



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2392

DATE FILMED 2/25/88 CAMERA NO. 4

CAMERAMAN GPC

38040673725

PUBLIC RECORD INDEX - MUR 2392

1. Memo, 17 Mar 87, John D. Gibson (Reports Analysis Division) to Lawrence M. Noble (Acting General Counsel), subj: Referral of Columbia Savings and Loan Association Federal Political Contribution Fund.
2. First General Counsel's Report, 20 Apr 87.
3. Certification of Commission Action, 23 Apr 87.
4. Ltr, 4 May 87, Scott E. Thomas (Chairman, FEC) to Karen Zavis (treasurer, Columbia Savings and Loan Association Federal Political Contribution Fund), w/atch Factual and Legal Analysis.
5. Ltr, 13 May 87, G. Sims Brannon (Ass't Secretary) to FEC, w/atch (Statement of Designation of Counsel).
6. General Counsel's Report, 25 Jun 87.
7. Certification of Commission Action, 30 Jun 87.
8. Ltr, 6 Jul 87, L.M. Noble to G. Sims Brannon.
9. General Counsel's Report, 3 Nov. 87.
10. Certification of Commission Action, 6 Nov. 87.
11. Ltr. 10 Nov 87, L.M. Noble to G. Simms Brannon, w/atch (executed 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.

88040673726



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 17, 1987

MEMORANDUM

TO: LAWRENCE M. NOBLE
ACTING GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

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

SUBJECT: 30 DAY POST-GENERAL REPORT NON-FILER REFERRALS OF
UNAUTHORIZED COMMITTEES

Attached is a listing of fifteen (15) unauthorized committees which failed to file the 1986 30 Day Post-General Report within thirty (30) days of the date of the Non-Filer Notice. In accordance with Standard 3 of the 1985-1986 RAD Review and Referral Procedures for Unauthorized Committees, further examination is required by your office.

On September 29, 1986, prior notification was sent to all unauthorized committees informing them that all committees, regardless of election activity, must file the 30 Day Post-General Report by December 4, 1986 (Attachment 16). Each committee which failed to submit a report covering the post-election reporting period was sent a Non-Filer Notice on December 23, 1986 (Attachment 17).

The attached printout lists the name, address and treasurer for each committee being referred. Any telephone conversations are referenced under Contacts with Filers. The Summary Pages of late-filed reports and/or letters of explanation are included under Reports Filed/Response(s). In addition, a "C" index accompanies each committee. In a few instances, the aggregate receipt and disbursement figures may be inflated because reports were submitted covering portions of the same reporting period.

If you have any questions, please contact Lisa J. Stolaruk at 376-2480.

Attachments

88040673727

C00194316

Columbia Savings and Loan Association
Federal Political Contribution Fund

87NF-61

88040673728

8 8 0 4 0 6 7 3 7 2 9

**COLUMBIA SAVINGS AND LOAN ASSOCIATION FEDERAL
POLITICAL CONTRIBUTION FUND**

(Attachments 1a - 1d)

8 8 0 4 0 6 7 3 7 3 0

FEDERAL ELECTION COMMISSION
1985-1986
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 16MAR87

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES TYPE OF FILER	MICROFILM LOCATION
COLUMBIA SAVINGS AND LOAN ASSOCIATION FEDERAL POLITICAL CONTRIBUTION FUND				ID #C00194316 NON-PARTY QUALIFIED		
CONNECTED ORGANIZATION: COLUMBIA SAVINGS AND LOAN ASSOCIATION						
1985	STATEMENT OF ORGANIZATION			8MAR85	2	85FEC/367/4077
	MISCELLANEOUS REPORT TO FEC			18APR85	2	85FEC/371/1552
	STATEMENT OF ORGANIZATION - AMENDMENT			22APR85	3	85FEC/371/3219
	STATEMENT OF ORGANIZATION - AMENDMENT			20DEC85	3	85FEC/392/5381
	MID-YEAR REPORT	13,055	7,015	7MAR85 -30JUN85	12	85FEC/382/3967
	REQUEST FOR ADDITIONAL INFORMATION			7MAR85 -30JUN85	3	86FEC/403/4349
	REQUEST FOR ADDITIONAL INFORMATION 2ND			7MAR85 -30JUN85	7	86FEC/405/5145
	YEAR-END	29,075	12,500	1JUL85 -31DEC85	14	86FEC/398/0428
	YEAR-END - AMENDMENT	29,075	12,500	1JUL85 -31DEC85	3	86FEC/406/1215
	REQUEST FOR ADDITIONAL INFORMATION			1JUL85 -31DEC85	3	86FEC/403/4345
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL85 -31DEC85	1	86FEC/405/5152
1986	APRIL QUARTERLY	8,852	16,750	1JAN86 -31MAR86	5	86FEC/409/1763
	JULY QUARTERLY	1,725	10,250	1APR86 -30JUN86	2	86FEC/419/4274
	JULY QUARTERLY - AMENDMENT	1,725	10,250	1APR86 -30JUN86	5	86FEC/422/0166
	REQUEST FOR ADDITIONAL INFORMATION			1APR86 -30JUN86	1	86FEC/424/3413
	OCTOBER QUARTERLY	22,186	15,100	1JUL86 -30SEP86	6	86FEC/435/0646
	NOTICE OF FAILURE TO FILE			24NOV86	1	86FEC/452/1440
	YEAR-END	31,074	6,517	1OCT86 -31DEC86	6	87FEC/457/0431
	TOTAL	105,967	0 68,132		0	79 TOTAL PAGES

All reports have been reviewed

Cash on hand as of 12/31/86: \$37,836

Debts owed by the Committee as of
12/31/86: \$0

Attachment 1a

MEMORANDUM TO THE FILES:

COMMITTEE: Columbia Savings and Loan Assoc. Fed. Political Contribution Fund
I.D. NUMBER: C00194316
CONTACT: G. Sims Brannon , Assistant Secretary
DATE: 1/5/87
ANALYST: Brian J. Hancock
SUBJECT: Response to 30G Non-Filer Notice.

88040673731

Mr. Brannon phoned to respond to our Non-Filer Notice. Mr. Brannon stated that he did not think that he was required to file the 30 Day Post-General Election Report. Mr. Brannon had called the FEC's 800 Number at an earlier date and was told that since his committee had no federal activity during the period from 10/1/87 to 10/15/87, that there was no need to file the 12 Day Pre-General Election Report. He was under the false impression that this would be true during the 30 Day Post-General period as well. Mr. Brannon said that he now realized that this was not the case, & that he would send the 30 Day Post-General Election Report as soon as possible.

1

Attachment 1c

RECEIVED AT THE FEC
HAND DELIVERED
87 JAN 30 AM: 28

COLUMBIA SAVINGS AND LOAN ASSOCIATION
FEDERAL POLITICAL CONTRIBUTION FUND

January 29, 1987

FEDERAL EXPRESS

Federal Election Commission
1325 K. Street N.W.
Washington, D.C. 20461

Enclosed is the filing on form 3X on behalf of Columbia Savings and Loan Association Federal Political Contribution Fund, for the period ending December 31, 1986. The Fund inadvertently failed to file a post-election report because of a mis-communication between the Fund and the Commission. All information required in the post-election report is contained herein.

Very truly yours,



G. Sims Brannon
Assistant Secretary

GJB:nrg

cc: California Secretary of State
Colorado Secretary of State
Illinois Secretary of State

encl:

88040673752
87-1370431

1

Attachment 1d
REPORT OF RECEIPTS AND DISBURSEMENTS
 For a Political Committee Other Than an Authorized Committee

RECEIVED AT THE FEC
HAND DELIVERED
87 JAN 30 11:28

(Summary Page)

1 Name of Committee (in Full)
**Columbia Savings and Loan Association
 Federal Political Contribution Fund**

Address (Number and Street)
8840 Wilshire Blvd.

City, State and ZIP Code
Beverly Hills, CA 90211

Check here if address is different than previously reported

2 FEC Identification Number
000194316

3 This committee qualified as a multicandidate committee during this Reporting Period on _____

4. TYPE OF REPORT (Check appropriate boxes)

(a) April 15 Quarterly Report October 15 Quarterly Report
 July 15 Quarterly Report January 31 Year End Report
 July 31 Mid Year Report (Non Election Year Only)
 Monthly Report for _____
 Tenth day report preceding _____ election on _____ in the State of _____
 Thirtieth day report following the General Election on _____ in the State of _____
 Termination Report

(b) Is this Report an Amendment?
 YES NO

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SUMMARY

5 Comm. Period October 1, 1986 through December 31, 1986

6 (a) Cash on hand January 1, 19 86

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 1B)

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

Total Disbursements (from Line 7B)

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

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

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

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6(a)		\$ 22,615.68
6(b)	\$ 13,279.62	
6(c)	\$ 31,074.49	\$ 63,838.43
6(d)	\$ 44,354.11	\$ 86,454.11
7	\$ 6,517.57	\$ 48,617.57
8	\$ 37,836.54	\$ 37,836.54
9	\$ -0-	\$ -0-
10	\$ -0-	\$ -0-

I hereby declare that the foregoing is true and correct to the best of my knowledge and belief.

Karen Zavis
 Name of Principal Officer or Treasurer

Karen Zavis
 SIGNATURE OF TREASURER

Date 1/29/87

For further information contact
 Federal Election Commission
 900 E Street, N.W.
 Washington, D.C. 20463
 Toll Free 800-426-6530
 Local 202-376-3120

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

SENSITIVE

**FEDERAL ELECTION COMMISSION
FIRST GENERAL COUNSEL'S REPORT**

**RAD Referrals 87NF-61
through 87NF-76
STAFF: A. Weissenborn**

10-1-87
10-1-87

CONFIDENTIAL

SOURCE OF MUR: INTERNALLY GENERATED

**RESPONDENTS': Columbia Savings and Loan
Association Federal Political Contribution
Fund and Karen Zavis, as treasurer;**

88040673734

RELEVANT STATUTE: 2 U.S.C. § 434(a)(4)(A)(iii)
INTERNAL REPORTS CHECKED: Public Records
FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

On March 17, 1987, the Reports Analysis Division ("RAD") referred the following 15 unauthorized political committees to the Office of the General Counsel for failure to file the 1986 Post-General Election Report timely:^{1/} Columbia Savings and Loan Association Federal Political Contribution Fund;

II. FACTUAL AND LEGAL ANALYSIS

(A) The Facts

On September 29, 1986, notification was sent to all unauthorized political committee advising that regardless of

^{1/} The 1986 Post-General Election Report must disclose all financial activity from the close of books of the last report, or the date of registration (whichever is later), through November 24, 1986.

^{2/} The fifteen committees discussed in this report were referred to this Office as a group by the Reports Analysis Division. Each referral in which the Commission decides to open a MUR will be assigned a separate MUR number and handled by the staff person indicated in the attached notification letters.

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2

election activity, the 1986 Post-General Election Report was required to be filed by December 4, 1986. Each political committee which failed to submit a report covering the post-general election reporting period was sent a Non-Filer Notice on December 23, 1986.

1. Columbia Savings and Loan Association Federal Political Contribution Fund

On January 30, 1987, the 1986 Year-End Report was filed. The report covered the period required to be disclosed on both the 1986 Post-General Election Report and the 1986 Year-End Report. Thus, the information required on the 1986 Post-General Election Report was submitted 57 days late. The 1986 Year-End Report disclosed receipts of \$31,074 and disbursements of \$6,517 for the period of October 1, 1986, through December 31, 1986.

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(B) The Applicable Law

Pursuant to 2 U.S.C. § 434(a)(4)(A)(iii), all political committees other than the authorized committees of a candidate shall file a post-general election report, which shall be filed no later than the 30th day after the general election and which shall be complete as of the 20th day after such general election.

(C) Application of the Law to the Facts

The record in this matter demonstrates that the 15 political committees discussed on pages 3 - 7 above were required to file the 1986 Post-General Election Report by December 4, 1986. The above committees, however, failed to file the report in a timely manner. In consideration of this circumstance it is the recommendation of this office that the Commission open a Matter Under Review and find reason to believe that a violation of 2 U.S.C. § 434(a)(4)(A)(iii) occurred with respect to the late filing of the 1986 Post-General Election Report by: Columbia Savings and Loan Association Federal, Political Contribution Fund and Karen Zavis, as treasurer;
as treasurer;

880440673737

Political Action Committee (DBL-PAC)

88040673738

III. RECOMMENDATIONS

1. **Open Matters Under Review with respect to each of the following:**

a) **Columbia Savings and Loan Association Political Contribution Fund and Karen Zavis, as treasurer**

b)

c)

Inc.

d).

(DBL-

e)

f)

g)

h)

i)

j)

k)

l)

m)

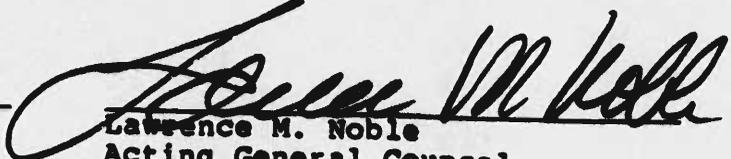
2. **Find reason to believe those political committees and individuals listed in recommendation one above violated 2 U.S.C. § 434(a)(4)(A)(iii).**

3.

38040673739

4.

5. Approve the attached letters and Factual and Legal Analyses.

Date 4/20/87 
Lawrence M. Noble
Acting General Counsel

Attachments

- 1. RAD Referral
- 2. Letters (14) and Analyses (14)

38040673740

Federal Election Commission
Certification for RAD Ref. 87NF-61
through 87NF-75
April 23, 1987

Page 2

1. Open Matters Under Review with respect to each
of the following:

a) Columbia Savings and Loan Association
Political Contribution Fund and Karen
Zavis, as treasurer.

b)

c)

d)

e)

f)

g)

h)

i)

j)

k)

l)

m)

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3

(continued)

2. Find reason to believe those political committees and individuals listed above violated 2 U.S.C. § 434(a)(4)(A)(iii).

3.

4.

5. Approve the letters and Factual and Legal Analyses, as recommended in the First General Counsel's Report signed April 20, 1987.

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

Attest:

4-23-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

3

Received in the Office of Commission Secretary: Mon., 4-20-87, 4:57
Circulated on 48 hour tally basis: Tues., 4-21-87, 11:00
Deadline for vote: Thurs., 4-23-87, 11:00



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 4, 1987

*John
Pawley*

Karen Zavis, Treasurer
Columbia Savings and Loan Association
Federal Political Contribution Fund
8840 Wilshire Boulevard
Beverly Hills, CA 90211

Re: MUR 2392
Columbia Savings and Loan
Association Federal Political
Contribution Fund; Karen
Zavis, as treasurer

Dear Ms. Zavis:

On April 23, 1987, the Federal Election Commission found that there is reason to believe Columbia Savings and Loan Association Federal Political Contribution Fund ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The 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 the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the 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 the 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

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Letter to Karen Zavis
Page 2

pursued. The Office of the 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, the Commission will not entertain requests for pre-probable cause conciliation 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 the 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 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 Delanie D. Painter, at (202) 376-5690.

Sincerely,



Scott E. Thomas
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form

88040673745

4

7/2/87

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Columbia Savings and Loan
Association Federal Political
Contribution Fund and Karen
Zavis, as treasurer

MUR 2392

On September 29, 1986, notification was sent to all unauthorized political committees advising that regardless of election activity, the 1986 Post-General Election Report was required to be filed by December 4, 1986. The 1986 Post-General Report is required to disclose all financial activity from the close of books of the last report, or the date of registration (whichever is later), through November 24, 1986. Each political committee which failed to submit a report covering the post-general election reporting period was sent a Non-Filer Notice on December 23, 1986.

On January 30, 1987, the 1986 Year-End Report was filed. The report covered the period required to be disclosed on both the 1986 Post-General Election Report and the 1986 Year-End Report. Thus, the information required on the 1986 Post-General Election Report was submitted 57 days late. The 1986 Year-End Report disclosed receipts of \$31,074 and disbursements of \$6,517 for the period of October 1, 1986, through December 31, 1986.

Pursuant to 2 U.S.C. § 434(a)(4)(A)(iii), all political committees other than the authorized committees of a candidate shall file a post-general election report, which shall be filed no later than the 30th day after the general election and which shall be complete as of the 20th day after such general election.

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The record in this matter demonstrates that respondents were required to file the 1986 Post-General Election Report by December 4, 1986. The respondents, however, failed to file the report in a timely manner. In consideration of this circumstance it is the recommendation of the Office of the General Counsel that the Commission find reason to believe Columbia Savings and Loan Association Federal Political Contribution Fund and Karen Zavis, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii).

88040673747

RECEIVED AT THE FEC
ACC# 3389
87 MAY 18 09:33

COLUMBIA SAVINGS AND LOAN ASSOCIATION
FEDERAL POLITICAL CONTRIBUTION FUND
8840 Wilshire Boulevard
Beverly Hills, California 90211

May 13, 1987

Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Attn: Delanie D. Painter

Re: MUR 2392
Columbia Savings and Loan Association
Federal Political Contribution Fund;
Karen Zavis as treasurer

Dear Delanie:

Pursuant to our telephone conversation yesterday, Columbia Savings and Loan Association Federal Political Contribution Fund ("Committee") and Karen Zavis, as treasurer of the Committee, request pre-probable cause conciliation with respect to the above-referenced matter. A Statement of Designation of Counsel is enclosed.

I have also enclosed a copy of my letter of January 29, 1987 to the Federal Election Commission ("Commission"). In that letter, I acknowledge that the Committee failed to file the 1986 Post-General Election Report on December 4, 1986. The events leading up to the writing of that letter are as follows:

1. Prior to the 1986 general election, I telephoned the Commission to discuss both the Pre-General Election Report and the Post-General Election Report which were described in Commission publications. Based on my understanding of my conversation with a staff member, I believed that non-candidate committees were not required to file either of those two reports.
2. The Committee was in fact not required to file the Pre-General Election Report but was required to file the Post-General Election Report. The Committee filed neither report.

87 MAY 18 10:38

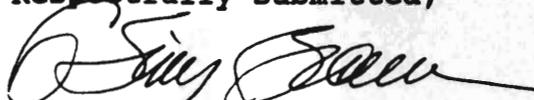
38040673748

3. In January 1987, I again spoke with a Commission staff member who clarified the filing requirements for me. I offered to prepare and file the Post-General Election Report at that time. The staff member indicated that a late filing would be unnecessary since all information which would be in the Post-General Election Report would also be included in the Committee's year-end report, which was at that point due one week later.
4. The Committee did in fact file its year-end report in a timely manner. The year-end report contains all information which would have been contained in the Post-General Election Report.

The Committee has filed every report other than the Post-General Election Report on a timely basis. Because the Committee is less than 2 years old, those of us operating the Committee had no experience in the particular reporting requirements of an election year. Karen Zavis and I have worked diligently to comply with all of the Commission's regulations. At the time we failed to file the Post-General Election Report, we believed that we were not required to file that report. We are committed to strict observation of all of the Commission's regulations including timely observation of all filing requirements and regret the misunderstanding regarding the Post-General Election Report.

Please contact me if you need additional information and when you are prepared to proceed with the conciliation process. For your records, my direct telephone number is (213) 854-9224.

Respectfully submitted,


G. Sims Brannon
Assistant Secretary

GSB:nrg

cc (w/encl.): Karen Zavis

38040673749

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2392

NAME OF COUNSEL: G. Sims Brannon

ADDRESS: 8840 Wilshire Blvd.

Beverly Hills, CA 90211

TELEPHONE: (213) 854-9224

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.

May 13, 1987
Date

Karen Zavis
Signature Karen Zavis, Treasurer

RESPONDENT'S NAME: Columbia Savings and Loan Association

ADDRESS: Political Contribution Fund: Karen Zavis, Treasurer

8840 Wilshire Blvd.

Beverly Hills, CA 90211

HOME PHONE: _____

BUSINESS PHONE: (213) 854-9240

88040673750

COLUMBIA SAVINGS AND LOAN ASSOCIATION
FEDERAL POLITICAL CONTRIBUTION FUND

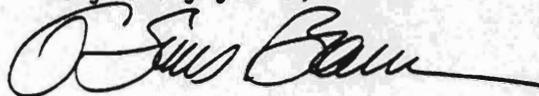
January 29, 1987

FEDERAL EXPRESS

Federal Election Commission
1325 K. Street N.W.
Washington, D.C. 20463

Enclosed is the filing on form 3X on behalf of Columbia Savings and Loan Association Federal Political Contribution Fund, for the period ending December 31, 1986. The Fund inadvertently failed to file a post-election report because of a mis-communication between the Fund and the Commission. All information required in the post-election report is contained herein.

Very truly yours,



G. Sims Brannon
Assistant Secretary

GSB:nrg

cc: California Secretary of State
Colorado Secretary of State
Illinois Secretary of State

encls.

38040673751

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SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Columbia Savings and Loan) MUR 2392
Association Federal Political)
Contribution Fund, and)
Karen Zavis, as treasurer)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On April 23, 1987, the Commission found reason to believe that the Columbia Savings and Loan Association Federal Political Contribution Fund, and Karen Zavis, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii) by failing to file the 1986 Post-General Report in a timely manner. By letter dated May 13, 1987, respondents requested to settle this matter prior to a finding of probable cause to believe (Attachment 1).

II. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

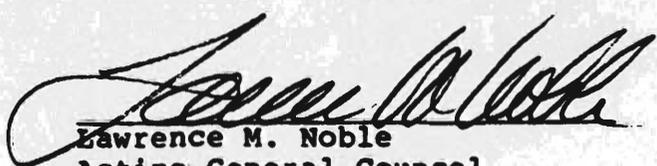
88040673752

8 9 0 4 0 6 7 3 7 5 3

III. RECOMMENDATIONS

- 1. Enter into conciliation with the Columbia Savings and Loan Association Federal Political Contribution Fund and Karen Zavis, as treasurer, prior to a finding of probable cause to believe.
- 2. Approve the attached proposed conciliation agreement and letter.

Date 6/25/87


 Lawrence M. Noble
 Acting General Counsel

Attachments

- 1. Request for conciliation
- 2. Proposed agreement and letter



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 5

88040673754

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Columbia Savings and Loan) MUR 2392
Association Federal Political)
Contribution Fund, and)
Karen Zavis, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 30, 1987, the Commission decided by a vote of 6-0 to take the following actions in MUR 2392:

1. Enter into conciliation with the Columbia Savings and Loan Association Federal Political Contribution Fund and Karen Zavis, as treasurer, prior to a finding of probable cause to believe.
2. Approve the proposed conciliation agreement and letter, as recommended in the General Counsel's Report signed June 25, 1987.

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

Attest:

6/30/87
Date

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

Received in the Office of Commission Secretary: Thurs., 6-25-87, 1:25
Circulated on 48 hour tally basis: Fri., 6-26-87, 12:00
Deadline for vote: Tue., 6-30-87, 4:00

/jw/

38040673755



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 6, 1987

G. Sims Brannon
8840 Wilshire Blvd.
Beverly Hills, CA 90211

RE: MUR 2392
Columbia Savings and Loan
Association
Federal Political Contribution
Fund and Karen Zavis, as
treasurer

Dear Mr. Brannon:

On April 23, 1987, the Federal Election Commission found reason to believe that your client, the Columbia Savings and Loan Association, Federal Political Contribution Fund, and Karen Zavis, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii). At your request, on June 30, 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

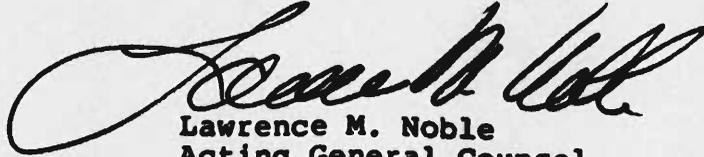
88040673756

8

Letter to G. Sims Brannon
Page 2

Delanie D. Painter, the attorney assigned to this matter, at
(202) 376-5690.

Sincerely,



Lawrence M. Noble
Acting General Counsel

Enclosure
Conciliation Agreement

88040673757

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

87 NOV -3 PM 3:47

In the Matter of)
)
Columbia Savings and Loan) MUR 2392
Association Federal Political)
Contribution Fund and)
Karen Zavis, as treasurer)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Karen Zavis, the treasurer of the Columbia Savings and Loan Association Federal Political Contribution Fund.

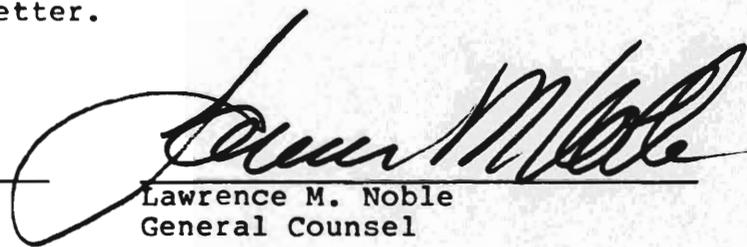
The attached agreement contains no changes from the agreement approved by the Commission on September 25, 1987. Respondents also sent a check for the full amount of the civil penalty, \$500.00, which was received in this Office on October 19, 1987.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Columbia Savings and Loan Association Federal Political Contribution Fund and Karen Zavis, as treasurer.
2. Close the file.
3. Approve the attached letter.

Date

11/3/87


Lawrence M. Noble
General Counsel

Attachments

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

88040670758

Painter

COLUMBIA SAVINGS & LOAN ASSOC. No 1042
FEDERAL POLITICAL CONTRIBUTION FUND
 8840 WILSHIRE BLVD., 3RD FLOOR
 BEVERLY HILLS, CA 90211

October 13 19 87 16-1606
 1220

Federal Election Commission \$ 500.00

Five hundred and 00/100*****

HEAD OFFICE
CITY NATIONAL BANK
 400 North Roxbury Drive
 Beverly Hills, California 90210

MUR 2392

"MONEY MARKET ACCOUNT"

0950 [Signature]
 J. Center White

⑈001042⑈ ⑆22016066⑆ 00100847724⑈

CIC#4580

MEMORANDUM

TO: DEBRA A. TRIMIEW TO: CECILIA LIEBER

FROM: CECILIA LIEBER FROM: Michele Braussard
~~DEBRA A. TRIMIEW~~

RECEIVED
 COMMISSION
 FEDERAL ELECTION
 OFFICE OF GENERAL COUNSEL
 87 OCT 19 AM 10:27

CHECK NO. 1042 [A COPY OF WHICH IS ATTACHED] RELATING TO
 MUR 2392 AND NAME Columbia Savings & Loan Assoc. Fed. Pol. Contribution
 Fund and Karen Zavis, as treasurer

WAS RECEIVED ON 10/19/87. PLEASE INDICATE THE ACCOUNT INTO

WHICH IT SHOULD BE DEPOSITED:

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

SIGNATURE Michele Braussard DATE 10/19/87

Attachment 2



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 143 see 11

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Columbia Savings and Loan)	MUR 2392
Association Federal Political)	
Contribution Fund and)	
Karen Zavis, as treasurer)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 6, 1987, the Commission decided by a vote of 6-0 to take the following actions in MUR 2392:

1. Accept the conciliation agreement with Columbia Savings and Loan Association Federal Political Contribution Fund and Karen Zavis, as treasurer, as recommended in the General Counsel's report signed November 3, 1987.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's report signed November 3, 1987.

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

Attest:

11-6-87

Date

Marjorie W. Emmons

Marjorie W. Emmons for
Secretary of the Commission

Received in the Office of Commission Secretary:	Tues.,	11-3-87,	3:47
Circulated on 48 hour tally basis:	Wed.,	11-4-87,	11:00
Deadline for vote:	Fri.,	11-6-87,	11:00

9 3 0 4 0 6 7 3 7 6 1



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

10 November 1987

plm

G. Sims Brannon
8840 Wilshire Blvd.
Beverly Hills, CA 90211

RE: MUR 2392
Columbia Savings and Loan
Association Federal
Political Contribution
Fund and Karen Zavis, as
treasurer

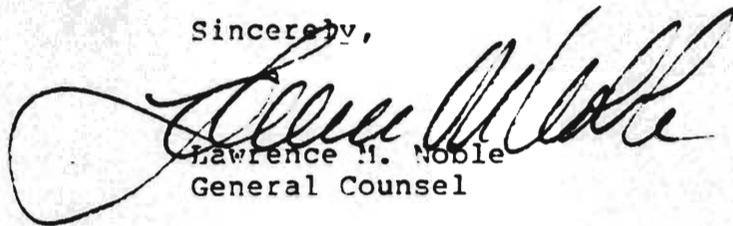
Dear Mr. Brannon:

On November 6, 1987, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(iii), a provision 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 Delanie D. Painter, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

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GCC#4580

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
87 OCT 19 AM 10:37

In the Matter of)	
)	
Columbia Savings and Loan)	MUR 2392
Association Federal Political)	
Contribution Fund and)	
Karen Zavis, 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 Columbia Savings and Loan Association Federal Political Contribution Fund and Karen Zavis, as treasurer ("Respondents") violated 2 U.S.C. § 434(a)(4)(A)(iii).

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, Columbia Savings and Loan Association Federal Political Contribution Fund, is a political committee

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within the meaning of 2 U.S.C. § 431(4).

2. Respondent, Karen Zavis, is the treasurer of Columbia Savings and Loan Association Federal Political Contribution Fund.

3. Respondents did not file the 1986 Post-General Report. Respondents contend that their failure to file this report was not knowing and willful.

4. Respondents filed the 1986 Year-End Report on January 30, 1987.

5. The 1986 Year-End Report covered the period required to be disclosed on both the 1986 Post-General Election Report and the 1986 Year-End Report. Thus, the information required on the 1986 Post-General Election Report was submitted 57 days late.

6. According to 2 U.S.C. § 434(a)(4)(A)(iii), political committees other than authorized committees of a candidate shall file a post-general election report no later than the 30th day after the general election.

7. Since the Committee registered with the Commission, it has filed all required reports other than the 1986 Post-General Report in a timely manner.

V. Respondents failed to file the 1986 Post-General Report in a timely manner in violation of 2 U.S.C. § 434(a)(4)(A)(iii).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Five Hundred Dollars (\$500.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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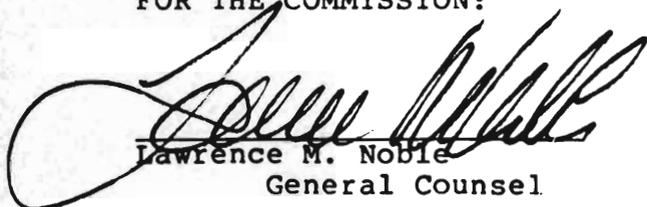
VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute 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 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. Noble
General Counsel

11/10/87
Date

FOR THE RESPONDENTS:


Karen Zavis
Treasurer

October 13, 1987
Date

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2392

DATE FILMED 2/25/88 CAMERA NO. 4

CAMERAMAN GPC

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