



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2208

DATE FILMED 4/24/87 CAMERA NO. 4  
CAMERAMAN AS

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FEDERAL ELECTION COMMISSION

routing slips, circulation materials,

referral information

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The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

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- (1) Classified Information
- (2) Internal rules and practices
- (3) Exempted by other statute
- (4) Trade secrets and commercial or financial information
- (5) Internal Documents
- (6) Personal privacy
- (7) Investigatory files
- (8) Banking Information
- (9) Well Information (geographic or geophysical)

Signed Charles L. Smith

date April 17, 1987

FEC 9-21-77

*Handwritten:*  
 10/20  
 4/20/87



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 10, 1987

Henry M. Grannan, Esquire  
20 North Wacker Drive  
Chicago, Illinois 60606

RE: MUR 2208  
Citizens for Cardiss Collins

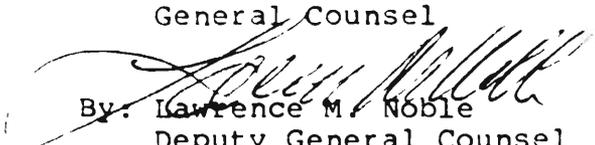
Dear Mr. Grannan:

On March 5, 1987, 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)(2)(A)(i) and (iii) and 434(a)(2)(B)(ii), provisions 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: Lawrence M. Noble  
Deputy General Counsel

Enclosure  
Conciliation Agreement

87040544743

*plan*



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Henry M. Grannan, Esquire  
20 North Wacker Drive  
Chicago, Illinois 60606

RE: MUR 2208  
Citizens for Cardiss Collins

Dear Mr. Grannan:

On March 5, 1987, 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)(2)(A)(i) and (iii) and 434(a)(2)(B)(ii), provisions 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: Lawrence M. Noble  
Deputy General Counsel

Enclosure  
Conciliation Agreement

*Law* 3/9

*Law*  
3/9/87

87040641744

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of	)	
	)	
Citizens for Cardiss Collins	)	MUR 2208
and Rosetta Harris, 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. Reason to believe has been found that Citizens for Cardiss Collins and Rosetta Harris, as treasurer ("Respondents") violated 2 U.S.C. §§ 434(a)(2)(A)(i) and (iii) and 434(a)(2)(B)(ii), by failing to file their (1986) 12 Day pre-primary, (1986) April Quarterly, and (1985) Year End reports in a timely manner.

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.

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

1. Respondent Citizens for Cardiss Collins is the principal authorized campaign committee of Cardiss Collins, a candidate for the U.S. House of Representatives from Illinois. Respondent Rosetta Harris is the treasurer of that committee.

2. Under 2 U.S.C. § 434(a)(2)(A), Respondents are required, in a year in which there is a regularly scheduled election for which Ms. Collins is seeking election or nomination for election, to file a pre-primary report no later than the 12th day before the primary election, and a quarterly report, which shall be filed no later than the 15th day after the last day of each calendar quarter. Respondents were also required to file a Year End report for 1985 no later than January 31, 1986, pursuant to 2 U.S.C. § 434(a)(2)(B)(ii).

3. Respondents' (1986) Pre-primary report, due on March 6, 1986, was not filed until March 18, 1986 - 12 days late.

4. Respondents' (1986) April Quarterly report, due April 15, 1986, was not filed until April 22, 1986 - 7 days late.

5. Respondents' (1985) Year End report, due January 31, 1986, was not filed until February 13, 1986 - 13 days late.

V. Respondents' failure to file their (1986) Pre-primary election report and (1986) April Quarterly report in a timely manner was in violation of 2 U.S.C. §§ 434(a)(2)(A)(i) and (iii), and their failure to file their (1985) Year End report in a timely manner was in violation of 2 U.S.C. § 434(a)(2)(B)(ii).

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

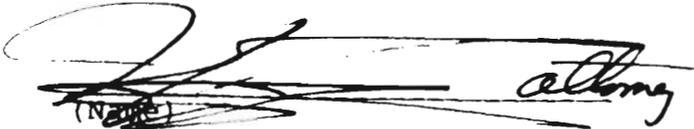
FOR THE COMMISSION:

Charles N. Steele  
General Counsel

BY:   
Lawrence M. Noble  
Deputy General Counsel

3/10/87  
Date

FOR THE RESPONDENTS:

  
~~(Name)~~  
(Position)

Jan 31, 1987  
Date

87047644747

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Citizens for Cardiss Collins ) MUR 2208  
and Rosetta Harris, as treasurer )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 5, 1987, the Commission decided by a vote of 5-0 to take the following actions in MUR 2208:

1. Approve the conciliation agreement, as recommended in the General Counsel's Report signed March 2, 1987.
2. Approve and send the letter, as recommended in the General Counsel's Report signed March 2, 1987.
3. Close the file.

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

Attest:

3-6-87

Date

*Marjorie W. Emmons*

Marjorie W. Emmons  
Secretary of the Commission

Received in the Office of Commission Secretary:	Tues.,	3-3-87,	11:02
Circulated on 48 hour tally basis:	Tues.,	3-3-87,	4:00
Deadline for vote:	Thurs.,	3-5-87,	4:00

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**SENSITIVE**

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of )  
Citizens for Cardiss Collins ) MUR 2208  
and Rosetta Harris, as treasurer )  
)

10/11/02

**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND AND LEGAL ANALYSIS**

Attached is a conciliation agreement which has been signed by Henry M. Grannan, attorney for respondents Citizens for Cardiss Collins and Rosetta Harris, as treasurer (See Attachment 1)

Accordingly, this Office recommends that the Commission approve the attached agreement.

**II. RECOMMENDATIONS**

1. Approve the attached conciliation agreement.
2. Approve and send the attached letter.
3. Close the file.

Charles N. Steele  
General Counsel

Date \_\_\_\_\_ By: Lawrence M. Noble  
Deputy General Counsel

- Attachments
1. Signed conciliation agreement
  2. Proposed letter to respondents

9704764748

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Citizens for Cardiss Collins	)	MUR 2208
and Rosetta Harris, 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. Reason to believe has been found that Citizens for Cardiss Collins and Rosetta Harris, as treasurer ("Respondents") violated 2 U.S.C. §§ 434(a)(2)(A)(i) and (iii) and 434(a)(2)(B)(ii), by failing to file their (1986) 12 Day pre-primary, (1986) April Quarterly, and (1985) Year End reports in a timely manner.

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.

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

1. Respondent Citizens for Cardiss Collins is the principal authorized campaign committee of Cardiss Collins, a candidate for the U.S. House of Representatives from Illinois. Respondent Rosetta Harris is the treasurer of that committee.

2. Under 2 U.S.C. § 434(a)(2)(A), Respondents are required, in a year in which there is a regularly scheduled election for which Ms. Collins is seeking election or nomination for election, to file a pre-primary report no later than the 12th day before the primary election, and a quarterly report, which shall be filed no later than the 15th day after the last day of each calendar quarter. Respondents were also required to file a Year End report for 1985 no later than January 31, 1986, pursuant to 2 U.S.C. § 434(a)(2)(B)(ii).

3. Respondents' (1986) Pre-primary report, due on March 6, 1986, was not filed until March 18, 1986 - 12 days late.

4. Respondents' (1986) April Quarterly report, due April 15, 1986, was not filed until April 22, 1986 - 7 days late.

5. Respondents' (1985) Year End report, due January 31, 1986, was not filed until February 13, 1986 - 13 days late.

V. Respondents' failure to file their (1986) Pre-primary election report and (1986) April Quarterly report in a timely manner was in violation of 2 U.S.C. §§ 434(a)(2)(A)(i) and (iii), and their failure to file their (1985) Year End report in a timely manner was in violation of 2 U.S.C. § 434(a)(2)(B)(ii).

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VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Two Thousand Five Hundred dollars (\$2,500), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

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

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

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

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

FOR THE COMMISSION:

Charles N. Steele  
General Counsel

BY:

\_\_\_\_\_  
Lawrence M. Noble  
Deputy General Counsel

\_\_\_\_\_  
Date

FOR THE RESPONDENTS:

~~\_\_\_\_\_~~  
~~(Name)~~  
(Position)

*attorney* \_\_\_\_\_  
Date *Jan 31, 1987*

37949644756



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Henry M. Grannan, Esquire  
20 North Wacker Drive  
Chicago, Illinois 60606

RE: MUR 2208  
Citizens for Cardiss Collins

Dear Mr. Grannan:

On \_\_\_\_\_, 1987, the Commission accepted the conciliation agreement signed by you in settlement of a violation of 2 U.S.C. §§ 434(a)(2)(A)(1) and (iii) and 434(b)(2)(B)(ii), provisions 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. (Make your check for the civil penalty payable to the Federal Election Commission). 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: Lawrence M. Noble  
Deputy General Counsel

Enclosure  
Conciliation Agreement

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel *Cox*

DATE: March 3, 1987

SUBJECT: MUR 2208 - General Counsel's Report

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

CIRCULATIONS		DISTRIBUTION	
48 Hour Tally Vote	[XX]	Compliance	[XX]
Sensitive	[XX]	Audit Matters	[ ]
Non-Sensitive	[ ]	Litigation	[ ]
24 Hour No Objection	[ ]	Closed MUR Letters	[ ]
Sensitive	[ ]	Status Sheets	[ ]
Non-Sensitive	[ ]	Advisory Opinions	[ ]
Information	[ ]	Other (see distribution below)	[ ]
Sensitive	[ ]		
Non-Sensitive	[ ]		
Other	[ ]		

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RECEIVED AT THE FEC

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CCC 2648

*Henry M. Grannan*

*Chartered*

ATTORNEYS AT LAW  
20 NORTH WACKER DRIVE  
CHICAGO, ILLINOIS 60606  
(312) 346-0005

HENRY M. GRANNAN  
CANDICE K. CASAZZA  
THOMAS F. FLANAGAN  
EDWARD N. KALLAS, JR.

February 3, 1987

87 FEB 6 3:49

RECEIVED  
OFFICE OF THE  
GENERAL COUNSEL

Charles N. Steele, Esq.  
General Counsel  
Federal Election Commission  
Washington, D.C. 20463

Attn.: Charles Snyder, Esq.

In Re: Citizens For Cardiss Collins  
MUR 2208

Dear Mr. Snyder:

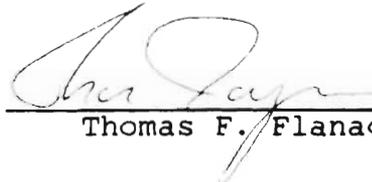
Enclosed herewith please find a copy of the Conciliation Agreement between the above committee and the Federal Election Commission. This Agreement has been signed by Henry M. Grannan, Esq., designated attorney for the committee.

Please provide us with further instructions as to how and when the fine is to be paid.

Very truly yours,

HENRY M. GRANNAN, CHARTERED

by

  
Thomas F. Flanagan

TFF/pes  
Enclosure

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) MUR 2208  
Citizens for Cardiss Collins )  
and Rosetta Harris, )  
as treasurer )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 5 1987, the Commission decided by a vote of 6-0 to take the following actions in MUR 2208:

2. Approve and send the letter and recommended conciliation agreement, as recommended in the General Counsel's Report signed December 19, 1986.

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

Attest:

1-6-87

Date

*Marjorie W. Emmons*

Marjorie W. Emmons  
Secretary of the Commission

Received in Office of Commission Secretary: Mon., 12-22-86, 3:24  
Circulated on 48 hour tally basis: Tues., 12-23-86, 11:00  
Deadline for vote: Mon., 1-5-87, 4:00

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**SENSITIVE**

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of )  
 )  
Citizens for Cardiss Collins )  
and Rosetta Harris, )  
as treasurer )

MUR 2208

SEP 22 1986 P 3:24

**GENERAL COUNSEL'S REPORT**

**BACKGROUND**

On July 22, 1986, the Commission found reason to believe that Citizens for Cardiss Collins ("CCC") and its treasurer violated 2 U.S.C. §§ 434(a)(2)(A)(i) and (iii) and 434(a)(2)(B)(ii) by filing Pre-Primary, Quarterly, and Year End Reports 12, 7, and 13 days late, respectively. On September 23, 1986, the Commission voted to enter into pre-probable cause

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RECOMMENDATIONS

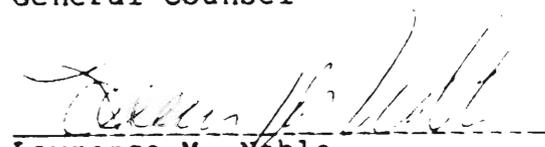
2. Approve and send the attached letter and conciliation agreement.

Charles N. Steele  
General Counsel

Date

12/17/56

By:

  
Lawrence M. Noble  
Deputy General Counsel

Attachments

1. Proposed Conciliation Agreement
2. Letter from Henry Grannan
3. Proposed letter to Henry Grannan

37040544759

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Citizens for Cardiss Collins	)	MUR 2208
and Rosetta Harris, 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. Reason to believe has been found that Citizens for Cardiss Collins and Rosetta Harris, as treasurer ("Respondents") violated 2 U.S.C. §§ 434(a)(2)(A)(i) and (iii) and 434(a)(2)(B)(ii), by failing to file their (1986) 12 Day pre-primary, (1986) April Quarterly, and (1985) Year End reports in a timely manner.

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.

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

1. Respondent Citizens for Cardiss Collins is the principal authorized campaign committee of Cardiss Collins, a candidate for the U.S. House of Representatives from Illinois. Respondent Rosetta Harris is the treasurer of that committee.

2. Under 2 U.S.C. § 434(a)(2)(A), Respondents are required, in a year in which there is a regularly scheduled election for which Ms. Collins is seeking election or nomination for election, to file a pre-primary report no later than the 12th day before the primary election, and a quarterly report, which shall be filed no later than the 15th day after the last day of each calendar quarter. Respondents were also required to file a Year End report for 1985 no later than January 31, 1986, pursuant to 2 U.S.C. § 434(a)(2)(B)(ii).

3. Respondents' (1986) Pre-primary report, due on March 6, 1986, was not filed until March 18, 1986 - 12 days late.

4. Respondents' (1986) April Quarterly report, due April 15, 1986, was not filed until April 22, 1986 - 7 days late.

5. Respondents' (1985) Year End report, due January 31, 1986, was not filed until February 13, 1986 - 13 days late.

V. Respondents' failure to file their (1986) Pre-primary election report and (1986) April Quarterly report in a timely manner was in violation of 2 U.S.C. §§ 434(a)(2)(A)(i) and (iii), and their failure to file their (1985) Year End report in a timely manner was in violation of 2 U.S.C. § 434(a)(2)(B)(ii).

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VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Two Thousand Five Hundred dollars (\$2,500), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

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

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

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

37040644752

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:

\_\_\_\_\_  
Lawrence M. Noble  
Deputy General Counsel

\_\_\_\_\_ Date

FOR THE RESPONDENTS:

\_\_\_\_\_  
(Name)  
(Position)

\_\_\_\_\_ Date

37040644763



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary  
FROM: Office of General Counsel *Rd*  
DATE: December 22, 1986  
SUBJECT: MUR 2208 - General Counsel's Report

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"/>		

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary  
FROM: Office of General Counsel *Red*  
DATE: October 31, 1986  
SUBJECT: MUR 2208 - 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 [kX]  
Sensitive [kX]  
Non-Sensitive [ ]  
Other [ ]

DISTRIBUTION

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

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**SENSITIVE**

FEDERAL ELECTION COMMISSION

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**SENSITIVE**

20 OCT 31 1986  
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COMMISSION



MEMORANDUM TO: THE COMMISSION  
FROM: MARJORIE W. EMMONS/ JOSHUA MCFADDEN  
DATE: NOVEMBER 3, 1986  
SUBJECT: MUR 2208 - General Counsel's Report

*Jm*

le  
*[Signature]*  
Noble  
ral Counsel

The attached has been circulated for your information.

070475497

Attachment

060

**SENSITIVE**



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: THE COMMISSION

FROM: MARJORIE W. EMMONS/ JOSHUA MCFADDEN *Jm*

DATE: NOVEMBER 3, 1986

SUBJECT: MUR 2208 - General Counsel's Report

The attached has been circulated for your information.

87040344767

Attachment

**SENSITIVE**

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of	)	
	)	
Citizens for Cardiss Collins and	)	MUR 2208
Rosetta Harris, as treasurer	)	

99 OCT 31 P 11:31 AM

**GENERAL COUNSEL'S REPORT**

On September 23, 1986, the Commission authorized the commencement of conciliation with the Respondents in the above-captioned Matter prior to a finding of probable cause to believe. The Office of General Counsel has concluded that an extension of the conciliation period by an additional thirty days would facilitate the conclusion of a satisfactory settlement with the Respondents.

Charles N. Steele  
General Counsel

10/31/86  
Date

BY: *Lawrence M. Noble*  
Lawrence M. Noble  
Deputy General Counsel

87040341763

**SENSITIVE**

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of )  
 )  
Citizens for Cardiss Collins and ) MUR 2208  
Rosetta Harris, as treasurer )

**GENERAL COUNSEL'S REPORT**

On September 23, 1986, the Commission authorized the commencement of conciliation with the Respondents in the above-captioned Matter prior to a finding of probable cause to believe. The Office of General Counsel has concluded that an extension of the conciliation period by an additional thirty days would facilitate the conclusion of a satisfactory settlement with the Respondents.

Charles N. Steele  
General Counsel

10/31/86  
Date

BY: *Lawrence M. Noble*  
Lawrence M. Noble  
Deputy General Counsel

99 OCT 31 P 3: 44  
OFFICE OF GENERAL COUNSEL  
FEDERAL ELECTION COMMISSION

87040341759

*plm*



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

September 25, 1986

Henry M. Grannan, Esquire  
20 North Wacker Driver  
Chicago, Illinois 60606

RE: MUR 2208  
Citizens for Cardiss  
Collins and Rosetta  
Harris, as treasurer

Dear Mr. Grannan:

On July 22, 1986, the Commission found reason to believe that Citizens for Cardiss Collins and Rosetta Harris as treasurer, violated 2 U.S.C. §§ 434(a)(2)(B)(ii) and 434(a)(2)(A)(i) and (iii). At your request, the Commission determined on September 23, 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 your clients 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 Charles Snyder, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele  
General Counsel

*Lawrence M. Noble*  
By: Lawrence M. Noble  
Deputy General Counsel

Enclosures

87040; 44770



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Henry M. Grannan, Esquire  
20 North Wacker Driver  
Chicago, Illinois 60606

RE: MUR 2208  
Citizens for Cardiss  
Collins and Rosetta  
Harris, as treasurer

Dear Mr. Grannan:

On July 22, 1986, the Commission found reason to believe that Citizens for Cardiss Collins and Rosetta Harris as treasurer, violated 2 U.S.C. §§ 434(a)(2)(B)(ii) and 434(a)(2)(A)(i) and (iii). At your request, the Commission determined on \_\_\_\_\_, 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 your clients 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 Charles Snyder, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele  
General Counsel

By: Lawrence M. Noble  
Deputy General Counsel

Enclosures

*CS 9/24*

*L.M.N. 9/24/86*

87040644771

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Citizens for Cardiss Collins ) MUR 2208  
Rosetta Harris, as treasurer )

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of September 23, 1986, do hereby certify that the Commission decided by a vote of 5-1 to take the following actions in MUR 2208:

1. Enter into conciliation with Citizens for Cardiss Collins and Rosetta Harris, as treasurer, prior to a finding of probable cause to believe.
2. Approve and send the letter and proposed conciliation agreement attached to the General Counsel's report dated September 15, 1986.

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

Attest:

9-23-86

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

87040641772



FEDERAL ELECTION COMMISSION  
WASHINGTON D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL  
FROM: MARJORIE W. EMMONS/ CHERYL A. FLEMING  
DATE: SEPTEMBER 18, 1986  
SUBJECT: OBJECTION TO MUR 2208 - GENERAL COUNSEL'S REPORT  
SIGNED SEPTEMBER 15, 1986

*CF*

The above-named document was circulated to the  
Commission on Tuesday, September 15, 1986 at 11:00 A.M.

Objections have been received from the Commissioners  
as indicated by the name(s) checked:

Commissioner Aikens	<u>          X          </u>
Commissioner Elliott	<u>                          </u>
Commissioner Harris	<u>                          </u>
Commissioner Josefiak	<u>                          </u>
Commissioner McDonald	<u>                          </u>
Commissioner McGarry	<u>                          </u>

This matter will be placed on the Executive Session  
agenda for Tuesday, September 23, 1986.

877473



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary  
FROM: Office of General Counsel *Red*  
DATE: September 15, 1986  
SUBJECT: MUR 2208 - General Counsel's Report

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"/>		

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**SENSITIVE**

**BEFORE THE FEDERAL ELECTION COMMISSION**

RECEIVED  
OFFICE OF THE SEC  
COMMISSIONER SECRETARY

In the Matter of )  
 )  
Citizens for Cardiss Collins )  
and Rosetta Harris, as treasurer )

MUR 2208 20 SEP 15 P 1:39

**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND AND LEGAL ANALYSIS**

On July 22, 1986, the Commission voted to open a MUR in this case, which had been referred to the Office of General Counsel by the Reports Analysis Division, and to find reason to believe that Citizens for Cardiss Collins ("CCC") and Rosetta Harris, as treasurer, violated 2 U.S.C. §§ 434(a)(2)(A)(i) and (iii) and 434(a)(2)(B)(ii). Respondents have now requested pre-probable cause conciliation. (Attachment 1).

Respondents filed their (1986) 12 Day Pre-primary report 12 days late; their (1986) April Quarterly report 7 days late; and their (1985) Year End report 13 days late. The aggregated receipts and disbursements of the foregoing reports were as follows: April Quarterly report, \$141,920; 1985 Year End report, \$102,766; and the Pre-primary report, \$100,472.

**II. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY**

87040:44775

R 7 0 4 7 6 4 4 7 7 5

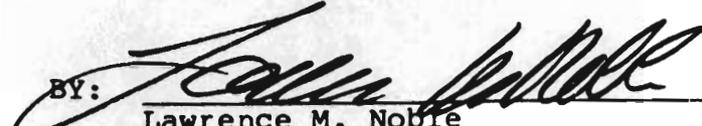
**III. RECOMMENDATIONS**

1. Enter into conciliation with Citizens for Cardiss Collins and Rosetta Harris, as treasurer, prior to a finding of probable cause to believe.

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

Charles N. Steele  
General Counsel

9/15/86  
Date

BY:   
Lawrence M. Noble  
Deputy General Counsel

Attachments

1. Letter from Henry M. Grannan
2. Proposed conciliation agreement
3. Proposed letter to respondents

97047644777

Attachment 1

RECEIVED  
OFFICE OF THE  
GENERAL COUNSEL

44-1206  
Snyder  
RECEIVED  
OFFICE OF THE  
SECRETARY  
COMMISSION

*Henry M. Grannan*

*Selected*  
ATTORNEYS AT LAW  
20 NORTH WACKER DRIVE  
CHICAGO, ILLINOIS 60606  
(312) 346-0005

36 AUG 13 P 3: 53

86 AUG 13 P 12: 00

HENRY M. GRANNAN  
CANDICE K. CABAZZA  
THOMAS F. FLANAGAN  
EDWARD N. KALLAS, JR.

August 11, 1986

Ms. Joan D. Aikens  
Chairman  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 2208  
Citizens for Cardiss Collins  
and Rosetta Harris, Treasurer

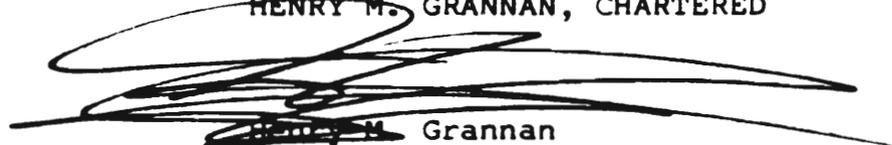
Dear Ms. Aikens:

In reply to your correspondence dated July 25, 1986, as designated legal counsel for Citizens for Cardiss Collins and Rosetta Harris pursuant to the enclosed statement of Designation of Counsel, please be advised that the committee and Ms. Harris wish to engage in conciliation proceedings with the Office of General Counsel with respect to the above-referenced matter as a means of resolving the issues raised.

Please do not hesitate to contact the undersigned at any time with respect to these proceedings.

Very truly yours,

HENRY M. GRANNAN, CHARTERED



Henry M. Grannan

HMG/tj  
enclosure

87040644778

attachment 3



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Henry M. Grannan, Esquire  
20 North Wacker Driver  
Chicago, Illinois 60606

RE: MUR 2208  
Citizens for Cardiss  
Collins and Rosetta  
Harris, as treasurer

Dear Mr. Grannan:

On July 22, 1986, the Commission found reason to believe that Citizens for Cardiss Collins and Rosetta Harris as treasurer, violated 2 U.S.C. §§ 434(a)(2)(B)(ii) and 434(a)(2)(A)(i) and (iii). At your request, the Commission determined on \_\_\_\_\_, 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 your clients 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 Charles Snyder, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele  
General Counsel

By: Lawrence M. Noble  
Deputy General Counsel

Enclosures

97040644779



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

September 17, 1986

MEMORANDUM

TO: CHARLES STEELE  
GENERAL COUNSEL

ATTENTION: CHARLES SNYDER

FROM: OSCELYN A. ANDERSON *Ora*  
COMPLIANCE CLERK  
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

SUBJECT: MUR 2208

Please review the attached Request for Additional Information which is to be sent to Citizens for Cardiss Collins for the July Quarterly Report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have must be forwarded to RAD in writing by 11:00 a.m. on Friday, September 19, 1986.

If comments are not received in writing by the above date and time, the RFAI notice will be sent.

If you have any questions, please contact Oscelyn A. Anderson at 376-2490. Thank you.

COMMENTS:

Attachment

97040544730



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Rosetta Harris, Treasurer  
Citizens for Cardiss Collins  
210 7th Street, S.E.  
Suite 1984C  
Washington, DC 20003

Identification Number: C00055632

Reference: July Quarterly Report (4/1/86-6/30/86)

Dear Ms. Harris:

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

-Please provide a Schedule C to support the amount reported on Line 10 of the Summary Page.

-Schedule A of your report (pertinent portion attached) discloses contributions which appear to exceed the limits set forth in the Act. An individual or a political committee other than a multicandidate committee may not make contributions to a candidate for Federal office in excess of \$1,000 per election. If you have received a contribution which exceeds the limits, the Commission recommends that you refund to the donor the amount in excess of \$1,000. The Commission should be notified in writing if a refund is necessary. In addition, any refund should appear on Line 20 of the Detailed Summary Page and Schedule B of your next report. (2 U.S.C. §§441a(a) and (f))

The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office.

If the contributions in question were incompletely or incorrectly reported, you may wish to submit documentation for the public record. Please amend your report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of excessive contributions, prompt action by you to refund the excessive amounts will be taken into consideration.

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-Schedule A of your report discloses contributions received after March 18, 1986 which are designated for the Primary Election. All contributions received after the Primary Election should be designated for the General Election unless these contributions are being used to pay off Primary debts. Enclosed is a copy of a recent Advisory Opinion issued by the Commission pertaining to this matter.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,



Noriega E. James  
Reports Analyst  
Reports Analysis Division

37040441732

**SCHEDULE A**

**ITEMIZED RECEIPTS**

Page 2 of 6 for  
 LINE NUMBER 111  
 (Use separate schedule(s) for each  
 category of the Detailed  
 Summary Page)

Any information copied from such Reports or 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)			
<b>CITIZENS FOR CARDISS COLLINS</b>			
<b>A. Full Name, Mailing Address and ZIP Code</b> Committee for "JR" 425 S. Cherry Street, Suite 630 Denver, CO 80222	<b>Name of Employer</b>	<b>Date (month, day, year)</b> 4/10/86	<b>Amount of Each Receipt This Period</b> 500.00
<b>Receipt For</b> <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Occupation</b>	<b>Aggregate Year-to-Date - \$ 500.00</b>	
<b>B. Full Name, Mailing Address and ZIP Code</b> Auction Markets PAC of the Chicago Board of Trade 141 W. Jackson Blvd. Chicago, IL 60604	<b>Name of Employer</b>	<b>Date (month, day, year)</b> 4/10/86	<b>Amount of Each Receipt This Period</b> 1,000.00
<b>Receipt For</b> <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Occupation</b>	<b>Aggregate Year-to-Date - \$ 2,000.00</b>	
<b>C. Full Name, Mailing Address and ZIP Code</b> Chicago Campaign Committee 4633 South Racine Ave. Chicago, IL 60609	<b>Name of Employer</b>	<b>Date (month, day, year)</b> 4/15/86	<b>Amount of Each Receipt This Period</b> 2,000.00 <i>MEY</i>
<b>Receipt For</b> <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Occupation</b>	<b>Aggregate Year-to-Date - \$ 2,000.00</b>	
<b>D. Full Name, Mailing Address and ZIP Code</b> Capital Political Action Committee P.O. Box 75669 Washington, DC 20013	<b>Name of Employer</b>	<b>Date (month, day, year)</b> 4/16/86	<b>Amount of Each Receipt This Period</b> 500.00
<b>Receipt For</b> <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Occupation</b>	<b>Aggregate Year-to-Date - \$ 500.00</b>	
<b>E. Full Name, Mailing Address and ZIP Code</b> Metropolitan Employees Political Participation Funds One Madison Avenue New York, NY 10010	<b>Name of Employer</b>	<b>Date (month, day, year)</b> 4/16/86	<b>Amount of Each Receipt This Period</b> 500.00
<b>Receipt For</b> <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Occupation</b>	<b>Aggregate Year-to-Date - \$ 500.00</b>	
<b>F. Full Name, Mailing Address and ZIP Code</b> Engineers' Political Education Committee (E.P.E.C.) 1125 Seventeenth St., NW Washington, DC 20036	<b>Name of Employer</b>	<b>Date (month, day, year)</b> 4/22/86	<b>Amount of Each Receipt This Period</b> 2,000.00
<b>Receipt For</b> <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Occupation</b>	<b>Aggregate Year-to-Date - \$ 2,000.00</b>	
<b>G. Full Name, Mailing Address and ZIP Code</b> United Food & Commercial Workers International Union -Active Ballot Club 1775 K Street, N.W. Washington, DC 20006	<b>Name of Employer</b>	<b>Date (month, day, year)</b> 4/22/86	<b>Amount of Each Receipt This Period</b> 4,000.00
<b>Receipt For</b> <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Occupation</b>	<b>Aggregate Year-to-Date - \$ 4,000.00</b>	
<b>SUBTOTAL of Receipts This Page (optional)</b>			<b>10,500.00</b>
<b>TOTAL This Period (last page this line number only)</b>			

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20461

RECEIVED  
FEDERAL ELECTION COMMISSION

24 AUG 17 5:12:52

August 17, 1984

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

ADVISORY OPINION 1984-32

David A. Myers  
Attorney-at-Law  
P.O. Box 427  
Elyria, OH 44036

Dear Mr. Myers:

This responds to your letter of June 26, 1984, as supplemented by your letter of August 6, 1984, requesting an advisory opinion on behalf of the Don Pease for Congress Committee concerning application of the Federal Election Campaign Act of 1971, as amended ("the Act"), and Commission regulations to the receipt of a contribution designated for the 1984 primary election.

You state that on April 13, 1984, the United Auto Worker's regional director notified the Don Pease for Congress Committee ("the Pease Committee") in writing that a contribution designated for the 1984 primary election would be forthcoming from the UAW's separate segregated fund. You add that on April 19, 1984, the political committee drew a check which was forwarded to an Ohio official of the committee for transmission to the Pease Committee. The Ohio primary was held on May 8, 1984. The Pease Committee received the contribution check on June 2, 1984.<sup>1/</sup>

You ask whether this contribution is attributable to the 1984 primary election or the 1984 general election for contribution limitation purposes. If it is attributable to the

<sup>1/</sup> The 1984 July Quarterly Report filed by the Pease Committee lists a \$4,700 contribution from the United Auto Workers Voluntary Community Action Program ("UAW V CAP") as received on June 5, 1984. Reports filed by UAW V CAP show a \$300 contribution made to the Pease Committee on October 25, 1983, as a 1984 primary election contribution. The Commission notes, however, that the report filed by the Pease Committee for this period fails to include this \$300 contribution as an itemized receipt.

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primary election, you ask whether it was "made" after the primary election. If it was, you further ask how to calculate "net debts outstanding" and specifically ask whether the Pease Committee must have had no cash on hand on the primary date, whether the carryover balance from the 1982 campaign must be included in the cash on hand, and whether 1983 contributions designated for the 1984 general election may be excluded from the cash on hand.

The Act provides that a multi-candidate political committee shall not make contributions "to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$5,000." 2 U.S.C. §441a(a)(2)(A). This limitation applies separately with respect to the primary election and the general election. 2 U.S.C. §§431(1)(A) and 441a(a)(6). Thus, a multi-candidate political committee may contribute in the same election cycle an aggregate of \$5,000 to a candidate with respect to the primary election and an aggregate of \$5,000 to a candidate with respect to the general election.

Commission regulations provide that when a contribution is not designated in writing for a particular election, it will be treated as made for the primary election if made before (or on) the date of the primary election, and such a contribution will be treated as made for the general election if made after the date of the primary election. 11 CFR 110.1(a)(2)(ii).<sup>2/</sup> If a contribution is designated for a particular election, it is treated as made for that election. An exception exists, however, for a contribution, designated for the primary election, that is made after the date of the primary election. Such a contribution "shall be made only to the extent that the contribution does not exceed net debts outstanding from the primary election... ." 11 CFR 110.1(a)(2)(i).

The Commission notes that the subject contribution in this request was designated in writing for the 1984 primary election but that the contributor or its agents retained possession and control of the check until it was delivered to the Pease Committee after the primary election. Neither the Act nor Commission regulations define at what point a contribution is "made" for limitation purposes for primary and general elections. Such a determination must depend on the specific factual circumstances. The Commission can state only that in these factual circumstances the subject contribution could not have been "made" any earlier than June 2, 1984, when it left the control of the contributor and was received by the Pease Committee. Compare, U.S. v. Hankin, 607 F.2d 611 (3d Cir. 1979). Because this contribution was designated in writing for the primary election, it is not attributable to the 1984 general

<sup>2/</sup> This provision is made applicable to multi-candidate committees by 11 CFR 110.2(a)(1).

election pursuant to 11 CFR 110.100 (2) (ii) (B). Thus, this primary election contribution can be made by the contributor (and accepted by the Pease Committee) only to the extent that the Pease Committee had net debts outstanding from the May 8, 1984, Ohio primary election.

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The regulations neither define "net debts outstanding" nor provide a method for calculating this figure. In the Commission's view "net debts outstanding," as the term itself implies, means the difference between (i) the total of the committee's debts and obligations incurred with respect to the primary election and (ii) the total of the committee's cash on hand and receivables available to pay those debts and obligations as of the date that a contribution designated for the primary election is made. See Advisory Opinion 1975-53. The determination of net debts outstanding does not require that the committee have a zero cash balance on the date of the primary election. The calculation of total debts and obligations attributable to the primary election includes primary election loans and primary election expenses incurred but not paid. In this case the calculation of total cash on hand at the time the primary election contribution is made would include those funds that the committee did, in fact, carry over from the 1982 campaign because such funds represent contributions that were undesignated with respect to the 1984 primary election and were made before that election.<sup>3/</sup> The calculation of total cash on hand, however, may exclude contributions made prior to the date of the 1984 primary election only if such contributions were designated in writing by the contributor as for the 1984 general election. Any other contributions, even if reported by the Pease Committee as for the 1984 general election, are still deemed available to pay 1984 primary debts and obligations.

If the calculation set forth above results in the Pease Committee's having net debts outstanding on the date the contribution is made, the subject contribution may be treated as made with respect to the primary election for contribution limitation purposes but only to the extent that the amount of the contribution does not exceed the amount of the net debts

<sup>3/</sup> To the extent that this balance from 1982 includes contributions made after the date of the 1982 general election, these contributors must aggregate, for contribution limitation purposes, their post-election 1982 contributions with any other contribution made with respect to Mr. Pease's 1984 primary election. See Advisory Opinions 1980-30 and 1977-24.

outstanding.<sup>4/</sup> If this calculation, however, does not yield a "net debts outstanding" result, the Pease Committee must either (1) return the contribution to the contributor or (2) have the contributor designate in writing that the contribution is for the 1984 general election, only to the extent that by doing so the contributor does not exceed its \$441a contribution limitation for the 1984 general election.

This response constitutes an advisory opinion concerning application of the Act, or regulations prescribed by the Commission, to the specific transactions or activities set forth in your request. See 2 U.S.C. §437f.

Sincerely yours,



Lee Ann Elliott  
Chairman for the  
Federal Election Commission

4/ Regarding this determination, the Commission notes that reports filed by the Pease Committee indicate that it carried over a cash balance of \$43,068 from 1982. It reported a pre-primary cash balance of \$69,107 and a June 30 cash balance of \$67,097. The Pease Committee has not reported any primary election debts. The extent to which it may exclude any of the \$51,624 in contributions it has reported as general election contributions will depend upon how many of these contributions were designated in writing by the contributor as for the 1984 general election.

Enclosures (AOs 1980-30, 1977-24, and 1975-53)

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ACC# 1206

RECEIVED  
OFFICE OF THE  
GENERAL COUNSEL

86 AUG 13 12:00

RECEIVED  
OFFICE OF THE FEC  
COMMISSION SECRETARY

*Henry M. Grannan*

*Chartered*  
ATTORNEYS AT LAW  
20 NORTH WACKER DRIVE  
CHICAGO, ILLINOIS 60606  
(312) 346-0005

6 AUG 13 P 3: 53

HENRY M. GRANNAN  
CANDICE K. CASAZZA  
THOMAS F. FLANAGAN  
EDWARD N. KALLAS, JR.

August 11, 1986

Ms. Joan D. Aikens  
Chairman  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 2208  
Citizens for Cardiss Collins  
and Rosetta Harris, Treasurer

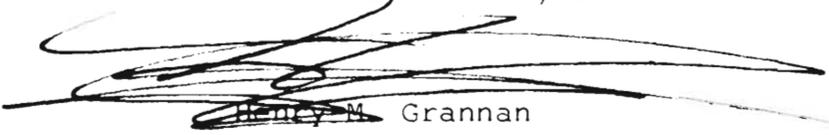
Dear Ms. Aikens:

In reply to your correspondence dated July 25, 1986, as designated legal counsel for Citizens for Cardiss Collins and Rosetta Harris pursuant to the enclosed statement of Designation of Counsel, please be advised that the committee and Ms. Harris wish to engage in conciliation proceedings with the Office of General Counsel with respect to the above-referenced matter as a means of resolving the issues raised.

Please do not hesitate to contact the undersigned at any time with respect to these proceedings.

Very truly yours,

HENRY M. GRANNAN, CHARTERED



Henry M. Grannan

HMG/tj  
enclosure

3709044788

**STATEMENT OF DESIGNATION OF COUNSEL**

**MUR** 2208

**NAME OF COUNSEL:** Henry M. Grannan

**ADDRESS:** Henry M. Grannan, Chartered

20 N. Wacker Drive

Chicago, IL 60606

**TELEPHONE:** (312) 346-0005

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.

Aug. 5, 1986  
Date

X Rosetta Harris  
Signature

**RESPONDENT'S NAME:** Citizens for Cardiss Collins; & Rosetta Harris

**ADDRESS:** 210 7th Street, S.E.

Suite 1984-C

Washington, DC 20003

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

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

87040344789



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 25, 1986

Rosetta Harris, Treasurer  
Citizens for Cardiss Collins  
210 7th Street, SE, Suite 1984-C  
Washington, DC 20003

RE: MUR 2208  
Citizens for Cardiss Collins  
and Rosetta Harris, as  
treasurer

Dear Ms. Harris:

On July 22, 1986, the Federal Election Commission determined that there is reason to believe Citizens for Cardiss Collins and you, as treasurer, violated 2 U.S.C. §§ 434(a)(2)(A)(i) and (iii) and 434(a)(2)(B)(ii), provisions 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. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

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

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

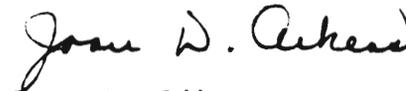
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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 Charles Snyder, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,



Joan D. Aikens  
Chairman

Enclosures

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

cc: Cardiss Collins

87040544701



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Rosetta Harris, Treasurer  
Citizens for Cardiss Collins  
210 7th Street, SE, Suite 1984-C  
Washington, DC 20003

RE: MUR  
Citizens for Cardiss Collins  
and Rosetta Harris, as  
treasurer

Dear Ms. Harris:

On \_\_\_\_\_, 1986, the Federal Election Commission determined that there is reason to believe Citizens for Cardiss Collins and you, as treasurer, violated 2 U.S.C. §§ 434(a)(2)(A)(i) and (iii) and 434(a)(2)(B)(ii), provisions 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. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

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

*COB 7/27/86*

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

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 Charles Snyder, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Joan D. Aikens  
Chairman

Enclosures

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

cc: Cardiss Collins

97040144793



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Rosetta Harris, Treasurer  
Citizens for Cardiss Collins  
210 7th Street, SE, Suite 1984-C  
Washington, DC 20003

RE: MUR  
Citizens for Cardiss Collins  
and Rosetta Harris, as  
treasurer

Dear Ms. Harris:

On , 1986, the Federal Election Commission determined that there is reason to believe Citizens for Cardiss Collins and you, as treasurer, violated 2 U.S.C. §§ 434(a)(2)(A)(i) and (iii) and 434(a)(2)(B)(ii), provisions 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. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

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

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

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 Charles Snyder, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Joan D. Aikens  
Chairman

Enclosures

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

cc: Cardiss Collins

87040544705

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

MUR NO.

STAFF MEMBER & TEL. NO.  
Charles Snyder (202) 376-5690

RESPONDENT:      Citizens for Cardiss Collins and Rosetta  
                         Harris, as treasurer

**SUMMARY OF ALLEGATIONS**

This matter was referred to the Office of General Counsel by the Reports Analysis Division ("RAD") on the grounds that Respondents, the Citizens for Cardiss Collins ("the Committee") and Rosetta Harris as treasurer, had violated the Federal Election Campaign Act ("the Act") by failing to file its 1985 Year End, 12 Day Pre-Primary, and April 1986 Quarterly reports in a timely manner.

**FACTUAL BASIS AND LEGAL ANALYSIS**

The Committee is the authorized campaign committee of Cardiss Collins, a Democratic candidate for Congress from Illinois; as such, the Committee is required to file:

- (A) in any calendar year during which there is a regularly scheduled election for which such candidate is seeking election, or nomination for election...
  - (i) a pre-election report, which shall be filed no later than the 12th day before ... any election in which such candidate is seeking election, or nomination for election...
  - (iii) additional quarterly reports which shall be filed no later than the 15th day after the last day of each calendar quarter ...[and]

(B) in any other calendar year the following reports shall be filed: ... (ii) a report covering the period beginning July 1 and ending December 31, which should be filed no later than January 31 of the following calendar year.

2 U.S.C. § 434(a)(2). According to RAD, the committee filed its 12 Day Pre-primary report, due on March 6, 1986, on March 12, 1986; its 1986 Quarterly report, due on April 18, 1986, on April 22, 1986; and its 1985 Year End report, due on January 31, 1986, on February 13, 1986. Thus, it appears that there is reason to believe respondents violated 2 U.S.C.

§§ 434(a)(3)(A)(i) and (iii) and 434(a)(2)(B)(ii).

87040644797

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

MUR NO. 2208

STAFF MEMBER & TEL. NO.  
Charles Snyder (202) 376-5690

RESPONDENT:      Citizens for Cardiss Collins and Rosetta  
                         Harris, as treasurer

**SUMMARY OF ALLEGATIONS**

This matter was referred to the Office of General Counsel by the Reports Analysis Division ("RAD") on the grounds that Respondents, the Citizens for Cardiss Collins ("the Committee") and Rosetta Harris as treasurer, had violated the Federal Election Campaign Act ("the Act") by failing to file its 1985 Year End, 12 Day Pre-Primary, and April 1986 Quarterly reports in a timely manner.

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  - (iii) additional quarterly reports which shall be filed no later than the 15th day after the last day of each calendar quarter ...[and]

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(B) in any other calendar year the following reports shall be filed: ... (ii) a report covering the period beginning July 1 and ending December 31, which should be filed no later than January 31 of the following calendar year.

2 U.S.C. § 434(a)(2). According to RAD, the committee filed its 12 Day Pre-primary report, due on March 6, 1986, on March 12, 1986; its 1986 Quarterly report, due on April 18, 1986, on April 22, 1986; and its 1985 Year End report, due on January 31, 1986, on February 13, 1986. Thus, it appears that there is reason to believe respondents violated 2 U.S.C. §§ 434(a)(3)(A)(i) and (iii) and 434(a)(2)(B)(ii).

87049641799

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Citizens for Cardiss Collins and )  
Rosetta Harris, as treasurer )

RAD #86NF-9 (WUR 2208)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of July 22, 1986, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in the above-captioned matter:

1. Open a MUR.
2. Find reason to believe that Citizens for Cardiss Collins and Rosetta Harris, as treasurer, violated 2 U.S.C. §§ 434(a)(2)(A)(i) and (iii) and 434(a)(2)(B)(ii).
3. Approve and send the letter and General Counsel's Factual and Legal Analysis attached to the General Counsel's report dated July 10, 1986, subject to amendment of the Factual and Legal Analysis as noted in the General Counsel's Errata dated July 16, 1986.

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

Attest:

7-22-86

Date

*Marjorie W. Emmons*

Marjorie W. Emmons  
Secretary of the Commission

97040641370



FEDERAL ELECTION COMMISSION  
999 E Street, NW.  
Washington, DC 20463

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL  
BY OGC TO THE COMMISSION:

RAD # 86NF-9  
STAFF MEMBER:  
Snyder

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

RESPONDENT'S NAME: Citizens for Cardiss Collins and Rosetta Harris, as treasurer

RELEVANT STATUTES: 2 U.S.C. §§ 434(a)(2)(A)(i) and iii and 434(a)(2)(B)(ii); 11 C.F.R. § 104.5(a)(1)(i) and (iii) and 104.5(a)(2)(i)(B)

INTERNAL REPORTS CHECKED: Respondent's reports

FEDERAL AGENCIES CHECKED: None

GENERATION OF MATTER

This matter was referred to the Office of General Counsel by the Reports Analysis Division ("RAD") on the grounds that Respondents, the Citizens for Cardiss Collins ("the Committee") and Rosetta Harris as treasurer, had violated the Federal Election Campaign Act ("the Act") by failing to file its 1985 Year End, 12 Day Pre-Primary, and April 1986 Quarterly reports in a timely manner.

FACTUAL AND LEGAL ANALYSIS

The Committee is the authorized campaign committee of Cardiss Collins, a Democratic candidate for Congress from Illinois; as such, the Committee is required to file:

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(A) in any calendar year during which there is a regularly scheduled election for which such candidate is seeking election, or nomination for election...

(i) a pre-election report, which shall be filed no later than the 12th day before ... any election in which such candidate is seeking election, or nomination for election...

(iii) additional quarterly reports which shall be filed no later than the 15th day after the last day of each calendar quarter ...[and]

(B) in any other calendar year the following reports shall be filed: ... (ii) a report covering the period beginning July 1 and ending December 31, which should be filed no later than January 31 of the following calendar year.

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2 U.S.C. § 434(a)(2). According to RAD, the committee filed its 12 Day Pre-primary report, due on March 6, 1986, on March 12, 1986; its 1986 Quarterly report, due on April 18, 1986, on April 22, 1986; and its 1985 Year End report, due on January 31, 1986, on February 13, 1986. Thus, it appears that there is reason to believe respondents violated 2 U.S.C.

§§ 434(a)(3)(A)(i) and (iii) and 434(a)(2)(B)(ii).

#### RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that Citizens for Cardiss Collins and Rosetta Harris, as treasurer, violated 2 U.S.C. §§ 434(a)(2)(A)(i) and (iii) and 434(a)(2)(B)(ii).

Attachment 1

86NF-9



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

10 June 1986

MEMORANDUM

TO: CHARLES N. STEELE  
GENERAL COUNSEL

THROUGH: JOHN C. SURINA *JS*  
STAFF DIRECTOR

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

SUBJECT: REFERRAL OF THE CITIZENS FOR CARDISS COLLINS

This is a referral of Citizens for Cardiss Collins ("the Committee"). The Committee failed to file three (3) Reports of Receipts and Disbursements in a timely manner for the 1985-1986

requires further examination by your office.

If you have any questions, please contact Noriega James at 376-2480.

Attachment

97040644974

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 10 June 1986

ANALYST: Noriega E. James

I. COMMITTEE: Citizens for Cardiss Collins (C00055632)  
Rosetta Harris, Treasurer  
210 7th Street, S.E., Suite 1984-C  
Washington, D.C. 20003

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

III. BACKGROUND:

Failure to Timely File Reports

The Citizens for Cardiss Collins ("the Committee") has failed to file three (3) Reports of Receipts and Disbursements in a timely manner for the 1985-1986 election cycle (see Chart on Page 2). The reports were filed between seven (7) and thirteen (13) calendar days late.

On March 28, 1986 a Chronic Late Filer Notice was sent to the Committee for failing to file the 1985 Year End and 12 Day Pre-Primary Reports in a timely manner (Attachment 9). The notice advised the Committee that any additional late filing of reports may result in legal enforcement action. Subsequent to the receipt of the Chronic Late Filer Notice, the Committee failed to file the April Quarterly Report in a timely manner.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

2704741303

## LATE FILING HISTORY

REPORT TYPE	PRIOR NOTICE	DATE DUE	NON-FILER NOTICE	DATE FILED
1985 Year End (7/1/85-12/31/85)	12/30/85 (Attachment 2)	1/31/86 <sup>1/</sup>	N/A	2/13/86 (Attachment 4)
1986 12 Day Pre-Primary (1/01/86-2/26/86)	2/10/86 (Attachment 5)	3/06/86	3/07/86 (Attachment 6)	3/18/86 (Attachment 7)
1986 April Quarterly (2/27/86-3/31/86)	3/21/86 (Attachment 9)	4/15/86	N/A	4/22/86 (Attachment 10)

<sup>1/</sup> The Committee sent in a letter on January 31, 1986 stating that the 1985 Year End Report was being compiled by their accountant and would be filed at the earliest possible time (Attachment 3).

FEDERAL ELECTION COMMISSION  
1985-1986

DATE 3JUN86

CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

PAGE 2

CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/	PARTY	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
			PRIMARY	GENERAL	PRIMARY	GENERAL			
COLLINS, CAROLISS			HOUSE 07 DEMOCRATIC PARTY		ILLINOIS		1986 ELECTION	ID# H6IL07024	
1. STATEMENT OF CANDIDATE									
1985 DISAVOWAL NOTICE							5SEP85	2	85FEC/387/1787
STATEMENT OF CANDIDATE							26SEP85	1	85HSE/291/1762
2. CANDIDATE REPORTS OF RECEIPTS & EXPENDITURES									
3. PRINCIPAL CAMPAIGN COMMITTEE									
CITIZENS FOR CAROLISS COLLINS							ID# C00055632	HOUSE	
1985 MID-YEAR REPORT			38,674		17,220		1JAN85 -30JUN85	22	85HSE/289/0067
MID-YEAR REPORT - AMENDMENT			-		-		1JAN85 -30JUN85	6	86HSE/292/1519
REQUEST FOR ADDITIONAL INFORMATION							1JAN85 -30JUN85	1	85FEC/390/3195
REQUEST FOR ADDITIONAL INFORMATION 2ND							1JAN85 -30JUN85	2	85FEC/391/3923
YEAR-END			42,309		60,457		1JUL85 -31DEC85	23	86HSE/297/3315
YEAR-END - AMENDMENT			-		-		1JUL85 -31DEC85	1	86HSE/299/0312
1ST LETTER INFORMATIONAL NOTICE							1JUL85 -31DEC85	1	86FEC/404/5097
1986 MISCELLANEOUS REPORT							31JAN86 TO FEC	1	86HSE/294/2278
48 HOUR CONTRIBUTION NOTICE							12MAR86	1	86HSE/298/1955
48 HOUR CONTRIBUTION NOTICE							17MAR86	1	86HSE/298/3700
MISCELLANEOUS NOTICE FROM FEC							28MAR86	1	86FEC/406/3354
PRE-PRIMARY			48,375		52,097		1JAN86 -26FEB86	17	86HSE/298/4053
NOTICE OF FAILURE TO FILE							1JAN86 -26FEB86	1	86FEC/407/3875
APRIL QUARTERLY			100,940		40,980		27FEB86 -31MAR86	18	86HSE/302/4807
REQUEST FOR ADDITIONAL INFORMATION							27FEB86 -31MAR86	8	86FEC/415/4302
TOTAL			230,298	0	170,754	0		104	TOTAL PAGES
4. AUTHORIZED COMMITTEES									
4B. TRANSFERS IN FROM JOINT FUNDRAISING COMMITTEES									

ATTACHMENT

All reports filed by this committee have been reviewed

Cash on hand as of March 31, 1986 -	\$92,266.75
Debts and obligations owed to the committee	\$ 0.00
Debts and obligations owed by the committee	\$35,000.00

2 7 0 4 0 5 4 1 2 0 7

# YEAR-END REPORT NOTICE

## FEDERAL ELECTION COMMISSION

### PRINCIPAL CAMPAIGN COMMITTEES

December 30, 1985

#### WHO MUST FILE

ALL PRINCIPAL CAMPAIGN COMMITTEES currently registered with the Commission must file a year-end report by January 31, 1986.

#### WHAT MUST BE REPORTED

The report must disclose all financial activity that occurred from the close of books for the last report through December 31, 1985. Political committees that have not previously filed a financial disclosure report should report all financial activity through December 31, 1985\*.

#### FILING DATE

Reports sent by registered or certified mail must be postmarked no later than midnight January 31, 1986. Reports hand delivered or mailed first class must be received no later than close of business January 31, 1986.

#### WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed reporting form for details.

#### COMPLIANCE

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

#### 1986 FILING REQUIREMENTS

See the January 1986 issue of the FEC Record for filing requirements during 1986.

\*The first report filed by a committee shall include all amounts received or disbursed prior to reaching the threshold for candidate registration. Activity which occurred prior to 1985 should be disclosed separately. See 11 CFR 101.3; 104.3(a) and (b).

**FOR INFORMATION CALL:** Information Services Division  
202/523-4068 or 800/424-9530



# CARDISS COLLINS

C O N G R E S S W O M A N

ATTACHMENT 3

January 11, 1986

JAN 31 PM 4:36

029092

Ms. Patricia Bias, Director  
Records and Registration  
1036 Longworth HOB  
Washington, DC 20515

Dear Ms. Bias:

The information for my January 31, 1986, FIC Report is presently being compiled by my accountant.

I will file the report at the earliest possible time.

Yours truly,

*Cardiss Collins*  
CARDISS COLLINS  
Member of Congress

75012010277

P.O. Box 2066, Chicago, IL 60690

REPORTS OF RECEIPTS AND DISBURSEMENTS  
For Authorized Committee

**HAND DELIVERED**

1985 YEAR END REPORT (Summary Page)

1 Name of Committee (in Full) **CITIZENS FOR CARDISS COLLINS**

2 P.C. Identification Number **029092**

Address (Number and Street) **210 7th Street, S.E., Suite 1984-C**

City, State and Zip Code **Washington, DC 20003**

3 This Report is a Amendment?  YES  NO

Check if address is different than previously reported

4 TYPE OF REPORT

April 15 Quarterly Report

July 15 Quarterly Report

October 15 Quarterly Report

January 31 Year End Report

July 31 Mid Year Report (Non election Year Only)

Twelfth day report preceding election on \_\_\_\_\_

Thirtieth day report following the General Election in the State \_\_\_\_\_

Termination Report

The report contains activity for:  Primary Election  General Election  Special Election  Runoff Election

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year to-Date
5	Covering Period <u>July 1, 1985</u> through <u>December 31, 1985</u>		
6	Net Contributions (other than loans)		
	(a) Total Contributions (other than loans) (from Line 11 (a))	41,094.27	79,754.27
	(b) Total Contribution Refunds (from Line 20 (b))		
	(c) Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a))	41,094.27	79,754.27
7	Net Operating Expenditures		
	(a) Total Operating Expenditures (from Line 17)	45,457.54	62,077.60
	(b) Total Offset to Operating Expenditures (from Line 14)		14.00
	(c) Net Operating Expenditures (subtract Line 7 (b) from 7 (a))	45,457.54	62,063.60
8	Cash on Hand at Close of Reporting Period (from Line 27)	36,029.00	
9	Debits and Obligations Owed TO The Committee (Name of on Schedule C or Schedule D)		
10	Debits and Obligations Owed BY The Committee (Name of on Schedule C or Schedule D)		

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

For further information, contact:  
Federal Election Commission  
Toll Free 800 424-9530  
Local 703 633-4888

Name of Print Name of Treasurer  
Rosette Davis Feb. 12, 1986

NOTE: Submission of this document or incomplete information may subject the person signing the Report to the penalties of 2 U.S.C. (437g)

No previous versions of PSC FORM 3 and PSC FORM 3a are allowed and should no longer be used

36012973315

# PRIMARY ELECTION REPORT NOTICE

## FEDERAL ELECTION COMMISSION

ILLINOIS

February 10, 1986

**WHO MUST FILE**

The principal campaign committees authorized by candidates<sup>1/</sup> in the Illinois Primary scheduled to be held March 18, 1986, must file a pre-election report by March 6, 1986.

**WHAT MUST BE REPORTED**

The report must disclose all financial activity that occurred from the close of books for the last report through February 26, 1986. Political committees that have not previously filed a financial disclosure report should report all financial activity through February 26, 1986.<sup>2/</sup> NOTE: In addition, if the campaign has more than one committee, the principal campaign committee must also file a consolidated report, (FEC form 3Z). For details see page 14 of the Campaign Guide For Congressional Candidates and Committees or 11 CFR 104.3(f).

**WHEN TO FILE**

Reports sent by registered or certified mail must be postmarked not later than midnight March 3, 1986. Reports hand delivered or mailed first class must be received no later than close of business March 6, 1986. (SEE REPORTING INFORMATION ON REVERSE SIDE).

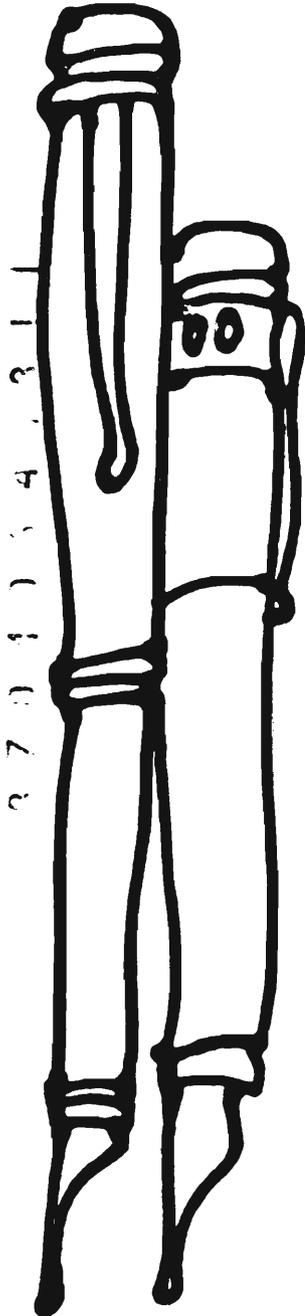
**WHERE AND HOW TO FILE**

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

<sup>1/</sup> Individuals should refer to the enclosed brochure for the definition of the term "candidate" and registration requirements. If you determine that you meet the definition of candidate, your principal campaign committee should comply with the above reporting requirements. Appropriate forms are enclosed.

<sup>2/</sup> The first report filed by a committee shall include all amounts received and disbursed prior to reaching the threshold for candidate registration. Activity which occurred prior to 1986 should be disclosed separately. See 11 CFR 101.3; 104.3 (a) and (b).

-over-



CALENDAR OF REPORTS FOR THE ILLINOIS PRIMARY ELECTION

NAME OF REPORT	PERIOD COVERED	REG./CERT MAILING DATE	FILING DATE
Pre-Primary	1/1* - 2/26	3/03/86	3/06/86
April Quarterly	2/27 - 3/31	4/15/86	4/15/86
July Quarterly	4/01 - 6/30	7/15/86	7/15/86

**LAST MINUTE CONTRIBUTIONS**

Last minute contributions of \$1,000 or more received, by authorized committees, between two and 20 days before the election, must be reported within 48 hours of their receipt.

**COMPLIANCE**

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

---

\*Committees should use this date, or the date of candidate status, whichever is later. See also footnote 2 on page 1.

**FOR INFORMATION CALL:** Information Services Division  
202/376-3120 or 800/424-9530

37040541812

RQ-7

(This is a copy of the text of a mailgram sent to the committee listed below on March 7, 1986.)

Rosetta Harris, Treasurer  
Citizens for Cardiss Collins  
210 7th Street, SE, Suite 1984C  
Washington, D.C. 20003

Identification Number: C00055632

Reference: 12 DAY PRE-PRIMARY REPORT (1/1/86-2/26/86)

It has come to the attention of the Federal Election Commission that you may have failed to file the 1986 12 Day Pre-Primary Report of Receipts and Expenditures as required by the Federal Election Campaign Act, as amended. Unless you recently registered, prior notification was sent to you approximately 24 days ago advising you that your report was due on March 6, 1986.

You will be allowed four (4) business days from the date of this notice to file the 12 Day Pre-Primary Report. The report should be filed with the Clerk of the House, Office of Records and Registration, 1036 Longworth HOB, Washington, D.C. 20515, or the Secretary of the Senate, Office of Public Records, 232 Hart Senate Office Building, Washington, D.C. 20510, as appropriate. Copy of the report should also be filed with the appropriate Secretary of State or equivalent state officer.

If you have filed the report timely by certified or registered mail, please notify us immediately, in writing, of the certified or registered number and the date that the report was sent.

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

If you have any questions regarding this matter, please contact the Reports Analysis Division on our toll free number (800) 424-9530 or on our local number (202) 376-2480.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

97905425443875

HAND DELIVERED

For Authorized Committee

ATTACHMENT 7

1986 PRE-PRIMARY REPORT (Summary Page)

CITIZENS FOR CARDISS COLLINS
10 7th Street, S.E., Suite 1984-C
Washington, DC 20003
029092
YES
No

OFFICE OF THE CLERK OF THE SUPREME COURT
MAR 18 1986
PRIMARY

TYPE OF REPORT

- April 15 Quarterly Report
July 15 Quarterly Report
October 15 Quarterly Report
January 31 Year End Report
July 31 Mid Year Report (Non election Year Only)
Twelfth day report preceding election on 3/18/86
Thirtieth day report following the General Election or on the State of
Termination Report

This report contains activity for:
Primary Election
General Election
Special Election
Runoff Election

Table with 3 columns: Line Number, Description, Column A (This Period), Column B (Calendar Year to Date). Rows include: 5. Covering Period Jan. 1, 1986 through Feb. 26, 1986; 6. Net Contributions (Total 46,075.00); 7. Net Operating Expenditures (Total 51,847.54); 8. Cash on Hand at Close of Reporting Period (32,306.46).

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

For further information, contact:
Federal Election Commission
Toll Free 800 424 9630
Local 202 632 4888

Type or Print Name of Treasurer:
Fayette Davis
3-17-86

NOTE: Submission of false or misleading or incomplete information may subject the person signing the Report to the penalties of 2 U.S.C. §437g

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

97 0544075 4:48 9 9 23

# QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

## CANDIDATE COMMITTEES

March 21, 1986

### WHO MUST FILE

The principal campaign committee of each Congressional candidate<sup>1/</sup> seeking election in 1986 must file a quarterly report by April 15, 1986. All other candidate committees should see below (Semiannual Filers) for their reporting schedule.

### WHAT MUST BE REPORTED

The report must disclose all financial activity that occurred from the close of books for the last report through March 31, 1986. Political committees that have not previously filed a financial disclosure report should report all financial activity through March 31, 1986.<sup>2/</sup> NOTE: In addition, if the campaign has more than one committee, the principal campaign committee must also file a consolidated report (FEC Form 3Z). For details, see page 14 of the Campaign Guide For Congressional Candidates and Committees, or 11 CFR 104.3(f).

### FILING DATE

Reports sent by registered or certified mail must be postmarked no later than midnight April 15, 1986. Reports hand delivered or mailed first class must be received no later than close of business April 15, 1986.

### WHERE AND HOW TO FILE

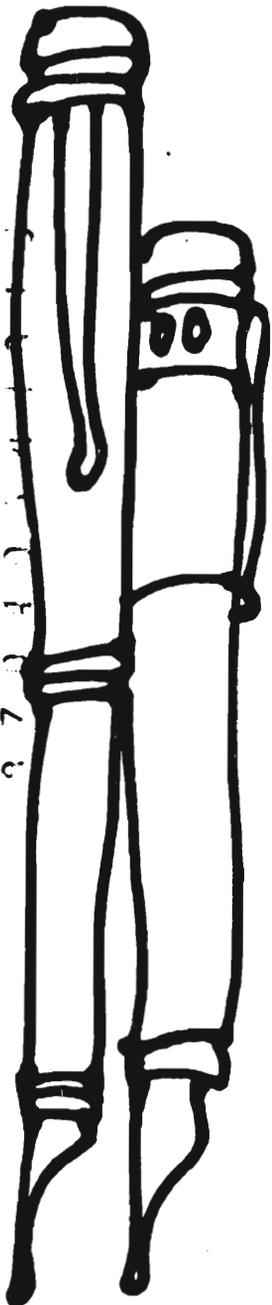
Committees should consult the instructions on the enclosed FEC Form 3, for details.

### SEMIANNUAL FILERS

Committees authorized by candidates for a Federal election held prior to 1986 or for a future election (i.e., a year other than 1986) need only file a report by July 31, 1986, covering all financial activity from the last report filed through June 30, 1986.

<sup>1/</sup>Individuals should refer to the enclosed brochure for the definition of the term "candidate" and registration requirements. If you determine that you meet the definition of candidate, your principal campaign committee should comply with the above reporting requirements. Appropriate forms are enclosed.

<sup>2/</sup>The first report filed by a committee shall include all amounts received or disbursed prior to reaching the threshold for candidate registration. Activity which occurred prior to 1986, however, should be disclosed separately. See 11 CFR 101.3; 104.3(a) and (b).



970117

**A REMINDER**

**FUTURE REPORTS**

All principal campaign committees of candidates seeking election in 1986 must continue to file quarterly reports this year, regardless of the outcome of the primary election in which the candidate participates. The next quarterly report is due July 15, 1986.

**COMPLIANCE**

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

FOR INFORMATION CALL: Information Services Division  
800/424-9530 or 202/376-3120

8704054815



FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20543

MAR 28 1986 MS-L

Rosetta Harris, Treasurer  
Citizens for Cardiss Collins  
210 7th Street, SE, Suite 1984C  
Washington, DC 20003

Identification Number: C00055632

Reference: 1985-1986 Election Cycle Reports

Dear Ms. Harris:

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

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
Year End (7/1/85-12/31/85)	1/31/86	2/13/86
12 Day Pre-Primary (1/1/86-2/26/86)	3/06/86	3/18/86

Timely filing is a specific requirement of the Federal Election Campaign Act and is essential to fulfilling the public disclosure concept embodied in that law. The Commission views failure to timely file reports as a serious violation of the Act. This communication is to advise you that, notwithstanding any matters which may be pending with the Commission, any additional failure to timely file a required report by your committee may result in the Commission initiating legal enforcement or audit action.

If you need assistance or have any questions regarding this matter, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

Peter Kell Jr.  
Chief, Authorized Branch  
Reports Analysis Division

9 6 9 3 4 0 5 0 3 3 4 3 4 1 3 1 7

STATEMENTS OF RECEIPTS AND DISBURSEMENTS  
For Authorized Committee

**HAND DELIVERED**

1986 APRIL QUARTERLY (Summary Page)

1 Name of Committee (on Full) **CITIZENS FOR CARDISS COLLINS** 2 PFC Identification Number **029092**

Address (Number and Street) **210 7th Street, S.E., Suite 1984-C** 3 Is this report for an individual?  YES  NO

City, State and Zip Code **Washington, DC 20003**  Check if address is different than previously reported

TYPE OF REPORT

- April 15 Quarterly Report
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year End Report
- July 31 Mid Year Report (Non election Year Only)
- Twelfth day report preceding election on \_\_\_\_\_ in the State of \_\_\_\_\_
- Thirtieth day report following the General Election on \_\_\_\_\_ in the State of \_\_\_\_\_
- Termination Report

This report covers activity for -  Primary Election  General Election  Special Election  Recall Election

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6 Operating Period <b>Feb. 27, 1986</b> through <b>March 31, 1986</b>		
6 Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (From Line 11 (a))	64,440.51	110,515.51
(b) Total Contribution Refunds (from Line 20 (b))		
(c) Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a))	64,440.51	110,515.51
7 Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	40,980.22	92,827.76
(b) Total Offset to Operating Expenditures (from Line 14)		
(c) Net Operating Expenditures (subtract Line 7 (b) from 7 (a))	40,980.22	92,827.76
8 Cash on Hand at Close of Reporting Period (from Line 27)	92,266.75	
9 Debt and Obligations Owed TO The Committee (Schedule C or Schedule D)		
10 Debt and Obligations Owed BY The Committee (Schedule C or Schedule D)	85,000.00	

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

For further information, contact  
Federal Election Commission  
Toll Free 800-424-9530  
Lands 202-424-9530

Roetta Harris  
Name of the Candidate

Roetta Harris  
Signature of Candidate

6-11-86  
Date

NOTE: Submission of false information is a criminal offense and subjects the person signing this Report to the penalties of 2 U.S.C. § 607c.

On printing copies of PFC FORM 3 and PFC FORM 2b are obsolete and should no longer be used.

PFC FORM 3 (1985)

3 7876 011 3024007

attachment 2

FEDERAL ELECTION COMMISSION  
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO.

STAFF MEMBER & TEL. NO.  
Charles Snyder (202) 376-5690

RESPONDENT: Citizens for Cardiss Collins and Rosetta Harris, as treasurer

SUMMARY OF ALLEGATIONS

This matter was referred to the Office of General Counsel by the Reports Analysis Division ("RAD") on the grounds that Respondents, the Citizens for Cardiss Collins ("the Committee") and Rosetta Harris as treasurer, had violated the Federal Election Campaign Act ("the Act") by failing to file its 1986 Year End, 12 Day Pre-Primary, and April 1986 Quarterly reports in a timely manner.

FACTUAL BASIS AND LEGAL ANALYSIS

The Committee is the authorized campaign committee of Cardiss Collins, a Democratic candidate for Congress from Illinois; as such, the Committee is required to file:

- (A) in any calendar year during which there is a regularly scheduled election for which such candidate is seeking election, or nomination for election...
  - (i) a pre-election report, which shall be filed no later than the 12th day before ... any election in which such candidate is seeking election, or nomination for election...
  - (iii) additional quarterly reports which shall be filed no later than the 15th day after the last day of each calendar quarter ...[and]

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(B) in any other calendar year the following reports shall be filed: ... (ii) a report covering the period beginning July 1 and ending December 31, which should be filed no later than January 31 of the following calendar year.

2 U.S.C. § 434(a)(2). According to RAD, the committee filed its 12 Day Pre-primary report, due on March 6, 1986, on March 12, 1986; its 1986 Quarterly report, due on April 18, 1986, on April 22, 1986; and its 1986 Year End report, due on January 31, 1986, on February 13, 1986. Thus, it appears that there is reason to believe respondents violated 2 U.S.C.

§§ 434(a)(3)(A)(i) and (iii) and 434(a)(2)(B)(ii).

87940644320

attachment 3



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Rosetta Harris, Treasurer  
Citizens for Cardiss Collins  
210 7th Street, SE, Suite 1984-C  
Washington, DC 20003

RE: MUR  
Citizens for Cardiss Collins  
and Rosetta Harris, as  
treasurer

Dear Ms. Harris:

On , 1986, the Federal Election Commission determined that there is reason to believe Citizens for Cardiss Collins and you, as treasurer, violated 2 U.S.C. §§ 434(a)(2)(A)(i) and (iii) and 434(a)(2)(B)(ii), provisions 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. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

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

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

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 Charles Snyder, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Joan D. Aikens  
Chairman

Enclosures

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

cc: Cardiss Collins

97047544322



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary  
FROM: Office of General Counsel *rd*  
DATE: July 16, 1986  
SUBJECT: RAD Ref. 86NF-9 - First General Counsel's Rpt.  
(ERRATA)

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

CIRCULATIONS		DISTRIBUTION	
48 Hour Tally Vote	[ ]	Compliance	[X]
Sensitive	[ ]	Audit Matters	[ ]
Non-Sensitive	[ ]	Litigation	[ ]
24 Hour No Objection	[ ]	Closed MUR Letters	[ ]
Sensitive	[ ]	Status Sheets	[ ]
Non-Sensitive	[ ]	Advisory Opinions	[ ]
Information	[ ]	Other (see distribution below)	[ ]
Sensitive	[ ]		
Non-Sensitive	[ ]		
Other	[X]		

SENSITIVE - CIRCULATE ON  
BLUE

97040644823

JUL 22 1986



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 16, 1986

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele  
General Counsel

BY: Lawrence M. Noble *[Signature]*  
Deputy General Counsel

SUBJECT: Errata, RAD 86NF-9  
Citizens for Cardiss Collins  
and Rosetta Harris, as treasurer

JUL 19 05:04

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In the First General Counsel's Report in the above-referenced matter, circulated to the Commission on July 14, 1986, the following errata should be noted. The Year End report referred to on pages 1 and 2 of the report and the General Counsel's Legal and Factual Analysis should be described as the "1985 Year End" report, and not as the 1986 Year End report. Attached are a corrected copies of pages 1 and 2 of the Report and the General Counsel's Legal and Factual Analysis.

066 Docket

SENSITIVE

EXECUTIVE SECRET

JUL 22 1986



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 16, 1986

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele  
General Counsel

BY: Lawrence M. Noble *LM*  
Deputy General Counsel

SUBJECT: Errata, RAD 86NF-9  
Citizens for Cardiss Collins  
and Rosetta Harris, as treasurer

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3704741300

FEDERAL ELECTION COMMISSION  
999 E Street, NW.  
Washington, DC 20463

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL  
BY OGC TO THE COMMISSION:

RAD # 86NF-9  
STAFF MEMBER:  
Snyder

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

RESPONDENT'S NAME: Citizens for Cardiss Collins and Rosetta Harris, as treasurer

RELEVANT STATUTES: 2 U.S.C. §§ 434(a)(2)(A)(i) and iii and 434(a)(2)(B)(ii); 11 C.F.R. § 104.5(a)(1)(i) and (iii) and 104.5(a)(2)(i)(B)

INTERNAL REPORTS CHECKED: Respondent's reports

FEDERAL AGENCIES CHECKED: None

GENERATION OF MATTER

This matter was referred to the Office of General Counsel by the Reports Analysis Division ("RAD") on the grounds that Respondents, the Citizens for Cardiss Collins ("the Committee") and Rosetta Harris as treasurer, had violated the Federal Election Campaign Act ("the Act") by failing to file its 1985 Year End, 12 Day Pre-Primary, and April 1986 Quarterly reports in a timely manner.

FACTUAL AND LEGAL ANALYSIS

The Committee is the authorized campaign committee of Cardiss Collins, a Democratic candidate for Congress from Illinois; as such, the Committee is required to file:

87040641327



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

MUR NO.

STAFF MEMBER & TEL. NO.  
Charles Snyder (202) 376-5690

RESPONDENT:     Citizens for Cardiss Collins and Rosetta  
                  Harris, as treasurer

**SUMMARY OF ALLEGATIONS**

This matter was referred to the Office of General Counsel by the Reports Analysis Division ("RAD") on the grounds that Respondents, the Citizens for Cardiss Collins ("the Committee") and Rosetta Harris as treasurer, had violated the Federal Election Campaign Act ("the Act") by failing to file its 1985 Year End, 12 Day Pre-Primary, and April 1986 Quarterly reports in a timely manner.

**FACTUAL BASIS AND LEGAL ANALYSIS**

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- α
- (A) in any calendar year during which there is a regularly scheduled election for which such candidate is seeking election, or nomination for election...
    - (i) a pre-election report, which shall be filed no later than the 12th day before ... any election in which such candidate is seeking election, or nomination for election...
    - (iii) additional quarterly reports which shall be filed no later than the 15th day after the last day of each calendar quarter ...[and]

**SENSITIVE**

FEDERAL ELECTION COMMISSION  
999 E Street, NW.  
Washington, DC 20463

**FIRST GENERAL COUNSEL'S REPORT**

DATE AND TIME OF TRANSMITTAL  
BY OGC TO THE COMMISSION:

RAD # 86NF-9  
STAFF MEMBER:  
Snyder

09 JUL 11 10:25

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

RESPONDENT'S NAME:           Citizens for Cardiss Collins and Rosetta Harris, as treasurer

RELEVANT STATUTES:         2 U.S.C. §§ 434(a)(2)(A)(i) and iii and 434(a)(2)(B)(ii); 11 C.F.R. § 104.5(a)(1)(i) and (iii) and 104.5(a)(2)(i)(B)

INTERNAL REPORTS  
CHECKED:                     Respondent's reports

FEDERAL AGENCIES  
CHECKED:                     None

**GENERATION OF MATTER**

This matter was referred to the Office of General Counsel by the Reports Analysis Division ("RAD") on the grounds that Respondents, the Citizens for Cardiss Collins ("the Committee") and Rosetta Harris as treasurer, had violated the Federal Election Campaign Act ("the Act") by failing to file its 1986 Year End, 12 Day Pre-Primary, and April 1986 Quarterly reports in a timely manner.

**FACTUAL AND LEGAL ANALYSIS**

The Committee is the authorized campaign committee of Cardiss Collins, a Democratic candidate for Congress from Illinois; as such, the Committee is required to file:

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(A) in any calendar year during which there is a regularly scheduled election for which such candidate is seeking election, or nomination for election...

(i) a pre-election report, which shall be filed no later than the 12th day before ... any election in which such candidate is seeking election, or nomination for election...

(iii) additional quarterly reports which shall be filed no later than the 15th day after the last day of each calendar quarter ...[and]

(B) in any other calendar year the following reports shall be filed: ... (ii) a report covering the period beginning July 1 and ending December 31, which should be filed no later than January 31 of the following calendar year.

8 7 0 4 0 6 4 4 8 3 1  
2 U.S.C. § 434(a)(2). According to RAD, the committee filed its 12 Day Pre-primary report, due on March 6, 1986, on March 12, 1986; its 1986 Quarterly report, due on April 18, 1986, on April 22, 1986; and its 1986 Year End report, due on January 31, 1986, on February 13, 1986. Thus, it appears that there is reason to believe respondents violated 2 U.S.C.

§§ 434(a)(3)(A)(i) and (iii) and 434(a)(2)(B)(ii).

#### RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that Citizens for Cardiss Collins and Rosetta Harris, as treasurer, violated 2 U.S.C. §§ 434(a)(2)(A)(i) and (iii) and 434(a)(2)(B)(ii).

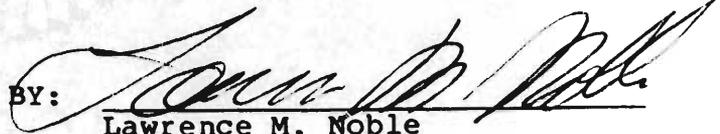
3. Approve and send the attached letter and General Counsel's Factual and Legal Analysis.

Charles N. Steele  
General Counsel

Date

7/10/86

BY:



Lawrence M. Noble  
Deputy General Counsel

Attachments

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

379405448332



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary  
FROM: Office of General Counsel *red*  
DATE: July 11, 1986  
SUBJECT: RAD Ref. 86NF-9 - First General Counsel's Report

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"/>		

97040644833



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

10 June 1986

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 CITIZENS FOR CARDISS COLLINS

This is a referral of Citizens for Cardiss Collins ("the Committee"). The Committee failed to file three (3) Reports of Receipts and Disbursements in a timely manner for the 1985-1986 cycle. According to the RAR...

requires further examination by your office.

If you have any questions, please contact Noriega James at 376-2480.

Attachment

370404334

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 10 June 1986

ANALYST: Noriega E. James

I. COMMITTEE: Citizens for Cardiss Collins (C00055632)  
Rosetta Harris, Treasurer  
210 7th Street, S.E., Suite 1984-C  
Washington, D.C. 20003

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

III. BACKGROUND:

Failure to Timely File Reports

The Citizens for Cardiss Collins ("the Committee") has failed to file three (3) Reports of Receipts and Disbursements in a timely manner for the 1985-1986 election cycle (see Chart on Page 2). The reports were filed between seven (7) and thirteen (13) calendar days late.

On March 28, 1986 a Chronic Late Filer Notice was sent to the Committee for failing to file the 1985 Year End and 12 Day Pre-Primary Reports in a timely manner (Attachment 9). The notice advised the Committee that any additional late filing of reports may result in legal enforcement action. Subsequent to the receipt of the Chronic Late Filer Notice, the Committee failed to file the April Quarterly Report in a timely manner.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

870440644835

## LATE FILING HISTORY

REPORT TYPE	PRIOR NOTICE	DATE DUE	NON-FILER NOTICE	DATE FILED
1985 Year End (7/1/85-12/31/85)	12/30/85 (Attachment 2)	1/31/86 <sup>1/</sup>	N/A	2/13/86 (Attachment 4)
1986 12 Day Pre-Primary (1/01/86-2/26/86)	2/10/86 (Attachment 5)	3/06/86	3/07/86 (Attachment 6)	3/18/86 (Attachment 7)
1986 April Quarterly (2/27/86-3/31/86)	3/21/86 (Attachment 9)	4/15/86	N/A	4/22/86 (Attachment 10)

<sup>1/</sup> The Committee sent in a letter on January 31, 1986 stating that the 1985 Year End Report was being compiled by their accountant and would be filed at the earliest possible time (Attachment 3).

FEDERAL ELECTION COMMISSION  
1985-1986

DATE 3JUN86

CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

PAGE 2

CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/	PARTY	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
			PRIMARY	GENERAL	PRIMARY	GENERAL			
COLLINS, CARMISS	HOUSE 07	DEMOCRATIC PARTY					1986 ELECTION	ID# H61L07024	
1. STATEMENT OF CANDIDATE									
1985 DISAVOWAL NOTICE							5SEP85	2	85FEC/387/1787
STATEMENT OF CANDIDATE							26SEP85	1	85HSE/291/1762
2. CANDIDATE REPORTS OF RECEIPTS & EXPENDITURES									
3. PRINCIPAL CAMPAIGN COMMITTEE									
CITIZENS FOR CARMISS COLLINS									
1985 MID-YEAR REPORT			38,674		17,220				
MID-YEAR REPORT - AMENDMENT			-		-				
REQUEST FOR ADDITIONAL INFORMATION									
REQUEST FOR ADDITIONAL INFORMATION 2ND									
YEAR-END			42,309		60,457				
YEAR-END - AMENDMENT			-		-				
1ST LETTER INFORMATIONAL NOTICE									
1986 MISCELLANEOUS REPORT									
48 HOUR CONTRIBUTION NOTICE									
48 HOUR CONTRIBUTION NOTICE									
MISCELLANEOUS NOTICE FROM FEC									
PRE-PRIMARY			48,375		52,097				
NOTICE OF FAILURE TO FILE									
APRIL QUARTERLY			100,940		40,980				
REQUEST FOR ADDITIONAL INFORMATION									
TOTAL			230,298	0	170,754	0		104	TOTAL PAGES
4. AUTHORIZED COMMITTEES									
4B. TRANSFERS IN FROM JOINT FUNDRAISING COMMITTEES									

All reports filed by this committee have been reviewed

Cash on hand as of March 31, 1986 - \$92,266.75

Debts and obligations owed to the committee \$ 0.00

Debts and obligations owed by the committee \$35,000.00

ATTACHMENT 1

7 8 9 0 1 2 3 4 5 6 7 8

# YEAR-END REPORT NOTICE

FEDERAL ELECTION COMMISSION

PRINCIPAL CAMPAIGN COMMITTEES

December 30, 1985

**WHO MUST FILE**

ALL PRINCIPAL CAMPAIGN COMMITTEES currently registered with the Commission must file a year-end report by January 31, 1986.

**WHAT MUST BE REPORTED**

The report must disclose all financial activity that occurred from the close of books for the last report through December 31, 1985. Political committees that have not previously filed a financial disclosure report should report all financial activity through December 31, 1985\*.

**FILING DATE**

Reports sent by registered or certified mail must be postmarked no later than midnight January 31, 1986. Reports hand delivered or mailed first class must be received no later than close of business January 31, 1986.

**WHERE AND HOW TO FILE**

Committees should consult the instructions on the enclosed reporting form for details.

**COMPLIANCE**

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

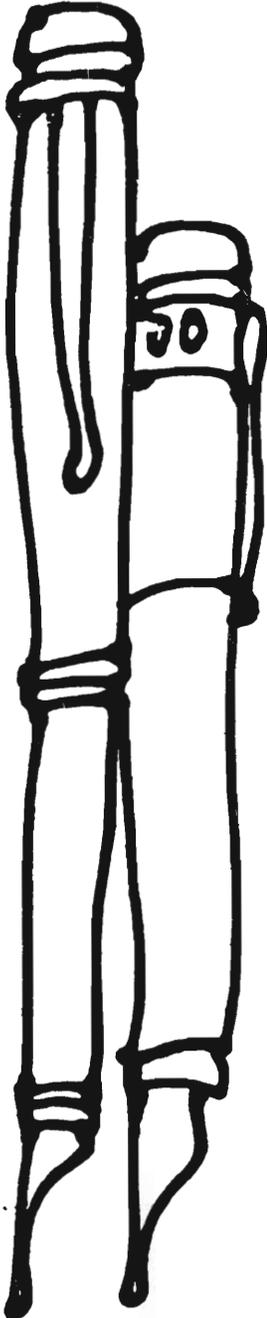
**1986 FILING REQUIREMENTS**

See the January 1986 issue of the FEC Record for filing requirements during 1986.

\*The first report filed by a committee shall include all amounts received or disbursed prior to reaching the threshold for candidate registration. Activity which occurred prior to 1985 should be disclosed separately. See 11 CFR 101.3; 104.3(a) and (b).

**FOR INFORMATION CALL:** Information Services Division  
202/523-4068 or 800/424-9530

3704254333



# CARDISS COLLINS

C O N G R E S S W O M A N

ATTACHMENT 3

January 11, 1986

029092

JAN 31 PM 4:38

Ms. Patricia Bias, Director  
Records and Registration  
1036 Longworth HOB  
Washington, DC 20515

Dear Ms. Bias:

The information for my January 31, 1986, FIC Report is presently being compiled by my accountant.

I will file the report at the earliest possible time.

Yours truly,

*Cardiss Collins*  
CARDISS COLLINS  
Member of Congress

3501201277

P.O. Box 2066, Chicago, IL 60690

REPORTS OF RECEIPTS AND DISBURSEMENTS  
For Authorized Committees

**HAND DELIVERED**

1985 YEAR END REPORT (Summary Page)

1 Name of Committee (in Full) **CITIZENS FOR CARDISS COLLINS**

2 PFC Identification Number **029092**

Address (Number and Street) **210 7th Street, S.E., Suite 1984-C**

3 This Report an Amendment?  YES  NO

City, State and Zip Code **Washington, DC 20003**

Check if address is different than previously reported

4 TYPE OF REPORT

April 15 Quarterly Report

July 15 Quarterly Report

October 15 Quarterly Report

January 31 Year End Report

July 31 Mid Year Report (Non election Year Only)

Twelfth day report preceding election on \_\_\_\_\_

Thirtieth day report following the General Election on \_\_\_\_\_ in the State of \_\_\_\_\_

Termination Report

The report contains activity for:  Primary Election  General Election  Special Election  Runoff Election

SUMMARY		COLUMN A	COLUMN B
		This Period	Calendar Year-to-Date
5	Covering Period <u>July 1, 1985</u> through <u>December 31, 1985</u>		
6	Net Contributions (other than loans)		
	(a) Total Contributions (other than loans) (from Line 11 (a))	41,094.27	79,754.27
	(b) Total Contribution Refunds (from Line 20 (b))		
	(c) Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a))	41,094.27	79,754.27
7	Net Operating Expenditures		
	(a) Total Operating Expenditures (from Line 17)	45,457.54	62,077.60
	(b) Total Offsets to Operating Expenditures (from Line 14)		14.00
	(c) Net Operating Expenditures (subtract Line 7 (b) from 7 (a))	45,457.54	62,063.60
8	Cash on Hand at Close of Reporting Period (from Line 27)	36,029.00	
9	Debts and Obligations Owed TO The Committee (Itemize on an Schedule C or Schedule D)		
10	Debts and Obligations Owed BY The Committee (Itemize on an Schedule C or Schedule D)		

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

For further information, contact:  
Federal Election Commission  
Toll Free 800 424 6689  
Local 202 633-4888

Name or Print Name of Treasurer

*Rosetta Bassis*  
\_\_\_\_\_  
Treasurer of the Committee

Feb. 12, 1986  
Date

NOTE: Submission of false information or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g

Be generous recipients of PFC FORM 3 and PFC FORM 2b are obsolete and should no longer be used

PFC FORM 3 (3-80)

3 6 0 1 2 9 7 3 3 1 5

RECEIVED  
 OFFICE OF THE CLERK  
 FEDERAL ELECTION COMMISSION  
 FEB 13 AM 10:02

# PRIMARY ELECTION REPORT NOTICE

FEDERAL ELECTION COMMISSION

ILLINOIS

February 10, 1986

## WHO MUST FILE

The principal campaign committees authorized by candidates<sup>1/</sup> in the Illinois Primary scheduled to be held March 18, 1986, must file a pre-election report by March 6, 1986.

## WHAT MUST BE REPORTED

The report must disclose all financial activity that occurred from the close of books for the last report through February 26, 1986. Political committees that have not previously filed a financial disclosure report should report all financial activity through February 26, 1986.<sup>2/</sup> NOTE: In addition, if the campaign has more than one committee, the principal campaign committee must also file a consolidated report, (FEC form 3Z). For details see page 14 of the Campaign Guide For Congressional Candidates and Committees or 11 CFR 104.3(f).

## WHEN TO FILE

Reports sent by registered or certified mail must be postmarked not later than midnight March 3, 1986. Reports hand delivered or mailed first class must be received no later than close of business March 6, 1986. (SEE REPORTING INFORMATION ON REVERSE SIDE).

## WHERE AND HOW TO FILE

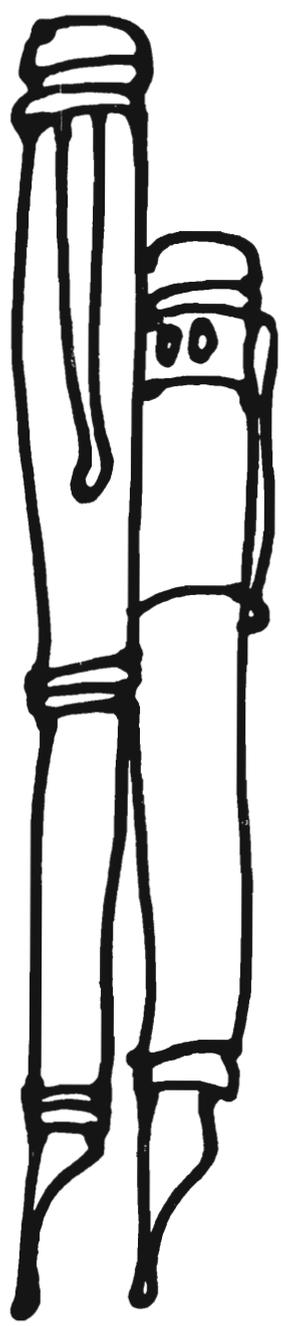
Committees should consult the instructions on the enclosed FEC Form 3, for details.

<sup>1/</sup> Individuals should refer to the enclosed brochure for the definition of the term "candidate" and registration requirements. If you determine that you meet the definition of candidate, your principal campaign committee should comply with the above reporting requirements. Appropriate forms are enclosed.

<sup>2/</sup> The first report filed by a committee shall include all amounts received and disbursed prior to reaching the threshold for candidate registration. Activity which occurred prior to 1986 should be disclosed separately. See 11 CFR 101.3; 104.3 (a) and (b).

-over-

3 7 0 4 0 3 1 1



## CALENDAR OF REPORTS FOR THE ILLINOIS PRIMARY ELECTION

NAME OF REPORT	PERIOD COVERED	REG./CERT MAILING DATE	FILING DATE
Pre-Primary	1/1* - 2/26	3/03/86	3/06/86
April Quarterly	2/27 - 3/31	4/15/86	4/15/86
July Quarterly	4/01 - 6/30	7/15/86	7/15/86

**LAST MINUTE CONTRIBUTIONS**

Last minute contributions of \$1,000 or more received, by authorized committees, between two and 20 days before the election, must be reported within 48 hours of their receipt.

**COMPLIANCE**

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

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\*Committees should use this date, or the date of candidate status, whichever is later. See also footnote 2 on page 1.

**FOR INFORMATION CALL:** Information Services Division  
202/376-3120 or 800/424-9530

37040:44842

RQ-7

(This is a copy of the text of a mailgram sent to the committee listed below on March 7, 1986.)

Rosetta Harris, Treasurer  
 Citizens for Cardiss Collins  
 210 7th Street, SE, Suite 1984C  
 Washington, D.C. 20003

Identification Number: C00055632

Reference: 12 DAY PRE-PRIMARY REPORT (1/1/86-2/26/86)

It has come to the attention of the Federal Election Commission that you may have failed to file the 1986 12 Day Pre-Primary Report of Receipts and Expenditures as required by the Federal Election Campaign Act, as amended. Unless you recently registered, prior notification was sent to you approximately 24 days ago advising you that your report was due on March 6, 1986.

You will be allowed four (4) business days from the date of this notice to file the 12 Day Pre-Primary Report. The report should be filed with the Clerk of the House, Office of Records and Registration, 1036 Longworth HOB, Washington, D.C. 20515, or the Secretary of the Senate, Office of Public Records, 232 Hart Senate Office Building, Washington, D.C. 20510, as appropriate. Copy of the report should also be filed with the appropriate Secretary of State or equivalent state officer.

If you have filed the report timely by certified or registered mail, please notify us immediately, in writing, of the certified or registered number and the date that the report was sent.

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

If you have any questions regarding this matter, please contact the Reports Analysis Division on our toll free number (800) 424-9530 or on our local number (202) 376-2480.

Sincerely,

John D. Gibson  
 Assistant Staff Director  
 Reports Analysis Division

87040341843  
 3570787

(Summary Page)

ALABAMA 1986 PRE-PRIMARY REPORT

CITIZENS FOR CARDINE COLLINS

029092

Address (Number and Street) 710 7th Street, S.E., Suite 1984-C  
City, State and Zip Code Washington, DC 20003

3. Is this Report an Amendment?  YES  NO

Check if address is different than previously reported

TYPE OF REPORT

- April 15 Quarterly Report
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 11 Year End Report
- July 31 Mid Year Report (Non-election Year Only)
- Twelfth day report preceding election on 3/18/86
- Thirtieth day report following the General Election or \_\_\_\_\_ in the State of \_\_\_\_\_
- Termination Report

This report contains activity for:  Primary Election  General Election  Special Election  Runoff Election

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year to Date
5	Covering Period Jan. 1, 1986 through Feb. 26, 1986		
6	Net Contributions (other than loans)		
	(a) Total Contributions (other than loans) (From Line 11 (a))	46,075.00	46,075.00
	(b) Total Contribution Refunds (from Line 20 (d))		
	(c) Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a))	46,075.00	46,075.00
7	Net Operating Expenditures		
	(a) Total Operating Expenditures (from Line 17)	51,847.54	51,847.54
	(b) Total Offsets to Operating Expenditures (from Line 14)		
	(c) Net Operating Expenditures (subtract Line 7 (b) from 7 (a))	51,847.54	51,847.54
8	Cash on Hand at Close of Reporting Period (from Line 27)	32,306.46	
9	Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)		
10	Debts and Obligations Owed BY The Committee (Itemize all on Schedule C or Schedule D)		

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

For further information, contact:  
Federal Election Commission  
Toll Free 800 426 9630  
Local 202 623 4000

Type or Print Name of Treasurer

*Rosetta Harris*  
SIGNATURE OF TREASURER

3-17-86  
Date

NOTE Submission of false overstatements 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 2a are obsolete and should no longer be used.

# QUARTERLY REPORT NOTICE

## FEDERAL ELECTION COMMISSION

### CANDIDATE COMMITTEES

March 21, 1986

#### WHO MUST FILE

The principal campaign committee of each Congressional candidate<sup>1/</sup> seeking election in 1986 must file a quarterly report by April 15, 1986. All other candidate committees should see below (Semiannual Filers) for their reporting schedule.

#### WHAT MUST BE REPORTED

The report must disclose all financial activity that occurred from the close of books for the last report through March 31, 1986. Political committees that have not previously filed a financial disclosure report should report all financial activity through March 31, 1986.<sup>2/</sup> NOTE: In addition, if the campaign has more than one committee, the principal campaign committee must also file a consolidated report (FEC Form 32). For details, see page 14 of the Campaign Guide For Congressional Candidates and Committees, or 11 CFR 104.3(f).

#### FILING DATE

Reports sent by registered or certified mail must be postmarked no later than midnight April 15, 1986. Reports hand delivered or mailed first class must be received no later than close of business April 15, 1986.

#### WHERE AND HOW TO FILE

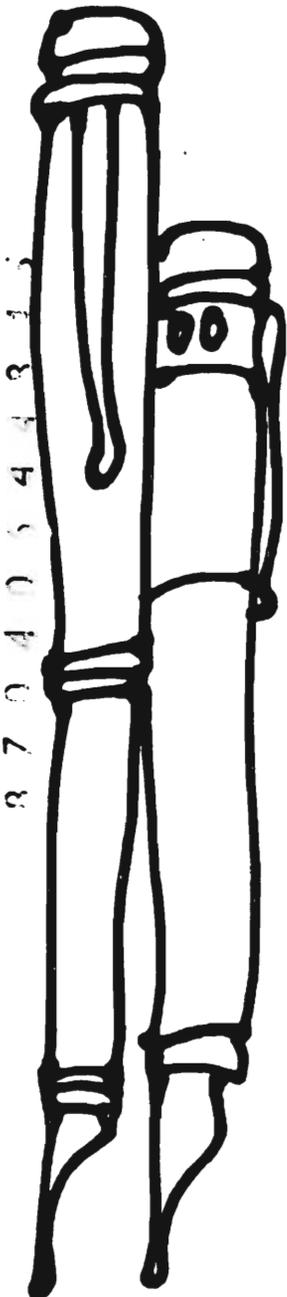
Committees should consult the instructions on the enclosed FEC Form 3, for details.

#### SEMIANNUAL FILERS

Committees authorized by candidates for a Federal election held prior to 1986 or for a future election (i.e., a year other than 1986) need only file a report by July 31, 1986, covering all financial activity from the last report filed through June 30, 1986.

<sup>1/</sup>Individuals should refer to the enclosed brochure for the definition of the term "candidate" and registration requirements. If you determine that you meet the definition of candidate, your principal campaign committee should comply with the above reporting requirements. Appropriate forms are enclosed.

<sup>2/</sup>The first report filed by a committee shall include all amounts received or disbursed prior to reaching the threshold for candidate registration. Activity which occurred prior to 1986, however, should be disclosed separately. See 11 CFR 101.3; 104.3(a) and (b).



**A REMINDER**

**FUTURE REPORTS**

All principal campaign committees of candidates seeking election in 1986 must continue to file quarterly reports this year, regardless of the outcome of the primary election in which the candidate participates. The next quarterly report is due July 15, 1986.

**COMPLIANCE**

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

**FOR INFORMATION CALL: Information Services Division  
800/424-9530 or 202/376-3120**

87040644840



FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20463

MAR 28 1986 MS-L

Rosetta Harris, Treasurer  
Citizens for Cardiss Collins  
210 7th Street, SE, Suite 1984C  
Washington, DC 20003

Identification Number: C00055632

Reference: 1985-1986 Election Cycle Reports

Dear Ms. Harris:

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

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
Year End (7/1/85-12/31/85)	1/31/86	2/13/86
12 Day Pre-Primary (1/1/86-2/26/86)	3/06/86	3/18/86

Timely filing is a specific requirement of the Federal Election Campaign Act and is essential to fulfilling the public disclosure concept embodied in that law. The Commission views failure to timely file reports as a serious violation of the Act. This communication is to advise you that, notwithstanding any matters which may be pending with the Commission, any additional failure to timely file a required report by your committee may result in the Commission initiating legal enforcement or audit action.

If you need assistance or have any questions regarding this matter, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

Peter Kell Jr.  
Chief, Authorized Branch  
Reports Analysis Division

867340333347

REPORTS OF RECEIPTS AND DISBURSEMENTS  
For Authorized Committee

**HAND DELIVERED**

1986 APRIL QUARTERLY (Summary Page)

ALICN AP, A ALICN AP, A

1 Name of Committee (in Full)  
**CITIZENS FOR CARDISS COLLINS**

2 PFC Identification Number  
**029092**

3 Is this report for jurisdiction?  
 YES  NO

Address (Number and Street)  
**210 7th Street, S.E., Suite 1984-C**

City, State and Zip Code  Check if address is different than previously reported  
**Washington, DC 20003**

TYPE OF REPORT

April 15 Quarterly Report  Twelfth day report preceding election on \_\_\_\_\_ in the State of \_\_\_\_\_

July 15 Quarterly Report  Thirtieth day report following the General Election in \_\_\_\_\_ in the State of \_\_\_\_\_

October 15 Quarterly Report

January 31 Year End Report

July 31 Mid Year Report (Election Year Only)  Termination Report

This report contains activity for:  Primary Election  General Election  Special Election  Runoff Election

SUMMARY		COLUMN A	COLUMN B
Covering Period Feb. 27, 1986 through March 31, 1986		This Period	Calendar Year-to-Date
6	Net Contributions (other than loans)		
(a)	Total Contributions (other than loans) (From Line 11 (a))	64,440.51	110,515.51
(b)	Total Contribution Refunds (from Line 20 (b))		
(c)	Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a))	64,440.51	110,515.51
7	Net Operating Expenditures		
(a)	Total Operating Expenditures (from Line 17)	40,980.22	92,827.76
(b)	Total Officers to Operating Expenditures (from Line 14)		
(c)	Net Operating Expenditures (subtract Line 7 (b) from 7 (a))	40,980.22	92,827.76
8	Cash on Hand at Close of Reporting Period (from Line 27)	92,266.75	
9	Debits and Obligations Owed TO The Committee (Schedule C or Schedule D)		
10	Debits and Obligations Owed BY The Committee (Schedule C or Schedule D)	85,000.00	

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

For further information, contact:  
Federal Election Commission  
Toll Free 800-424-9595  
Local 202-696-6999

ROSETTA HARRIS  
Name of the Treasurer  
*Roetta Harris*  
Signature of Treasurer

4-11-86

NOTE: Submission of false information or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. § 437c.

All previous copies of PFC FORM 3 and PFC FORM 2s are obsolete and should no longer be used.

PFC FORM 3 (2/85)

870810130218807

REC'D APR 22 1986  
FEDERAL ELECTION COMMISSION



FEDERAL ELECTION COMMISSION  
WASHINGTON DC 20463

THIS IS THE BEGINNING OF MUR # 2208  
DATE FILMED 7/24/87 CAMERA NO. 4  
CAMERAMAN A.S.

87040544849



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

9-21-87

THE FOLLOWING MATERIAL IS BEING ADDED TO THE  
PUBLIC FILE OF CLOSED MUR 2208

87040554144

*Henry M. Grannan*

*Esq.*

ATTORNEYS AT LAW  
20 NORTH WACKER DRIVE  
CHICAGO, ILLINOIS 60606  
(312) 346-0005

HENRY M. GRANNAN  
CANDICE K. CASAZZA  
THOMAS F. FLANAGAN  
EDWARD N. KALLAS, JR.

March 2, 1987

Via Federal Express

87 MAR 9 PM 1:13

RECEIVED  
OFFICE OF THE  
GENERAL COUNSEL

87040654145

Charles N. Steele, Esq.  
General Counsel  
Federal Election Commission  
Washington, D.C. 20463

Attention: Charles Snyder, Esq.

In Re: Citizens For Cardiss Collins  
MUR 2208

Dear Mr. Snyder:

On February 3 I forwarded to you an executed Conciliation Agreement with respect to the above and requested that you provide instructions regarding payment of the civil penalty imposed.

Because the Treasurer of the Committee is anxious to resolve this matter as quickly as possible, rather than wait for payment instructions I am enclosing herewith a check made payable to the Federal Election Commission in the amount of \$2,500 in payment of the penalty.

If payment at this time or in this manner is unacceptable, please let me know.

Very truly yours,

HENRY M. GRANNAN, CHARTERED

by   
Thomas F. Flanagan

TFF/pes  
Enclosure

CITIZENS FOR CARDISS COLLINS

P.O. BOX 2088  
CHICAGO, IL 60688

368

February 28, 1987

PAY TO THE ORDER OF

Federal Election Commission

\$ 2500.00

Twenty-five Hundred and <sup>00</sup>/<sub>100</sub>

DOLLARS



FOR Conciliation Agreement

Rosetta Harris

⑆000368⑆ -⑆⑆071000013⑆ 70 10427⑆

MEMORANDUM

TO:

Debra A. <sup>Trimiew</sup> ~~Reed~~

TO:

Cecilia Lieber

FROM:

Cecilia Lieber

FROM:

Debra A. <sup>Trimiew</sup> ~~Reed~~

CHECK NO. 368 (a copy of which is attached) RELATING TO MUR 2208 (Snyder) AND NAME Citizens For Cardiss Collins WAS RECEIVED ON 3/6/87. PLEASE INDICATE THE ACCOUNT INTO WHICH IT SHOULD BE DEPOSITED:

BUDGET CLEARING ACCOUNT (#95F3875.16)

CIVIL PENALTIES ACCOUNT (#95-1099.160)

OTHER

SIGNATURE

Debra A. Trimiew

DATE

3/6/87