	83FEC/282/1385
	OCTOBER QUARTERLY	16,943	14,750	10JUL82 -30SEP82	19	82FEC/248/4114
	OCTOBER QUARTERLY - AMENDMENT	16,943	14,750	1JUL82 -30SEP82	17	83FEC/266/5456
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL82 -30SEP82	1	83FEC/267/0438
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL82 -30SEP82	10	83FEC/272/3911
	OCTOBER QUARTERLY - AMENDMENT	17,092	14,750	1JUL82 -30SEP82	18	83FEC/280/3020
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL82 -30SEP82	1	83FEC/282/3909
	REQUEST FOR ADDITIONAL INFORMATION			1JUL82 -30SEP82	1	83FEC/271/2929
	REQUEST FOR ADDITIONAL INFORMATION			1JUL82 -30SEP82	1	83FEC/282/1386
	PRE-GENERAL	4,056	5,000	10CT82 -130CT82	10	82FEC/253/2879
	PRE-GENERAL - AMENDMENT	4,056	5,000	10CT82 -130CT82	10	83FEC/266/5473
	PRE-GENERAL - AMENDMENT	-	-	10CT82 -130CT82	1	83FEC/267/0437
	PRE-GENERAL - AMENDMENT	-	-	10CT82 -130CT82	4	83FEC/272/4088

Archives (Mar 1983)

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
	PRE-GENERAL - AMENDMENT	4,056	5,000	10CT82 -130CT82	10	83FEC/280/3038
	PRE-GENERAL - AMENDMENT	-	-	10CT82 -130CT82	1	83FEC/282/3910
	PRE-GENERAL - AMENDMENT	4,056	5,000	10CT82 -130CT82	9	83FEC/289/4303
	PRE-GENERAL - AMENDMENT	-	-	10CT82 -130CT82	1	83FEC/289/4445
	1 ST LETTER INFORMATIONAL NOTICE	-	-	10CT82 -130CT82	1	83FEC/271/1890
	REQUEST FOR ADDITIONAL INFORMATION	-	-	10CT82 -130CT82	1	83FEC/282/1387
	REQUEST FOR ADDITIONAL INFORMATION	-	-	10CT82 -130CT82	1	84FEC/290/0412
	POST-GENERAL	19,730	20,534	140CT82 -22NOV82	19	82FEC/258/4014
	POST-GENERAL - AMENDMENT	19,730	20,534	140CT82 -22NOV82	18	83FEC/266/5483
	POST-GENERAL - AMENDMENT	-	-	140CT82 -22NOV82	1	83FEC/267/0436
	POST-GENERAL - AMENDMENT	19,730	20,534	140CT82 -22NOV82	24	83FEC/272/3854
	POST-GENERAL - AMENDMENT	19,530	20,534	140CT82 -22NOV82	20	83FEC/280/3048
	POST-GENERAL - AMENDMENT	-	-	140CT82 -22NOV82	1	83FEC/282/3911
	REQUEST FOR ADDITIONAL INFORMATION	-	-	140CT82 -22NOV82	2	83FEC/271/2931
	REQUEST FOR ADDITIONAL INFORMATION	-	-	140CT82 -22NOV82	1	83FEC/282/1388
	YEAR-END	2,930	1,984	23NOV82 -31DEC82	9	83FEC/266/5431
	YEAR-END - AMENDMENT	2,930	1,984	23NOV82 -31DEC82	13	83FEC/272/3928
	YEAR-END - AMENDMENT	2,930	1,984	23NOV82 -31DEC82	9	83FEC/280/3088
	YEAR-END - AMENDMENT	-	-	23NOV82 -31DEC82	1	83FEC/282/3912
	YEAR-END - AMENDMENT	2,930	1,984	23NOV82 -31DEC82	9	83FEC/289/4312
	YEAR-END - AMENDMENT	-	-	23NOV82 -31DEC82	1	83FEC/289/4446
	REQUEST FOR ADDITIONAL INFORMATION	-	-	23NOV82 -31DEC82	2	83FEC/271/2934
	REQUEST FOR ADDITIONAL INFORMATION	-	-	23NOV82 -31DEC82	1	83FEC/282/1389
	REQUEST FOR ADDITIONAL INFORMATION	-	-	23NOV82 -31DEC82	1	83FEC/289/0284
1983	MISCELLANEOUS REPORT	-	-	20MAY83 TO FEC	2	83FEC/272/3907
	MISCELLANEOUS REPORT	-	-	20MAY83 TO FEC	2	83FEC/272/3895
	MISCELLANEOUS REPORT	-	-	21DEC83 TO FEC	2	83FEC/289/4285
	MISCELLANEOUS REPORT	-	-	21DEC83 TO FEC	2	83FEC/289/4287
	TOTAL	78,404	0	78,937	0	423 TOTAL PAGES

All Reports Reviewed.
 Ending CASH (12-31-82): \$ 1,407
 DEBTS (12-31-82) : \$ 14,731

Attachment 1 (Pages 2 of 3)

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
CALIFORNIA LEAGUE OF CONSERVATION VOTERS CONNECTED ORGANIZATION: NONE				NON-PARTY QUALIFIED		ID #C00012401
1983	STATEMENT OF ORGANIZATION - AMENDMENT			24JUN83	2	83FEC/274/1951
	MID-YEAR REPORT	11,981	13,121	1JAN83 -30JUN83	12	83FEC/280/2626
	YEAR-END	0	243	1JUL83 -31DEC83	12	84FEC/295/2592
	TOTAL	11,981	0	13,364	0	26 TOTAL PAGES

No Reports Reviewed.
 Ending Cash (12-31-83) : \$ 24
 Debts (12-31-83) : \$ 15,323

Attachment 1 (Page 3 of 3)

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

FEB 18 AM: 21

(Summary Page)

1. Name of Committee (in Full)
CALIFORNIA LEAG. OF CONSERVATION N. S.

Address (Number and Street)
942 MARKET ST. Suite 606

City, State and ZIP Code
SAN FRANCISCO CA 94102

Check if address is different than previously reported.

2. FEC Identification Number
C 000 12401

3. This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)

4. TYPE OF REPORT (check appropriate boxes)

(a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Monthly Report for _____
 Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
 Thirtieth day report following the General Election on _____ in the State of _____
 Termination Report

(b) Is this Report an Amendment?
 YES NO

8504051052234667

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period <u>1/1/81</u> Through <u>6/30/81</u>			
6. (a) Cash on Hand January 1, 19 <u>81</u>			\$ 2,214.31
(b) Cash on Hand at Beginning of Reporting Period	\$ 2,214.31		
(c) Total Receipts (from Line 1B)	\$ 14,902.61	\$ 14,902.61	
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 17,116.92	\$ 17,116.92	
7. Total Disbursements (from Line 2B)	\$ 16,298.02	\$ 16,298.02	
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) ..	\$ 818.90	\$ 818.90	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$		
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$		

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

For further information, contact:

CARL POPE
Type or Print Name of Treasurer

Federal Election Commission
Toll Free 800-424-6530
Local 202-423-4888

[Signature]
SIGNATURE OF TREASURER

Feb 8, 1981
Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437b.

All previous versions of FEC FORM 3 and FEC FORM 2a are obsolete and should no longer be used.

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FEC FORM 2X (2/80)

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

2 FEB 16 AM: 21

(Summary Page)

1. Name of Committee (in Full)
**CALIFORNIA LEAGUE OF
CONSERVATION VOTERS**

Address (Number and Street)
942 MARKET ST. #606

City, State and ZIP Code
SAN FRANCISCO CA 94102

Check if address is different than previously reported.

2. FEC Identification Number
C 000 12401

3. This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)

4. TYPE OF REPORT (check appropriate boxes)

(a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Monthly Report for _____
 Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
 Thirtieth day report following the General Election on _____ in the State of _____
 Termination Report

(b) Is this Report an Amendment?
 YES NO

8 2 0 3 2 1 3 4 5 9 7

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period	<u>7/1/81</u> Through <u>12/31/81</u>		
6. (b) Cash on Hand January 1, 19 <u>81</u>		\$ 2,214.31
(b) Cash on Hand at Beginning of Reporting Period	\$ 818.90	
(c) Total Receipts (from Line 18)	\$ 8170.13	\$ 23,072.74
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 8989.03	\$ 25,287.05
7. Total Disbursements (from Line 28)	\$ 8156.42	\$ 24,434.44
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 832.61	\$ 832.61
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

For further information, contact:

CARL POPE
Type or Print Name of Treasurer

Federal Election Commission
Toll Free 888-434-6630
Local 202-532-4000

Carl Pope
SIGNATURE OF TREASURER

Feb 8, 1981
Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

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JUL 14 1982

Attachment 2c

REGISTERED

REPORT OF RECEIPTS AND DISBURSEMENTS For a Political Committee Other Than an Authorized Committee

(Summary Page)

1. Name of Committee (in Full) California League of Conservation Voters

Address (Number and Street) 942 Market St. Suite #606

City, State and ZIP Code San Francisco, Ca. 94102

Check if address is different than previously reported.

2. FEC Identification Number C 000 12401

3. This committee qualified as a multicandidate committee during this Reporting Period on (date)

4. TYPE OF REPORT (check appropriate boxes)

- (a) April 15 Quarterly Report
July 15 Quarterly Report
October 15 Quarterly Report
January 31 Year End Report
July 31 Mid Year Report (Non-election Year Only)
Monthly Report for
Twelfth day report preceding election on in the State of
Thirtieth day report following the General Election on in the State of
Termination Report
(b) Is this Report an Amendment? YES NO

OFFICE OF THE CLERK U.S. HOUSE OF REPRESENTATIVES 1982 JUL 26 AM

SUMMARY

5. Covering Period 1/01/82 Through 6/30/82

- 6. (b) Cash on Hand January 1, 1982
(b) Cash on Hand at Beginning of Reporting Period
(c) Total Receipts (from Line 1B)
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)
7. Total Disbursements (from Line 2B)
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))
9. Debts and Obligations Owed TO the Committee
10. Debts and Obligations Owed BY the Committee

Table with 2 columns: Column A This Period, Column B Calendar Year-to-Date. Rows correspond to summary items 6(b) through 10.

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

For further information, contact:

Federal Election Commission Toll Free 800-426-9930 Local 202-673-4088

Betty A. Mangual

Type or Print Name of Treasurer

Signature of Treasurer

Date 7/12/82

Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

Empty table with 10 columns and 1 row.

FEC FORM 3X (3/80)

95040510524

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

82 NOV 4 PM 2:23

(Summary Page)

ALIGN AREA

ALIGN AREA

1. Name of Committee (In Full)

California League of Conservation Voters

Address (Number and Street)

942 Market St. Suite #606

City, State and ZIP Code

San Francisco, Ca. 94102

Check here if address is different than previously reported.

2. FEC Identification Number

C 000 1241

3. This committee qualified as a multicandidate committee during this Reporting Period on 10/5/82

4. TYPE OF REPORT (Check appropriate boxes)

(a) April 15 Quarterly Report October 15 Quarterly Report

July 15 Quarterly Report January 31 Year End Report

July 31 Mid Year Report (Non Election Year Only)

Monthly Report for

Twelfth day report preceding General (Type of Election)
election on 11/2/82 in the State of California

Thirtieth day report following the General Election

on _____ in the State of _____

Termination Report

(b) Is this Report an Amendment?

YES NO

SUMMARY

5. Covering Period 10/1/82 through 10/13/82

6. (a) Cash on hand January 1, 19 82

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 1B)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(e) and 6(c) for Column B)

7. Total Disbursements (from Line 2B)

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
		\$ 142.61
	\$ 2,261.74	
	\$ 4,056.00	\$ 33,140.82
	\$ 6,317.74	\$ 33,283.44
	\$ 5,000.00	\$ 31,965.70
	\$ 1,317.64	\$ 1,317.74
	\$ -0-	
	\$ -0-	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete

Carl Pooe

Type or Print Name of Treasurer

Carl Pooe
SIGNATURE OF TREASURER

10/21/82

Date

For further information contact

Federal Election Commission

Toll Free 800 424 9630

Local 707 523 4088

NOTE: Submission of false, erroneous or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 4371

All previous versions of FEC FORM 3 and FEC FORM 3s are obsolete and should no longer be used

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FEC FORM 3X (3/80)

35040510525
111779

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

RECEIVED AT THE FEC

Attachment 2e

03 FEB 22 P 3: 44

(Summary Page)

ALIGN AREA ALIGN AREA

1. Name of Committee (in Full)
California League of Conservation Voters

Address (Number and Street)
942 Market St. Suite #606

City, State and ZIP Code
San Francisco, Ca. 94102

Check here if address is different than previously reported.

2. FEC Identification Number
C 000 1241

3. This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (Check appropriate boxes)

(a) April 15 Quarterly Report October 15 Quarterly Report
 July 15 Quarterly Report January 31 Year End Report
 July 31 Mid Year Report (Non-Election Year Only)
 Monthly Report for _____
 Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____
 Thirtieth day report following the General Election
on _____ in the State of _____
 Termination Report

(b) Is this Report an Amendment?
 YES NO

85040510552631
03032465431

SUMMARY		COLUMN A	COLUMN B
5. Covering Period <u>11-23-82</u> through <u>12-31-82</u>		This Period	Calendar Year-to-Date
6. (a) Cash on hand January 1, 19 <u>82</u>			\$ 142.61
(b) Cash on Hand at Beginning of Reporting Period		\$ 1,737.90	
(c) Total Receipts (from Line 1B)		\$ 2,930.00	\$ 57,025.83
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 4,667.90	\$ 57,168.44
7. Total Disbursements (from Line 2B)		\$ 1,984.01	\$ 54,484.55
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 2,683.89	\$ 2,683.89
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)		\$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		\$ 9,600.02	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete

Carl Pope/Betty A. Mangual
Type or Print Name of Treasurer

Betty A. Mangual
SIGNATURE OF TREASURER

2/16/83
Date

For further information contact
 Federal Election Commission
 Toll Free 800 424 9530
 Local 707 573 4088

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. 6437c.

All previous versions of FEC FORM 3 and PFC FORM 3e are obsolete and should no longer be used

FEC FORM 3X (3/80)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2
14 December 1983

Nicholas B. Clinch, Treasurer
California League of Conservation
Voters
942 Market Street, Suite 606
San Francisco, CA 94102

Identification Number: C00012401

Reference: 1981-82 Election Cycle Reports

Dear Mr. Clinch:

This letter is prompted by the Commission's review of the reports filed by your committee for the 1981-82 election cycle. A review of the reports listed below indicates that your committee repeatedly failed to file reports in a timely manner. Timely filing is a specific requirement of the Federal Election Campaign Act and essential to fulfilling the public disclosure concept embodied in the law. The Commission views late filing as a serious violation of the Act.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
Mid-Year (1/1/81-6/30/81)	7/31/81	2/16/82
Year End (7/1/81-12/31/81)	1/31/82	2/16/82
April Quarterly (1/1/82-3/31/82)	4/15/82	7/16/82
12 Day Pre-General (10/1/82-10/13/82)	10/21/82	11/1/82
Year End (11/23/82-12/31/82)	1/31/83	2/16/83

This communication affords you the opportunity to present the reasons behind the late tenders noted above. Your response should be filed with the Federal Election Commission, 1325 K Street, NW, Washington, DC 20463 within fifteen (15) days of the date of this letter. The Commission will consider your response to this notice before taking action in this matter. If you need assistance or have any questions regarding this matter, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Michael B. Fuller
Chief
Party/Non-Party Branch
Reports Analysis Division

85040510527



20 December, 1983

BOARD:

OFFICERS:
Robert Shred
President
San Diego

Charles Green
Chairman of the Board
Santa Barbara
Bill Horton
Northern Vice President
Petaluma

Dorothy Green
Southern Vice President
Los Angeles

George Wagner
Treasurer
Billerica

John Johnson
Secretary
Cathlamet

MEMBERS:

Barbara Bennett
Los Angeles
Sam Peter Bohr
Inverness

Marlene Robinson
Los Angeles
Steve Smith
Santa Barbara

Charles R. Clark
Folsom

William Fennell
Petaluma

Don Frost
Redding

Paul Gubler
Los Angeles
Tom Gull
Berkeley

Paul Gravel
San Francisco

John Hagstrom
Sacramento

Tom Harbert
Los Angeles
James Hoyt
Santa Barbara

Joe Lester
Ventura

Glenn Leonard
Los Angeles

John Lundquist
Hemlock

Richard May
San Francisco

Barbara Matthews
Palo Alto

Shirley Mitchell
San Raphael

Larry Olson
Trinidad

Judy Oring
Riverside

John Phillips
Los Angeles

Bob Power
Los Angeles

Bill Price
Inverness

Carol Purcell
Santa Barbara

William Shi
Richmond

Jeff Ward
San Diego

John Zarek
Sacramento

STAFF

Carl Pope
Oakland

Lucy Blah
San Francisco

Bill Plant
Los Angeles

Michael B. Filler
Chief-Party/WOn-Party Branch
Reprots Analyst Division
1325 K St.
Washington, D C. 20463

Identification Number: Ccool2401

Reference: 1981-1982 Election Cycle Reports

Dear Mr. Filler:

There seems to be some confusion between the filing of our original reports and the amendments that were filed at the request of Mr. Mark Kleinman. When I first became the assistant treasurer and the person responsible for the timely filing of our FEC reports, there was some confusion on my part as to certain procedures. Mr. Kleinman and I did finally resolve these and it was my understanding that all was well at this point.

There was some delay in filing the 1982 year-end report, because, I was out sick for the two weeks following the day all business at year end was completed.

I am in the habit of sending all reports return receipt requested, and my records, although not entirely completely, support the timely filing of all original reports and amendments within the dates specified by Mr. Kleinman in his letters and subsequent phone calls between the two of us.

Enclosed please find copies of most pertinent correspondence between us and I sincerely hope this will clear up any discrepancy in our attempt to comply with all FEC regulations.

Sincerely,

Betty A. Mangual

Betty A. Mangual
Assistant Treasurer
California League of Conservation Voters

THE POLITICAL ACTION ARM OF THE ENVIRONMENTAL COMMUNITY
942 MARKET STREET, SUITE 606, SAN FRANCISCO, CA 94102 (415) 397-7780
12217 SANTA MONICA BLVD. LOS ANGELES, CA 90025 (213) 826-8812
23-A MISSION STREET, SANTA BARBARA, CA 93101 (805) 687-4544
1800-A L STREET, SACRAMENTO, CA 95814 (916) 447-4371

See Attached



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

EQ-2
14 December 1983

Nicholas B. Clinch, Treasurer
California League of Conservation
Voters
942 Market Street, Suite 606
San Francisco, CA 94102

Identification Number: C00012401

Reference: 1981-82 Election Cycle Reports

Dear Mr. Clinch:

This letter is prompted by the Commission's review of the reports filed by your committee for the 1981-82 election cycle. A review of the reports listed below indicates that your committee repeatedly failed to file reports in a timely manner. Timely filing is a specific requirement of the Federal Election Campaign Act and essential to fulfilling the public disclosure concept embodied in the law. The Commission views late filing as a serious violation of the Act.

852A 3259100157243

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
Mid-Year (1/1/81-6/30/81)	made 7/31/81	2/16/82
Year End (7/1/81-12/31/81)	made 1/31/82	2/16/82
April Quarterly (1/1/82-3/31/82)	made 4/15/82	7/16/82 amendment is attached
12 Day Pre-General (10/1/82-10/13/82)	10/21/82 early	11/1/82 amendment attached
Year End (11/23/82-12/31/82)	2/16 1/31/83 late	2/16/83 10:07 AM my per attached

amendment
see attached

amendment
is attached

amendment attached
10:07 AM my per
attached

This communication affords you the opportunity to present the reasons behind the late tenders noted above. Your response should be filed with the Federal Election Commission, 1325 K Street, NW, Washington, DC 20463 within fifteen (15) days of the date of this letter. The Commission will consider your response to this notice before taking action in this matter. If you need assistance or have any questions regarding this matter, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Michael B. Filler

Michael B. Filler
Chief
Party/Non-Party Branch
Reports Analysis Division



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 1668

Date Filmed 1/10/85 Camera No. --- 2

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