



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1787

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FEDERAL ELECTION COMMISSION

Blue Cards, Check Deposit Memorandum, Tally Sheets,
Withdrawal Memo, Routing Slip, 12 day Report & Comment
Sheet, GC Contribution Recommendation & offer (GC Reports:-2),
PPP-Report for Add. Info.

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):

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|-------------------------------------|---|--------------------------|--|
| <input checked="" type="checkbox"/> | (1) Classified Information | <input type="checkbox"/> | (6) Personal privacy |
| <input checked="" 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 | | |

35040511913

Signed Andrew J. Martini
date 1/23/84

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1787
10th Congressional District)
Democratic Committee)
Bradley P. Miller, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 15, 1985, the Commission decided by a vote of 6-0 to take the following actions in MUR 1787:

1. Accept the conciliation agreement submitted with the General Counsel's Report signed January 10, 1985.
2. Close the file.
3. Approve the letter attached to the General Counsel's Report signed January 10, 1985.

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

Attest:

1-16-85
Date

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

Received in Office of Commission Secretary: 1-11-85, 9:49
Circulated on 48 hour tally basis: 1-11-85, 2:00

35040511914



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 22, 1985

Bradley P. Miller, treasurer
10th Congressional District Democratic Committee
5244 North State Road
Alma, Michigan 48801

RE: MUR 1787

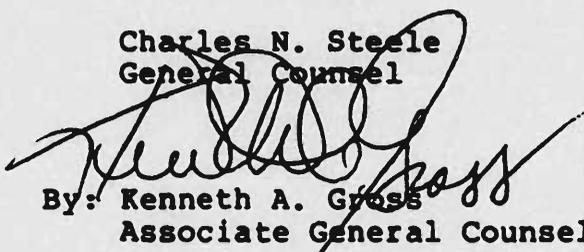
Dear Mr. Miller:

On January 15, 1985, the Commission accepted the conciliation agreement signed by you and a civil penalty in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(i) and (iv), 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

35040511915

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

1. The 10th Congressional District Democratic Committee is a political committee registered with the Commission.

2. Bradley P. Miller is the treasurer of the 10th Congressional District Democratic Committee.

3. The Respondents were required to file the 1983 Year-End Report by January 31, 1983. The report was filed on February 28, 1984.

4. The Respondents were required to file the 1984 April Quarterly Report by April 15, 1984. The report was filed on June 6, 1984.

5. The Respondents were required to file the 1984 July Quarterly Report by July 15, 1984. The report was filed on August 12, 1984.

V. Respondents violated 2 U.S.C. § 434 (a) (4) (A) (i) and (iv) by failing to file timely the 1983 Year-End, 1984 April and July Quarterly Reports.

VI. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of seven hundred dollars (\$700), pursuant to 2 U.S.C. § 437g(a) (5) (A).

VII. Respondents agree that they 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.

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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.

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 Gross*
Kenneth Gross
Associate General Counsel

January 18, 1985
Date

FOR THE RESPONDENTS:

Bradley P. Miller
Bradley P. Miller, Treasurer
10th Congressional District
Democratic Committee

12-6-84
Date

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Bradley P. Miller, treasurer
10th Congressional District Democratic Committee
5244 North State Road
Alma, Michigan 48801

RE: MUR 1787

Dear Mr. Miller:

On , 1985, the Commission accepted the conciliation agreement signed by you and a civil penalty in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(i) and (iv), 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

am 1/18

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ACC # 5742
Check 1787
Markovich

TENTH CONGRESSIONAL DISTRICT DEMOCRATIC COMMITTEE
5244 North Stateless SUPERIOR ST. ROAD
ALMA, MICH. 48801

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December 6 1984 74-300
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PAY TO THE ORDER OF Treasurer of the United States \$ 700.00
Seven Hundred & ^{NO}/₁₀ is _____ DOLLARS

 **isabella bank
and trust** MT. PLEASANT, MICH. 48868

X *Angie Rossetto*
X *Bradley P. Miller*

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 29, 1984

Bradley P. Miller, Treasurer
10th Congressional District Democratic Committee
5244 North State Road
Alma, Michigan 48801

Re: MUR 1787

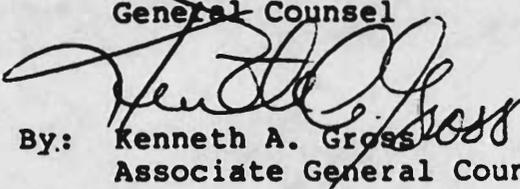
Dear Mr. Miller:

On September 13, 1984, the Commission found reason to believe that the 10th Congressional District Democratic Committee and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(i) and (iv). At your request, the Commission determined on November 26, 1984, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Andrew Maikovich, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

By: 
Kenneth A. Gross
Associate General Counsel

Enclosures

35040511921



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Bradley P. Miller, Treasurer
10th Congressional District Democratic Committee
5244 North State Road
Alma, Michigan 48801

Re: MUR 1787

Dear Mr. Miller:

On September 13, 1984, the Commission found reason to believe that the 10th Congressional District Democratic Committee and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(i) and (iv). At your request, the Commission determined on November 26, 1984, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Andrew Maikovich, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures

11/27 am

35040511922

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1787
10th Congressional District)
Democratic Committee)
Bradley P. Miller, Treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 26, 1984, the Commission decided by a vote of 6-0 to take the following actions in MUR 1787:

1. Enter into conciliation with the 10th Congressional District Democratic Committee and Bradley P. Miller, as treasurer, prior to a finding of probable cause to believe.
2. Approve the proposed conciliation agreement and letter attached to the General Counsel's Report signed November 20, 1984.

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

Attest:

11-26-84

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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

11-21-84, 8:28
11-21-84, 11:00

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The 10th Congressional District Democratic Committee

RECEIVED AT THE FEC
GCC # 4917
84 OCT 11 AM 11:01
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September 28, 1984

Federal Election Commission
1325 K Street
Washington, D.C. 20463

Dear Commission,

I am writing to request settlement of your September 13, 1984 determination that our committee may have violated a provision of the Federal Election Campaign Act of 1971 by not filing our reports in time.

The three reports in question were filed late and I would like to request that no action be taken against us only due to our strengthened resolve to be timely from now on. If that is not possible, I would then like to enter pre-probable cause conciliation as soon as that can be done in order to clear up this matter.

Thank you,



Brad Miller, Treasurer

35040511924



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 18, 1984

Bradley P. Miller, Treasurer
10th Congressional District Democratic Committee
5244 North State Road
Alma, Michigan 48801

RE: MUR 1787

Dear Mr. Miller:

On September 13, 1984, the Federal Election Commission determined that there is reason to believe the 10th Congressional District Democratic Committee, and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (iv), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). 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 your committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within ten days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, 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 intend to be represented by counsel in this matter, please advise the Commission by completing the 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.

35040511925

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 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 Andrew Maikovich, 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

35040511926

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 1787
STAFF MEMBER(S) & TEL. NO.
Maikovich 523-4000

RESPONDENT 10th Congressional District Democratic

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

It is alleged that the 10th Congressional District Democratic Committee (the "Committee") violated 2 U.S.C. § 434(a)(4)(A)(iv) by filing its Year-End Report 29 days late.

It is alleged the Committee also violated 2 U.S.C. § 434(a)(4)(A)(i) by filing its April Quarterly Report 50 days late and by filing its July Quarterly Report 17 days late.

FACTUAL AND LEGAL ANALYSIS

FACTS

The 10th Congressional District Democratic Committee failed to file its Year-End Report on the due date of January 31, 1984. The Committee was sent a Non-Filer notice on February 28, 1984. On February 29, 1984, the Committee filed its Year-End Report, 29 days late.

The Committee subsequently failed to file its April Quarterly Report by the April 15 deadline. The Committee was sent a Non-Filer Notice on May 8, 1984. On June 6, 1984, the Committee filed its April Quarterly Report, 50 days late.

On June 4, 1984, the Committee was mailed a Chronic Late Filer Notice for failing to file the previous two reports in a timely manner.

35040511927

Despite the notice, the Committee failed to file its July Quarterly Report by the due date of July 15, 1984. On August 12, 1984, the Committee filed its July Quarterly Report, 17 days late.

Legal Analysis

The 10th Congressional District Democratic Committee is a party committee not authorized by a candidate. As such, the Committee must file the necessary reports as prescribed in 2 U.S.C. § 434(a)(4)(A)(i) and (iv).

Unauthorized committees must file a Year-End report no later than January 31. 2 U.S.C. § 434(a)(4)(A)(iv). The Committee filed its Year-End report on February 29, 1984. There is reason to believe the Committee and its treasurer, Bradley P. Miller, violated 2 U.S.C. § 434(a)(4)(A)(iv) for failing to file its Year-End report in a timely manner.

2 U.S.C. § 434(a)(4)(A)(i) requires unauthorized committees to file quarterly reports in general election years no later than 15 days after the last day of the calendar quarter (i.e. April 15, July 15 and October 15). The Committee filed its April Quarterly Report on June 14, 1984 and its July Quarterly Report on August 1, 1984. There is reason to believe the Committee and its treasurer, Bradley P. Miller, violated 2 U.S.C. § 434(a)(4)(A)(i) for failing to file its April and July Quarterly Reports in a timely manner.

35040511928

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
10th Congressional District) 84 NF - 47
Democratic Committee and)
its treasurer,)
Bradley P. Miller)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 13, 1984, the Commission decided by a vote of 6-0 to take the following actions in the above-captioned matter:

1. Open a MUR.
2. Find reason to believe that the 10th Congressional District Democratic Party and its treasurer, Bradley P. Miller, violated 2 U.S.C. § 434(a)(4)(A)(i) and (iv).
3. Approve the letter and General Counsel's Factual and Legal Analysis attached to the General Counsel's report dated September 10, 1984.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry, and Reiche voted affirmatively for the decision.

Attest:

9-13-84

Date

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

35040511929



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 18, 1984

Bradley P. Miller, Treasurer
10th Congressional District Democratic Committee
5244 North State Road
Alma, Michigan 48801

RE: MUR 1787

Dear Mr. Miller:

On September 13, 1984, the Federal Election Commission determined that there is reason to believe the 10th Congressional District Democratic Committee, and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (iv), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). 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 your committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within ten days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, 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).

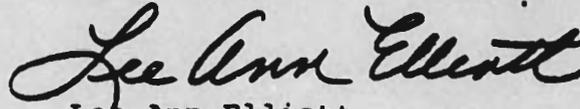
If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

35040511930

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 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 Andrew Maikovich, 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

85040511931

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 1787
STAFF MEMBER(S) & TEL. NO.
Maikovich 523-4000

RESPONDENT 10th Congressional District Democratic

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

It is alleged that the 10th Congressional District Democratic Committee (the "Committee") violated 2 U.S.C. § 434(a)(4)(A)(iv) by filing its Year-End Report 29 days late.

It is alleged the Committee also violated 2 U.S.C. § 434(a)(4)(A)(i) by filing its April Quarterly Report 50 days late and by filing its July Quarterly Report 17 days late.

FACTUAL AND LEGAL ANALYSIS

FACTS

The 10th Congressional District Democratic Committee failed to file its Year-End Report on the due date of January 31, 1984. The Committee was sent a Non-Filer notice on February 28, 1984. On February 29, 1984, the Committee filed its Year-End Report, 29 days late.

The Committee subsequently failed to file its April Quarterly Report by the April 15 deadline. The Committee was sent a Non-Filer Notice on May 8, 1984. On June 6, 1984, the Committee filed its April Quarterly Report, 50 days late.

On June 4, 1984, the Committee was mailed a Chronic Late Filer Notice for failing to file the previous two reports in a timely manner.

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Despite the notice, the Committee failed to file its July Quarterly Report by the due date of July 15, 1984. On August 12, 1984, the Committee filed its July Quarterly Report, 17 days late.

Legal Analysis

The 10th Congressional District Democratic Committee is a party committee not authorized by a candidate. As such, the Committee must file the necessary reports as prescribed in 2 U.S.C. § 434(a)(4)(A)(i) and (iv).

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Unauthorized committees must file a Year-End report no later than January 31. 2 U.S.C. § 434(a)(4)(A)(iv). The Committee filed its Year-End report on February 29, 1984. There is reason to believe the Committee and its treasurer, Bradley P. Miller, violated 2 U.S.C. § 434(a)(4)(A)(iv) for failing to file its Year-End report in a timely manner.

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2 U.S.C. § 434(a)(4)(A)(i) requires unauthorized committees to file quarterly reports in general election years no later than 15 days after the last day of the calendar quarter (i.e. April 15, July 15 and October 15). The Committee filed its April Quarterly Report on June 14, 1984 and its July Quarterly Report on August 1, 1984. There is reason to believe the Committee and its treasurer, Bradley P. Miller, violated 2 U.S.C. § 434(a)(4)(A)(i) for failing to file its April and July Quarterly Reports in a timely manner.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Bradley P. Miller, Treasurer
10th Congressional District Democratic Committee
5244 North State Road
Alma, Michigan 48801

RE: MUR

Dear Mr. Miller:

On September , 1984, the Federal Election Commission determined that there is reason to believe the 10th Congressional District Democratic Committee, and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (iv), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). 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 your committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within ten days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, 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 intend to be represented by counsel in this matter, please advise the Commission by completing the 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.

35040511934

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 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 Andrew Maikovich, 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

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AM.

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

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT

SEP 11 P 4: 43

DATE AND TIME OF TRANSMITTAL BY RAD REFERRAL: 84NF-47
OGC TO THE COMMISSION 9/11/84-4:40 STAFF MEMBER: Andrew Naikovich

SOURCE OF MUR: INTERNALLY GENERATED

RESPONDENTS' NAME: 10th Congressional District Democratic
Committee and its treasurer,
Bradley P. Miller

INTERNAL REPORTS CHECKED: The 10th Congressional District
Democratic Committee Reports

GENERATION OF MATTER

This matter was referred to the Office of General Counsel on
June 27, 1984, by the Reports Analysis Division, (Attachment 1).

SUMMARY OF ALLEGATIONS

It is alleged that the 10th Congressional District
Democratic Committee (the "Committee") violated 2 U.S.C.
§ 434(a)(4)(A)(iv) by filing its Year-End Report 29 days late.

It is alleged the Committee also violated 2 U.S.C.
§ 434(a)(4)(A)(i) by filing its April Quarterly Report 50 days
late and by filing its July Quarterly Report 17 days late.

FACTUAL AND LEGAL ANALYSIS

FACTS

The 10th Congressional District Democratic Committee failed
to file its Year-End Report on the due date of January 31, 1984.
The Committee was sent a Non-Filer notice on February 28, 1984.
On February 29, 1984, the Committee filed its Year-End Report, 29
days late.

35040511936

The Committee subsequently failed to file its April Quarterly Report by the April 15 deadline. The Committee was sent a Non-Filer Notice on May 8, 1984. On June 6, 1984, the Committee filed its April Quarterly Report, 50 days late.

On June 4, 1984, the Committee was mailed a Chronic Late Filer Notice for failing to file the previous two reports in a timely manner.

Despite the notice, the Committee failed to file its July Quarterly Report by the due date of July 15, 1984. On August 12, 1984, the Committee filed its July Quarterly Report, 17 days late.

Legal Analysis

The 10th Congressional District Democratic Committee is a party committee not authorized by a candidate. As such, the Committee must file the necessary reports as prescribed in 2 U.S.C. § 434(a)(4)(A)(i) and (iv).

Unauthorized committees must file a Year-End report no later than January 31. 2 U.S.C. § 434(a)(4)(A)(iv). The Committee filed its Year-End report on February 29, 1984. There is reason to believe the Committee and its treasurer, Bradley P. Miller, violated 2 U.S.C. § 434(a)(4)(A)(iv) for failing to file its Year-End report in a timely manner.

2 U.S.C. § 434(a)(4)(A)(i) requires unauthorized committees to file quarterly reports in general election years no later than 15 days after the last day of the calendar quarter (i.e. April 15, July 15 and October 15). The Committee filed its April Quarterly Report on June 14, 1984 and its July Quarterly Report

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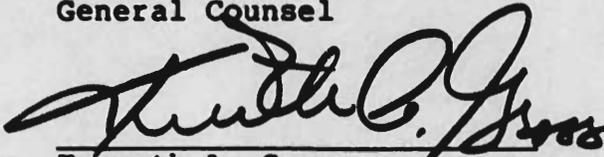
on August 1, 1984. There is reason to believe the Committee and its treasurer, Bradley P. Miller, violated 2 U.S.C. § 434(a)(4)(A)(i) for failing to file its April and July Quarterly Reports in a timely manner.

RECOMMENDATION

1. Open a MUR.
2. Find reason to believe that the 10th Congressional District Democratic Party and its treasurer, Bradley P. Miller, violated 2 U.S.C. § 434(a)(4)(A)(i) and (iv).
3. Approve the attached letter and General Counsel's Factual and Legal Analysis.

Charles N. Steele
General Counsel

September 10, 1984
Date


By: Kenneth A. Gross
Associate General Counsel

Attachments

- 1) Referral
- 2) Letter to Respondent
- 3) General Counsel's Factual and Legal Analysis

85040511938

Attachment 1

REPORTS ANALYSIS REFERRAL
TO
OFFICE OF GENERAL COUNSEL

DATE: 14 August 1984

ANALYST: Alva E. Smith

I. COMMITTEE: 10th Congressional District Democratic
Committee (C00099465)
Bradley P. Miller, Treasurer
5244 North State Road
Alma, MI 48801

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

III. BACKGROUND:

Chronic Late Filing of Reports

The 10th Congressional District Democratic Committee ("the Committee") failed to file three (3) Reports of Receipts and Disbursements in a timely manner for the 1983-1984 election cycle (Attachments 2, 3, and 4). The filings were between 17 and 50 days late.

<u>REPORT TYPE</u>	<u>DATE DUE</u>	<u>DATE FILED</u>
Year End (7/1/83-12/31/83)	1/31/84 ^{1/}	2/29/84
April Quarterly (1/1/84-3/31/84)	4/15/84 ^{2/}	6/4/84
July Quarterly (4/1/84-7/18/84)	7/15/84	8/1/84

^{1/} The Committee was sent a Non-Filer Notice on February 28, 1984 (Attachment 5).

^{2/} The Committee was sent a Non-Filer Notice on May 8, 1984 (Attachment 6).

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10TH CONGRESSIONAL DISTRICT
DEMOCRATIC COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

On June 14, 1984, the Committee was sent a Chronic Late Filer Notice for failing to file the 1983 Year End and 1984 April Quarterly Reports in a timely manner. The notice advised the Committee that additional late filings may result in legal enforcement action (Attachment 7). Despite this notice, however, the Committee failed to file the 1984 July Quarterly Report in a timely manner.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

The Committee was sent a Request for Additional Information on July 11, 1984 for failing to disclose administrative expenses on its 1984 April Quarterly Report (Attachment 8). On August 2, 1984, a Second Notice was sent for failing to respond (Attachment 9).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Bradley P. Miller, Treasurer
10th Congressional District Democratic Committee
5244 North State Road
Alma, Michigan 48801

RE: MUR

Dear Mr. Miller:

On September , 1984, the Federal Election Commission determined that there is reason to believe the 10th Congressional District Democratic Committee, and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (iv), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). 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 your committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within ten days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, 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 intend to be represented by counsel in this matter, please advise the Commission by completing the 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.

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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 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 Andrew Maikovich, 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

35040511942

(4)

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO.
STAFF MEMBER(S) & TEL. NO.
Maikovich 523-4000

RESPONDENT 10th Congressional District Democratic

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

It is alleged that the 10th Congressional District Democratic Committee (the "Committee") violated 2 U.S.C. § 434(a)(4)(A)(iv) by filing its Year-End Report 29 days late.

It is alleged the Committee also violated 2 U.S.C. § 434(a)(4)(A)(i) by filing its April Quarterly Report 50 days late and by filing its July Quarterly Report 17 days late.

FACTUAL AND LEGAL ANALYSIS

FACTS

The 10th Congressional District Democratic Committee failed to file its Year-End Report on the due date of January 31, 1984. The Committee was sent a Non-Filer notice on February 28, 1984. On February 29, 1984, the Committee filed its Year-End Report, 29 days late.

The Committee subsequently failed to file its April Quarterly Report by the April 15 deadline. The Committee was sent a Non-Filer Notice on May 8, 1984. On June 6, 1984, the Committee filed its April Quarterly Report, 50 days late.

On June 4, 1984, the Committee was mailed a Chronic Late Filer Notice for failing to file the previous two reports in a timely manner.

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Despite the notice, the Committee failed to file its July Quarterly Report by the due date of July 15, 1984. On August 12, 1984, the Committee filed its July Quarterly Report, 17 days late.

Legal Analysis

The 10th Congressional District Democratic Committee is a party committee not authorized by a candidate. As such, the Committee must file the necessary reports as prescribed in 2 U.S.C. § 434(a)(4)(A)(i) and (iv).

Unauthorized committees must file a Year-End report no later than January 31. 2 U.S.C. § 434(a)(4)(A)(iv). The Committee filed its Year-End report on February 29, 1984. There is reason to believe the Committee and its treasurer, Bradley P. Miller, violated 2 U.S.C. § 434(a)(4)(A)(iv) for failing to file its Year-End report in a timely manner.

2 U.S.C. § 434(a)(4)(A)(i) requires unauthorized committees to file quarterly reports in general election years no later than 15 days after the last day of the calendar quarter (i.e. April 15, July 15 and October 15). The Committee filed its April Quarterly Report on June 14, 1984 and its July Quarterly Report on August 1, 1984. There is reason to believe the Committee and its treasurer, Bradley P. Miller, violated 2 U.S.C. § 434(a)(4)(A)(i) for failing to file its April and July Quarterly Reports in a timely manner.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

14 August 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: REFERRAL OF THE 10TH CONGRESSIONAL DISTRICT
DEMOCRATIC COMMITTEE

This is a referral of the 10th Congressional District Democratic Committee ("the Committee"). The Committee failed to file three (3) reports in a timely manner during the 1983-1984 election cycle. According to the Review and Referral Procedures for Unauthorized Committees (Standard 4), this matter requires further examination by your office.

If you have any questions regarding this matter, please contact Alva E. Smith at 523-4048.

Attachment

35040511945

REPORTS ANALYSIS REFERRAL
TO
OFFICE OF GENERAL COUNSEL

DATE: 14 August 1984

ANALYST: Alva E. Smith

I. COMMITTEE: 10th Congressional District Democratic
Committee (C00099465)
Bradley P. Miller, Treasurer
5244 North State Road
Alma, MI 48801

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

III. BACKGROUND:

Chronic Late Filing of Reports

The 10th Congressional District Democratic Committee ("the Committee") failed to file three (3) Reports of Receipts and Disbursements in a timely manner for the 1983-1984 election cycle (Attachments 2, 3, and 4). The filings were between 17 and 50 days late.

<u>REPORT TYPE</u>	<u>DATE DUE</u>	<u>DATE FILED</u>
Year End (7/1/83-12/31/83)	1/31/84 ^{1/}	2/29/84
April Quarterly (1/1/84-3/31/84)	4/15/84 ^{2/}	6/4/84
July Quarterly (4/1/84-7/18/84)	7/15/84	8/1/84

^{1/} The Committee was sent a Non-Filer Notice on February 28, 1984 (Attachment 5).

^{2/} The Committee was sent a Non-Filer Notice on May 8, 1984 (Attachment 6).

35040511946

**10TH CONGRESSIONAL DISTRICT
DEMOCRATIC COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2**

On June 14, 1984, the Committee was sent a Chronic Late Filer Notice for failing to file the 1983 Year End and 1984 April Quarterly Reports in a timely manner. The notice advised the Committee that additional late filings may result in legal enforcement action (Attachment 7). Despite this notice, however, the Committee failed to file the 1984 July Quarterly Report in a timely manner.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

The Committee was sent a Request for Additional Information on July 11, 1984 for failing to disclose administrative expenses on its 1984 April Quarterly Report (Attachment 8). On August 2, 1984, a Second Notice was sent for failing to respond (Attachment 9).

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3 5 0 4 0 5 1 1 9 4 8

FEDERAL ELECTION COMMISSION
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (83-84)

DATE 8AUG84
 PAGE 1

PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
10TH CONGRESSIONAL DISTRICT DEMOCRATIC COMMITTEE CONNECTED ORGANIZATION: 10TH CONGRESSIONAL DIST DEM CMTE				PARTY QUALIFIED		ID-0C00099465
1983	MID-YEAR REPORT	54,182	52,439	1JAN83 -30JUN83	9	83FEC/279/5318
	YEAR-END	47,692	48,505	1JUL83 -31DEC83	8	84FEC/297/3917
	NOTICE OF FAILURE TO FILE			1JUL83 -31DEC83	1	84FEC/297/3871
1984	MISCELLANEOUS NOTICE FROM FEC			14JUN84	1	84FEC/316/5093
	APRIL QUARTERLY	26,853	27,819	1JAN84 -31MAR84	6	84FEC/216/1478
	NOTICE OF FAILURE TO FILE			1JAN84 -31MAR84	1	84FEC/313/4729
	REQUEST FOR ADDITIONAL INFORMATION			1JAN84 -31MAR84	2	84FEC/319/4000
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN84 -31MAR84	3	84FEC/324/4990
	JULY QUARTERLY	26,655	24,405	1APR84 -18JUL84	4	84FEC/324/4557
	TOTAL	155,382	0 153,168	0	35	TOTAL PAGES

All reports, with the exception of the 1984 July Quarterly Report, have been reviewed.

Ending cash-on-hand figure (as of 7/18/84): \$4,040 (as calculated by analyst)

Debts: \$0

(Attachment 1)

84 FEB 29

44

(Summary Page)

ALIGN AREA

ALIGN AREA

1. Name of Committee (In Full)

Tenth Congressional District
Democratic Committee

Address (Number and Street)

5244 N. State Road

City, State and ZIP Code

Alma, MI 48801

Check here if address is different than previously reported

2. FEC Identification Number

C 000 99 465

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) Y/L
- 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

5. Covering Period 7-1-83 through 12-31-83

6. (a) Cash on hand January 1, 1983

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(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 28)

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)		\$ 1824.08
6(b)	\$ 3567.34	
6(c)	\$ 47692.80	\$ 101875.72
6(d)	\$ 51260.14	\$ 103699.80
7	\$ 48505.49	\$ 100945.15
8	\$ 2,754.65	\$ 2,754.65
9	\$ —	
10	\$ —	

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

Bradley P. Miller
Type or Print Name of Treasurer

Bradley P. Miller 1-29-84
SIGNATURE OF TREASURER Date

For further information contact
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

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.

11/17/83	1/29/84	11/17/83	1/29/84				
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FEC FORM 3X (3/80)

3 3 0 1 4 0 5 1 7 9 . 4 9 1 7

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

84 JUN 4 11 24
ALMA AREA
ATTACHMENT '3

Summary Page

ALMA AREA

1 Name of Committee (in Full)

Tenth Congressional District
Democratic Committee

Address (Number and Street)

5244 N. State Rd.

City, State and ZIP Code

Alma, MI 48801

Check here if address is different than previously reported

2 FEC Identification Number

C000 99 465

3 The committee qualified as a multi-candidate committee during the Reporting Period on _____

4. TYPE OF REPORT (Check appropriate boxes)

- 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 _____
 Tenth day report preceding _____ Year or Election
 election on _____ in the State of _____
 Thirtieth day report following the General Election
 on _____ in the State of _____
 Termination Report

5a) Is the Report an Amendment?

YES NO

SUMMARY

6 Covering Period 1-1-84 through 3-31-84

6 (a) Cash on hand January 1, 19 84

6 (b) Cash on Hand at Beginning of Reporting Period

6 (c) Total Receipts from Line 18)

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

6 (e) Disbursements from Line 22

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

COLUMN A This Period	COLUMN B Calendar Year to Date
	2754.65
2754.65	
26853.62	26853.62
29608.27	29608.27
27819.11	27819.11
1789.16	1789.16

7 (a) Disbursements Due to the Committee

7 (b) Disbursements Due to Schedule D

7 (c) Disbursements Due to Schedule E

7 (d) Disbursements Due to Schedule F

Bradley P. Miller

Bradley P. Miller

May 15, 1984

9 1 7 5 5 1 6 1 1 7 8

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

ATTACHMENT 4
RECEIVED 2 THE FEC

(Summary Page)

84 AUG 1 ALL 53
ACTED AND

CLIQUE AREA

1 Name of Committee (in Full)

**Tenth Congressional District
Democratic Committee**

Address (Number and Street)

5244 North State Rd.

City, State and ZIP Code

Alma, MI 48801

Check here if address is different than previously reported

2 FEC Identification Number

C00099 465

3 This committee qualified as a multicandidate committee during the Reporting Period on _____

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 _____
 Tenth day report preceding _____ Type of Election
election on _____ in the State of _____
 Fifteenth 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 **4-1-84** through **7-18-84**

6 (a) Cash on hand January 1, 19 **84**

(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)

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

Bradley P. Miller
Type or Print Name of Treasurer

Bradley P. Miller **7-24-84**
SIGNATURE OF TREASURER Date

For further information contact

Federal Election Commission
Tel: For 800 426 9530
Loc: 703 573 6088

NOTE: Submission of false, erroneous or incomplete information may subject the person signing this report to the penalties of 18 U.S.C. § 437

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

FEC FORM 3A 3 80

851031541957



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

FEB 28 1984

RO-7

Bradley P. Miller, Treasurer
10th Congressional District Democratic
Committee
5244 N. State Road
Alma, MI 48801

Identification Number: C00099465

Reference: 1983 Year End Report (7/1/83-12/31/83)

Dear Mr. Miller:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Report of Receipts and Disbursements as required by the Federal Election Campaign Act. You were previously notified of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 1325 K Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

The failure to file this report may result in an audit or legal enforcement action.

If you have any questions regarding this matter, please contact Eugene LaCrocce on our toll-free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

85040511952



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

EO-7

May 8, 1984

Bradley P. Miller, Treasurer
10th Congressional District
Democratic Committee
5244 N. State Road
Alma, MI 48801

Identification Number: C00099465

Reference: April Quarterly Report (1/1/84-3/31/84)

Dear Mr. Miller:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Report of Receipts and Disbursements as required by the Federal Election Campaign Act. You were previously notified of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 1325 K Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

The failure to file this report may result in an audit or legal enforcement action.

If you have any questions regarding this matter, please contact Eugene LaCroce on our toll-free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

85040511953
910:3124729



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

MS-L

Bradley P. Miller, Treasurer
10th Congressional District
Democratic Committee
5244 N. State Road
Alma, MI 48801

JUN 14 1984

Identification Number: C00099465

Reference: 1983-1984 Election Cycle Reports

Dear Mr. Miller:

This letter is prompted by the Commission's review of the reports filed by your committee. The following is a list of reports your committee has failed to file in a timely manner.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
Year End (12/1/83-12/31/83)	1/31/84	2/29/84
April Quarterly (1/1/84-3/31/84)	4/15/84	6/4/84

Timely filing is a specific requirement of the Federal Election Campaign Act and is essential to fulfilling the public disclosure concept embodied in that law. The Commission views late filing as a serious violation of the Act. This communication is to advise you that any additional late filing of a required report by your committee may result in the Commission initiating legal enforcement action.

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) 523-4048.

Sincerely,

Michael B. Miller
Chief
Party/Non-Party Branch

950A,0,51,1,9,5,4



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20543

JUL 1 1984 HQ-2

Bradley P. Miller, Treasurer
10th Congressional District
Democratic Committee
5244 North State Road
Alma, MI 48801

Identification Number: C00099465

Reference: April Quarterly Report (1/1/84-3/31/84)

Dear Mr. Miller:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Each committee utilizing separate Federal and non-Federal accounts is required to allocate any administrative expenses between the accounts in proportion to the amount of funds expended on Federal and non-Federal elections or on another reasonable basis. Administrative expenses are those day-to-day costs of operating the committee, including rent, utilities, salaries and other miscellaneous office expenses. The Federal account of the committee must pay its share of such expenses. (11 CFR 106.1(e) and 102.5(a)(1)(i))

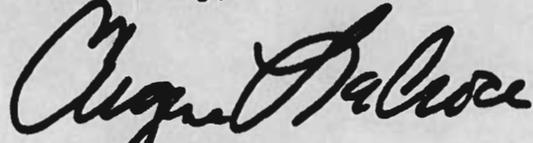
If your organization has incurred such administrative costs and your non-Federal account has paid for all such costs, your Federal account must reimburse the non-Federal account for its portion of the expenses. The amount incurred by the Federal account should be disclosed as a debt or obligation owed to the non-Federal account on Schedule D supporting Line 10 of the Summary Page. When payments are made toward the debt, they should be reported on Schedule B supporting Line 19 of the Detailed Summary Page and the debt should be reduced by a corresponding amount.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission

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94733170

within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,



Eugene LaCroce
Reports Analyst
Reports Analysis Division

85040511956

34033171771



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20541

RQ-3

August 2, 1984

Bradley P. Miller, Treasurer
 10th Congressional District
 Democratic Committee
 5244 North State Road
 Alma, MI 48801

Identification Number: C00099465

Reference: April Quarterly Report (1/1/84-3/31/84)

Dear Mr. Miller:

This letter is to inform you that as of August 1, 1984, the Commission has not received your response to our request for additional information, dated July 11, 1984. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

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

If you should have any questions related to this matter, please contact Eugene LaCroce on our toll-free number (800) 424-9530 or our local number (202) 523-4048.

Sincerely,

John D. Gibson
 Assistant Staff Director
 Reports Analysis Division

Enclosure

95040511957



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1787

Date Filmed 2/1/85 Camera No. --- 7

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