



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 2095

Date Filmed 5/27/86 Camera No. --- 2

Cameraman AS

86040783128

FEDERAL ELECTION COMMISSION

Routing Slips, Internal Documents &

Practices, Conciliation Matters.

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):

95040583129

- | | | | |
|-------------------------------------|---|-------------------------------------|--|
| <input checked="" type="checkbox"/> | (1) Classified Information | <input type="checkbox"/> | (6) Personal privacy |
| <input checked="" type="checkbox"/> | (2) Internal rules and practices | <input type="checkbox"/> | (7) Investigatory files |
| <input type="checkbox"/> | (3) Exempted by other statute | <input checked="" 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 John K. De...
date May 12, 1986

FEC 5-21-77

[Handwritten initials/signature]



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 6, 1986

Clay Bleck, Treasurer
Washington State Democratic
Central Committee
P.O. Box 4027
Seattle, WA 98104

RE: MUR 2095

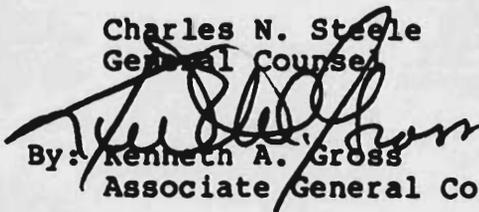
Dear Mr. Bleck:

On April 25, 1986, the Commission accepted the conciliation agreement signed by Jeff Smith as Executive Director 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

36040503130

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Washington State Democratic)	MUR 2095
Central Committee, and Clay Bleck,)	
as treasurer)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 25, 1986, the Commission decided by a vote of 6-0 to take the following actions in MUR 2095;

1. Accept the proposed conciliation agreement and civil penalty, as recommended in the General Counsel's Report signed April 21, 1986.
2. Approve and send the letter, attached to the General Counsel's Report signed April 21, 1986.
3. Close the file.

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

Attest:

4-25-86

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:	Tues.,	4-22-86,	2:41
Circulated on 48 hour tally basis:	Wed.,	4-23-86,	11:00
Deadline for vote:	Fri.,	4-25-86,	11:00

86040583131

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of
Washington State Democratic
Central Committee, and Clay Bleck,
as treasurer

)
)
) APR 22 1986
) MUR 2095-2:41
)
)

GENERAL COUNSEL'S REPORT

BACKGROUND

Attached is a conciliation agreement which has been signed by Jeff Smith, Executive Director of the Washington State Democratic Central Committee. The attached agreement contains no changes from the agreement approved by the Commission. Respondents have submitted a check for the civil penalty.

RECOMMENDATIONS

1. Accept the proposed conciliation agreement and civil penalty.
2. Approve and send the attached letter.
3. Close the file.

Charles N. Steele
General Counsel

April 21, 1986
Date

BY:

Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

Attachments

1. Signed conciliation agreement
2. Copy of civil penalty check
3. Proposed letter to Respondents

86040583132

ACC #244

In the Matter of)	
)	
Washington State Democratic)	MUR 2095
Central Committee)	
Clay Bleck, 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 the Washington State Democratic Central Committee ("the Committee"), and Clay Bleck, as treasurer ("Respondents"), violated 2 U.S.C. § 434(a)(4)(A)(ii) by failing to file in a timely fashion the pre-general election report due October 25, 1984.

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.

86040703133

36 APR 17

11 11

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

1. In 1984, respondent committee was an unauthorized political party committee within the meaning of 2 U.S.C.

§§ 431(4) and (15) and 11 C.F.R. §§ 100.5(e)(4) and (f)(2).

2. Commission records indicate that the Committee filed quarterly reports of receipts and disbursements under 2 U.S.C. § 434(a)(4) and was therefore required to file a pre-general election report by October 25, 1984.

3. Respondents were notified on October 1, 1984 that a 12 Day Pre-General Report was due on October 25, 1984, if contributions and expenditures had occurred during the period ending October 17, 1984.

4. Commission records indicate that the Committee made expenditures for general election candidates during the period ending October 17, 1984.

5. The Committee failed to file the report until January 27, 1985, ninety-seven days past the deadline.

V. WHEREFORE, Respondents and the Commission agree: In violation of 2 U.S.C. § 434(a)(4)(A)(ii) respondents failed to file in a timely fashion the pre-general election report due October 25, 1984.

VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of two hundred twenty-five dollars (\$225), pursuant to 2 U.S.C. § 437g(a)(5)(A).

86040583134

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.

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

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

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

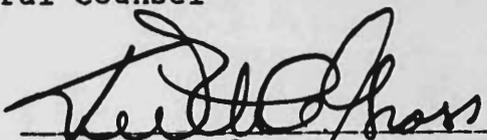
XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or

86040583135

oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

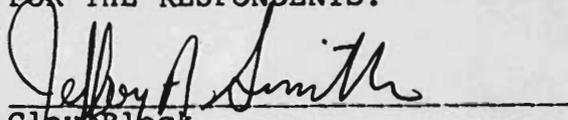
FOR THE COMMISSION:

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

May 5, 1986
Date

FOR THE RESPONDENTS:


Clay Bleck
Treasurer

4/14/86
Date

86040583136



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 3, 1986

Clay Bleck
Treasurer
Washington State Democratic
Central Committee
P.O. Box 4027
Seattle, WA 98104

RE: MUR 2095

Dear Mr. Bleck:

On October 24, 1985, the Commission found reason to believe that the Washington State Democratic Central Committee and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii). At your request, the Commission determined on January 29, 1986, 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 John Drury, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures

cc: Jeff Smith
Executive Director

86040563137

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Washington State Democratic) MUR 2095
Central Committee)
Clay Bleck, Treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 29, 1986, the Commission decided by a vote of 5-0 to take the following actions in MUR 2095:

1. Enter into conciliation with the Washington State Democratic Central Committee and Clay Bleck, as treasurer, prior to a finding of probable cause to believe.
2. Approve and send the proposed conciliation agreement and letter attached to the General Counsel's Report signed January 23, 1986.

Commissioners Aikens, Elliott, Harris, Josefiak and McGarry voted affirmatively for this decision; Commissioner McDonald did not cast a vote.

Attest:

1-29-86
Date

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

Received in Office of Commission Secretary: Fri., 1-24-86, 1:00
Circulated on 48 hour tally basis: Mon., 1-27-86, 11:00
Deadline for vote: Wed., 1-29-86, 11:00

8604053138

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE REC
COMMISSION SECRETARY

In the Matter of)
Washington State Democratic)
Central Committee)
Clay Bleck, Treasurer)

MUR 2095

25 JAN 24 P 1: 00

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On October 24, 1985, the Commission found reason to believe that the Washington State Democratic Central Committee, (hereinafter "the Committee") and Clay Bleck, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii). The Committee was notified of this determination by letter dated October 30, 1985. The Committee subsequently requested pre-probable cause conciliation.

II. LEGAL ANALYSIS

Section 434(a)(4)(A)(ii) of Title 2, United States Code, requires that all political committees, other than authorized committees of a candidate, shall file a pre-election report no later than the 12th day before any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election.

In 1984, the Committee was an unauthorized political party committee within the meaning of 2 U.S.C. §§ 431(4) and (15), and 11 C.F.R. §§ 100.5(e)(4) and (f)(2). Commission reports indicate that the Committee filed quarterly reports of receipts and disbursements under 2 U.S.C. § 434(a)(4). Thus, under § 434(a)(4)(A)(ii), the Committee was required to file a pre-general election report, in this case by October 25, 1984.

86040783139

Respondents were notified on October 1, 1984 that a 12 day pre-general report would be due on October 25 if contributions and expenditures were made in connection with the general election in the period ending October 17, 1984. Commission records shows that the Committee made expenditures for or contributions to general election candidates during this period. Yet, respondents failed to file such report by the deadline.

On December 28, 1984, the Commission sent a non-filer notice to the Committee for failure to file the 1984 30 day post-general election report, which the Committee was required to file by December 6, 1984. On January 30, 1985, the Committee's post-general and 1984 12 day pre-general election reports arrived at the Commission. They were sent by certified mail, postmarked January 27, 1985.

III. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

IV. RECOMMENDATIONS

1. Enter into conciliation with the Washington State Democratic Central Committee and Clay Bleck, as treasurer, prior to a finding of probable cause to believe.

8604053140

2. Approve and send the attached proposed conciliation agreement and letter.

Charles N. Steele
General Counsel

January 23, 1986
Date

BY:

Kenneth A. Gross
Associate General Counsel

Attachments

1. Proposed Conciliation Agreement
2. Proposed Letter

06040383141

WASHINGTON STATE DEMOCRATIC CENTRAL COMMITTEE

KAREN MARCHIORO
STATE CHAIR

85 NOV 18 11:35 AM '85
JEFF SMITH
EXECUTIVE DIRECTOR

CCC # 8957

November 12, 1985

John Drury
Office of the General Counsel
Federal Elections Commission
1325 K Street N.W.
Washington, D.C. 20463

5 NOV 18 11:35 AM '85

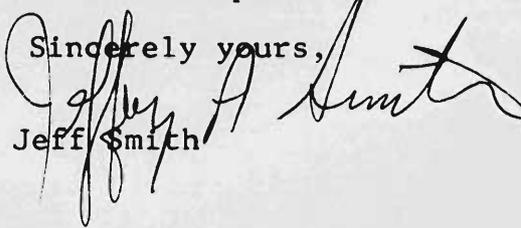
GENERAL COUNSEL

Dear Mr. Drury,

We would like to pursue pre-probable cause concili-
ation in MUR 2095.

Please advise us as to the next steps in this
process. You will find us most co-operative.

Sincerely yours,



Jeff Smith

85040503142



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 30, 1985

Clay Beck, Treasurer
Washington State Democratic
Central Committee
1701 Smith Tower
Seattle, Washington 98104

RE: MUR 2095
Clay Beck, Treasurer
Washington State Democratic
Central Committee

Dear Mr. Beck:

On October 24, 1985, the Federal Election Commission determined that there is reason to believe that the Washington State Democratic Central Committee 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 fifteen 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.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so

86040783143

that it may complete its investigation of the matter. Further, requests for pre-probable conciliation after briefs on probable cause have been mailed to the respondent will not be entertained.

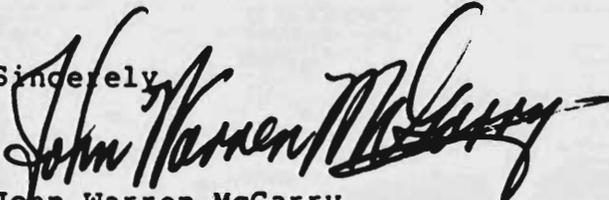
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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

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

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Paul Reyes, the staff member 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

86040383144

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 2095

STAFF MEMBER AND TELE. NO.
Paul Reyes (202) 523-4000

RESPONDENT: Washington State Democratic Central Committee
Clay Beck, Treasurer

SUMMARY OF ALLEGATIONS

The Washington State Democratic Central Committee and Clay Beck, as treasurer, (respondents) failed to timely file the 1984 Pre-General Election Report of receipts and disbursements as required by 2 U.S.C. § 434(a)(4)(A)(ii).

III. FACTUAL BASIS AND LEGAL ANALYSIS

Section 434(a)(4)(A)(ii) of Title 2, United States Code, requires that all political committees other than authorized committees of a candidate shall file a pre-election report, which shall be filed no later than the 12th day before (or posted by registered or certified mail no later than the 15th day before) any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election, and which shall be complete as of the 20th day before the election. See Also 11 C.F.R. § 104.5(c)(1)(ii)(A).

Respondent Washington State Democratic Central Committee (the "Committee"), in 1984, was an unauthorized political party committee, within the meaning of 2 U.S.C. §§ 431(4) and (15) and 11 C.F.R. §§ 100.5(e)(4) and (f)(2). Commission records indicate that the Committee filed quarterly reports of receipts and

86040583145

disbursements under 2 U.S.C. § 434(a)(4) and was, therefore, required to file a pre-general election report by October 25, 1984.*/ Commission records further indicate that the Committee made expenditures for or contributions to general election candidates during the period ending October 17, 1984.

Respondents were notified on October 1, 1984, that a 12 Day Pre-General Report was due on October 25, 1984 if contributions and expenditures, which had not previously been reported, were made in connection with the general election during the period ending October 17, 1984.

On December 28, 1984, a non-filer notice was sent to the Committee for failure to file the 1984 30 Day Post-General election report covering October 1, 1984 through November 26, 1984 by December 6, 1984. On January 30, 1985, the Commission received the Committee's Post-General Election Report and a 1984 12 Day Pre-General election report from the Committee.

The Pre-General Election Report disclosed activity covering the period October 1, 1984 through October 17, 1984. It was sent by certified mail, post marked January 27, 1985. That report disclosed \$58,770.50 in receipts for the period and \$21,337.65 in disbursements for the same period. Subsequent amendments have changed those figures to, respectively, \$47,079 and \$40,458. Accordingly, the General Counsel concludes that respondents filed their Pre-General election report ninety-seven

*/ That report would have been timely filed if sent by certified or registered mail and postmarked no later than October 22, 1984.

8 6 0 4 0 5 8 3 1 4 6

days late and recommends that there is reason to believe that
2 U.S.C. § 434(a)(4)(A)(ii) was violated by the Washington State
Democratic Central Committee and Clay Beck as treasurer.

pr

85040783147

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
Washington State Democratic)	RAD Ref. 85NF-127
Central Committee)	
Clay Beck, Treasurer)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 28, 1985, the Commission decided by a vote of 4-0 to take the following actions in RAD Ref. 85NF-127:

1. Open a MUR.
2. Find reason to believe that the Washinton State Democratic Central Committee and Clay Beck, as treasurer, violated 2 U.S.C. § 434(a) (A) (ii).
3. Approve and send the letter and factual and legal analysis attached to the First General Counsel' Report signed October 21, 1985.

Commissioners Elliott, Harris, Josefiak, McDonald voted affirmatively for this decision; Commissioners Aikens and McGarry did not cast a vote.

Attest:

10-28-85
Date

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

Received in Office of Commission Secretary:	Wed.,	10-23-85,	2:05
Circulated on 48 hour tally basis:	Thurs.,	10-24-85,	11:00
Deadline for vote:	Mon.,	10-28-85,	11:00

85040503148

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Washington State Democratic) RAD Ref. 85NF-127
Central Committee)
Clay Beck, Treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 24, 1985, the Commission decided by a vote of 6-0 to take the following actions in RAD Ref. 85NF-127:

1. Find reason to believe that the Washington State Democratic Central Committee and Clay Beck, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii).
2. Approve and send the letter and factual and legal analysis attached to the First General Counsel's Report signed October 21, 1985.

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

Attest:

10-24-85
Date

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

Received in Office of Commission Secretary: Tues., 10-22-85, 10:02
Circulated on 48 hour tally basis: Tues., 10-22-85, 4:00
Deadline for vote: Thurs., 10-24-85, 4:00

8504073149

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION:

RAD REFERRAL: 85NF-127
STAFF: Paul Reyes
523-4000

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

RESPONDENTS' NAMES: Washington State Democratic
Central Committee
Clay Beck, Treasurer

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

INTERNAL REPORTS
CHECKED: Committee Reports

FEDERAL AGENCIES
CHECKED: None

I. GENERATION OF MATTER

Based on information ascertained in the normal course of its supervisory responsibilities, the Reports Analysis Division (RAD) referred this matter to the General Counsel's Office on September 30, 1985.

II. SUMMARY OF ALLEGATIONS

The Washington State Democratic Central Committee and Clay Beck, as treasurer, (respondents) failed to timely file the 1984 Pre-General Election Report of receipts and disbursements as required by 2 U.S.C. § 434(a)(4)(A)(ii).

III. FACTUAL AND LEGAL ANALYSIS

Section 434(a)(4)(A)(ii) of Title 2, United States Code, requires that all political committees other than authorized committees of a candidate shall file a pre-election report, which shall be filed no later than the 12th day before (or posted by registered or certified mail no later than the 15th day before)

0
6
0
4
0
3
1
5
0

any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election, and which shall be complete as of the 20th day before the election. See Also 11 C.F.R. § 104.5(c)(1)(ii)(A).

Respondent Washington State Democratic Central Committee (the "Committee"), in 1984, was an unauthorized political party committee, within the meaning of 2 U.S.C. §§ 431(4) and (15) and 11 C.F.R. §§ 100.5(e)(4) and (f)(2). Commission records indicate that the Committee filed quarterly reports of receipts and disbursements under 2 U.S.C. § 434(a)(4) and was, therefore, required to file a pre-general election report by October 25, 1984.^{1/} Commission records further indicate that the Committee made expenditures for or contributions to general election candidates during the period ending October 17, 1984.

Respondents were notified on October 1, 1984, that a 12 Day Pre-General Report was due on October 25, 1984 if contributions and expenditures, which had not previously been reported, were made in connection with the general election during the period ending October 17, 1984 (Attachment I, pps. 6-7).

On December 28, 1984, a non-filer notice was sent to the Committee for failure to file the 1984 30 Day Post-General

^{1/} That report would have been timely filed if sent by certified or registered mail and postmarked no later than October 22, 1984.

15153151
40763151
40763151
40763151

election report covering October 1, 1984 through November 26, 1984 by December 6, 1984. (Attachment I, p. 8). On January 30, 1985, the Commission received the Committee's Post-General election report and a 1984 12 Day Pre-General election report from the Committee.

The Pre-General Election Report disclosed activity covering the period October 1, 1984 through October 17, 1984. It was sent by certified mail, post marked January 27, 1985.

(Attachment I, pps. 9-12). That report disclosed \$58,770.50 in receipts for the period and \$21,337.65 in disbursements for the same period. Subsequent amendments have changed those figures to, respectively, \$47,079 and \$40,458. Accordingly, the General Counsel concludes that respondents filed their Pre-General election report ninety-seven days late and recommends that there is reason to believe that 2 U.S.C. § 434(a)(4)(A)(ii) was violated by the Washington State Democratic Central Committee and Clay Beck as treasurer.

IV. RECOMMENDATIONS

1. Find reason to believe that the Washington State Democratic Central Committee and Clay Beck, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii).

25040583152

2. Approve and send the attached letter and factual and legal analysis.

Charles N. Steele
General Counsel

October 21, 1985
Date

BY: 
Kenneth A. Gross
Associate General Counsel

Attachments
RAD Referral
Proposed letter with Factual
and Legal Analysis

36040783153



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 30, 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: REFERRAL OF THE WASHINGTON STATE DEMOCRATIC
CENTRAL COMMITTEE

This is a referral of the Washington State Democratic Central Committee ("WSDCC") for failing to file the 1984 12 Day Pre-General Report of Receipts and Disbursements by Election Day, November 6, 1984. According to the , further examination is required by your office.

If you have any questions, please contact Ed Ryan at 523-4048.

Attachment

86040503154

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: September 30, 1985ANALYST: Ed Ryan

I. COMMITTEE: Washington State Democratic Central
Committee (C00114439)
Clay Bleck, Treasurer
1701 Smith Tower
Seattle, WA 98104

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

III. BACKGROUND:

Failure to Timely File the 1984 12 Day Pre-General Report

The Washington State Democratic Central Committee ("WSDCC") failed to file the 1984 12 Day Pre-General Report of Receipts and Disbursements by Election Day, November 6, 1984. WSDCC was notified on October 1, 1984 that a 12 Day Pre-General Report was due on October 25, 1984 if contributions and expenditures, which had not previously been reported, were made in connection with the general election during the period ending October 17, 1984 (Attachment 2).

On December 28, 1984, a Non-Filer Notice was sent to WSDCC for failure to file the 1984 30 Day Post-General Report covering October 1, 1984 through November 26, 1984 (Attachment 3). On January 27, 1985, the Commission received a 1984 12 Day Pre-General Report from WSDCC, which disclosed activity covering the period from October 1, 1984 through October 17, 1984 (Attachment 4).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

86040583155

PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
WASHINGTON STATE DEMOCRATIC CENTRAL COMMITTEE				PARTY QUALIFIED		ID #C00114439
1983	STATEMENT OF ORGANIZATION - AMENDMENT			3JUN83	2	83FEC/272/5277
	APRIL QUARTERLY	0	1,824	1JAN83 -31MAR83	4	83FEC/269/5103
	APRIL QUARTERLY - AMENDMENT	0	1,824	1JAN83 -31MAR83	6	83FEC/272/2558
	APRIL QUARTERLY - AMENDMENT	0	1,824	1JAN83 -31MAR83	6	84FEC/313/1119
	REQUEST FOR ADDITIONAL INFORMATION			1JAN83 -31MAR83	1	84FEC/306/3295
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN83 -31MAR83	6	84FEC/311/2911
	JULY QUARTERLY	17,445	0	1APR83 -30JUN83	5	84FEC/306/4051
	NOTICE OF FAILURE TO FILE			1APR83 -30JUN83	1	84FEC/306/0091
	PRE-PRIMARY	19,898	15,958	1JUL83 -27SEP83	4	83FEC/284/1035
	PRE-PRIMARY - AMENDMENT	19,898	15,958	1JUL83 -27SEP83	9	84FEC/325/0524
	PRE-PRIMARY - AMENDMENT	24,698	16,296	1JUL83 -27SEP83	7	85FEC/367/5332
	REQUEST FOR ADDITIONAL INFORMATION			1JUL83 -27SEP83	2	84FEC/306/3297
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL83 -27SEP83	1	84FEC/312/0134
	REQUEST FOR ADDITIONAL INFORMATION			1JUL83 -27SEP83	1	84FEC/348/4939
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL83 -27SEP83	18	84FEC/352/5415
	PRE-GENERAL	87,119	60,936	27SEP83 -24OCT83	11	83FEC/286/1238
	PRE-GENERAL - AMENDMENT	-	-	27SEP83 -24OCT83	3	83FEC/286/2385
	PRE-GENERAL - AMENDMENT	62,119	60,936	27SEP83 -24OCT83	16	84FEC/325/0508
	PRE-GENERAL - AMENDMENT	82,229	60,453	27SEP83 -24OCT83	9	85FEC/367/5339
	REQUEST FOR ADDITIONAL INFORMATION			27SEP83 -24OCT83	2	84FEC/306/3300
	REQUEST FOR ADDITIONAL INFORMATION 2ND			27SEP83 -24OCT83	1	84FEC/312/0133
	REQUEST FOR ADDITIONAL INFORMATION			27SEP83 -24OCT83	3	84FEC/348/4941
	REQUEST FOR ADDITIONAL INFORMATION 2ND			27SEP83 -24OCT83	1	84FEC/353/4044
	REQUEST FOR ADDITIONAL INFORMATION			25OCT83 - 8DEC83	5	84FEC/312/2357
	REQUEST FOR ADDITIONAL INFORMATION 2ND			25OCT83 - 8DEC83	6	84FEC/314/3029
	REQUEST FOR ADDITIONAL INFORMATION			25OCT83 - 8DEC83	2	84FEC/348/4945
	REQUEST FOR ADDITIONAL INFORMATION 2ND			25OCT83 - 8DEC83	1	84FEC/353/4043
	POST-RUN-OFF	49,195	67,917	25OCT83 - 8DEC83	13	83FEC/288/5374
	POST-RUN-OFF - AMENDMENT	48,195	67,917	25OCT83 - 8DEC83	20	84FEC/325/0488
	POST-RUN-OFF - AMENDMENT	49,178	67,936	25OCT83 - 8DEC83	12	85FEC/367/5348
	YEAR-END	3,577	10,125	8DEC83 -31DEC83	5	84FEC/293/1952
	YEAR-END - AMENDMENT	3,577	10,125	8DEC83 -31DEC83	7	84FEC/308/5377
	YEAR-END - AMENDMENT	3,577	10,000	8DEC83 -31DEC83	9	85FEC/367/5360
	REQUEST FOR ADDITIONAL INFORMATION			8DEC83 -31DEC83	1	84FEC/306/3303
	REQUEST FOR ADDITIONAL INFORMATION			8DEC83 -31DEC83	3	84FEC/348/4948
	REQUEST FOR ADDITIONAL INFORMATION 2ND			8DEC83 -31DEC83	1	84FEC/353/4049
1984	STATEMENT OF ORGANIZATION - AMENDMENT			31JUL84	2	84FEC/324/3855
	APRIL QUARTERLY	31,225	20,839	1JAN84 -31MAR84	8	84FEC/309/0938
	APRIL QUARTERLY - AMENDMENT	31,422	20,714	1JAN84 -31MAR84	10	85FEC/367/5369
	REQUEST FOR ADDITIONAL INFORMATION			1JAN84 -31MAR84	3	84FEC/348/4952
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN84 -31MAR84	1	84FEC/353/4048
	JULY QUARTERLY	75,013	11,595	1APR84 -30JUN84	8	84FEC/320/4176
	JULY QUARTERLY - AMENDMENT	77,820	25,234	1APR84 -30JUN84	11	85FEC/367/5379
	REQUEST FOR ADDITIONAL INFORMATION			1APR84 -30JUN84	1	84FEC/348/4956
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR84 -30JUN84	1	84FEC/353/4047

PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
	PRE-PRIMARY	47,390	11,969	1JUL84 -29AUG84	12	84FEC/329/2870
	PRE-PRIMARY - AMENDMENT	48,521	44,493	1JUL84 -29AUG84	13	85FEC/367/5390
	REQUEST FOR ADDITIONAL INFORMATION			1JUL84 -29AUG84	2	84FEC/348/4936
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL84 -29AUG84	1	84FEC/353/4046
	OCTOBER QUARTERLY	41,812	35,207	31AUG84 -30SEP84	11	84FEC/341/5000
	OCTOBER QUARTERLY - AMENDMENT	42,310	35,207	30AUG84 -30SEP84	11	85FEC/367/5403
	REQUEST FOR ADDITIONAL INFORMATION			31AUG84 -30SEP84	2	84FEC/348/4958
	REQUEST FOR ADDITIONAL INFORMATION 2ND			31AUG84 -30SEP84	1	84FEC/353/4045
	PRE-GENERAL	58,770	21,337	1OCT84 -17OCT84	11	85FEC/362/3032
	PRE-GENERAL - AMENDMENT	47,079	40,458	1OCT84 -17OCT84	5	85FEC/368/4676
	PRE-GENERAL - AMENDMENT	-	-	1OCT84 -17OCT84	2	85FEC/369/1615
	REQUEST FOR ADDITIONAL INFORMATION			1OCT84 -17OCT84	2	85FEC/367/4024
	POST-GENERAL	70,484	173,181	18OCT84 -26NOV84	24	85FEC/362/3008
	POST-GENERAL - AMENDMENT	81,901	184,665	18OCT84 -26NOV84	22	85FEC/367/5414
	POST-GENERAL - AMENDMENT	-	-	18OCT84 -26NOV84	1	85FEC/369/1944
	NOTICE OF FAILURE TO FILE			1OCT84 -26NOV84	1	84FEC/357/4748
	REQUEST FOR ADDITIONAL INFORMATION			18OCT84 -26NOV84	2	85FEC/367/4027
	YEAR-END	1,683	45	26NOV84 -31DEC84	7	85FEC/367/5436
	NOTICE OF FAILURE TO FILE			27NOV84 -31DEC84	1	85FEC/366/4635
	TOTAL	507,863	0 507,325	0	380	TOTAL PAGES

Debts owed to the Committee as of 12/31/84: -0-
 Debts owed by the Committee as of 12/31/84: -0-
 Cash on hand as of 12/31/84: \$2,364.
 All reports have been reviewed.

8 5 0 4 0 5 8 3 1 5 8

FEDERAL ELECTION COMMISSION
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-86)

DATE 27SEP85
 PAGE 1

PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
WASHINGTON STATE DEMOCRATIC CENTRAL COMMITTEE				PARTY QUALIFIED		ID #C00114439
	1985 APRIL QUARTERLY	87,442	24,203	1JAN85 -31MAR85	9	85FEC/370/1531
	JULY QUARTERLY	21,533	18,952	1APR85 -30JUN85	7	85FEC/378/0876
	TOTAL	108,975	0	43,155	0	16 TOTAL PAGES

Debts owed to the Committee as of 6/30/85: -0-
 Debts owed by the Committee as of 6/30/85: -0-
 Cash on hand as of 6/30/85: \$68,183.71
 All reports have been reviewed.



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20540

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).

0040503159



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

05040583160



FEDERAL ELECTION COMMISSION
 WASHINGTON, D.C. 20543

EQ-7

December 28, 1984

Clay Bleck, Treasurer
Washington State Democratic
Central Committee
1701 Smith Tower
Seattle, WA 98104

Identification Number: C00114439

Reference: 30 Day Post-General Report (10/1/84-11/26/84)

Dear Mr. Bleck:

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 Edward Ryan 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

8604033747481

RECEIVED BY THE FEC

85 JAN 30 11:07

STATE OF MICHIGAN
For a Political Committee Other Than an Authorized Committee

(Summary Page)

ALIAS AREA

ALIAS AREA

1. Name of Committee (in Full)

**DEMOCRATIC STATE COMMITTEE
GENERAL ELECTIONS
1701 South Tower
Ann Arbor, MI 48104**

Address (Number and Street)

City, State and ZIP Code

Check here if address is different than previously reported.

2. FEC Identifying Number

200 114439

This committee qualified as a noncandidate committee during this reporting period on _____

4. TYPE OF REPORT (Check appropriate boxes)

- April 15 Quarterly Report
- July 15 Quarterly Report
- July 31 Mid Year Report (Non-Election Year Only)
- Monthly Report for _____
- Watch day report preceding _____
election on **11-6-84** in the State of **MI**
- Through day report following the General Election
on _____ in the State of _____
- Termination Report

Is this Report an Amendment?

YES NO

3. SUMMARY

Reporting Period **10-1-84** through **10-17-84**

Balance on Hand January 1, 19**84**

Balance on Hand at Beginning of Reporting Period

(a) Total Receipts (from Line 1B)

(b) Total Disbursements (from Line 2B)

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

8. Debt and Obligations Owed TO The Committee

9. Debt and Obligations Owed BY the Committee

COLUMN A This Period	COLUMN B Calendar Year-to-Date
	22299.23
137853.03	
58770.50	253936.01
196623.53	276235.24
21337.65	100949.36
175285.88	175285.88
0	
0	

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

Eloy Black
TREASURER

John A. Amato
SECRETARY

10/15/84

For further information contact:
Federal Election Commission
Toll Free 800-434-8830
Local 202-473-4000

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

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

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

FEC FORM 3X (3/80)

WSA. ST. DEMO. CENTRAL COM

Form: 11/1/04 To: 10/17/04

	COL. LINE A Total This Period	COL. LINE B Calendar Year-To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loan) FROM:			
(a) Individuals/Persons Other Than Political Committees	38,770.50	152,970.96	116d
(b) Political Party Committees		0.00	116d
(c) Other Political Committees		300.16	116d
(d) TOTAL CONTRIBUTIONS (other than loan) (Add 116d, 116d and 116d)	38,770.50	153,271.12	116d
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES			12
13. ALL LOANS RECEIVED			13
14. LOAN REPAYMENTS RECEIVED			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Retain, etc.)			15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
17. OTHER RECEIPTS (Donations, Interest, etc.)		118.17	17
(d) TOTAL RECEIPTS (Add 116d, 12, 13, 14, 15, 16 and 17)	58,770.50	253,389.01	18
C			
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	20,837.65	97,246.86	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	500.00	1,320.00	21
22. INDEPENDENT EXPENDITURES (See Schedule E)			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (U.S.C. § 641 (a)(2) (Use Schedule F))			23
24. LOAN REPAYMENTS MADE			24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees		145.00	26a)
(b) Political Party Committees		128.82	26b)
(c) Other Political Committees		-	26c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26a), 26b) and 26c)		273.82	26d)
27. OTHER DISBURSEMENTS			27
28. TOTAL DISBURSEMENTS (Add from 19, 20, 21, 22, 23, 24, 25, 26d) and 27)	21,337.65	100,946.86	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loan) from Line 11d)	38,770.50	153,271.12	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26d)		273.82	30
31. NET CONTRIBUTIONS (other than loan) (Subtract Line 30 from Line 29)	38,770.50	152,997.30	31
32. TOTAL OPERATING EXPENDITURES from Line 19	20,837.65	97,246.86	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15			33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	20,837.65	97,246.86	34

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 1
 (For information only - do not enter on this page)
 (See instructions on the back of the Schedule B page)

Any information copied from such Reports and Statements is for the purpose of copying contributions or for commercial purposes, other than using the name and address to obtain copies of the Reports and Statements.

Name of Committee (in Full)

1701 Smith Tower
 Seattle, WA 98104
 CENTRAL COMMITTEE

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Al Swift for Congress 444 State St. South Bellingham WA 98225	Contribution Swift - 2nd Qtr list Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/6/04	\$500.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period

0503014614

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (list page this line number only)

8 6 0 4 0 5 8 3 1 6 5

~~8 5 9 3 3 4 2 8 0 4 2~~

WITH SLICK
TE, 11/27/84

JAN 27

1985

JAN 27

PM
11 5

FEDERAL ELECTION COMMISSION
1325 K STREET N.W
WASHINGTON, D.C.

20463

ATTACHMENT 4
(Page 4 of 4)

CERTIFIED
P 117 198 189



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, DC 20463

THIS IS THE BEGINNING OF MUR # 2095

Date Filmed 5/22/86 Camera No. --- 2

Cameraman AS

86040583166