



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20543

THIS IS THE END OF MUR # 1970

Date Filmed 8/14/85 Camera No. --- 2

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FEDERAL ELECTION COMMISSION

Check Memo, 2 Conciliatory Proposals, 3 Tally Memos

Copy of Con. Agreement/Letter, 3 Blue Cards, Routing Slip

Correspondence Control Slip - Memo changing referral to MUR

Copy of Mur Cert.

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 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 checked="" 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

Andrew S. Martin

date

8/1/85

85040543374

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Harrah's Political Action) MUR 1970
Committee and)
Samuel P. McMullen, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 2, 1985, the Commission decided by a vote of 6-0 to take the following actions in MUR 1970:

1. Accept the conciliation agreement submitted with the General Counsel's Report signed June 26, 1985.
2. Close the file.
3. Send the letter attached to the General Counsel's Report signed June 26, 1985.

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

Attest:

7-2-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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

6-27-85, 11:17
6-27-85, 4:00

85040543375

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

In the Matter of)
)
Harrah's Political Action)
Committee and)
Samuel P. McMullen, as treasurer)

MUR 1970

85 JUN 27 AM 2:57

SENSITIVE

GENERAL COUNSEL'S REPORT

BACKGROUND

Attached is a conciliation agreement which has been signed by the treasurer of Harrah's Political Action Committee.

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

RECOMMENDATION

The Office of General Counsel recommends the acceptance of this agreement, closing of the file, and sending the attached letter.

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

June 26, 1970
Date

Attachments

1. Conciliation Agreement & Letter
2. Photocopy of Civil Penalty Check
3. Letter to Respondent

85040543376

Harrah's

POLITICAL ACTION COMMITTEE
P. O. BOX 10, RENO, NEVADA 89504 • TELEPHONE (702) 786-3232

RECEIVED AT THE FE...
6-11-7720
JUN 10 11:04

June 5, 1985

RECEIVED
OFFICE OF THE
GENERAL COUNSEL
85 JUN 11 3:52

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 "K" Street, N.W.
Washington, D.C. 20463

RE: MUR 1970--Harrah's Political Action Committee

Dear Mr. Steele:

Enclosed you will find the original and a copy of the Conciliation Agreement both as executed by myself as Treasurer of Harrah's Political Action Committee. You will also find a check in the amount of \$200 to satisfy the corresponding civil penalty prescribed within the conciliation agreement.

This one late filing was certainly unintentional and clearly the exception to our normal practices. We appreciate having the opportunity to settle this matter prior to a finding of probable cause, particularly in such a prompt manner. Please be kind enough to return a fully signed copy of the Agreement to me for our records.

Sincerely,

Samuel P. McMullen
Samuel P. McMullen
Secretary-Treasurer

SPM/kb

Enc. (Conciliation Agreement)
(Check)

85040543377

6007720

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Harrah's Political Action Committee) MUR 1970
and Samuel P. McMullen, as treasurer)

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 Harrah's Political Action Committee and Samuel P. McMullen, as treasurer, (hereinafter "the Respondents") violated 2 U.S.C. § 441a(a)(4)(B).

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

I. The Commission has jurisdiction over the 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:

1. Harrah's Political Action Committee is a political committee registered with the Commission.

85040543378

2. Samuel P. McMullen is the treasurer of Harrah's Political Action Committee.

3. The Respondents were required to file the 1984 Pre-General Election Report by October 25, 1984. The report was filed on November 28, 1984.

V. Respondents violated 2 U.S.C. § 434(a)(4)(B) by failing to file timely the 1984 Pre-General Election Report.

VI. 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).

VII. 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.

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

IX. 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.

X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and

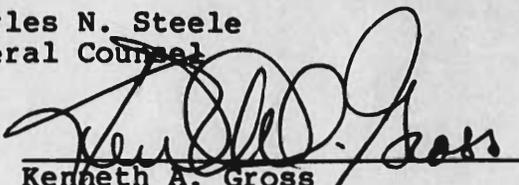
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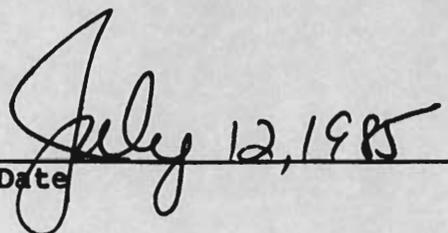
no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

FOR THE COMMISSION:

Charles N. Steele
General Counsel

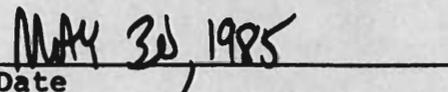
By:


Kenneth A. Gross
Associate General Counsel


Date

FOR RESPONDENTS:


Samuel P. McMillen
Secretary-Treasurer
Harrah's Political Action Committee


Date

85040543380



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 16, 1985

Samuel P. McMullen
Harrah's Political Action Committee
P.O. Box 10
Reno, Nevada 89504

RE: MUR 1970

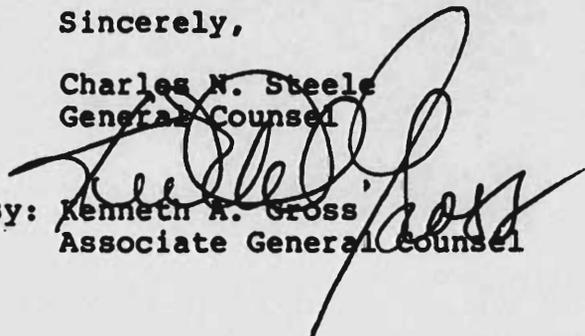
Dear Mr. McMullen:

On July 2, 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)(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 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

85040543381

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1970
Harrah's Political Action Committee)
Samuel P. McMullen, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 15, 1985, the Commission decided by a vote of 6-0 to take the following actions in MUR 1970:

1. Enter into conciliation with Harrah's Political Action Committee and Samuel P. McMullen, 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 May 10, 1985.

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

Attest:

5-17-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary: 5-13-85, 9:10
Circulated on 48 hour tally basis: 5-13-85, 4:00

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BEFORE THE FEDERAL ELECTION COMMISSION

REC
FEC
SECRETARY

In the Matter of

Harrah's Political Action Committee
and Samuel P. McMullen, as treasurer

)
) MAY 13 9:11
) MUR 1970
)

GENERAL COUNSEL'S REPORT

SENSITIVE

I. BACKGROUND

On April 3, 1985, the Commission determined there is reason to believe Harrah's Political Action Committee and Samuel P. McMullen, as treasurer, violated 2 U.S.C. § 434(a)(4)(b) by failing to file the 1984 Pre-General Election Report in a timely manner. By letter dated April 26, 1985, the Committee's treasurer requested to settle this matter prior to a finding of probable cause to believe (Attachment 1).

II. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTIES

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III. GENERAL COUNSEL'S RECOMMENDATIONS

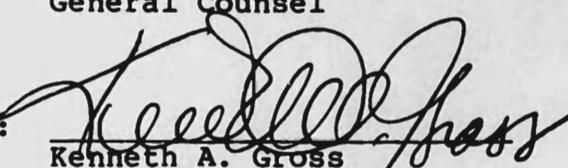
1. Enter into conciliation with Harrah's Political Action Committee and Samuel P. McMullen, is treasurer, prior to a finding of probable cause to believe.
2. Approve the attached proposed conciliation agreement and letter.

Charles N. Steele
General Counsel

Date

May 10, 1985

By:


Kenneth A. Gross
Associate General Counsel

Attachments

1. Letter from Respondent
2. Proposed agreement and letter

85040543384

Harrah's

Attachment 1
POLITICAL ACTION COMMITTEE
P. O. BOX 10, RENO, NEVADA 89504 • TELEPHONE (702) 784-3232

THE FEC
HAND DELIVERED
APR 29 12:47

23 P 3:16

April 26, 1985

Mr. Andrew Maikovich, Esq.
Office of the General Counsel
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

RE: MUR 1970/HARRAH'S POLITICAL ACTION COMMITTEE

Dear Mr. Maikovich:

This is to acknowledge receipt by Harrah's Political Action Committee of a letter dated April 12, 1985, from the Federal Election Commission concerning the above-numbered matter. The date of receipt in our office was April 16, 1985.

This letter indicates that the Commission has determined that there is reason to believe that Harrah's Political Action Committee has violated a provision of the Federal Election Campaign Act of 1971. In response, Harrah's Political Action Committee forwards the following information and respectfully requests conciliation of this matter prior to any finding of probable cause.

The factual analysis supporting the Commission's determination indicates that our 12-Day Pre-General Election Report was filed on November 28, 1984, thirty-four calendar days later than the required due date of October 25, 1984. For this, we sincerely apologize. The 1984 election year was the first for myself as Treasurer and for my staff, having assumed these duties in 1984--after the last election season. Thus, though we were quite familiar with the monthly reporting system, we had no previous experience with specific election year reports. To compound this problem, we were following a schedule for reporting which unintentionally omitted the 12-Day Pre-General Election Report.

Upon receiving written notification from the Federal Election Commission that we had failed to submit this 12-Day Pre-General Election Report,

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Mr. Andrew Maikovich, Esq.
Page 2
April 26, 1985

we immediately filed the report two days after receipt of this notification.

We have never had any intention of withholding any information from the Commission and did not intend to do so in this case. To confirm this, please note that we filed our regular monthly report for October 1984 on November 10, 1984, and this monthly report covers and includes the same period which is the subject of the 12-Day Pre-General Election Report and all contributions made during this period. As further confirmation, it is important to emphasize that Harrah's Political Action Committee made no contributions to any candidate for federal election during the period covered by the 12-Day Pre-General Election Report.

Since its inception, Harrah's Political Action Committee has had a strong record of compliance with the Federal Election Campaign Act and no significant problems with the Federal Election Commission. We have always been timely in filing our monthly reports, usually well in advance of any deadline. Our clear intent and practice is to fully comply with the provisions of the Federal Election Campaign Act and we sincerely apologize for our inadvertent failure to file the 1984 12-Day Pre-General Election Report in a timely fashion. To insure future compliance, we have already taken action to insure that such a situation will never occur again.

With respect to the conciliation process, we intend to cooperate fully and will await a response from your office. If you should have any questions or desire any further information, you need only ask.

Once again, we apologize for any inconvenience our oversight may have caused.

Sincerely,


Samuel P. McMullen
Secretary-Treasurer
Harrah's Political Action
Committee

SPM/kd

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Attachment



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Samuel P. McMullen
Harrah's Political Action Committee
P.O. Box 10
Reno, Nevada 89504

RE: MUR 1970

Dear Mr. McMullen:

On April 3, 1985, the Commission found reason to believe that Harrah's Political Action Committee violated 2 U.S.C. 2 U.S.C. § 434(a)(4)(B). At your request, the Commission determined on , 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 you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, 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 attorney assigned to this matter, at 202-523-4000.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

85040543387

3

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Harrah's Political Action) RAD Referral 85NF-35
Committee)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 3, 1985, the Commission decided by a vote of 5-0 to take the following actions in RAD Referral 85NF-35:

1. Open a MUR.
2. Find reason to believe Harrah's Political Action Committee and Samuel P. McMullen, as treasurer, violated 2 U.S.C. § 434(a)(4)(B).
3. Approve the letter and Factual and Legal Analysis attached to the First General Counsel's Report signed March 29, 1985.

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

Attest:

4-3-85
Date

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

Received in Office of Commission Secretary: 3-29-85, 11:49
Circulated on tally vote basis: 4- 1-85, 11:00

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SENSITIVE

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

FIRST GENERAL COUNSEL'S REPORT 29 All: 49

DATE AND TIME OF TRANSMITTAL BY OGC TO THE COMMISSION 3/29/85-11:55 RAD Referral: 85NF-35
Staff Member: Andrew Maikovich

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

RESPONDENT'S NAME: Harrah's Political Action Committee

RELEVANT STATUTES: 2 U.S.C. § 434(a)(4)(B)

INTERNAL REPORTS CHECKED: Harrah's Political Action Committee

GENERATION OF MATTER

This matter was referred to the Office of General Counsel on January 15, 1985, by the Reports Analysis Division (Attachment 1).

SUMMARY OF ALLEGATIONS

It is alleged that Harrah's Political Action Committee ("Harrah's") violated 2 U.S.C. § 434(a)(4)(B) by not timely filing its 1984 Pre-General Election Report.

FACTUAL AND LEGAL ANALYSIS

Facts

On October 1, 1984, Harrah's was sent notification of the requirement that monthly filers must file a 12-Day Pre-General Election Report by October 25, 1984. Harrah's filed its 12-Day Pre-General Election Report on November 28, 1984, 34 calendar days late.

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Legal Analysis

Harrah's is a political committee other than the authorized committee of a candidate. As a monthly filer, Harrah's is required to file the necessary reports as prescribed in 2 U.S.C. § 434(a)(4)(B). This section requires unauthorized committees to file a 12-Day Pre-General Election Report no later than the 12th day before a general election, in this case October 25, 1984. Harrah's filed its Pre-General Election Report on November 28, 1984, 34 days late.

RECOMMENDATIONS

The Office of General Counsel recommends that the Commission:

1. Open a MUR.
2. Find reason to believe Harrah's Political Action Committee and Samuel P. McMullen, as treasurer, violated 2 U.S.C § 434(a)(4)(B).
3. Approve the attached letter and Factual and Legal Analysis.

March 29, 1985
Date

Charles N. Steele
General Counsel

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

Attachments

1. Reports Analysis Referral
2. Letter to Respondent
3. Factual and Legal Analysis

85040543390





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 15, 1985

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

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

SUBJECT: NON-FILER REFERRALS OF MONTHLY UNAUTHORIZED COMMITTEES

In accordance with Standard 3 of the RAD Review and Referral Procedures for Unauthorized Committees, the attached list of monthly filers is being forwarded to your offices, for failing to file a report covering the pre-election period by election day.

Since the number of committees being referred is relatively large, we felt it best to arrange the information in chart format. You will note that the attached printouts list the names, addresses, and treasurers for thirty-five (35) committees with "C" Indices provided for each. ^{1/} Any telephonic communications have been referenced under Contacts with Filers. The Summary Pages of the late filed reports and/or explanatory letters have been referenced under Response(s).

Two committees have been deleted from the list, because they meet the expedited audit referral threshold. Should the Commission not approve to audit these committees, they will be referred to your office at a later date. The attachments for these committees have also been deleted causing two gaps in the sequence.

All unauthorized committees were sent prior notification on October 1, 1984, which specifically informed monthly filers of the requirement to file a 12 Day Pre-General Election Report by October 25, 1984 (Attachment 38). The committees, which failed to submit either a 12 Day Pre-General Report or a November Monthly Report, were sent Non-Filer Notices on November 16, 1984

^{1/} In some cases, the aggregate receipt and disbursement figures may be inflated because committees submitted reports covering portions of the same periods (e.g., a November Monthly covering October 1, 1984 through October 31, 1984 and a Pre-General Report covering October 1, 1984 through October 17, 1984.)

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PAGE 2

(see copy of notice - Attachment 39). Certain committees (i.e., those noted with an asterisk on the attached computer printouts) were not sent Non-Filer Notices because a) a report covering the pre-election period was indexed by November 15, 1984, or b) the committee had not been assigned at the time the non-filer printout was generated.

If you have any questions, please contact Michael Filler at 523-4048.

Attachments

85040543392

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Attachment 2



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Samuel P. McMullen
Harrah's Political Action Committee
P.O. Box 10
Reno, Nevada 89504

RE: MUR
Harrah's Political Action Committee

Dear Mr. McMullen:

On , 1985, the Federal Election Commission determined that there is reason to believe that Harrah's Political Action Committee and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) 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).

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

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Letter to Samuel P. McMullen
Page 2

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 Andrew Maikovich, the attorney assigned to this matter, at (202) 523-4000.

Sincerely,

John Warren McGarry
Chairman

Enclosures

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

85040543394

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR
STAFF MEMBER & TELE. NO.
Maikovich 523-4000

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

RESPONDENT'S NAME: Harrah's Political Action Committee

SUMMARY OF ALLEGATIONS

It is alleged that Harrah's Political Action Committee ("Harrah's") violated 2 U.S.C. § 434(a)(4)(B) by not timely filing its 1984 Pre-General Election Report.

FACTUAL AND LEGAL ANALYSIS

Facts

On October 1, 1984, Harrah's was sent notification of the requirement that monthly filers must file a 12-Day Pre-General Election Report by October 25, 1984. Harrah's filed its 12-Day Pre-General Election Report on November 28, 1984, 34 calendar days late.

Legal Analysis

Harrah's is a political committee other than the authorized committee of a candidate. As a monthly filer, Harrah's is required to file the necessary reports as prescribed in 2 U.S.C. § 434(a)(4)(B). This section requires unauthorized committees to file a 12-Day Pre-General Election Report no later than the 12th day before a general election, in this case October 25, 1984. Harrah's filed its Pre-General Election Report on November 28, 1984, 34 days late.

85040543395



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 12, 1985

Samuel P. McMullen
Harrah's Political Action Committee
P.O. Box 10
Reno, Nevada 89504

RE: MUR 1970
Harrah's Political Action Committee

Dear Mr. McMullen:

On April 3, 1985, the Federal Election Commission determined that there is reason to believe that Harrah's Political Action Committee and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) 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).

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

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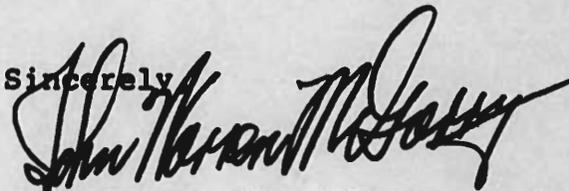
Letter to Samuel P. McMullen
Page 2

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.

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Sincerely,



John Warren McGarry
Chairman

Enclosures

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

85040543397

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR 1970
STAFF MEMBER & TELE. NO.
Maikovich 523-4000

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D
RESPONDENT'S NAME: Harrah's Political Action Committee

SUMMARY OF ALLEGATIONS

It is alleged that Harrah's Political Action Committee ("Harrah's") violated 2 U.S.C. § 434(a)(4)(B) by not timely filing its 1984 Pre-General Election Report.

FACTUAL AND LEGAL ANALYSIS

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FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20543

85040543399

THIS IS THE BEGINNING OF MUR # 1970,

Date Filmed 8/14/85 Camera No. --- 2

Cameraman AS