



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2327

DATE FILMED 2/17/88 CAMERA NO. 3

CAMERAMAN GPC

99240672084

PUBLIC RECORD INDEX - MUR 2327

1. Memo, 24 Dec 86, John D. Gibson, (Reports Analysis Division) to Charles N. Steele (General Counsel), Subj: Referral of the Friends of Siljander, w/atch (RAD Referral Pkg).
2. First General Counsel's Report, 9 Jun 87.
3. Certification of Commission action, 15 Jan 87.
4. Ltr, dtd 30 Jan 87, Scott E. Thomas (Chairman, FEC) to Jerry Balg, (treas, Friends of Siljander Committee).
5. Ltr, dtd 2 Feb 87, Jerry Balog to FEC.
6. General Counsel's Report 17 Mar 87.
7. Certification of Commission action, 23 Mar 87.
8. Ltr, dtd 27 Mar 87, Lawrence M. Noble (Acting General Counsel) to J. Balog.
9. Ltr, dtd 27 Mar 87, Scott Thomas to David Redman (Treas, Friends of Siljander Committee).
10. Ltr, dtd 8 Apr 87, D. Redman to FEC.
11. Ltr, dtd 17 Apr 87, D. Redman to FEC.
12. General Counsel's Report, 12 June 87.
13. Memo, 17 June 87, M.W. Emmons to L.M. Noble, Subj: Comments on G.C. Report, w/atch (Comment sheet).
14. Memo, 17 June 87, M.W. Emmons to L.M. Noble, subj: Objections to G.C. Report.
15. Certification of Commission action, 24 June 87.
16. Ltr, dtd 25 June 87, L.M. Noble to D.W. Redman.
17. Ltr, dtd 21 Oct 87, D.W. Redman to FEC, w/atch (civil penalty check).
18. General Counsel's Report, 13 Nov 87.

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19. Certification of Commission action, 18 Nov 87.
20. Clsg. Ltr, dtd 23 Nov 87, L.M. Noble to D. Redman, w/atch (conciliation agreement).

-END-

NOTE: In preparing its file for the public record, O.G.C. routinely removes those documents in which it perceives little or no public interest, and those documents, or portions thereof, which are exempt from disclosure under the Freedom of Information Act.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 24, 1986

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA *JS*
STAFF DIRECTOR

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

SUBJECT: REFERRAL OF THE FRIENDS OF SILJANDER

This is a referral of the Friends of Siljander committee (the "Committee"). The Committee has failed to file the 1986 October Quarterly Report of Receipts and Disbursements. According to the 1985-1986 Reports Analysis Division Review and Referral Procedures for Authorized Committees (Standard 1), further examination is required by your office.

The candidate lost the primary election, held on August 5, 1986, with 45.4% of the vote.

If you have any questions, please contact Linda Tangney at 376-2480.

Attachment

88040672087

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: December 24, 1986ANALYST: Linda Tangney

- I. COMMITTEE: Friends of Siljander (C00153957)
Jerry Balog, Treasurer
P.O. Box 102
Three Rivers, MI 49093
- II. RELEVANT STATUTE: 2 U.S.C §434(a)(2)(A)(iii)
11 CFR 104.5(a)(1)(iii)
- III. BACKGROUND:

Failure to File a Required Report of Receipts
and Disbursements

The Friends of Siljander committee (the "Committee") has failed to file the 1986 October Quarterly Report of Receipts and Disbursements. Prior Notice was sent September 19, 1986, informing the Committee that the 1986 October Quarterly Report was due on October 15, 1986 (Attachment 2). A Non-Filer Notice was sent to the Committee on November 13, 1986, for failure to file the October Quarterly Report (Attachment 3). The Non-Filer Notice informed the Committee that failure to file this report might result in audit or legal enforcement action.

On December 12, 1986, a Reports Analysis Division analyst telephoned the candidate's office and requested to speak with someone about the Committee's report. A member of the staff stated that they were in the process of shutting down the office, that the treasurer, Jerry Balog, was aware that the October Quarterly Report needed to be filed, and would file it soon (Attachment 4).

To date, no response has been received.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/	PARTY	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
			PRIMARY	GENERAL	PRIMARY	GENERAL			
SILJANDER, MARK D	HOUSE 04	REPUBLICAN PARTY			MICHIGAN		1986 ELECTION	ID# H2MI04146	
1. STATEMENT OF CANDIDATE									
1986 DISAVOWAL NOTICE							11FEB86	2	86FEC/402/2263
STATEMENT OF CANDIDATE							18FEB86	1	86HSE/297/3767
2. PRINCIPAL CAMPAIGN COMMITTEE									
FRIENDS OF SILJANDER									
1985 MID-YEAR REPORT			2,042		14,216				
YEAR-END			178,055		13,414				
YEAR-END - AMENDMENT			-		-				
YEAR-END - AMENDMENT			171,285		13,414				
REQUEST FOR ADDITIONAL INFORMATION									
REQUEST FOR ADDITIONAL INFORMATION 2ND									
1986 STATEMENT OF ORGANIZATION - AMENDMENT									
APRIL QUARTERLY			29,852		72,747				
JULY QUARTERLY			76,029		124,261				
JULY QUARTERLY - AMENDMENT			-		-				
NOTICE OF FAILURE TO FILE									
REQUEST FOR ADDITIONAL INFORMATION									
PRE-PRIMARY			32,995		45,038				
NOTICE OF FAILURE TO FILE									
1'ST LETTER INFORMATIONAL NOTICE									
NOTICE OF FAILURE TO FILE									
TOTAL			312,203		0	269,676		0	
3. AUTHORIZED COMMITTEES									
4. JOINT FUNDRAISING COMMITTEES AUTHORIZED BY THE CAMPAIGN									
									131 TOTAL PAGES

All reports have been reviewed.
 Ending Cash-on-hand as of 7/16/86: \$61,272
 Outstanding debts as of 7/16/86: \$8,973

QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

CANDIDATE COMMITTEES

September 19, 1986

WHO MUST FILE

The principal campaign committee of each Congressional candidate seeking election in 1986 must file a quarterly report by October 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 September 30, 1986. Political committees that have not previously filed a financial disclosure report should report all financial activity through September 30, 1986.* 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 October 15, 1986. Reports hand delivered or mailed first class must be received no later than close of business October 15, 1986.

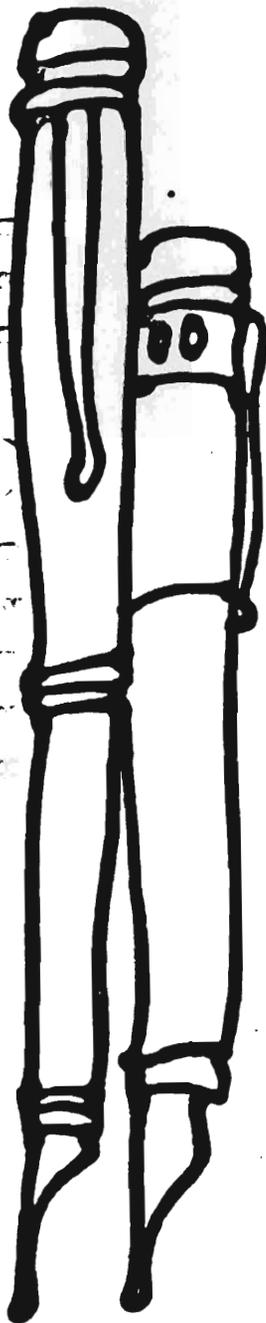
WHERE AND HOW TO FILE

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

SEMIANNUAL FILERS

Political 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 year-end report by January 31, 1987, covering all financial activity from the last report filed through December 31, 1986.

*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, however, should be disclosed separately. See 11 CFR 101.3; 104.3(a) and (b).



A REMINDER

FUTURE REPORTS FOR QUARTERLY FILERS

Principal campaign committees participating in a general election must file a pre-and post-general election report. A notice explaining your filing requirements will be sent to you before the general election.

All committees must file the year-end report by January 31, 1987. The notice explaining this filing requirement will be sent to you after the general election.

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

93040572001

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

EQ-7

November 13, 1986

Jerry Balog, Treasurer
Friends of Siljander
P.O. Box 102
Three Rivers, MI 49093

Identification Number: C00153957

Reference: October Quarterly Report (7/17/86-9/30/86)

Dear Mr. Balog:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Report of Receipts and Disbursements as required by the Federal Election Campaign Act. You were previously notified of the due date for this report.

It is important that you file this report immediately with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, DC 20515, or the Secretary of the Senate, 232 Hart Senate Office Building, Washington, DC 20510, as appropriate. A copy of the report should also be filed with the Secretary of State or equivalent state officer of your state.

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

If you have any questions regarding this matter, please contact Peter Kell on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

8673441365

MEMORANDUM FOR FILES: TELECON

SUBJECT: 1986 OCTOBER QUARTERLY REPORT

FROM: LINDA TANGNEY

TO: MARK SILJANDER'S OFFICE

NAME OF COMMITTEE: FRIENDS OF SILJANDER

DATE: 12/12/86

I was unable to reach the treasurer, Jerry Balog, and telephoned Mark Siljander's office to request to speak with someone about the missing October Quarterly report. A member of the office staff said that they were in the process of shutting down the office, that the treasurer, Jerry Balog was aware that the report needed to be filed, and would be filing it soon.

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SENSITIVE

FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION _____

RAD Referral 86NF-57
STAFF MEMBER
Frances B. Hagan

07
M 12
AM: 02

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

RESPONDENTS' NAMES: Friends of Siljander Committee
Jerry Balog, Treasurer

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

INTERNAL REPORTS
CHECKED: RAD Referral, Disclosure Reports

FEDERAL AGENCIES
CHECKED: None

GENERATION OF MATTER

This matter was referred to the Office of General Counsel by the Reports Analysis Division.

SUMMARY OF ALLEGATIONS

The Friends of Siljander Committee ("the Committee") and Jerry Balog, as treasurer, failed to file the 1986 October Quarterly Report in violation of 2 U.S.C. § 434(a)(2)(A)(iii).

FACTUAL AND LEGAL ANALYSIS

2 U.S.C. § 434(a)(2)(A)(iii) requires in part that during an election year, a principal campaign committee shall file quarterly reports to be filed no later than the 15th day after the last day of each calendar quarter, and which shall be complete as of the last day of each calendar quarter (except the Year End Report which is due January 31).

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On September 19, 1986, RAD notified the Committee that its 1986 October Quarterly Report (7/1/86 - 9/30/86) was due October 15, 1986. On November 13, 1986, RAD sent a non-filer notice and informed the Committee that failure to file could result in audit or legal enforcement action. On December 12, 1986, a RAD analyst contacted the Committee by telephone and was told that the office was being closed but that the treasurer was aware of the reporting responsibility and would soon submit the report. The required report has not been received.

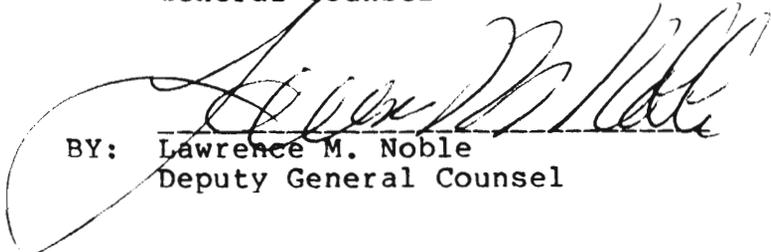
Because the Committee failed to file its 1986 October Quarterly Report, the Office of the General Counsel recommends that the Commission find reason to believe that the Committee and its treasurer violated 2 U.S.C. § 434(a)(2)(A)(iii).

RECOMMENDATION

1. Open a MUR.
2. Find reason to believe that the Friends of Siljander Committee and Jerry Balog, as treasurer, violated 2 U.S.C. § 434(a)(2)(A)(iii).
3. Send the attached letter and General Counsel's Factual and Legal Analysis.

Charles N. Steele
General Counsel

1/9/87
Date _____

BY: 
Lawrence M. Noble
Deputy General Counsel

Attachment
Letter and General Counsel's Factual and Legal Analysis
RAD Referral

8 3 7 4 0 5 7 2 0 9 5



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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Attachments to First
General Counsel's Report

have been removed from this position in the Public Record File either because they duplicate documents located elsewhere in this file, or because they reflect exempt information.

For Attachment 2 see 1

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Friends of Siljander Committee)
Jerry Balog, Treasurer)

RAD Ref. 86NF-57

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 14, 1987, the Commission decided by a vote of 6-0 to take the following actions in RAD Ref. 86NF-57.

1. Open a MUR.
2. Find reason to believe that the Friends of Siljander Committee and Jerry Balog, as treasurer, violated 2 U.S.C. § 434(a)(2)(A)(iii).
3. Send the letter and General Counsel's Factual and Legal Analysis, as recommended in the First General Counsel's Report signed January 9, 1987.

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

Attest:

Jan 15, 1987

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary:	Mon.,	1-12-87,	11:02
Circulated on 48 hour tally basis:	Mon.,	1-12-87,	4:00
Deadline for vote:	Wed.,	1-14-87,	4:00

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 30, 1987

Jerry Balog, Treasurer
Friends of Siljander Committee
P.O. Box 102
Three Rivers, MI 49093

RE: MUR 2327
Friends of Siljander
Committee
Jerry Balog, as treasurer

Dear Mr. Balog:

On January 14, 1987, the Federal Election Commission determined that there is reason to believe that the Friends of Siljander Committee and you, as treasurer, violated 2 U.S.C. § 434(a)(2)(A)(iii), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within fifteen days of your receipt of this letter.

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

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or

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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 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 Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,



Scott E. Thomas
Chairman

Enclosures

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

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87 FEB 5 All: RB

Federal Election Commission
999 "E" ST. NW
Washington DC 20463

87 FEB 6 P 3:58

RECEIVED
GENERAL COUNSEL

2-2-87

Ms Fran Hagan,

This letter is a follow up
our recent phone conversation.

The Friends of Siljinder Committee
accepted my resignation as treasurer
Sept 1, 1986. We would like to

amend the "Statement of Organization"
to change the new treasurer to
DAVID REDMAN, 6433 Susan's Lane,
Falls Church, VA 22043

Phone 703-536-6515. all communication
should be sent to David Redman.

Thank you for helping me clean
up this matter.

Sincerely
Jerry Balog

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BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)
) MUR 2327
Friends of Siljander Committee)
David Redman, Treasurer)

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GENERAL COUNSEL'S REPORT

On January 14, 1987, the Commission found reason to believe that the Friends of Siljander Committee ("the Committee") and Jerry Balog, as treasurer, violated 2 U.S.C. § 434(a)(2)(A)(iii) for failing to file the 1986 October Quarterly Report. In response to the reason to believe notice, Mr. Balog informed us that the Committee "accepted my resignation as treasurer on September 1, 1986." Because an amended statement of organization was not received, Mr. Balog remained the treasurer of record. The record has now been amended to show David Redman as Committee treasurer.

Because Mr. Balog was not the treasurer when the Commission made its findings, this Office is making a new recommendation concerning the non-filer violation with the new treasurer included. Further, as a result of the tardy amendment to the statement of organization, the Committee has violated 2 U.S.C. § 433(c) which requires such changes to be reported within 10 days of the change. We have updated the General Counsel's Factual and Legal Analysis for the new treasurer.

RECOMMENDATIONS

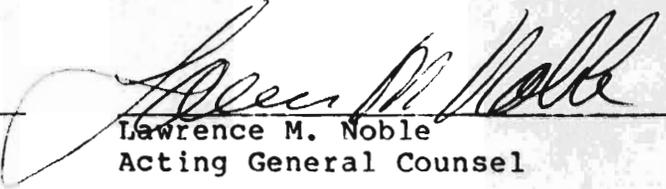
1. Find reason to believe that the Friends of Siljander Committee and David Redman, as treasurer, violated 2 U.S.C. § 433(c).

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2. Find reason to believe that David Redman, as treasurer of the Friends of Siljander Committee, violated 2 U.S.C. § 434(a)(2)(A)(iii).
3. Take no further action against Jerry Balog, as treasurer of the Friends of Siljander Committee, for a violation of 2 U.S.C. § 434(a)(2)(A)(iii).
4. Send the attached letters and General Counsel's Factual and Legal Analyses.

Date

3/17/87


Lawrence M. Noble
Acting General Counsel

Attachments

Letter to Respondents
General Counsel's Updated Factual and Legal Analyses
Letter from Respondent

83740572102



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Attachments to General
Counsel's Report

have been removed from this position in the Public Record File either because they duplicate documents located elsewhere in this file, or because they reflect exempt information.

For Attachment 1 see 8+9

_____	_____
<u>3</u>	<u>5</u>
_____	_____
_____	_____

68040672103

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Friends of Siljander Committee) MUR 2327
David Redman, Treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 23, 1987, the Commission decided by a vote of 6-0 to take the following actions in MUR 2327:

1. Find reason to believe that the Friends of Siljander Committee and David Redman, as treasurer, violated 2 U.S.C. § 433(c).
2. Find reason to believe that David Redman, as treasurer of the Friends of Siljander Committee, violated 2 U.S.C. § 434(a)(2)(A)(iii).
3. Take no further action against Jerry Balog, as treasurer of the Friends of Siljander Committee, for a violation of 2 U.S.C. § 434(a)(2)(A)(iii).

(continued)

89040672104

Federal Election Commission
Certification for MUR 2327
March 23, 1987

Page 2

4. Send the letters and General Counsel's Factual and Legal Analyses, as recommended in the General Counsel's Report signed March 17, 1987.

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

Attest:

3-23-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Wed., 3-18-87, 4:56
Circulated on 48 hour tally basis: Thurs., 3-19-87, 11:00
Deadline for vote: Mon., 3-23-87, 11:00

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plm



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 27, 1987

Mr. Jerry Balog
P.O. Box 102
Three Rivers, MI 49093

Re: MUR 2327
Jerry Balog, as treasurer

Dear Mr. Balog:

On January 14, 1987, the Commission found reason to believe that the Friends of Siljander Committee and you, as treasurer, had violated 2 U.S.C. § 434(a)(2)(A)(iii), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action against you and on March 23, 1987, closed its file as it pertains to you. The General Counsel's Factual and Legal analysis which formed a basis for the Commission's finding is attached for your information.

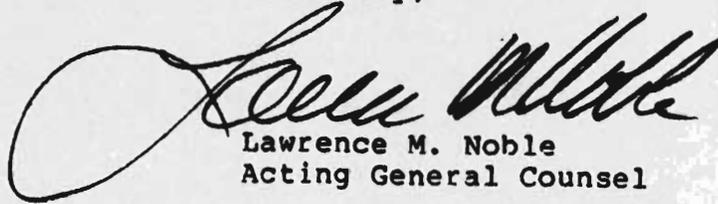
The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within 10 days of your receipt of this letter.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

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If you have any questions, please direct them to Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
Acting General Counsel

Enclosure

83040572107



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 27, 1987

David Redman, Treasurer
Friends of Siljander Committee
6433 Susan's Lane
Falls Church, VA 22043

RE: MUR 2327
Friends of Siljander
Committee
David Redman, as
treasurer

Dear Mr. Redman:

On January 14, 1987, the Federal Election Commission found reason to believe that the Friends of Siljander Committee and Jerry Balog, as treasurer, violated 2 U.S.C. § 434(a)(2)(A)(iii). On March 23, 1987, the Commission took no further action against Jerry Balog, as treasurer, for a violation of 2 U.S.C. § 434(a)(2)(A)(iii), but found reason to believe you, as treasurer, violated 2 U.S.C. § 434(a)(2)(A)(iii). The Commission also found reason to believe that the Committee and you, as treasurer, violated 2 U.S.C. § 433(c). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within fifteen days of your receipt of this letter.

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

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or

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plm

GCC# 3076
Hagan

87 APR 9 4:33

RECEIVED
GENERAL COUNSEL

David W. Redman, Treasurer
Friends of Siljander Committee
6433 Susan's Lane
Falls Church, VA 22043

Federal Election Commission
Washington, DC 20463

Dear Mr. Thomas:

I am responding to your letter dated March 27, 1987 regarding MUR 2327.

It was my understanding that Jerry Balog, former treasurer of the Friends of Siljander Committee was going to notify the FEC of the change of treasurer for the Friends of Siljander Committee. Mr. Balog was in fact the treasurer of the Committee until at least the end of December 1986. He received his final payment from the committee for performing the duties of treasurer on December 27, 1986. Mr. Balog continued to make bank deposits and write checks until December 27, 1986.

I did not obtain full control of the finances of the committee until late January 1987 when Mr. Balog mailed me the financial records of the committee and the checkbook ledger. I did begin to gather the data necessary to complete the third quarter report and the year end report that would need to be filed in January of 1987 in late December 1986.

If Mr. Balog resigned on September 1, 1986, the committee was without a treasurer until I obtained all of the financial data for the committee the end of January, or until February 9, 1987 when Mr. Balog notified the Commission of the change of treasurers.

It is my intention as treasurer of the Friends of Siljander Committee to comply with all of the Federal Election Commission reporting requirements. To that end I have enclosed the 1986 October Quarterly Report and the 1986 Year End Report.

It is my understanding that with the submission of these two reports the committee will have met all of the reporting obligations for 1986.

Please inform me as to whether or not this letter and the enclosed reports are sufficient additional information to demonstrate that no further action should be taken against the Friends of Siljander Committee or me as treasurer.

Sincerely,

David W Redman
David W. Redman

BCC 3143

RECEIVED AT THE FEC

87 APR 17 AM: 08

David W. Redman, Treasurer
Friends of Siljander Committee
6433 Susan's Lane
Falls Church, VA 22043

Federal Election Commission
999 E. Street NW,
Washington, DC 20463

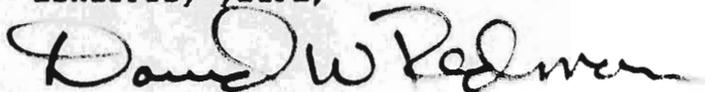
87 APR 17 P 2: 58

RECEIVED
GENERAL COUNSEL

Dear Mr. Thomas:

Please be advised that the Friends of Siljander Committee and I as treasurer would like to enter into a pre-probable cause conciliation to resolve MUR 2327.

Sincerely yours,



David W. Redman

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//

SENSITIVE

17 JUN 12
P 2: 24

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Friends of Siljander Committee,) MUR 2327
David Redman, Treasurer)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On January 14, 1987, the Commission found reason to believe that the Friends of Siljander Committee ("Committee") and Jerry Balog, as treasurer, violated 2 U.S.C. § 434(a)(2)(A)(iii), by failing to file the 1986 October Quarterly Report in a timely manner. After Respondents notified the Commission that Jerry Balog had resigned as treasurer on September 1, 1986, the Commission took no further action against Jerry Balog as treasurer on March 23, 1987. On the same date, the Commission found reason to believe that David Redman, as treasurer, violated 2 U.S.C. § 434(a)(2)(A)(iii), and that the Committee and David Redman, as treasurer violated 2 U.S.C. § 433(c), by failing to amend the Statement of Organization to reflect the change of treasurer within 10 days of the change. In an undated letter received on April 17, 1987, Respondents requested conciliation to settle this matter prior to a finding of probable cause to believe. (Attachment 1)

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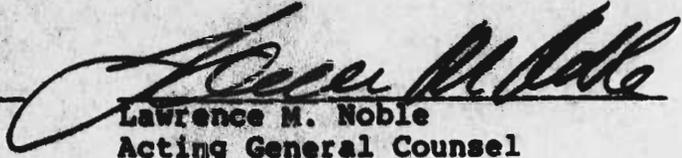
III. RECOMMENDATIONS

1. Enter into conciliation with the Friends of Siljander Committee, David Redman, treasurer, prior to a finding of probable cause to believe.

2. Approve the attached proposed conciliation agreement and letter.

Date

6/12/87


Lawrence M. Noble
Acting General Counsel

Attachments

1. Request for conciliation
2. Proposed agreement and letter

83040672114



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Attachments to General
Council's Report

have been removed from this position in the Public Record File either because they duplicate documents located elsewhere in this file, or because they reflect exempt information.

For Attachment 1 see 11
~~11~~

88040672115

SENSITIVE



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DATE & TIME TRANSMITTED: Monday, June 15, 1987, 11:00

COMMISSIONER: AIKENS, ELLIOTT, JOSEFIK, McDONALD, McGARRY, THOMAS

RETURN TO COMMISSION SECRETARY BY Wednesday, June 17, 1987, 11:00

SUBJECT: MUR 2327 - General Counsel's Report
Signed June 12, 1987

67 JUN 17 11:01

00040672117

- I approve the recommendation
- I object to the recommendation

COMMENTS: The "NOW THEREFORE" clause is inappropriate for a pre-PCTB agreement.

DATE: 6/17/87 SIGNATURE [Signature]

A DEFINITE VOTE IS REQUIRED. ALL BALLOTS MUST BE SIGNED AND DATED.
PLEASE RETURN ONLY THE BALLOT TO THE COMMISSION SECRETARY.
PLEASE RETURN BALLOT NO LATER THAN DATE AND TIME SHOWN ABOVE.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: LAWRENCE M. NOBLE
ACTING GENERAL COUNSEL

FROM: MARJORIE W. EMMONS /JERYL L. WARREN *JLW*

DATE: JUNE 17, 1987

SUBJECT: OBJECTION TO MUR 2327 - GENERAL COUNSEL'S REPORT
SIGNED JUNE 12, 1987

The above-captioned document was circulated to the Commission on Monday, June 15, 1987 at 11:00.

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

Commissioner Aikens _____
Commissioner Elliott _____
Commissioner Josefiak _____
Commissioner McDonald _____ X
Commissioner McGarry _____
Commissioner Thomas _____

This matter will be placed on the Executive Session agenda for Tuesday, June 23, 1987.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Friends of Siljander Committee,) MUR 2327
David Redman, Treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of June 23, 1987, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 2327:

1. Enter into conciliation with the Friends of Siljander Committee, David Redman, treasurer, prior to a finding of probable cause to believe.
2. Approve the proposed conciliation agreement and letter attached to the General Counsel's report dated June 12, 1987.

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

Attest:

June 24, 1987

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

99740672119



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 25, 1987

Redman

David W. Redman, Treasurer
Friends of Siljander Committee
6433 Susan's Lane
Falls Church, VA 22043

Re: MUR 2327
Friends of Siljander Committee

Dear Mr. Redman:

On January 14, 1987, the Federal Election Commission found reason to believe that the Friends of Siljander Committee violated 2 U.S.C. § 434 (a) (2) (A) (iii), and on March 23, 1987, the Commission found reason to believe that you, as treasurer, violated 2 U.S.C. § 434(a) (2) (A) (iii) and 2 U.S.C. § 433(c), and that the Friends of Siljander Committee violated 2 U.S.C. § 433(c). At your request, June 23, 1987, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Delanie D. Painter, the attorney assigned to this matter at 202-376-5690.

Sincerely,

Lawrence M. Noble
Lawrence M. Noble
Acting General Counsel

Enclosure
Conciliation Agreement

23040572120

QCC#4667

David W. Redman
Friends of Siljander Committee
6433 Susan's Lane
Falls Church, VA 22043

Federal Election Commission
Washington, DC 20463

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
87 OCT 21 PM 3:05

Dear Mr. Thomas:

I have received the Federal Election Commission's conciliation agreement dated September 23, 1987. The Friends of Siljander Committee accepts the conciliation agreement and the civil penalty of \$1500.

The Committee is actively engaged in a program to retire the balance of our campaign debt. We have recently completed a mailing to 17,000 potential donors and hope to do another mailing to past contributors in the near future.

I am in the process of negotiating with some of our creditors to come to a settlement regarding our outstanding balance with them. The Friends of Siljander Committee hopes to be able to close out the Committee by the end of 1987.

I do request that the Commission allow us to make 6 monthly installment payments on the civil penalty. We have spent most of our resources on debt retirement and would be unable to remit the entire \$1500 at this time.

It was indicated to me in recent discussions with a representative of the Commission that a six month installment arrangement would be acceptable.

Enclosed with this letter is our first installment payment. Thank you for your cooperation in helping us to resolve this matter.

Sincerely,

David W Redman

David W. Redman

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Sent to OGC 10-27-87

SILJANDER FOR CONGRESS COMMITTEE

P. O. BOX 102
THREE RIVERS, MI 49093

2512

74-261
724

PAY
TO THE
ORDER OF

Federal Election Commission

10-12-1987 \$ 250.00

Two hundred - fifty and ^{no} / 100

DOLLARS



David W Redman

FOR

⑈002512⑈ ⑆072402610⑆

⑆15⑈964⑈9⑈

CCC#4607

MEMORANDUM

TO: DEBRA A. TRIMIEW

TO: CECILIA LIEBER

FROM: CECILIA LIEBER

FROM: Michele Broussard
~~DEBRA A. TRIMIEW~~

CHECK NO. 2512 { A COPY OF WHICH IS ATTACHED } RELATING TO
Friends of Siljander Committee

MUR 2327 AND NAME (Marinelli)

WAS RECEIVED ON 10/21/87. PLEASE INDICATE THE ACCOUNT INTO

WHICH IT SHOULD BE DEPOSITED:

- BUDGET CLEARING ACCOUNT { 95F3875.16 }
- CIVIL PENALTIES ACCOUNT { 95-1099.160 }
- OTHER _____

SIGNATURE Michele Broussard DATE 10/21/87

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
87 OCT 21 PM 3:05

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION COMMISSION

87 NOV 13 PM 2:36

In the Matter of)
) MUR 2327
Friends of Siljander Committee)
and David Redman, as treasurer)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

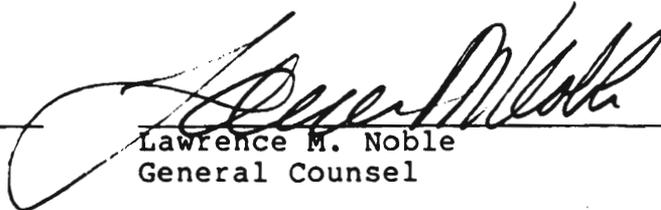
Attached is a conciliation agreement which has been signed by David Redman, the treasurer of the Friends of Siljander Committee ("the Committee").

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with the Friends of Siljander Committee and David Redman, as treasurer.
2. Close the file.
3. Approve the attached letter.

Date

11/13/87


Lawrence M. Noble
General Counsel

Attachments

1. Conciliation Agreement
2. Photocopy of civil penalty check
3. Letter to Respondent

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Friends of Siljander Committee) MUR 2327
and David Redman, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 18, 1987, the Commission decided by a vote of 5-0 to take the following actions in MUR 2327:

1. Accept the conciliation agreement with the Friends of Siljander Committee and David Redman, as treasurer, as recommended in the General Counsel's Report signed November 13, 1987.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's Report signed November 13, 1987.

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

Attest:

11-18-87
Date

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

Received in the Office of Commission Secretary: Fri., 11-13-87, 2:36
Circulated on 48 hour tally basis: Mon., 11-16-87, 11:00
Deadline for vote: Wed., 11-18-87, 11:00

33040572124



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 23, 1987

David Redman, Treasurer
Friends of Siljander Committee
6433 Susan's Lane
Falls Church, VA 22043

RE: MUR 2327
Friend of Siljander
Committee and David
Redman, as treasurer

Dear Mr. Redman:

On November 18, 1987, the Federal Election Commission accepted the signed conciliation agreement and the first installment of the civil penalty submitted on your behalf in settlement of a violation of 2 U.S.C. § 434(a)(2)(A)(iii) and 2 U.S.C. § 433(c), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter. This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Michael Marinelli, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

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000#4696

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

BEFORE THE FEDERAL ELECTION COMMISSION

87 NOV -3 AM 11:05

In the Matter of)	
)	MUR 2327
Friends of Siljander Committee)	
David Redman, as treasurer)	

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Friends of Siljander Committee and David Redman, as treasurer, ("Respondents") violated 2 U.S.C. § 434(a)(2)(A)(iii) and 2 U.S.C. § 433(c).

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
87 NOV -3 PM 12:07

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

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

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

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

1. Respondent, Friends of Siljander Committee, is a political committee within the meaning of 2 U.S.C. § 431(4).

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2. Respondent, David Redman, is the treasurer of the Friends of Siljander Committee.

3. Respondents filed the 1986 October Quarterly Report, which was due on October 15, 1986, on April 8, 1987, 175 days late.

4. The former treasurer of the Friends of Siljander Committee, Jerry Balog, resigned on September 1, 1986, but continued to receive compensation and to function in the capacity of treasurer until December 31, 1986.

5. Respondents did not amend their Statement of Organization to reflect the change in treasurer until February 5, 1987.

V.1. Respondents failed to file their 1986 October Quarterly Report in a timely manner, in violation of 2 U.S.C. § 434(a)(2)(A)(iii).

2. Respondents failed to amend their Statement of Organization to reflect the change of treasurer within 10 days after the change, in violation of 2 U.S.C. § 433(c).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Fifteen Hundred Dollars (\$1,500.00), pursuant to 2 U.S.C. § 437g(a)(5)(A), such penalty to be paid as follows:

1. One initial payment of \$250 due on November 1, 1987;

2. Thereafter beginning on December 1, 1987, five consecutive monthly installment payment of \$250 each;

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3. Each such installment shall be paid on the first day of the month in which it becomes due.

4. In the event that any installment payment is not received by the Commission by the fifth day of the month in which it becomes due, the Commission may, at its discretion, accelerate the remaining payments and cause the entire amount to become due upon ten days written notice to the respondent. Failure by the Commission to accelerate the payments with regard to any overdue installment shall not be construed as a waiver of its right to do so with regard to future overdue installments.

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 requirement contained in this agreement and to so notify the Commission.

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

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

FOR THE COMMISSION:

Lawrence M. Nobile
Lawrence M. Nobile
General Counsel

11/20/87
Date

FOR THE RESPONDENTS:

David W. Redman
David Redman
Treasurer

November 1, 1987
Date

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2327

DATE FILMED 2/17/88 CAMERA NO. 3

CAMERAMAN SPC

88040672130



FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

THE FOLLOWING MATERIAL IS BEING ADDED TO THE
PUBLIC FILE OF CLOSED MUR 2327.

89040752159



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 13, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mark Siljander, Treasurer
Friends of Siljander
11084 Thrush Ridge Road
Reston, VA 22091

RE: MUR 2327
Friends of Siljander
and Mark Siljander, as
treasurer

Dear Mr. Siljander:

On November 18, 1987, the Federal Election Commission accepted the signed conciliation agreement signed by your Committee, in settlement of the above-referenced matter. Pursuant to Section VI of that agreement, your Committee agreed to pay a civil penalty of \$1,500 with payment to be made in six monthly installments of \$250.

The Commission's records indicate that the Committee has paid to date, \$1,250. The Commission requests payment of the remaining portion of civil penalty, in full, within 10 days of receipt of this letter.

If you have any questions regarding this matter, please contact Michael Marinelli, at (202) 376-8200.

Sincerely,

Lois G. Lerner
Associate General Counsel

Enclosures
Conciliation Agreement
Copies of payment checks

R 9 0 4 0 7 5 2 1 6 0