



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2026

Date Filmed 2/21/86 Camera No. --- 2

Cameraman AS

86040570608

FEDERAL ELECTION COMMISSION

Phone Routing Slips; Extra Copies of GC Report; Proposed Conciliation

Agreement; File Index and Tabs; 12 Day Pre-Brief Report and Comments

RAD Cover Memo to Referral; GC Report closing the investigation ..

The above-described material was removed from this file pursuant to the following exemptions 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 checked="" type="checkbox"/> | (2) Internal rules and practices | <input checked="" 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 type="checkbox"/> | (5) Internal Documents | | |

Signed Marlene Brown

date 2/11/86

86040570609



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 16, 1986

Bonnie Benner, Treasurer
4th Congressional District
Democratic Party
Box 259, Route 2
Berrien Springs, Michigan 49103

RE: MUR 2026
4th Congressional District
Democratic Party
Bonnie Benner, as treasurer

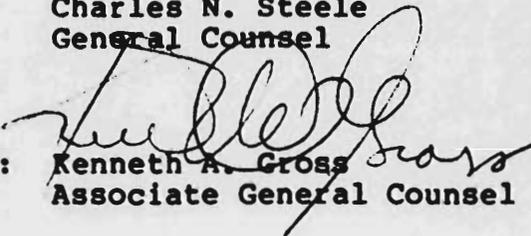
Dear Ms. Benner:

On January 13, 1986, the Commission accepted the conciliation agreement you signed and a civil penalty in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(ii), 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

86040570610

85 DEC 23 P 2: 35

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
)	MUR 2026
4th Congressional District)	
Democratic Party and)	
Bonnie Benner, 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 probable cause to believe that the 4th Congressional District Democratic Party and Bonnie Benner, as treasurer, (hereinafter "the Respondents") violated 2 U.S.C. § 434(a).

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. 4th Congressional District Democratic Party is a political committee registered with the Commission.

9504057061

2. Bonnie Benner is the treasurer of the 4th Congressional District Democratic Party.

3. The Respondents were required to file the 1984 Pre-General Report by October 25, 1984. The report was filed on January 4, 1985, 71 days late.

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

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 suit 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.

06040570612

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

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

FOR THE COMMISSION:

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

January 15, 1986
Date

FOR THE RESPONDENTS:



1/22/85
Date

36040570613



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Bonnie Benner, Treasurer
4th Congressional District
Democratic Party
Box 259, Route 2
Berrien Springs, Michigan 49103

RE: MUR 2026
4th Congressional District
Democratic Party
Bonnie Benner, as treasurer

Dear Ms. Benner:

On , 1986, the Commission accepted the conciliation agreement you signed and a civil penalty in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(ii), 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

ms 1/15/86

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

66040570614

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	MUR 2026
4th Congressional District)	
Democratic Party)	
Bonnie Benner, as treasurer)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 13, 1986, the Commission decided by a vote of 6-0 to take the followings actions in MUR 2026:

1. Accept the conciliation agreement attached to the General Counsel's Report signed January 6, 1986.
2. Close the file.
3. Send the letter to the respondents attached to the General Counsel's Report signed January 6, 1986.

Commissioners Aikens, Elliott, Harris, Josefiak, McDonald and McGarry voted affirmatively for this decision.

Attest:

1-13-86

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:	Wed.,	1-8-86,	12:32
Circulated on 48 hour tally basis:	Thurs.,	1-9-86,	11:00
Deadline for vote:	Mon.,	1-13-86,	11:00

86040570615



FEDERAL ELECTION COMMISSION
 WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
 FROM: Office of General Counsel *rd*
 DATE: January 7, 1986
 SUBJECT: MUR 2026 - General Counsel's Report

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

CIRCULATIONS

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

DISTRIBUTION

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

86140570616

BEFORE THE FEDERAL ELECTION COMMISSION
January , 1986

SENSITIVE

In the Matter of)
)
4th Congressional District)
Democratic Party)
Bonnie Benner, as treasurer)

88 JAN 8 P12: 32
MUR 2026

GENERAL COUNSEL'S REPORT

Background

Attached is a conciliation agreement which has been signed by Bonnie Benner, treasurer of the 4th Congressional District Democratic Party.

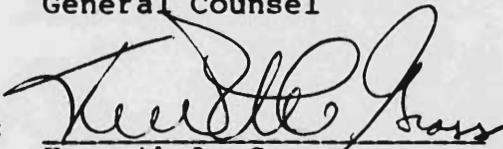
The attached agreement contains no changes from the agreement approved by the Commission, and a check for the civil penalty has been received.

Recommendation

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

Charles N. Steele
General Counsel

January 6, 1986
Date

BY: 
Kenneth A. Gross
Associate General Counsel

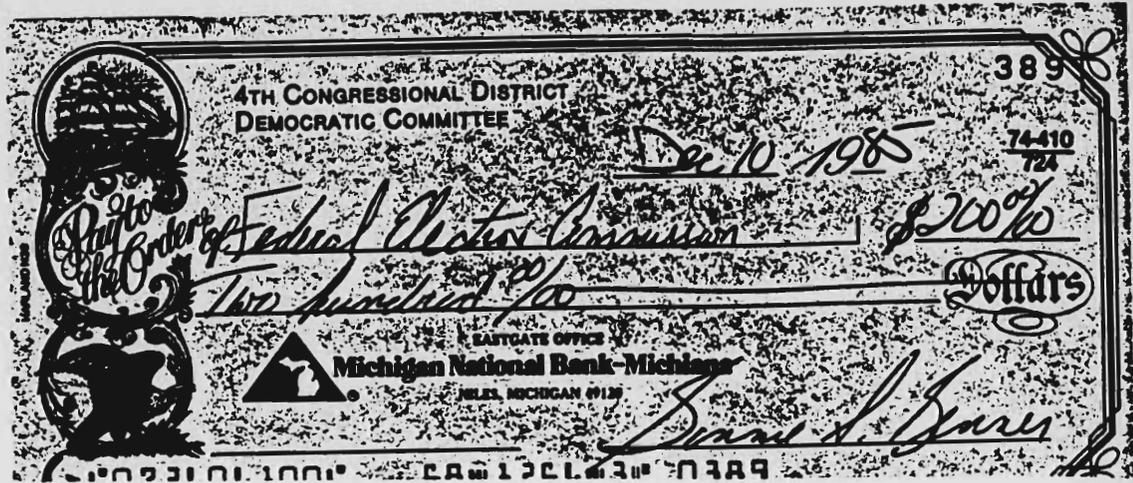
Attachments

- Conciliation Agreement
- Photocopy of civil penalty check
- Letter to Respondent

36740570617

06040570613

190619



GCC 9288

MEMORANDUM

TO: RETHA DIXON

TO: JOAN HARRIS

FROM: JOAN HARRIS

FROM: RETHA DIXON

CHECK NO. 389 (a copy of which is attached) RELATING
 TO MUR 2026 AND NAME 4th Congressional District
 WAS RECEIVED ON 12-26-85. PLEASE INDICATE THE ACCOUNT INTO
 WHICH IT SHOULD BE DEPOSITED:

BUDGET CLEARING ACCOUNT (#95F3875.16)

CIVIL PENALTIES ACCOUNT (#95-1099.160)

OTHER _____

SIGNATURE Robyn M. Bishop DATE 12-30-85

8 6 7 4 0 5 7 0 6 2 0



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Bonnie Benner, Treasurer
4th Congressional District Democratic Party
Box 259
Route 2
Berrien Springs, MI 49103

RE: MUR 2026
4th Congressional District
Democratic Party
Bonnie Benner, as treasurer

Dear Ms. Benner:

On , 1986, 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), 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

Attachment 3

36040570621



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 1, 1985

Bonnie Benner, Treasurer
4th District Democratic Party
Box 259/Route #2
Berrien Springs, MI 49103

RE: MUR 2026
4th District Democratic
Party

Dear Ms. Benner:

On October 29, 1985, the Commission determined that there is probable cause to believe 4th District Democratic Party and you, as treasurer, committed a violation of 2 U.S.C. § 434(a)(4)(A)(ii), a provision of the Federal Election Campaign Act of 1971, as amended, in connection with the late filing of the 1984 Pre-General Report.

The Commission has a duty to attempt to correct such violations for a period of thirty to ninety days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. If we are unable to reach an agreement during that period, the Commission may institute civil suit in United States District court and seek payment of a civil penalty.

We enclose a conciliation agreement that this office is prepared to recommend to the Commission 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 within ten days. I will then recommend that the Commission approve the agreement. Please make your check for the civil penalty payable to the U.S. Treasurer.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Andrew Maikovich, the attorney assigned to this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Conciliation Agreement

86740570622



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Bonnie Benner, Treasurer
4th District Democratic Party
Box 259/Route #2
Berrien Springs, MI 49103

RE: MUR 2026
4th District Democratic
Party

Dear Ms. Benner:

On October 29 , 1985, the Commission determined that there is probable cause to believe 4th District Democratic Party and you, as treasurer, committed a violation of 2 U.S.C. § 434(a) (4) (A) (ii), a provision of the Federal Election Campaign Act of 1971, as amended, in connection with the late filing of the 1984 Pre-General Report.

The Commission has a duty to attempt to correct such violations for a period of thirty to ninety days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. If we are unable to reach an agreement during that period, the Commission may institute civil suit in United States District court and seek payment of a civil penalty.

We enclose a conciliation agreement that this office is prepared to recommend to the Commission 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 within ten days. I will then recommend that the Commission approve the agreement. Please make your check for the civil penalty payable to the U.S. Treasurer.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Andrew Maikovich, the attorney assigned to this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Conciliation Agreement

3
2
6
7
0
4
6
3



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Bonnie Benner, Treasurer
4th District Democratic Party
Box 259/Route #2
Berrien Springs, MI 49103

RE: MUR 2026
4th District Democratic
Party

Dear Ms. Benner:

On _____, 1985, the Commission determined that there is probable cause to believe 4th District Democratic Party and you, as treasurer, committed a violation of 2 U.S.C. § 434(a)(4)(A)(ii), a provision of the Federal Election Campaign Act of 1971, as amended, in connection with the late filing of the 1984 Pre-General Report.

The Commission has a duty to attempt to correct such violations for a period of thirty to ninety days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. If we are unable to reach an agreement during that period, the Commission may institute civil suit in United States District court and seek payment of a civil penalty.

We enclose a conciliation agreement that this office is prepared to recommend to the Commission 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 within ten days. I will then recommend that the Commission approve the agreement. Please make your check for the civil penalty payable to the U.S. Treasurer.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Andrew Maikovich, the attorney assigned to this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Conciliation Agreement

amm 10/30

36740570624

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
4th Congressional District) MUR 2026
Democratic Party and)
Bonnie Benner, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of October 29, 1985, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 2026:

1. Find probable cause to believe the 4th Congressional District Democratic Party and Bonnie Benner, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii).
2. Approve the proposed conciliation agreement and letter attached to the General Counsel's report dated October 22, 1985.

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

Attest:

10-29-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

86040570625



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
 FROM: Office of General Counsel *rd*
 DATE: October 22, 1985
 SUBJECT: MUR 2026 - General Counsel's Report

The attached is submitted as an Agenda document
 for the Commission Meeting of October 29, 1985

Open Session _____
 Closed Session XX

CIRCULATIONS

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

Other [kx]

DISTRIBUTION

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

SENSITIVE

CIRCULATE ON BLUE PAPER

ON AGENDA 10-29-85

06740570626

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
4th Congressional District) MUR 2026
Democratic Party and)
Bonnie Benner, as treasurer)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On October 1, 1984, the 4th Congressional District Democratic Party ("4th District") was sent notification of requirement that a Pre-General Report was due on October 25, 1984, if contributions or expenditures were made in connection with the general election during the period ending October 17, 1984. The Pre-General Report was filed on January 4, 1985, showing \$8,640 in contributions to federal candidates and political committees.

On June 10, 1985, the Commission found reason to believe the 4th District violated 2 U.S.C. § 434(a)(4)(A)(ii), for not filing its Pre-General Report in a timely manner. On June 26, 1985, a letter was mailed to the 4th District notifying it of the Commission's finding.

On August 23, 1985, the Office of the General Counsel advised the respondents that it was prepared to recommend that the Commission find probable cause to believe a violation occurred. No reply was received from the respondents.

II. LEGAL ANALYSIS

The Office of the General Counsel relies on the analysis in its Brief of August 23, 1985.

85 OCT 22 P 2: 48

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

4290750570627

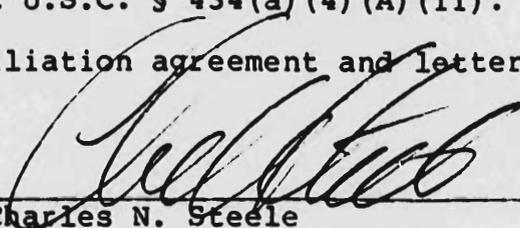
III. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

IV. RECOMMENDATION

The Office of the General Counsel recommends the Commission:

1. Find probable cause to believe the 4th Congressional District Democratic Party violated 2 U.S.C. § 434(a)(4)(A)(ii).
2. Approve the proposed conciliation agreement and letter.

22 October 1985
Date



Charles N. Steele
General Counsel

Attachments:
Conciliation Agreement and
Letter

86740570628



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Bonnie Benner, Treasurer
4th District Democratic Party
Box 259/Route #2
Berrien Springs, MI 49103

RE: MUR 2026
4th District Democratic
Party

Dear Ms. Benner:

On , 1985, the Commission determined that there is probable cause to believe 4th District Democratic Party and you, as treasurer, committed a violation of 2 U.S.C. § 434(a)(4)(A)(ii), a provision of the Federal Election Campaign Act of 1971, as amended, in connection with the late filing of the 1984 Pre-General Report.

The Commission has a duty to attempt to correct such violations for a period of thirty to ninety days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. If we are unable to reach an agreement during that period, the Commission may institute civil suit in United States District court and seek payment of a civil penalty.

We enclose a conciliation agreement that this office is prepared to recommend to the Commission 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 within ten days. I will then recommend that the Commission approve the agreement. Please make your check for the civil penalty payable to the U.S. Treasurer.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Andrew Maikovich, the attorney assigned to this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Conciliation Agreement

96040570629



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
 FROM: Office of General Counsel *RMB*
 DATE: August 23, 1985
 SUBJECT: MUR#2026 - Memorandum to the Commission

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

CIRCULATIONS

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

DISTRIBUTION

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

86740570630



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

85 AUG 23 P12:31

August 23, 1985

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel

SENSITIVE

SUBJECT: MUR # 2026

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondent of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on August 23, 1985. Following receipt of the Respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Brief
2. Letter to Respondent

96040570631

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
4th Congressional District)	
Democratic Party and)	MUR 2026
Bonnie Benner, as treasurer)	

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On October 1, 1984, the 4th Congressional District Democratic Party ("4th District") was sent notification of the requirement that a Pre-General Report was due on October 25, 1984, if contributions or expenditures were made in connection with the general election during the period ending October 17, 1984. The Pre-General Report was filed on January 4, 1985, showing \$8,640 in contributions to federal candidates and political committees.

On June 10, 1985, the Commission found reason to believe the 4th District violated 2 U.S.C. § 434(a)(4)(A)(ii), for not filing its Pre-General Report in a timely manner. On June 26, 1985, a letter was mailed to the 4th District notifying it of the Commission's finding.

II. LEGAL ANALYSIS

The 4th District is a political committee other than the committee of a candidate. As such, it is required to file the necessary reports as prescribed in 2 U.S.C. § 434(a)(4)(A)(ii), which requires unauthorized committees to file a Pre-General Election Report no later than the 12th day before a general election, in this case October 25, 1984. The 4th District filed its Pre-General Report on January 4, 1985, 71 calendar days late.

36740570632

III. RECOMMENDATION

The Office of General Counsel recommends the Commission find probable cause to believe the 4th Congressional District Democratic Party violated 2 U.S.C. § 434(a)(4)(A)(ii).

Date

Charles N. Steele
General Counsel

26740570633

Attachment 2



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Bonnie Benner, Treasurer
4th District Democratic Party
Box 259 Route #2
Berrien Springs, MI 49103

RE: MUR 2026
4th District Democratic Party

Dear Ms. Benner:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on June 10, 1985, found reason to believe that your committee had violated 2 U.S.C. § 434(a)(4)(A)(ii) and instituted an investigation in this matter.

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

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

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

86740570634

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

Should you have any questions, please contact Andrew Maikovich at (202)523-4000.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

06740670635

OGC Draft



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

85 AUG 23 12:31

August 23, 1985

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel *CNS*

SENSITIVE

SUBJECT: MUR # 2026

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondent of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on August 23, 1985. Following receipt of the Respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Brief
2. Letter to Respondent

26740570636

III. RECOMMENDATION

The Office of General Counsel recommends the Commission find probable cause to believe the 4th Congressional District Democratic Party violated 2 U.S.C. § 434(a)(4)(A)(ii).

Date

Charles N. Steele
General Counsel

06740570637

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

Should you have any questions, please contact Andrew Maikovich at (202)523-4000.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

86760570638



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 23, 1985

Bonnie Benner, Treasurer
4th District Democratic Party
Box 259 Route #2
Berrien Springs, MI 49103

RE: MUR 2026
4th District Democratic Party

Dear Ms. Benner:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on June 10, 1985, found reason to believe that your committee had violated 2 U.S.C. § 434(a)(4)(A)(ii) and instituted an investigation in this matter.

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

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

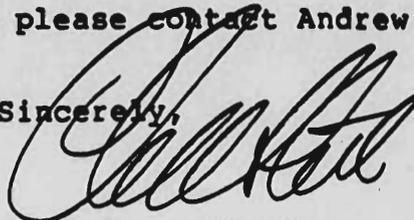
If you are unable to file a responsive brief within 15 days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extensions beyond 20 days.

86040570639

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

Should you have any questions, please contact Andrew Maikovich at (202)523-4000.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief

06040570640

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
4th Congressional District)
Democratic Party and) MUR 2026
Bonnie Benner, as treasurer)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On October 1, 1984, the 4th Congressional District Democratic Party ("4th District") was sent notification of the requirement that a Pre-General Report was due on October 25, 1984, if contributions or expenditures were made in connection with the general election during the period ending October 17, 1984. The Pre-General Report was filed on January 4, 1985, showing \$8,640 in contributions to federal candidates and political committees.

On June 10, 1985, the Commission found reason to believe the 4th District violated 2 U.S.C. § 434(a)(4)(A)(ii), for not filing its Pre-General Report in a timely manner. On June 26, 1985, a letter was mailed to the 4th District notifying it of the Commission's finding.

II. LEGAL ANALYSIS

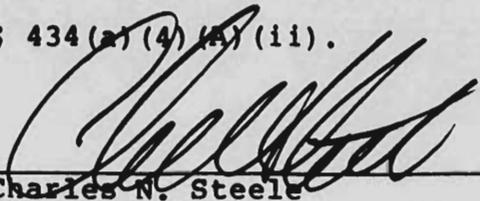
The 4th District is a political committee other than the committee of a candidate. As such, it is required to file the necessary reports as prescribed in 2 U.S.C. § 434(a)(4)(A)(ii), which requires unauthorized committees to file a Pre-General Election Report no later than the 12th day before a general election, in this case October 25, 1984. The 4th District filed its Pre-General Report on January 4, 1985, 71 calendar days late.

86040570641

III. RECOMMENDATION

The Office of General Counsel recommends the Commission find probable cause to believe the 4th Congressional District Democratic Party violated 2 U.S.C. § 434(a)(4)(A)(ii).

22 August 1985
Date



Charles N. Steele
General Counsel

86740570642



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 26, 1985

Bonnie Benner, Treasurer
4th District Democratic Party
Box 2591 Route #2
Berrien Springs, MI 49103

RE: MUR 2026
4th District Democratic Party

Dear Ms. Benner:

On June 10, 1985, the Federal Election Commission determined that there is reason to believe the 4th District Democratic Party and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii), 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.

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

86040570643

Letter to Bonnie Benner, Treasurer
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

06040570644

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

SUMMARY OF ALLEGATIONS

It is alleged that the 4th Congressional District Democratic Party ("4th District") violated 2 U.S.C. § 434(a)(4)(A)(ii) by not timely filing its 1984 Pre-General Election Report.

FACTUAL AND LEGAL ANALYSIS

Facts

On October 1, 1984, the 4th District was sent notification of the requirement that a Pre-General Report was due on October 25, 1984, if contributions or expenditures were made in connection with the general election during the period ending October 17, 1984. The Pre-General Report was filed on January 4, 1985, showing \$8,640 in contributions to federal candidates and political committees.

Legal Analysis

The 4th District is a political committee other than the committee of a candidate. As such, it is required to file the necessary reports as prescribed in 2 U.S.C. § 434(a)(4)(A)(ii), which requires unauthorized committees to file a Pre-General Election Report no later than the 12th day before a general election, in this case October 25, 1984. The 4th District filed its Pre-General Report on January 4, 1985, 71 calendar days late.

The Office of General Counsel therefore recommends the Commission find reason to believe the 4th District violated 2 U.S.C. § 434(a)(4)(A)(ii).

06740570645

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.

9 6 7 4 0 5 7 0 6 4 6

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: _____

86140570647



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Bonnie Benner, Treasurer
4th District Democratic Party
Box 2591 Route #2
Berrien Springs, MI 49103

RE: MUR _____
4th District Democratic Party

Dear Ms. Benner:

On _____, 1985, the Federal Election Commission determined that there is reason to believe the 4th District Democratic Party and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii), 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.

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

06740570648

Letter to Bonnie Benner, Treasurer
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,

Enclosures

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

mm 6/20

96740570649

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	RAD Referral 85NF-89
4th Congressional District Democratic)	
Party and Bonnie S. Benner, as)	
treasurer)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 10, 1985, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 85NF-89:

1. Open a MUR.
2. Find reason to believe the 4th Congressional District Democratic Party and Bonnie S. Benner, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii).
3. Approve the letters and legal and factual analysis attached to the First General Counsel's Report signed June 5, 1985.

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

Attest:

6-12-85
Date

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

Received in Office of Commission Secretary:	6-6-85,	10:59
Circulated on 48 hour tally basis:	6-6-85,	4:00

06740570650



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *rd*
DATE: June 6, 1985
SUBJECT: RAD Ref. 85NF-89: First General Counsel's Rpt.

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

CIRCULATIONS

DISTRIBUTION

48 Hour Tally Vote	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Sensitive	<input checked="" type="checkbox"/>	Audit Matters	<input type="checkbox"/>
Non-Sensitive	<input type="checkbox"/>	Litigation	<input type="checkbox"/>
24 Hour No Objection	<input type="checkbox"/>	Closed MUR Letters	<input type="checkbox"/>
Sensitive	<input type="checkbox"/>	Status Sheets	<input type="checkbox"/>
Non-Sensitive	<input type="checkbox"/>	Advisory Opinions	<input type="checkbox"/>
Information	<input type="checkbox"/>	Other (see distribution below)	<input type="checkbox"/>
Sensitive	<input type="checkbox"/>		
Non-Sensitive	<input type="checkbox"/>		
Other	<input type="checkbox"/>		

06140570651

SENSITIVE

RECEIVED

FIRST GENERAL COUNSEL'S OFFICE OF THE FEC

DATE AND TIME OF TRANSMITTAL
BY OGC TO COMMISSION _____

COMMISSION SECRETARY
RAD REFERRAL: 85NF-89
STAFF: A. Maikovich

85 JUN 6 AJO: 59

SOURCE OF MUR: INTERNALLY GENERATED

RESPONDENT'S NAME: 4th Congressional District Democratic Party and Bonnie S. Benner, as treasurer

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

INTERNAL REPORTS CHECKED: Reports of 4th Congressional District Democratic Party

GENERATION OF MATTER

This matter was referred to the Office of General Counsel on May 13, 1985, by the Reports Analysis Division (Attachment 1).

SUMMARY OF ALLEGATIONS

It is alleged that the 4th Congressional District Democratic Party ("4th District") violated 2 U.S.C. § 434(a)(4)(A)(ii) by not timely filing its 1984 Pre-General Election Report.

FACTUAL AND LEGAL ANALYSIS

Facts

On October 1, 1984, the 4th District was sent notification of the requirement that a Pre-General Report was due on October 25, 1984, if contributions or expenditures were made in connection with the general election during the period ending October 17, 1984. The Pre-General Report was filed on January 4, 1985, showing \$8,640 in contributions to federal candidates and political committees.

Legal Analysis

The 4th District is a political committee other than the committee of a candidate. As such, it is required to file the necessary reports as prescribed in 2 U.S.C. § 434(a)(4)(A)(ii),

25010570652

which requires unauthorized committees to file a Pre-General Election Report no later than the 12th day before a general election, in this case October 25, 1984. The Ford Committee filed its Pre-General Report on January 4, 1985, 71 calendar days late.

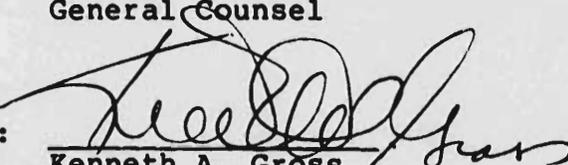
The Office of General Counsel therefore recommends the Commission find reason to believe the 4th District violated 2 U.S.C. § 434(a)(4)(A)(ii).

RECOMMENDATION

1. Open a MUR.
2. Find reason to believe the 4th Congressional District Democratic Democratic Party and Bonnie S. Benner, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii).
3. Approve the attached letters and legal and factual analysis.

Charles N. Steele
General Counsel

BY:


Kenneth A. Gross
Associate General Counsel

June 5, 1985
Date

Attachments:

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

86040570653

Attachment 2



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Bonnie Benner, Treasurer
4th District Democratic Party
Box 2591 Route #2
Berrien Springs, MI 49103

RE: MUR _____
4th District Democratic Party

Dear Ms. Benner:

On _____, 1985, the Federal Election Commission determined that there is reason to believe the 4th District Democratic Party and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii), 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.

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

86040570654

4

Letter to Bonnie Benner, Treasurer
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,

Enclosures

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

86740570655

Attachment 3
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

SUMMARY OF ALLEGATIONS

It is alleged that the 4th Congressional District Democratic Party ("4th District") violated 2 U.S.C. § 434(a)(4)(A)(ii) by not timely filing its 1984 Pre-General Election Report.

FACTUAL AND LEGAL ANALYSIS

Facts

On October 1, 1984, the 4th District was sent notification of the requirement that a Pre-General Report was due on October 25, 1984, if contributions or expenditures were made in connection with the general election during the period ending October 17, 1984. The Pre-General Report was filed on January 4, 1985, showing \$8,640 in contributions to federal candidates and political committees.

Legal Analysis

The 4th District is a political committee other than the committee of a candidate. As such, it is required to file the necessary reports as prescribed in 2 U.S.C. § 434(a)(4)(A)(ii), which requires unauthorized committees to file a Pre-General Election Report no later than the 12th day before a general election, in this case October 25, 1984. The Ford Committee filed its Pre-General Report on January 4, 1985, 71 calendar days late.

The Office of General Counsel therefore recommends the Commission find reason to believe the 4th District violated 2 U.S.C. § 434(a)(4)(A)(ii).

06010570656

4TH DISTRICT DEMOCRATIC PARTY

(Attachments 1a - 1d)

85040370657

3 6 7 4 0 5 7 0 6 5 9
 FEDERAL ELECTION COMMISSION
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (83-84)

DATE 24APR85
 PAGE 1

PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
4TH DISTRICT DEMOCRATIC PARTY				PARTY QUALIFIED		ID #C00132753
	1983 STATEMENT OF ORGANIZATION - AMENDMENT			7MAR83	3	83FEC/267/2665
	APRIL QUARTERLY	50	85	1JAN83 -31MAR83	6	83FEC/269/5246
	APRIL QUARTERLY - AMENDMENT	12,229	8,589	1JAN83 -31MAR83	10	84FEC/293/2077
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN83 -31MAR83	1	85FEC/369/0027
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1JAN83 -31MAR83	2	84FEC/357/1438
	REQUEST FOR ADDITIONAL INFORMATION 2ND	-	-	1JAN83 -31MAR83	17	85FEC/359/1132
	JULY QUARTERLY	6,879	7,297	1APR83 -30JUN83	9	83FEC/276/1665
	JULY QUARTERLY - AMENDMENT	2,725	7,198	1APR83 -30JUN83	8	84FEC/293/2081
	JULY QUARTERLY - AMENDMENT	-	-	1APR83 -30JUN83	1	85FEC/369/0025
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1APR83 -30JUN83	1	84FEC/357/2148
	REQUEST FOR ADDITIONAL INFORMATION 2ND	-	-	1APR83 -30JUN83	1	85FEC/359/2401
	OCTOBER QUARTERLY	4,340	4,621	1JUL83 -30SEP83	8	83FEC/285/2317
	OCTOBER QUARTERLY - AMENDMENT	4,340	4,621	1JUL83 -30SEP83	3	84FEC/293/2095
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL83 -30SEP83	1	85FEC/309/0024
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1JUL83 -30SEP83	5	84FEC/357/1441
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1JUL83 -30SEP83	1	84FEC/357/2145
	REQUEST FOR ADDITIONAL INFORMATION 2ND	-	-	1JUL83 -30SEP83	1	85FEC/359/2400
	REQUEST FOR ADDITIONAL INFORMATION 2ND	-	-	1JUL83 -30SEP83	1	85FEC/359/2399
	YEAR-END	4,170	4,413	1OCT83 -31DEC83	6	84FEC/293/2098
	YEAR-END - AMENDMENT	-	-	18OCT83 -31DEC83	7	85FEC/366/4439
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1OCT83 -31DEC83	2	84FEC/357/1447
	REQUEST FOR ADDITIONAL INFORMATION 2ND	-	-	1OCT83 -31DEC83	1	85FEC/359/2398
	1984 APRIL QUARTERLY	5,334	5,809	1JAN84 -31MAR84	8	84FEC/308/5103
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN84 -31MAR84	1	85FEC/369/0028
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1JAN84 -31MAR84	5	84FEC/357/1450
	REQUEST FOR ADDITIONAL INFORMATION 2ND	-	-	1JAN84 -31MAR84	1	85FEC/359/2397
	JULY QUARTERLY	15,614	5,474	1APR84 -30JUN84	9	84FEC/322/3637
	JULY QUARTERLY - AMENDMENT	-	-	1APR84 -30JUN84	1	85FEC/369/0026
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1APR84 -30JUN84	2	84FEC/357/1455
	REQUEST FOR ADDITIONAL INFORMATION 2ND	-	-	1APR84 -30JUN84	1	85FEC/359/2396
	OCTOBER QUARTERLY	13,205	7,250	1JUL84 -30SEP84	11	84FEC/339/1394
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL84 -30SEP84	3	85FEC/368/2407
	1ST LETTER INFORMATIONAL NOTICE	-	-	1JUL84 -30SEP84	3	85FEC/363/3243
	PRE-GENERAL	5,200	12,198	1OCT84 -20OCT84	9	85FEC/358/1741
	PRE-GENERAL - AMENDMENT	-	-	1OCT84 -20OCT84	1	85FEC/368/5047
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1OCT84 -20OCT84	3	85FEC/365/2099
	REQUEST FOR ADDITIONAL INFORMATION 2ND	-	-	1OCT84 -20OCT84	8	85FEC/367/1788
	POST-GENERAL	2,450	8,675	20OCT84 -20NOV84	8	85FEC/358/1750
	POST-GENERAL - AMENDMENT	2,450	8,202	20OCT84 -20NOV84	4	85FEC/365/2892
	NOTICE OF FAILURE TO FILE	-	-	1OCT84 -20NOV84	1	84FEC/357/4934
	REQUEST FOR ADDITIONAL INFORMATION	-	-	20OCT84 -20NOV84	4	85FEC/305/2103
	REQUEST FOR ADDITIONAL INFORMATION 2ND	-	-	20OCT84 -20NOV84	1	85FEC/367/2546
	YEAR-END	6,020	1,700	27NOV84 -31DEC84	9	85FEC/365/2883
	TOTAL	71,287	0 85,520	0	190	TOTAL PAGES

ATTACHMENT 1a

All Reports Reviewed. Ending Cash on Hand as of 12/31/84= \$8,803.28 Outstanding Debts as of 12/31/84= \$0



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20540

ATTACHMENT 1b

page 1 of 2

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-

957057069

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

86740570660



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

BQ-7

December 28, 1984

Bonnie Benner, Treasurer
4th District Democratic Party
Box 259/Route 2
Berrien Springs, MI 49103

Identification Number: C00132753

Reference: 30 Day Post-General Report (10/01/84-11/26/84)

Dear Ms. Benner:

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 J. Hunter Bryan 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

84033774934
06040570661

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

FEC

(Summary Page)

ALLEGY AREA

85 JAN 9 ALLEGY AREA

1. Name of Committee (in Full)
**4TH CONGRESSIONAL DISTRICT
DEMOCRATIC PARTY**

Address (Number and Street)
Rt 2 Box 259

City, State and ZIP Code
BELLEVUE SR ME. 49103

Check here if address is different than previously reported

2. FEC Identification Number
C 00132753

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 _____
 Twelfth day report preceding GENERAL Type of Election
 election on Nov 6 in the State of ME
 Twelfth 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 11-1-84 through 10-20-84

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

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

(c) Total Receipts (from Line 1b) _____

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

7 Total Disbursements (from Line 2b) _____

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

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

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

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6 (a)		\$ 1680 62
6 (b)	\$ 17295 22	
6 (c)	\$ 5200 00	\$ 39354 03
6 (d)	\$ 22495 22	\$ 70581 98
7	\$ 12198 84	\$ 30738 27
8	\$ 10296 38	\$ 40143 71
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.

Bonnie S. Bellow
Type or Print Name of Treasurer

Bonnie S. Bellow
SIGNATURE OF TREASURER

10-24-84
Date

For further information contact:
Federal Election Commission
Toll Free 800-424-9630
Local 702-573-4888

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

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

--	--	--	--	--	--	--	--

FEC FORM 3X (3/80)

01742

Page 1 of 1 for
LINE NUMBER 211
(Use separate schedule(s) for each
category of the Detailed
Summary Page)

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)			
4TH CONGRESSIONAL DISTRICT DEMOCRATIC PARTY			
A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
CHARLOTT PERMUELL 42nd STATE REP. TALBOTT RIVES, ME. 49473	CONTRIBUTION Disbursement for <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10-17-84	1,300.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
CHARLES KELLY 44TH STATE REP. BENIGN HARBOR ME. 49622	CONTRIBUTION Disbursement for <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10-17-84	1000.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
DERITT GRADENTZ 45TH STATE REP. DEWALAC, ME. 49647	CONTRIBUTION Disbursement for <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10-17-84	1,300.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
CAROL LUCAS 54TH STATE REP. HOLLAND, ME. 49473	CONTRIBUTION Disbursement for <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10-17-84	1,300.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
MARY HUISMAN 95TH STATE REP. SPRING LAKE, ME. 49456	CONTRIBUTION Disbursement for <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10-17-84	1,300.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
CHARLES REDEBAUGH VICKSBURG, ME.	CONTRIBUTION Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10-17-84	2440.00 AG
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
SUBTOTAL of Disbursements This Page (optional)			—
TOTAL This Period (last page this line number only)			8640.00

0 1 7 1 7
 0 3 3 : 0 1 7 1 7
 0 3 0 3 3 : 0 1 7 1 7
 0 3 0 3 3 : 0 1 7 1 7



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2026

Date Filmed 2/21/86 Camera No. --- 2

Cameraman AS

96740570665