



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.  
WASHINGTON, D.C. 20543

THIS IS THE END OF MUR # 1928

Date Filmed 6/21/85 Camera No. --- 4

Cameraman AS

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FEDERAL ELECTION COMMISSION

3 routing slips (5); 1<sup>st</sup> GC Report (5),  
Conciliation Agreement (Duplicate) (5);  
2 Commission Routing Slips (5); Correspon-  
dence (duplicates) (5).

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 Joyce M. Cullinan  
date 6/19/85

FEC 9-21-77

85040524467

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1922
Hawaiian Telephone Company	)	
Employees' Good Government	)	
Club	)	
RoseMarie McDonald, as treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 29, 1985, the Commission decided by a vote of 5-0 to take the following actions in MUR 1922:

1. Accept the agreement submitted with the General Counsel's Report signed May 23, 1985.
2. Close the file.
3. Approve the letter attached to the General Counsel's Report signed May 23, 1985.

Commissioners Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter; Commissioner Aikens did not cast a vote.

Attest:

5/30/85  
Date

Marjorie W Emmons  
Marjorie W. Emmons  
Secretary of the Commission

Received in Office of Commission Secretary:	5-23-85, 4:17
Circulated on 48 hour tally basis:	5-24-85, 2:00

85040524463

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Hawaiian Telephone Company	)	MUR 1922
Employees' Good Government Club	)	
RoseMarie McDonald, as treasurer	)	

RECEIVED  
 MAY 13 5:14  
 FEDERAL ELECTION COMMISSION

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Hawaiian Telephone Company Employees' Good Government Club and RoseMarie McDonald, as treasurer ("Respondents"), violated 2 U.S.C. § 434(a)(4)(A) by failing to timely file the 1984 October Quarterly and 12 Day Pre-General Election reports.

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

I. The Commission has jurisdiction over the Respondents, 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. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enter voluntarily into this agreement with the Commission.

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

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1. Hawaiian Telephone Company Employees' Good Government Club is a political committee pursuant to 2 U.S.C. § 431(4)(B).

2. RoseMarie McDonald is the treasurer of the Hawaiian Telephone Company Employees' Good Government Club.

3. The Respondents filed their 1984 October Quarterly Report, which was due on October 15, 1984, on December 5, 1984.

4. The Respondents filed their 1984 12 Day Pre-General Election Report, which was due on October 25, 1984, on December 5, 1984.

V. Pursuant to 2 U.S.C. § 434(a)(4)(A), a political committee is required, through its treasurer, to file, in a year in which a regularly scheduled general election is held, certain quarterly reports no later than the 15th day after the last day of each calendar quarter and a pre-general election report no later than the 12th day before (or posted by registered or certified mail no later than the 15th day before) the general election if the committee makes a contribution to or expenditure on behalf of a candidate in the general election.

VI. By failing to timely file the 1984 October Quarterly and 12 Day Pre-General Election reports, Respondents violated 2 U.S.C. § 434(a)(4)(A).

VII. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of Two Hundred Dollars (\$200), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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VIII. 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.

IX. 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.

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

XI. 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.

XII. 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

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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*  
Kenneth A. Gross  
Associate General Counsel

*May 31, 1985*  
Date

FOR THE RESPONDENTS:

*RoseMarie McDonald*  
RoseMarie McDonald  
Treasurer

*May 8, 1985*  
Date

8504051447?



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 3, 1985

Davis D. Higa  
Attorney at Law  
P.O. Box 2200  
Honolulu, Hawaii 96841

Re: MUR 1922  
Hawaiian Telephone Company  
Employees' Good Government Club  
RoseMarie McDonald, as treasurer

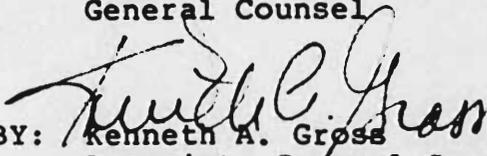
Dear Mr. Higa:

On May 29, 1985, the Commission accepted the conciliation agreement signed by Ms. McDonald and a civil penalty in settlement of a violation of 2 U.S.C. § 434(a)(4)(B), 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 respondents 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

35040524473



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 24, 1985

Davis D. Higa, Esquire  
Attorney At Law  
P.O. Box 2200  
Honolulu, Hawaii 96841

RE: MUR 1922  
Hawaiian Telephone Company  
Employees' Good Government Club  
RoseMarie McDonald, as treasurer

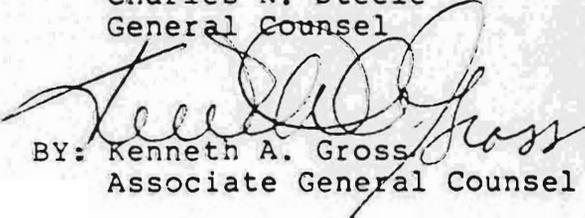
Dear Mr. Higa:

On March 8, 1985, the Commission found reason to believe that the Hawaiian Telephone Company Employees' Good Government Club and RoseMarie McDonald, as treasurer, violated 2 U.S.C. § 434(a)(4)(A). At your request, the Commission determined on April 19, 1985, 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 your clients agree with the provisions of the enclosed agreement, please have it signed and return it, along with the civil penalty, to the Commission. The check for the civil penalty should be made payable to the U.S. Treasurer. 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 Marybeth Tarrant, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,

Charles N. Steele  
General Counsel

  
BY: Kenneth A. Gross  
Associate General Counsel

Enclosure

85040524474

BEFORE THE FEDERAL ELECTION COMMISSION

FEC  
MAY 23 1985

In the Matter of )  
 )  
Hawaiian Telephone Company )  
Employees' Good Government Club )  
RoseMarie McDonald, as treasurer )

MUR 1922

**SENSITIVE**

**GENERAL COUNSEL'S REPORT**

**BACKGROUND**

On April 19, 1985, the Commission voted to enter into pre-probable cause conciliation with the Hawaiian Telephone Company Employees' Good Government Club and RoseMarie McDonald, as treasurer, and approved a proposed conciliation agreement. Attached is a conciliation agreement which has been signed by Ms. McDonald.

The attached agreement contains no changes from the agreement approved by the Commission and a check for the civil penalty has been received.

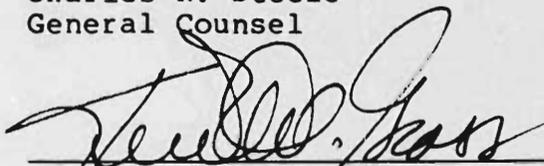
**RECOMMENDATIONS**

The Office of General Counsel recommends the Commission:

1. accept the attached agreement;
2. close the file; and
3. approve the attached letter.

Charles N. Steele  
General Counsel

May 23, 1985  
Date

BY:   
Kenneth A. Gross  
Associate General Counsel

Attachments

1. Conciliation Agreement
2. Copy of civil penalty check
3. Proposed letter

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DAVIS D. HIGA  
ATTORNEY AT LAW

FEC  
Doc # 7440  
95 MAY 13 P 3: 09  
Jarrant

Mailing Address  
P.O. Box 2200 • Honolulu, Hawaii 96841  
Phone: (808) 546-3606

May 9, 1985

MAY 13 P 5: 14  
COMMUNICATIONS UNIT

Kenneth A. Gross, Esq.  
Associate General Counsel  
Federal Election Commission  
Washington, D. C. 20463

Re: MUR 1922  
Hawaiian Telephone Company  
Employees' Good Government Club  
RoseMarie McDonald, As Treasurer

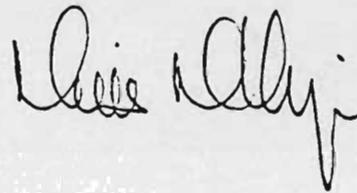
Dear Mr. Gross:

Enclosed herewith is the executed Conciliation Agreement between the Federal Election Commission and the above named Respondents. Also included is a check in the amount of \$200.00 payable to the U.S. Treasurer in compliance with paragraph VII of the Conciliation Agreement.

It is my understanding that the execution of the Conciliation Agreement and the payment of the civil penalty will conclude this MATTER UNDER REVIEW (MUR).

If additional information or documentation is required please feel free to contact me.

Yours truly,



0014D:vw

Enclosures

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HAWAIIAN TELEPHONE COMPANY EMPLOYEES  
GOOD GOVERNMENT CLUB  
P. O. BOX 2200  
HONOLULU, HAWAII 96841

59-102  
1213

May 8, 1985

PAY TO THE ORDER OF U. S. Treasurer \$ 200.00

7 Two hundred and 00/100----- DOLLARS



payable through Bank of Hawaii main branch  
HONOLULU HAWAII 96813  
HAWAIIAN TEL EMPLOYEES  
FEDERAL CREDIT UNION  
1181 ALAKEA STREET  
HONOLULU, HAWAII 96813

TWO SIGNATURES REQUIRED

*Rosemarie McDonald*

*May T. Buckley*

4 FOR Civil Penalty

85040524477

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1922
Hawaiian Telephone Company	)	
Employees' Good Government Club	)	
RoseMarie McDonald, as treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 19, 1985, the Commission decided by a vote of 6-0 to take the following actions in MUR 1922:

1. Enter into pre-probable cause conciliation with Hawaiian Telephone Company Employees' Good Government Club and RoseMarie McDonald, as treasurer.
2. Approve the conciliation agreement submitted with the General Counsel's Report signed April 15, 1985.
3. Approve the letter attached to the General Counsel's Report signed April 15, 1985.

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

Attest:

4-22-85  
Date

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

Received in Office of Commission Secretary:	4-16-85, 12:58
Circulated on 48 hour tally basis:	4-17-85, 11:00

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**SENSITIVE**

BEFORE THE FEDERAL ELECTION COMMISSION

FILED  
FEDERAL  
SECRETARY

In the Matter of	)	
	)	
Hawaiian Telephone Company	)	MUR 1922
Employees' Good Government Club	)	
RoseMarie McDonald, as treasurer	)	

APR 16 12: 50

**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND**

This matter was referred to the Office of General Counsel by the Reports Analysis Division ("RAD"). On March 8, 1985, the Commission voted to open a MUR and found reason to believe that the Hawaiian Telephone Company Employees' Good Government Club ("Committee") and RoseMarie McDonald, as treasurer, violated 2 U.S.C. § 434(a)(4)(A). On April 1, 1985, this Office received a response from counsel for the Respondents requesting pre-probable cause conciliation. See Attachment 1.

**II. ANALYSIS**

Pursuant to 2 U.S.C. § 434(a)(4)(A), a political committee is required, through its treasurer, to file, in a year in which a regularly scheduled general election is held, certain quarterly reports no later than the 15th day after the last day of each calendar quarter and a pre-general election report no later than the 12th day before (or posted by registered or certified mail no later than the 15th day before) the general election if the committee makes a contribution to or expenditure on behalf of a candidate in the general election.

On December 5, 1984, the Respondents filed by certified mail an October Quarterly Report, which was due October 15, 1984, and

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a 12 Day Pre-General Election Report, which should have been sent by certified mail on October 22, 1984.

In light of the Respondents' request, the Office of General Counsel recommends that the Commission enter into pre-probable cause conciliation with the Respondents.

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

IV. RECOMMENDATIONS

1. Enter into pre-probable cause conciliation with Hawaiian Telephone Company Employees' Good Government Club and RoseMarie McDonald, as treasurer.
2. Approve the attached conciliation agreement.
3. Approve the attached letter.

Charles N. Steele  
General Counsel

April 15, 1985  
Date

BY:

Kenneth A. Gross  
Kenneth A. Gross  
Associate General Counsel

Attachments

1. Letter from counsel
2. Reports
3. Proposed conciliation agreement
4. Proposed letter

85040524430

**DAVIS D. HIGA**  
ATTORNEY AT LAW

600# 7096

P.O. Box 2200 • Honolulu, Hawaii 96841  
Phone: (808) 546-3606

Mailing Address

March 26, 1985

John Warren McGarry, Chairman  
Federal Election Commission  
Washington, D. C. 20463

APR 2 1985  
P/2: 58  
COMMUNICATIONS SECTION

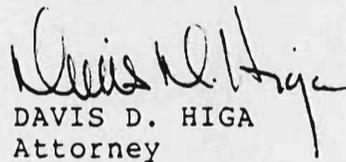
Re: MUR No. 1922  
Hawaiian Telephone Company Employees'  
Good Government Club  
RoseMarie McDonald, as Treasurer

Dear Mr. McGarry:

In response to your letter dated March 19, 1985 regarding the above-captioned matter, Hawaiian Telephone Company Employees' Good Government Club and RoseMarie McDonald, Treasurer, respectfully request, pursuant to the Federal Election Commission's Preliminary Procedure, disposition of MUR No. 1922 in a conciliation proceeding prior to a finding of probable cause to believe a violation has been committed.

Should you require additional information or clarification, please call me at (808) 546-3606.

Very truly yours,

  
DAVIS D. HIGA  
Attorney

0052I:if

cc: Marybeth Tarrant

85040524431

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

Attachment 7  
RECEIVED AT THE FEC  
(Page 1 Of 2)

(Summary Page)

84 DEC 7 11:11  
ALIGN AREA

**ALIGN AREA**

1. Name of Committee (In Full)  
**Hawaiian Telephone Company Employees  
Good Government Club**

---

Address (Number and Street)  
**P. O. Box 2200**

---

City, State and ZIP Code  
**Honolulu, Hawaii 96841**

Check here if address is different than previously reported.

2. FEC Identification Number  
**6 00010371**

3.  This committee qualified as a multicandidate committee during the 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

81033040524482  
 1583

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	July 1, 1984 through Sept. 30, 1984		
6 (a) Cash on hand January 1, 1984			\$ 20,000.11
(b) Cash on Hand at Beginning of Reporting Period		\$ 20,426.42	
(c) Total Receipts (from Line 18)		\$ 6,021.46	\$ 19,027.27
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 26,447.88	\$ 39,027.38
7. Total Disbursements (from Line 28)		\$ 15,083.35	\$ 27,662.85
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 11,364.53	\$ 11,364.53
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 202 523-4088

**RoseMarie McDonald**  
 Type or Print Name of Treasurer  
 \_\_\_\_\_  
 Signature of Treasurer  
**RoseMarie McDonald**

**Dec 5, 1984**  
 Date

NOTE: Submission of false or erroneous or incomplete information may subject the person signing this report to the penalty in 2 U.S.C. § 437j.

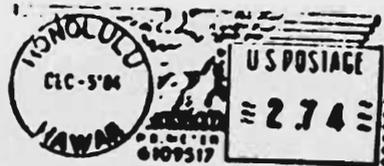
All previous versions of FEC FORM 2 and FEC FORM 2s are obsolete and should no longer be used.

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FEC FORM 3X (3/80)

Attachment 2 (2)

8 5 0 4 0 5 3 1 4 6 4 7 3 4 3



# HAWAIIAN TELEPHONE

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

RETURN RECEIPT  
CERTIFIED MAIL



Attachment 7  
(Page 2 of 2)

3



SCHEDULE B

ITEMIZED DISBURSEMENTS

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

Telephone Company Employees Good Government Club

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Democratic Party of Hawaii 33 S. King Street, Suite 415 Honolulu, Hawaii 96813	Earmarked specifically for Walter Mondale Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Earmarked	10/2/84	\$ 96.00
B. Full Name, Mailing Address and ZIP Code Donald S. Bowman, III P. O. Box 2200 Honolulu, Hawaii 96813	Reimbursement for expenses for Political Trng. Seminar Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):	10/4/84	28.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			\$124.00

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5

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
				NON-PARTY QUALIFIED	ID #C00010371	
1983	STATEMENT OF ORGANIZATION - AMENDMENT			16MAY83	2	83FEC/272/0090
	MID-YEAR REPORT	11,917	8,497	31JAN83 -30JUN83	16	83FEC/280/1060
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN83 -30JUN83	3	83FEC/282/1683
	YEAR-END	12,384	1,898	1JUL83 -31DEC83	8	84FEC/295/4770
	YEAR-END - AMENDMENT	-	-	1JUL83 -31DEC83	3	84FEC/314/4023
	REQUEST FOR ADDITIONAL INFORMATION			1JUL83 -31DEC83	1	84FEC/313/4864
1984	MISCELLANEOUS NOTICE FROM FEC			14DEC84	1	84FEC/356/5434
	APRIL QUARTERLY	6,130	8,726	1JAN84 -31MAR84	11	84FEC/311/02
	APRIL QUARTERLY - AMENDMENT	6,130	8,726	1JAN84 -31MAR84	12	84FEC/311/26
	APRIL QUARTERLY - AMENDMENT	6,129	8,726	1JAN84 -31MAR84	12	84FEC/324/3809
	1'ST LETTER INFORMATIONAL NOTICE			1JAN84 -31MAR84	1	84FEC/318/2592
	JULY QUARTERLY	6,876	3,853	1APR84 -30JUN84	10	84FEC/324/3614
	OCTOBER QUARTERLY	6,021	15,083	1JUL84 -30SEP84	22	84FEC/353/1583
	NOTICE OF FAILURE TO FILE			1JUL84 -30SEP84	1	84FEC/348/2087
	1'ST LETTER INFORMATIONAL NOTICE			1JUL84 -30SEP84	1	85FEC/363/4951
	PRE-GENERAL	1,336	124	1OCT84 -17OCT84	6	84FEC/353/1605
	1'ST LETTER INFORMATIONAL NOTICE			1OCT84 -17OCT84	1	85FEC/363/4950
	POST-GENERAL	2,981	6,080	18OCT84 -26NOV84	13	84FEC/353/1611
	1'ST LETTER INFORMATIONAL NOTICE			18OCT84 -26NOV84	1	85FEC/363/3215
	YEAR-END	2,966	-	27NOV84 -31DEC84	6	85FEC/358/2136
	YEAR-END - AMENDMENT	2,963	-	27NOV84 -31DEC84	3	85FEC/358/4754
	TOTAL	50,607	0	44,261	0	134 TOTAL PAGES

Cash on Hand as of 12/31/84; \$12,441  
 Debts and Obligations Owed to the Committee: \$-0-  
 Debts and Obligations Owed by the Committee: \$-0-

All reports reviewed through July Quarterly

3

ANALYST: Kolesa

CONVERSATION WITH: RoseMarie McDonald

COMMITTEE: Hawaiian Telephone Company Employees Good Government Club

DATE: November 28, 1984

SUBJECT(S): Non-Filing of October Quarterly report

I phone M. McDonald regarding the October Quarterly report. She stated that because of administrative reasons it had not been filed yet but she would mail it promptly.

85040524437



0 1 2 3 4 5 6 7 8 9



# HAWAIIAN TELEPHONE

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

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

RETURN RECEIPT  
REQUIRED



(=)

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

Attachment 8  
RECEIVED AT THE FEC

(Page 1 Of 3)

(Summary Page)

84 DEC 7 11:10  
ALIGN AREA

ALIGN AREA

1 Name of Committee (In Full)  
**Hawaiian Telephone Company Employees  
Good Government Club**

---

Address (Number and Street)  
**P. O. Box 2200**

---

City, State and ZIP Code  
**Honolulu, Hawaii 96841**

Check here if address is different than previously reported.

2. FEC Identification Number  
**6 00010371**

3.  This committee qualified as a multicandidate committee during this 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 \_\_\_\_\_  
 Twelfth day report preceding General  
(Type of Election)  
election on NOV. 6, 1984 in the State of Hawaii  
 Thirtieth day report following the General Election  
on \_\_\_\_\_ in the State of \_\_\_\_\_  
 Termination Report

(b) Is this Report an Amendment?  
 Yes     NO

3951948; 364499

SUMMARY		COLUMN A	COLUMN B
5. Covering Period <u>Oct. 1, 1984</u> through <u>Oct. 17, 1984</u>		This Period	Calendar Year-to-Date
6. (a) Cash on hand January 1, 19 <u>84</u>			\$ 20,000.11
(b) Cash on Hand at Beginning of Reporting Period		\$ 11,364.53	
(c) Total Receipts (from Line 18)		\$ 1,336.27	\$ 20,363.54
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 12,700.80	\$ 40,363.65
7. Total Disbursements (from Line 28)		\$ 124.00	\$ 27,786.85
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 12,576.80	\$ 12,576.80
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 202-523-4088

RoseMarie McDonald  
 Type or Print Name of Treasurer

RoseMarie McDonald  
 SIGNATURE OF TREASURER

Dec 5, 1984  
 Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 4374.

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

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FEC FORM 3X (3/80)

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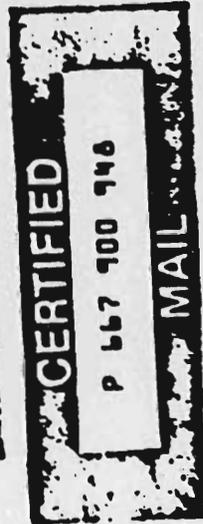


**HAWAIIAN TELEPHONE**

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

MAIL ROOM

**RETURN RECEIPT  
REQUESTED**



SCHEDULE B

ITEMIZED DISBURSEMENTS

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

Telephone Company Employees Good Government Club

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Earmarked specifically for Walter Mondale	Date (month, day, year)	Amount of Each Disbursement This Period
Democratic Party of Hawaii 33 S. King Street, Suite 415 Honolulu, Hawaii 96813	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Earmarked	10/2/84	\$ 96.00
B. Full Name, Mailing Address and ZIP Code Donald S. Bowman, III P. O. Box 2200 Honolulu, Hawaii 96813	Purpose of Disbursement Reimbursement for expenses for Political Trng. Seminar	Date (month, day, year) 10/4/84	Amount of Each Disbursement This Period 28.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			\$124.00

14



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

September 21, 1984

**OCTOBER REPORTING NOTICE FOR UNAUTHORIZED COMMITTEES**

**WHO MUST FILE**

ALL unauthorized political committees, except those that file monthly, must file a quarterly report by October 15, 1984. (See Monthly Filers below.)

**WHAT MUST BE REPORTED**

All financial activity must be disclosed from the last report filed through September 30, 1984. Political committees which have not previously filed a financial disclosure report should report all financial activity from the date of registration,\* through September 30, 1984.

**WHEN TO FILE**

Reports sent by registered or certified mail must be postmarked no later than October 15, 1984. Reports hand delivered or mailed first class must be received no later than close of business October 15, 1984.

**WHERE AND HOW TO FILE**

Committees should consult the instructions on the enclosed FEC Form 3X for details.

**MONTHLY FILERS**

Committees that file on a monthly schedule must file their next report by October 20, 1984, and disclose all financial activity of their committee from September 1 through September 30, 1984. Monthly reports are due by the twentieth of each month and should cover all financial activity of the previous month.

**COMPLIANCE**

Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is a serious violation. Committees are subject to enforcement action for late filing. Illegible reports which can not be clearly reproduced and reports submitted on non-FEC forms will not be accepted. Committees filing such documents will be required to refile.

\*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received during the current reporting period. See 11 CFR 104.3(a) and (b).

FOR INFORMATION CALL: Office of Public Communications  
800/424-9530 or 202/523-4068

35040524493



October 1, 1984

**GENERAL ELECTION FILING NOTICE  
FOR UNAUTHORIZED COMMITTEES**

**WHO MUST FILE THE PRE-GENERAL ELECTION REPORT**

All committees that file monthly reports must file the pre-general election report due October 25, 1984.

In addition all quarterly filing committees that have made contributions or expenditures (including independent expenditures) in connection with the general election must file a pre-election report, if such activity has not previously been reported. See below for post-general filing information.

**WHAT MUST BE REPORTED**

The report must disclose all financial activity of the committee from the later of, the last report filed or the date of registration\* through October 17, 1984. (Monthly filers must disclose all financial activity from the later of October 1 or the date of registration\* through October 17, 1984.)

**WHEN TO FILE**

Pre-general election reports sent registered or certified mail must be postmarked no later than October 22, 1984. Reports hand delivered or mailed first class must be received no later than close of business October 25, 1984.

\* \* \* \* \*

**WHO MUST FILE THE POST-GENERAL ELECTION REPORT**

All committees must file the post-general election report due December 6, 1984, regardless of election activity.

**WHAT MUST BE REPORTED**

The post-general election report must cover all financial activity of the committee from either the date of the last report filed or the date of registration, whichever is later\* through November 26, 1984.

**WHEN TO FILE**

Post-general election reports sent by registered or certified mail must be postmarked no later than December 6, 1984. Reports hand delivered or mailed first class must be received no later than close of business December 6, 1984.

\*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received during the current reporting period. See 11 CFR 104.3(a) and (b).

-over-

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**WHERE AND HOW TO FILE**

Committees should consult the instructions on the enclosed FEC form 3X, for details.

**QUARTERLY FILERS**

Name of Report	Period Covered	Reg./Cert. Mailing Date	Filing Date
3rd Q-Report	07/01* - 09/30	10/15/84	10/15/84
Pre-General	10/01 - 10/17	10/22/84	10/25/84
Post-General**	10/18 - 11/26	12/06/84	12/06/84
Year-end	11/27 - 12/31	01/31/85	01/31/85

\*Or from date of registration, or the close of books of the last report filed, whichever is later.

\*\*Reports filed by committees that did not file the pre-General report should cover all financial activity from the last report filed through November 26, 1984.

\*\*\*

**MONTHLY FILERS**

Name of Report	Period Covered	Reg./Cert. Mailing Date	Filing Date
Oct. Monthly	09/01 - 09/30	10/20/84	10/20/84
Pre-General	10/01 - 10/17	10/22/84	10/25/84
Post-General	10/18 - 11/26	12/06/84	12/06/84
Year-end	11/27 - 12/31	01/31/85	01/31/85

**COMPLIANCE**

Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is a serious violation. Committees are subject to enforcement action for late filing. Illegible reports which can not be clearly reproduced and reports submitted on non-FEC forms will not be accepted. Committees filing such documents will be required to refile.

FOR INFORMATION CALL: Office Of Public Communications  
800/424-9530 or 202/523-4068

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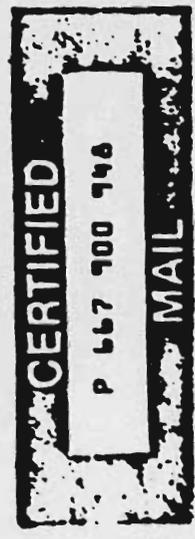


**HAWAIIAN TELEPHONE**

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

RECEIVED  
FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

**RETURN RECEIPT  
REQUESTED**





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Davis D. Higa, Esquire  
Attorney At Law  
P.O. Box 2200  
Honolulu, Hawaii 96841

RE: MUR 1922  
Hawaiian Telephone Company  
Employees' Good Government Club  
RoseMarie McDonald, as treasurer

Dear Mr. Higa:

On March 8, 1985, the Commission found reason to believe that the Hawaiian Telephone Company Employees' Good Government Club and RoseMarie McDonald, as treasurer, violated 2 U.S.C. § 434(a)(4)(A). At your request, the Commission determined on April , 1985, 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 your clients agree with the provisions of the enclosed agreement, please have it signed and return it, along with the civil penalty, to the Commission. The check for the civil penalty should be made payable to the U.S. Treasurer. 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 Marybeth Tarrant, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,

Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel

Enclosure

Attachment 4 (11)

85040524497

CCC# 7046  
Tarrant

**DAVIS D. HIGA**  
ATTORNEY AT LAW

OFFICE OF THE FEC  
COMMISSION SECRETARY

25 APR 2 1985

Mailing Address  
Honolulu, Hawaii 96841  
Phone: (808) 546-3606

March 26, 1985

John Warren McGarry, Chairman  
Federal Election Commission  
Washington, D. C. 20463

Re: MUR No. 1922  
Hawaiian Telephone Company Employees'  
Good Government Club  
RoseMarie McDonald, as Treasurer

APR 2 1985  
P12: 58  
GENERAL COUNSEL

35040524493

Dear Mr. McGarry:

In response to your letter dated March 19, 1985 regarding the above-captioned matter, Hawaiian Telephone Company Employees' Good Government Club and RoseMarie McDonald, Treasurer, respectfully request, pursuant to the Federal Election Commission's Preliminary Procedure, disposition of MUR No. 1922 in a conciliation proceeding prior to a finding of probable cause to believe a violation has been committed.

Should you require additional information or clarification, please call me at (808) 546-3606.

Very truly yours,

*Davis D. Higa*  
DAVIS D. HIGA  
Attorney

0052I:if

cc: Marybeth Tarrant

**STATEMENT OF DESIGNATION OF COUNSEL**

MUR No. 1922

NAME OF COUNSEL: Davis D. Higa

ADDRESS: 1177 Bishop Street

P. O. Box 2200

Honolulu, HI 96841

TELEPHONE: (808) 546-3606

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

3/26/85  
Date

Rosemarie McDonald  
Signature

RESPONDENT'S NAME: Hawaiian Telephone Company Employees'  
Good Government Club and  
RoseMarie McDonald

ADDRESS: 1177 Bishop Street

P. O. Box 2200

Honolulu, HI 96841

HOME PHONE: (808) 689-6779

BUSINESS PHONE: (808) 546-2678

85040524497

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	RAD Referral 85NF-47
Hawaiian Telephone Company Employees	)	
Good Government Club	)	
RoseMarie McDonald, as treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 8, 1985, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 85NF-47:

1. Open a MUR.
2. Find reason to believe that the Hawaiian Telephone Company Employees Good Government Club and RoseMarie McDonald, as treasurer, violated 2 U.S.C. § 434(a)(4)(A).
3. Approve the letter and the General Counsel's Factual and Legal Analysis attached to the First General Counsel's Report signed March 5, 1985.

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

Attest:

3-8-85  
Date

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

Received in Office of Commission Secretary:	3-5-85, 5:03
Circulated on 48 hour tally basis:	3-6-85, 11:00

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**SENSITIVE**

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

RECEIVED  
OFFICE OF THE SECRETARY  
MAR 5 8 5:03

**FIRST GENERAL COUNSEL'S REPORT**

DATE AND TIME OF TRANSMITTAL BY OGC TO THE COMMISSION 3/5/85-5:00 RAD REFERRAL 85NF-47  
STAFF MEMBER Marybeth Tarrant

SOURCE OF MUR: INTERNALLY GENERATED  
RESPONDENTS' NAMES: Hawaiian Telephone Company Employees Good Government Club and RoseMarie McDonald, as treasurer

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

INTERNAL REPORTS CHECKED: Reports filed by Respondents

FEDERAL AGENCIES CHECKED: None

**GENERATION OF MATTER**

This matter was referred to the Office of the General Counsel by the Reports Analysis Division ("RAD").

**SUMMARY OF ALLEGATIONS**

It is alleged that the Hawaiian Telephone Company Employees Good Government Club ("Committee") and RoseMarie McDonald, as treasurer, failed to file the 1984 October Quarterly and 12 Day Pre-General Election Reports in a timely manner, in violation of 2 U.S.C. § 434(a)(4)(A).

**FACTUAL AND LEGAL ANALYSIS**

Pursuant to 2 U.S.C. § 434(a)(4)(A), a political committee is required, through its treasurer, to file certain quarterly reports, in a calendar year in which a regularly scheduled general election is held, which are to be filed no later than the 15th day after the last day of each calendar quarter and a

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pre-election report, which is to be filed no later than the 12th day before (or posted by registered or certified mail no later than the 15th day before) any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election.

On September 21, 1984, the Committee was notified that the October Quarterly Report was due October 15, 1984. On October 1, 1984, the Committee was notified that a 12 Day Pre-Election Report was due on October 25, 1984, if the requirements for filing such a report were met.

On November 6, 1984, a Non-Filer Notice was sent to the Respondents for failure to file the 1984 October Quarterly Report. A RAD analyst telephoned RoseMarie McDonald, the treasurer, on November 28, 1984, regarding this issue. Ms. McDonald stated that the report had not been filed due to administrative reasons but indicated that the report would be filed promptly. On December 5, 1984, the Respondents filed a 1984 October Quarterly Report and a 12 Day Pre-General Election Report, which disclosed a \$96 disbursement to the Democratic Party of Hawaii and listed the purpose of disbursement as "earmarked specifically for Walter Mondale." \*/ In light of the late

---

\*/ In October 1983, the Commission administratively terminated the Democratic Party of Hawaii/Federal Campaign Committee. On October 15, 1984, the Democratic Party of Hawaii filed another statement of organization, however, no reports, as yet, have been filed. Because the committee has not filed any reports, it is not clear how exactly this \$96 was spent.

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filings, the Office of the General Counsel recommends that the Commission open a MUR and find reason to believe that the Respondents violated 2 U.S.C. § 434(a)(4)(A).

**RECOMMENDATIONS**

1. Open a MUR.
2. Find reason to believe that the Hawaiian Telephone Company Employees Good Government Club and RoseMarie McDonald, as treasurer, violated 2 U.S.C. § 434(a)(4)(A).
3. Approve the attached letter and the General Counsel's Factual and Legal Analysis.

Charles N. Steele  
General Counsel

March 5, 1985  
Date

By:

Kenneth A. Gross  
Associate General Counsel

**Attachments**

1. RAD Referral
2. Proposed letter
3. General Counsel's Factual and Legal Analysis

35040514500



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

March 19, 1985

RoseMarie McDonald, Treasurer  
Hawaiian Telephone Company Employees  
Good Government Club  
P.O. Box 2200  
Honolulu, Hawaii 96841

Re: MUR 1922

Dear Ms. McDonald:

On March 8, 1985, the Federal Election Commission determined that there is reason to believe the Hawaiian Telephone Company Employees Good Government Club, and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A), 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 the 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).

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Letter to RoseMarie McDonald  
Page 2

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.

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 Marybeth Tarrant, the staff member assigned to this matter, at (202)523-4143.

Sincerely,



John Warren McGarry  
Chairman

Enclosures

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

85040524505

**FEDERAL ELECTION COMMISSION**  
**GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS**

DATE \_\_\_\_\_

MUR NO. 1922  
STAFF MEMBER & TEL. NO.  
Marybeth Tarrant  
(202) 523-4143

RESPONDENTS     Hawaiian Telephone Company Employees  
                  Good Government Club  
                  RoseMarie McDonald, as 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**

It is alleged that the Hawaiian Telephone Company Employees Good Government Club ("Committee") and RoseMarie McDonald, as treasurer, failed to file the 1984 October Quarterly and 12 Day Pre-General Election Reports in a timely manner, in violation of 2 U.S.C. § 434(a)(4)(A).

**FACTUAL AND LEGAL ANALYSIS**

Pursuant to 2 U.S.C. § 434(a)(4)(A), a political committee is required, through its treasurer, to file certain quarterly reports, in a calendar year in which a regularly scheduled general election is held, which are to be filed no later than the 15th day after the last day of each calendar quarter and a pre-election report, which is to be filed no later than the 12th day before (or posted by registered or certified mail no later than the 15th day before) any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election.

On September 21, 1984, the Committee was notified that the October Quarterly Report was due October 15, 1984. On October 1, 1984, the Committee was notified that a 12 Day Pre-Election

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Report was due on October 25, 1984, if the requirements for filing such a report were met.

On November 6, 1984, a Non-Filer Notice was sent to the Respondents for failure to file the 1984 October Quarterly Report. A RAD analyst telephoned RoseMarie McDonald, the treasurer, on November 28, 1984, regarding this issue. Ms. McDonald stated that the report had not been filed due to administrative reasons but indicated that the report would be filed promptly. On December 5, 1984, the Respondents filed a 1984 October Quarterly Report and a 12 Day Pre-General Election Report, which disclosed a \$96 disbursement to the Democratic Party of Hawaii and listed the purpose of disbursement as "earmarked specifically for Walter Mondale." \*/ In light of the late filings, the Office of the General Counsel recommends that the Commission open a MUR and find reason to believe that the Respondents violated 2 U.S.C. § 434(a)(4)(A).

---

\*/ In October 1983, the Commission administratively terminated the Democratic Party of Hawaii/Federal Campaign Committee. On October 15, 1984, the Democratic Party of Hawaii filed another statement of organization, however, no reports, as yet, have been filed. Because the committee has not filed any reports, it is not clear how exactly this \$96 was spent.

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DESCRIPTION OF PRELIMINARY PROCEDURES  
FOR PROCESSING POSSIBLE VIOLATIONS DISCOVERED BY THE  
FEDERAL ELECTION COMMISSION

Possible violations discovered during the normal course of the Commission's supervisory responsibilities shall be referred to the Enforcement Division of the Office of General Counsel where they are assigned a MUR (Matter Under Review) number, and assigned to a staff member.

Following review of the information which generated the MUR, a recommendation on how to proceed on the matter, which shall include preliminary legal and factual analysis, and any information compiled from materials available to the Commission shall be submitted to the Commission. This initial report shall recommend either: (a) that the Commission find reason to believe that a possible violation of the Federal Election Campaign Act (FECA) may have occurred or is about to occur and that the Commission conduct an investigation of the matter; or (b) that the Commission find no reason to believe that a possible violation of the FECA has occurred and that the Commission close the file on the matter.

Thereafter, if the Commission decides by an affirmative vote of four (4) Commissioners that there is reason to believe that a violation of the Federal Election Campaign Act (FECA) has been committed or is about to be committed, the Office of the General Counsel shall open an investigation into the matter. Upon notification of the Commission's finding(s), within 15 days a respondent(s) may submit any factual or legal materials relevant to the allegations. During the investigation, the Commission shall have the power to subpoena documents, to subpoena individuals to appear for depositions, and to order answers to interrogatories. The respondent(s) may be contacted more than once by the Commission in its investigation.

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If, during this period of investigation, the respondent(s) indicate a desire to enter into conciliation, the Office of General Counsel staff may begin the conciliation process prior to a finding of probable cause to believe a violation has been committed. Conciliation is an informal method of conference and persuasion to endeavor to correct or prevent a violation of the Federal Election Campaign Act (FECA). Most often, the result of conciliation is an agreement signed by the Commission and the respondent(s). The Conciliation Agreement must be adopted by four votes of the Commission before it becomes final. After signature by the Commission and the respondent(s), the Commission shall make public the Conciliation Agreement.

[If the investigation warrants], and no conciliation agreement is entered into prior to a probable cause to believe finding, the General Counsel must notify the respondent(s) of his intent to proceed to a vote on probable cause to believe that a violation of the Federal Election Campaign Act (FECA) has been committed or is about to be committed. Included with the notification to the respondent(s) shall be a brief setting forth the position of the General Counsel on the legal and factual issues of the case. Within 15 days of receipt of such brief, the respondent(s) may submit a brief posing the position of respondent(s) and replying to the brief of the General Counsel. Both briefs will then be filed with the Commission Secretary and will be considered by the Commission. Thereafter, if the Commission determines by an affirmative vote of four (4) Commissioners, that there is probable cause to believe that a violation of the FECA has been committed or is about to be committed conciliation must be undertaken for a period of at least 30 days but not more than 90 days. If the Commission is unable to correct or prevent any violation of the FECA through conciliation the Office of General Counsel may recommend that the Commission file a civil suit against the respondent(s) to enforce the Federal Election Campaign Act (FECA). Thereafter, the Commission may, upon an affirmative vote of four (4) Commissioners, institute civil action for relief in the District Court of the United States.

See 2 U.S.C. § 437g, 11 C.F.R. Part 111.

November 1980

85040524509

STATEMENT OF DESIGNATION OF COUNSEL

MUR \_\_\_\_\_

NAME OF COUNSEL: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

TELEPHONE: \_\_\_\_\_

The above-named individual is hereby designated as my  
counsel and is authorized to receive any notifications and other  
communications from the Commission and to act on my behalf before  
the Commission.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature

RESPONDENT'S NAME: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

HOME PHONE: \_\_\_\_\_

BUSINESS PHONE: \_\_\_\_\_

35040524510

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 6 February 1985

ANALYST: Paul Kolesa

I. COMMITTEE: Hawaiian Telephone Company Employees  
Good Government Club (C00010371)  
RoseMarie McDonald, Treasurer  
P.O. Box 2200  
Honolulu, HI 96841

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

III. BACKGROUND:

Failure to Timely File the 1984 October Quarterly and 12 Day Pre-General Reports

The Hawaiian Telephone Company Employees Good Government Club ("the Club") failed to file the 1984 October Quarterly and the 12 Day Pre-General Reports of Receipts and Disbursements by Election Day, November 6, 1984. The Club was notified on September 21, 1984, that the October Quarterly Report was due on October 15, 1984 (Attachment 2). On October 1, 1984, the Club was notified that a 12 Day Pre-General Report was due on October 25, 1984 if contributions and expenditures, which had not previously been reported, were made in connection with the general election (Attachment 3).

On November 6, 1984, a Non-Filer Notice was sent to the Club for its failure to file the 1984 October Quarterly Report (Attachment 4). A Reports Analysis Division ("RAD") analyst telephoned RoseMarie McDonald, the Club's treasurer, on November 28, 1984. Ms. McDonald stated that the October Quarterly Report had not been prepared because of administrative reasons. She indicated that it would be mailed promptly (Attachment 5).

Since the report had not been received at the Commission, the RAD analyst contacted Ms. McDonald again on December 5, 1984. Ms. McDonald stated that the October Quarterly Report would be sent Federal Express, along with the 12 Day Pre-General Report (Attachment 6).

Attachment 1 (1)

85040504511

HAWAIIAN TELEPHONE COMPANY  
EMPLOYEES GOOD GOVERNMENT  
CLUB  
REPORTS ANALYSIS OGC REFERRAL  
PAGE 2

On December 5, 1984, the Club filed the 1984 October Quarterly Report and the 12 Day Pre-General Report (Attachments 7 and 8 respectively).

The 1984 12 Day Pre-General Report disclosed a \$96 disbursement to the Democratic Party of Hawaii (Attachment 8). The purpose of the disbursement was listed as "earmarked specifically for Walter Mondale."

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

85040524512

**ANALYST:** Kolesa

**CONVERSATION WITH:** RoseMarie McDonald

**COMMITTEE:** Hawaiian Telephone Company Employees Good Government Club

**DATE:** December 5, 1984

**SUBJECT(S):** Non-Filing of the October Quarterly Report

I phoned Ms. McDonald to see whether the October Quarterly report had been mailed. She stated that the report along with the 12 Day Pre-General report would be sent Federal Express that day.

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THE FEDERAL ELECTION COMMISSION  
OFFICE OF THE SECRETARY

25 MAR 18 P 1: 57

**SENSITIVE**

March 18, 1985

MEMORANDUM TO: The Commission

FROM: Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel *KAG*

SUBJECT: RAD Referral 85NF-47

On March 8, 1985 the Commission approved the recommendation that RAD Referral 85NF-47 should become a MUR. Therefore, all documents which had previously been contained in RAD Referral 85NF-47 should now become MUR 1922.

Attachment  
Copy of Certification

85040524514

BEFORE THE FEDERAL ELECTION COMMISSION

*MUR 1922*  
*Warrant*

In the Matter of	)	
Hawaiian Telephone Company Employees	)	RAD Referral 85NF-47
Good Government Club	)	
RoseMarie McDonald, as treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 8, 1985, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 85NF-47:

1. Open a MUR.
2. Find reason to believe that the Hawaiian Telephone Company Employees Good Government Club and RoseMarie McDonald, as treasurer, violated 2 U.S.C. § 434(a)(4)(A).
3. Approve the letter and the General Counsel's Factual and Legal Analysis attached to the First General Counsel's Report signed March 5, 1985.

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

Attest:

3-8-85  
Date

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

Received in Office of Commission Secretary:	3-5-85, 5:03
Circulated on 48 hour tally basis:	3-6-85, 11:00

85040524515



FEDERAL ELECTION COMMISSION  
WASHINGTON DC 20463

RQ-7

November 6, 1984

Rosemarie McDonald, Treasurer  
Hawaiian Telephone Company  
Employees Good Government Club  
P.O. Box 2200  
Honolulu, HI 96841

Identification Number: C00010371

Reference: OCTOBER QUARTERLY REPORT (7/1/84-9/30/84)

Dear Ms. McDonald:

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 Paul Kolessa on our toll-free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

*John D. Gibson*  
John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

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9173; 0 777



FEDERAL ELECTION COMMISSION

1325 K STREET NW  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 1922

Date Filmed 6/21/85 Camera No. --- 4

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