



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2460
DATE FILMED 3/30/88 CAMERA NO. 4
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88040690348



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

9 March 1987

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 HOLLYWOOD WOMEN'S POLITICAL
COMMITTEE

This is a referral of the Hollywood Women's Political Committee ("the Committee") for receiving two apparent excessive contributions totalling \$20,000 in the form of bank loan guarantees.

If you have any questions regarding this matter, please contact Andrew Dodson at 376-2480.

Attachment

98040690349

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 9 March 1987

ANALYST: Andrew Dodson

I. COMMITTEE: Hollywood Women's Political
Committee (C00188979)
Bonnie Reiss, Treasurer
2029 Century Park East, Suite 600
Los Angeles, CA 90067

II. RELEVANT STATUTE: 2 U.S.C. §441a(f)

III. BACKGROUND:

Receipt of Apparent Excessive Contributions

The Hollywood Women's Political Committee ("the Committee") filed a 1986 October Quarterly Report that disclosed the receipt of a \$30,000 loan on August 18, 1986 from Western Bank of Los Angeles. The report listed Marilyn Bergman and Paula Weinstein as the guarantors of the loan, but did not list the amounts guaranteed by each (Attachment 2).

The Committee's 1986 12 Day Pre-General Report disclosed the full repayment of the loan on October 14, 1986 (Attachment 3).

On November 19, 1986, the Reports Analysis Division ("RAD") sent a Request for Additional Information ("RFAI") noting that the Committee may have received excessive contributions in the form of bank loan guarantees and advising the Committee that although the Commission may take further legal action, the prompt refunding of the apparent excessive contributions would be taken into consideration (Attachment 4). In addition, the RFAI requested the full identification of each guarantor and the amount guaranteed by each.

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**HOLLYWOOD WOMEN'S POLITICAL COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2**

On December 11, 1986, RAD sent a Second Notice stating that although the Committee had repaid the loan, it still had not provided the full identification of the guarantors of the loan and a copy of the repayment check (Attachment 5).

On December 15, 1986, the Committee filed an amendment to the 1986 October Quarterly Report that included the full identification of the guarantors, Marilyn Bergman and Paula Weistein. Each had guaranteed \$15,000 of the loan (Attachment 6).

On January 6, 1987, the treasurer of the Committee, Ms. Bonnie Reiss, called the RAD analyst to find out if the Committee's response had been sufficient. The RAD analyst told her that the Committee needed to send a copy of the repayment check (Attachment 7).

On January 9, 1987, the Committee filed an amendment that included a photocopy of a Western Bank statement detailing the October 14, 1986 repayment of the loan (Attachment 8).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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

DATE 4MAR87
PAGE 1

NON-PARTY RELATED

Attachment 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
HOLLYWOOD WOMEN'S POLITICAL COMMITTEE CONNECTED ORGANIZATION: VOICES FOR CHANGE				NON-PARTY QUALIFIED		ID #C00188979
1985	APRIL QUARTERLY	2,654	2,330	1JAN85 -31MAR85	7	85FEC/370/3765
	APRIL QUARTERLY - AMENDMENT	2,654	2,330	1JAN85 -31MAR85	4	87FEC/455/2722
	MID-YEAR REPORT	1,354	6,619	1APR85 -30JUN85	6	85FEC/381/2926
	MID-YEAR REPORT - AMENDMENT	1,354	6,733	1APR85 -30JUN85	4	87FEC/455/2726
	OCTOBER QUARTERLY	22,511	9,973	1JUL85 -30SEP85	7	85FEC/389/0886
	OCTOBER QUARTERLY - AMENDMENT	22,848	10,403	1JUL85 -30SEP85	9	87FEC/455/2730
	YEAR-END	14,993	25,999	1OCT85 -31DEC85	9	86FEC/394/5303
	YEAR-END - AMENDMENT	14,993	19,999	1OCT85 -31DEC85	9	86FEC/395/5379
	YEAR-END - AMENDMENT	14,903	20,011	1OCT85 -31DEC85	5	87FEC/455/2739
1986	STATEMENT OF ORGANIZATION - AMENDMENT			27AUG86	2	86FEC/429/3453
	STATEMENT OF ORGANIZATION - AMENDMENT			23SEP86	2	86FEC/431/4238
	APRIL QUARTERLY	12,305	26,464	1JAN86 -31MAR86	8	86FEC/410/2502
	APRIL QUARTERLY - AMENDMENT	12,305	26,528	1JAN86 -31MAR86	3	87FEC/453/4825
	JULY QUARTERLY	21,678	20,695	1APR86 -30JUN86	11	86FEC/420/4960
	JULY QUARTERLY - AMENDMENT	21,678	20,695	1APR86 -30JUN86	4	86FEC/430/1924
	JULY QUARTERLY - AMENDMENT	22,534	20,723	1APR86 -30JUN86	9	86FEC/445/0869
	REQUEST FOR ADDITIONAL INFORMATION			1APR86 -30JUN86	1	86FEC/426/1107
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR86 -30JUN86	2	86FEC/428/3405
	REQUEST FOR ADDITIONAL INFORMATION			1APR86 -30JUN86	1	86FEC/443/4404
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR86 -30JUN86	2	86FEC/445/1476
	OCTOBER QUARTERLY	71,088	59,114	1JUL86 -30SEP86	30	86FEC/436/0585
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL86 -30SEP86	4	86FEC/451/2164
	OCTOBER QUARTERLY - AMENDMENT	71,078	59,170	1JUL86 -30SEP86	3	87FEC/453/4822
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL86 -30SEP86	3	87FEC/453/2470
	REQUEST FOR ADDITIONAL INFORMATION			1JUL86 -30SEP86	3	86FEC/444/3705
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL86 -30SEP86	2	86FEC/451/0501
	PRE-GENERAL	244,664	48,299	1OCT86 -15OCT86	69	86FEC/439/3224
	PRE-GENERAL - AMENDMENT	244,208	48,299	1OCT86 -15OCT86	5	87FEC/453/4813
	REQUEST FOR ADDITIONAL INFORMATION			1OCT86 -15OCT86	1	86FEC/450/5372
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT86 -15OCT86	2	87FEC/452/3611
	POST-GENERAL	61,259	169,970	16OCT86 -24NOV86	52	86FEC/448/5220
	POST-GENERAL - AMENDMENT	61,588	169,995	16OCT86 -24NOV86	11	87FEC/455/2697
	1'ST LETTER INFORMATIONAL NOTICE			16OCT86 -24NOV86	1	87FEC/453/2615
	YEAR-END	10,551	25,384	25NOV86 -31DEC86	13	87FEC/460/2276
	1'ST LETTER INFORMATIONAL NOTICE			25NOV86 -31DEC86	3	87FEC/461/4990
	TOTAL	464,023	0 389,576	0	307	TOTAL PAGES

All reports have been reviewed.
Ending cash on hand as of 12/31/86: \$92,547.28
Total debts and obligations owed TO the Committee as of 12/31/86: \$0
Total debts and obligations owed BY the Committee as of 12/31/86: \$0

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SCHEDULE C
(Revised 2/85)

LOANS

Page 1 of 1
LINE NUMBER 12
(Use separate schedules for each numbered line)

Name of Contributor (in Full) HOLLYWOOD WOMEN'S POLITICAL COMMITTEE			
A. Full Name, Mailing Address and ZIP Code of Loan Source WESTERN BANK 1871 LANTANA BLVD. LOS ANGELES, CA 90024		Original Amount of Loan 20000	Balance Outstanding at Close of This Period 20000
Station: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Terms: Date Incurred <u>1/1/86</u> Date Due <u>12/31/86</u> Interest Rate <u>7.75</u> (SAPR) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item A MARY S. GREGORY			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding 0	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding 0	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding 0	
B. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Balance Outstanding at Close of This Period
Station: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ (SAPR) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding 0	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding 0	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding 0	
SUBTOTALS This Period This Page (optional)			
TOTALS This Period (fill page in this line only)			

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Carry outstanding balance only to LINE 2, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

SCHEDULE C
(Revised 2/83)

LOANS

Page 1 of 1 by
LOAN NUMBER 13
Use address schedule
for each numbered line

Name of Committee (or Full)			
HOLLYWOOD WOMEN'S POLITICAL COMMITTEE			
A Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payments To Date	Balance Outstanding at Close of This Period
WESTERN BANK 1851 WESTWOOD BL LOS ANGELES, CA 90024	39000	39000.	0.
Election <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			
Terms Date Incurred <u>8/14/76</u> Date Due <u>10/31/76</u> Interest Rate <u>7.92</u> (Rate) <input type="checkbox"/> Secured			
Let All Endorsers or Guarantors (if any) to Item A			
MAYRA GARCIA WESTWOOD			
1 Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding:		
	\$		
2 Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding:		
	\$		
3 Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding:		
	\$		
B Full Name, Mailing Address and ZIP Code of Loan Source			
Election <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			
Terms Date Incurred _____ Date Due _____ Interest Rate _____ (Rate) <input type="checkbox"/> Secured			
Let All Endorsers or Guarantors (if any) to Item B			
1 Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding:		
	\$		
2 Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding:		
	\$		
3 Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding:		
	\$		
SUBTOTALS This Period This Page (optional)			
TOTALS This Period (last page in this two only)			

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Use address schedule for each numbered line. If no Schedule D carry forward to appropriate line of Summary

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule for each category of the Detailed Summary Page

PAGE 109
FOR LINE NUMBER 24

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes other than using the name and address of any political committee to solicit contributions from such committee

NAME OF COMMITTEE (in Full)

HOLLY WOOD WOMENS POLITICAL COMMITTEE

A Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
WESTERN BANK 1251 WESTWOOD BL. LAS ANGELES, CA 90024	PAY OFF COMM. LOAN Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-14-86	30,000.
B Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
C Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
D Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
E Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
F Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
G Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
H Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
I Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		

SUBTOTAL Disbursements This Page (optional)

32000

TOTAL Disbursements (see page 1 for line number only)

34000



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

NOV 19 .

Bonnie M. Reiss, Treasurer
Hollywood Women's Political
Committee
2029 Century Park East, Suite 600
Los Angeles, CA 90067

Identification Number: C00188979

Reference: October Quarterly Report (7/1/86-9/30/86)

Dear Ms. Reiss:

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:

-Schedule C discloses a loan from Western Bank in the amount of \$30,000. In instances where the loan has endorsers or guarantors, the following information must be supplied: (1) the identification of each endorser or guarantor; and (2) the amount of endorsement or guarantee outstanding at the close of the reporting period. The term "identification" means (a) in the case of an individual, his or her full name, mailing address, occupation, and name of employer; and (b) in the case of any other person, the person's full name and address. 11 CFR 100.7(a)(1)(i)(C) and 104.3(a)(4)(iv).

-Your report discloses a contribution which appears to exceed the limitations of 2 U.S.C. §441a (pertinent portion(s) attached). A loan, endorsement, or guarantee is included in the definition of a contribution under 2 U.S.C. §431(8)(A) and 11 CFR 100.7(a)(1)(i). If you have received a contribution that exceeds the limits, the Commission recommends that you repay the excess amount. Please inform the Commission immediately in writing and provide a photocopy of your repayment check. Any repayment should be disclosed on a supporting Schedule B for Line 24 of your next report.

Alternatively, you may obtain additional endorsers or guarantors. To the extent that this requires renegotiation of the outstanding loan or execution of a

DR

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new note, please inform the Commission in writing and identify any additional endorsers/guarantors (including the amount(s) endorsed by each). Furthermore, any new or renegotiated loan should be disclosed on Schedule C of your next report.

If the contribution(s) in question was incorrectly reported and/or you have additional information, you may wish to submit documentation for the public record.

Although the Commission may take further legal steps concerning the acceptance of an excessive contribution in the form of a loan, endorsement or guarantee, your prompt action will be taken into consideration.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission 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,



Bill Baber
Reports Analyst
Reports Analysis Division

83040690357



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-3

December 11, 1986

Bonnie M. Reiss, Treasurer
Hollywood Women's Political
Committee
2029 Century Park East, Suite 600
Los Angeles, CA 90067

Identification Number: C00188979

Reference: October Quarterly Report (7/1/86-9/30/86)

Dear Ms. Reiss:

On November 19, 1986, you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

The Commission notes your repayment of the \$30,000 loan from Western Bank on October 14, 1986. However, you have not provided all of the requested information. For this response to be considered adequate, the following information is still required.

-Schedule C discloses a loan from Western Bank in the amount of \$30,000. In instances where the loan has endorsers or guarantors, the following information must be supplied: (1) the identification of each endorser or guarantor; and (2) the amount of endorsement or guarantee outstanding at the close of the reporting period. The term "identification" means (a) in the case of an individual, his or her full name, mailing address, occupation, and name of employer; and (b) in the case of any other person, the person's full name and address. 11 CFR 100.7(a)(1)(i)(C) and 104.3(a)(4)(iv).

-Please provide a photocopy of your repayment check to Western Bank. *DR*

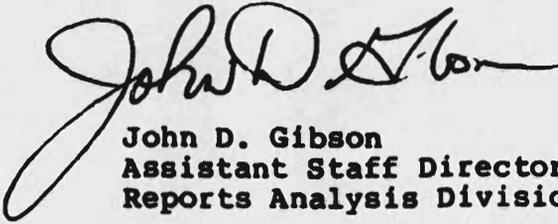
Although the Commission may take further legal steps concerning the acceptance of an excessive contribution in the form of a loan, endorsement or guarantee, your prompt action will be taken into consideration.

If this information is not received by the Commission within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

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If you should have any questions related to this matter, please contact Bill Baber on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,



John D. Gibson
Assistant Staff Director
Reports Analysis Division

38040690359

RECEIVED AT THE FEC

86 DEC 15 AM: 00

LAW OFFICES
HOWARD, RING & CHEEVER
A PROFESSIONAL CORPORATION

10000 WILSHIRE BOULEVARD, SUITE 2100
LOS ANGELES, CALIFORNIA 90024
TELEPHONE (213) 478-3022

GERALD M. CHEEVER
DOUGLAS R. RING
ROBERT M. HOWARD
PAUL S. ADLER
GLEN L. HULIN
BENT V. MOUTON
MARTINE E. SAPPAN
STEPHEN L. SPECTOR
KEITH E. THOMAS
RALPH M. WEISS
ALAN G. BAUER

TELEX
126000
RAP MAIL
(213) 477-0800
TELESCOPE
(213) 473-3000

OUR FILE NUMBER

OF COUNSEL
BONNIE M. REISS

December 11, 1986

Mr. Bill Baber
Reports Analyst
Federal Election Commission
Washington, D.C. 20463

Re: October Quarterly Report (7/1/86-9/30/86)

Dear Bill,

I have enclosed the amendment to the above-referenced report, which includes details on the guarantors of our \$30,000.00 loan.

The loan was fully paid off on October 14, 1986, so I do not think we will have a problem with the guarantors giving excessive contributions. If you have any additional questions please contact me at my office (213) 478-3022.

Thanks for all of your help!

Sincerely,

Bonnie Reiss
Bonnie Reiss

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12151

SCHEDULE C
(Revised 3/88)

LOANS

Page 1 of 1 for
LINE NUMBER 10
(Use separate schedules
for each numbered line)

Name of Committee (in Full) HOLLYWOOD WOMEN'S POLITICAL COMMITTEE			
A. Full Name, Mailing Address and ZIP Code of Loan Source: Western Bank 1251 Westwood Blvd. Los Angeles, CA	Original Amount of Loan 30,000	Cumulative Payments To Date	Balance Outstanding at Close of This Period 30,000
Election: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Terms: Date Incurred <u>9/18/85</u> Date Due <u>10/3/86</u> Interest Rate <u>7.92</u> % (Apr) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item A: Marilyn Bergman			
1. Full Name, Mailing Address and ZIP Code: Marilyn Bergman 714 N. Maple Beverly Hills, CA	Name of Employer self		
	Occupation Songwriter/composer		
	Amount Guaranteed Outstanding \$15,000		
2. Full Name, Mailing Address and ZIP Code: Paula Weinstein 1422 Capri Drive Pacific Palisades, CA	Name of Employer WW Productions		
	Occupation Film Producer		
	Amount Guaranteed Outstanding \$15,000		
3. Full Name, Mailing Address and ZIP Code:	Name of Employer:		
	Occupation:		
	Amount Guaranteed Outstanding \$		
B. Full Name, Mailing Address and ZIP Code of Loan Source			
		Original Amount of Loan	Balance Outstanding at Close of This Period
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (Apr) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item B:			
1. Full Name, Mailing Address and ZIP Code:	Name of Employer:		
	Occupation:		
	Amount Guaranteed Outstanding \$		
2. Full Name, Mailing Address and ZIP Code:	Name of Employer:		
	Occupation:		
	Amount Guaranteed Outstanding \$		
3. Full Name, Mailing Address and ZIP Code:	Name of Employer:		
	Occupation:		
	Amount Guaranteed Outstanding \$		
SUBTOTALS This Period This Page (optional):			
TOTALS This Period (last page in this line only):			
Carry outstanding balance only to LINE 3, Schedule D for this line. If no Schedule D, carry forward to appropriate line of Summary.			

1512155

MEMORANDUM TO THE FILES:

COMMITTEE: HOLLYWOOD WOMEN'S POLITICAL COMMITTEE
I.D. NUMBER: CO0188979
CONTACT: Bonnie Reiss
DATE: January 6, 1987
ANALYST: Bill Baber
SUBJECT: Follow up to her response to the Second Notice

Bonnie Reiss called me today to follow up on her response to the Second Notice she received for the 1986 October Quarterly Report. She asked me if her response had been sufficient.

I told Bonnie that she needed to send a copy of her repayment check to Western Bank.

8 9 7 4 0 6 9 0 3 6 2

WESTERN BANK
HEAD OFFICE
1251 WESTWOOD BLVD
LOS ANGELES, CA. 90024



2002-1	10339	11 12 86	0.00
6.500% ABOVE BASE RATE			
TRAN CODE	ENTRY DATE	PREPARED BY	BANK USE ONLY

HOLLYWOOD WOMEN'S POL.COMM
2029 CENTURY PK EAST
SUITE 8 600
LOS ANGELES, CA 90067

BALANCE DUE .00
INTEREST DUE .00
TOTAL .00 * ← PAY THIS AMOUNT

THE ABOVE DESCRIBED NOTE IS DUE ON THE DATE INDICATED.
PLEASE PRESENT THIS NOTICE WITH YOUR PAYMENT.

SUBJECT TO RATE CHANGE

20,600.00	20,371.09	371.09	30,000.00	.00
INTEREST PAID TO 10 16 86				
37 7 3 4 5	LOST # 091 840341 NOTE # U9339 30,000.00 INTEREST RATE CHANGED FROM 8.500 TO 8.000 30,000.00- .00 371.09- 371.09			.00 30,000.00 .00 .00

SEP 1978 REV 5.75

RECEIVED AT THE FCC
Attachment 8
(Page 1 Of 2)
JAN 9 1967

LAW OFFICES
HOWARD KING & CHISSEVER
A PROFESSIONAL CORPORATION

10000 WILSHIRE BOULEVARD, SUITE 2000
LOS ANGELES, CALIFORNIA 90024
TELEPHONE (213) 470-2000

GERALD R. CHISSEVER
DOUGLAS R. KING
ROGER H. HOWARD
PAUL S. ADLER
GLEN L. BULIN
BENT V. BOLTON
MARTINE E. SAFFRAN
STEPHEN L. SPECTOR
BETH E. THOMAS
RALPH H. WEISS
ALAN G. SALEY

TELETYPE
213-470-2000
FAX MAIL
(213) 470-2000
TELESCOPE
(213) 470-2000
OUR FILE NUMBER

OF COUNSEL
BONNIE M. REISS

January 6, 1967

Mr. Bill Baber
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

Re: Hollywood Womens Political Committee

Dear Mr. Baber:

Pursuant to your telephone conversation with Bonnie Reiss this afternoon, enclosed please find a copy of the proof of repayment concerning the \$30,000.00 loan in regards to the above-referenced organization.

If you should need any further assistance, please do not hesitate to call our offices. Thanks again for your cooperation.

Sincerely yours,

Michelle R. King

Michelle R. King
Legal Assistant to Bonnie Reiss

970A03920437614

WESTERN BANK
HEAD OFFICE
3251 WESTWOOD BLVD
LOS ANGELES, CA. 90024



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0.0000 ABOVE BASE RATE

TRAN CODE	ENTRY DATE	PREPARED BY	BANK USE ONLY
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HOLLYWOOD WOMEN'S POL.COMM
2029 LANTARY PK EAST
SUITE # 600
LOS ANGELES, CA 90067

BALANCE DUE .00
INTEREST DUE .00
TOTAL .00 * PAY THIS AMOUNT

THE ABOVE DESCRIBED NOTE IS DUE ON THE DATE INDICATED
PLEASE PRESENT THIS NOTICE WITH YOUR PAYMENT.

SUBJECT TO RATE CHANGE

30,000.00	30,371.09	371.09	30,000.00	.00
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INTEREST PAID TO 10 16 86

377345	LIST #	691 340341 NOTE # U9339		.00
	19 06	30,000.00		30,000.00
	20 06	INTEREST RATE CHANGED FROM 8.500 TO 8.000		
	10 86	30,000.00-	.00	30,000.00-
	10 86	371.09-	371.09	.00

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SENSITIVE

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

FIRST GENERAL COUNSEL'S REPORT

RAD Ref. 87L-6
STAFF MEMBER
Jonathan Levin

87 MAR 1
p 4: 15

SOURCE OF MUR: INTERNALLY GENERATED

**RESPONDENTS: Hollywood Women's Political Committee
Bonnie Reiss, as treasurer**

Paula Weinstein

Marilyn Bergman

**RELEVANT STATUTORY
SECTIONS AND
REGULATIONS:**

- 2 U.S.C. § 431(8)(A)(i)
- 2 U.S.C. § 441a(a)(1)(C)
- 2 U.S.C. § 441a(f)
- 11 C.F.R. § 100.7(a)(1)(i)(A)
- 11 C.F.R. § 100.7(a)(1)(i)(B)
- 11 C.F.R. § 100.7(a)(1)(i)(C)

**INTERNAL REPORTS
CHECKED:**

Public Records

**FEDERAL AGENCIES
CHECKED:**

None

GENERATION OF MATTER

The Hollywood Women's Political Committee ("the Committee") was referred by the Reports Analysis Division to the Office of the General Counsel for the apparent receipt of excessive contributions in the form of loan endorsements by Paula Weinstein and Marilyn Bergman.

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FACTUAL AND LEGAL ANALYSIS

The 1986 October Quarterly Report of the Hollywood Women's Political Committee disclosed the receipt of a \$30,000 loan on August 18, 1986, from Western Bank of Los Angeles. The report listed Marilyn Bergman and Paula Weinstein as the endorsers without listing the amount endorsed by each. On December 15, 1986, the Committee filed an amended October Quarterly Report listing Mrs. Bergman and Ms. Weinstein as each endorsing \$15,000.

The Committee's 1986 12 Day Pre-General Report disclosed the full repayment of the loan on October 14, 1986. On January 9, 1987, the Committee sent an amendment that included a photocopy of a statement from the Western Bank detailing the repayment of the loan.

The reports of the Committee indicate that, as of August 18, 1986, Paula Weinstein had made a total of \$3,014.99 in non-loan contributions to the Committee. She made no further non-loan contributions during the time that the loan was outstanding.

The reports of the Committee also indicate that, as of August 18, 1986, Marilyn Bergman had made a total of \$1,100 in non-loan contributions to the Committee. The reports indicate that Mrs. Bergman made further contributions while the loan was outstanding. On October 7, 1986, she and her husband made a joint contribution of \$650; \$325 may be attributable to Mrs. Bergman. In addition, the Committee's Pre-General Report

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discloses a disbursement on October 8, 1986, of \$880 to Mrs. Bergman with the notation "Reimb. Streisand Gift." If this was for a gift to be presented to Barbara Streisand at the fundraiser for the Committee held at her estate on September 6, 1986, then the money paid by Mrs. Bergman may have been an advance made in early September, 1986, and, thus, a contribution according to 2 U.S.C. § 431(8)(A)(i). It appears, therefore, that while the loan was outstanding, Mrs. Bergman had made non-loan contributions totalling \$2,205.

Section 441a(a)(1)(C) states that no person shall make contributions exceeding \$5,000 to a political committee, other than a principal campaign committee or a national party committee, during a calendar year. Section 441a(f) prohibits the knowing acceptance of contributions exceeding the limits of 2 U.S.C. § 441a. According to 2 U.S.C. § 431(8)(A)(i), a loan is a contribution and, according to 11 C.F.R. 100.7(a)(1)(i), "the term 'loan' includes a guarantee, endorsement, and any other form of security." Section 100.7(a)(1)(i) at subsections (A) and (B) states as follows:

(A) A loan which exceeds the contribution limitations of 2 U.S.C. § 441a and 11 C.F.R. Part 110 shall be unlawful whether or not it is repaid.

(B) A loan is a contribution at the time it is made and is a contribution to the extent that it remains unpaid. The aggregate amount loaned to a candidate or committee by a contributor, when added to other contributions from that individual to that candidate or committee, shall not exceed the contribution limitations set forth at 11 C.F.R. Part 110. A loan, to the extent it is repaid, is no longer a contribution.

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Section 100.7(a)(1)(i)(C) provides that each endorser or guarantor shall be deemed to have contributed that portion of the total amount of the loan for which he or she agreed to be liable on the agreement, or, in the absence of such written stipulation, the loan shall be considered a loan by each endorser or guarantor in the proportion that they each bear to the total number of endorsers or guarantors. In the present instance, it appears from the Committee's reporting of each person as a guarantor of \$15,000 that the loan note contained their signatures without a written stipulation as to the proportion being guaranteed by each.

The reports of the Committee indicate, therefore, that, while the loan was outstanding, Ms. Weinstein's contributions to the Committee totalled \$18,014.99. The reports also indicate that, during this period, Mrs. Bergman's contributions totalled \$16,100 as of August 18, \$16,980 as of early September, \$17,305 as of October 7, and \$16,425 as of October 8, 1986.

Based on the foregoing analysis, this Office recommends that the Commission open a Matter Under Review and find reason to believe that Paula Weinstein violated 2 U.S.C. § 441a(a)(1)(C), that Marilyn Bergman violated 2 U.S.C. § 441a(a)(1)(C), and that the Hollywood Women's Political Committee and Bonnie Reiss, as treasurer, violated 2 U.S.C. § 441a(f).

RECOMMENDATIONS

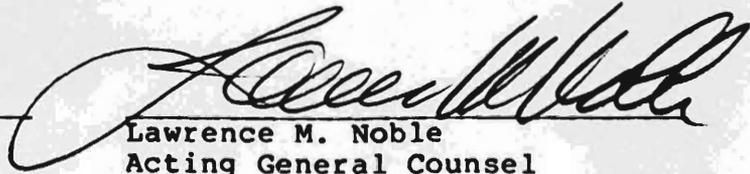
1. Open a Matter Under Review.
2. Find reason to believe that Paula Weinstein violated 2 U.S.C. § 441a(a)(1)(C).

98040690369

3. Find reason to believe that Marilyn Bergman violated 2 U.S.C. § 441a(a)(1)(C).
4. Find reason to believe that the Hollywood Women's Political Committee and Bonnie Reiss, as treasurer, violated 2 U.S.C. § 441a(f).
5. Approve the attached letters and Factual and Legal Analyses.

Date

2/1/87


Lawrence M. Noble
Acting General Counsel

Attachments

1. Referral from RAD
2. Proposed letter and Factual and Legal Analysis for the Committee.
3. Proposed letter and Factual and Legal Analysis for Paula Weinstein.
4. Proposed letter and Factual and Legal Analysis for Marilyn Bergman.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Hollywood Women's Political Committee)
Bonnie Reiss, as treasurer)

RAD Ref. 87L-6 (MUR 2460)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 4, 1987, the Commission decided by a vote of 6-0 to take the following actions in RAD Ref. 87L-6:

1. Open a Matter Under Review.
2. Find reason to believe that Paula Weinstein violated 2 U.S.C. § 441a(a)(1)(C).
3. Find reason to believe that Marilyn Bergman violated 2 U.S.C. § 441a(a)(1)(C).
4. Find reason to believe that the Hollywood Women's Political Committee and Bonnie Reiss, as treasurer, violated 2 U.S.C. § 441a(f).
5. Approve the letters and Factual and Legal Analyses, as recommended in the First General Counsel's Report signed June 1, 1987.

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

Attest:

June 4, 1987
Date

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

Received in Office of Commission Secretary: Mon., 6-01-87, 4:15
Circulated on 48 hour tally basis: Tues., 6-02-87, 11:00
Deadline for vote: Thurs., 6-04-87, 11:00

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 10, 1987

Paula Weinstein
1422 Capri Drive
Pacific Palisades, CA 90272

Re: MUR 2460
Paula Weinstein

Dear Ms. Weinstein:

On June 4, 1987, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(C), 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 you. 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 you, 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 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.

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Handwritten initials

Letter to Paula Weinstein
Page 2

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 Jonathan Levin, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,



Scott E. Thomas
Chairman

Enclosures

- Factual and Legal Analysis
- Procedures
- Designation of Counsel Form

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 10, 1987

Marilyn Bergman
714 N. Maple
Beverly Hills, CA 90210

Re: MUR 2460
Marilyn Bergman

Dear Mrs. Bergman:

On June 4, 1987, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(C), 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 you. 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 you, 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 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.

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Handwritten initials

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 Jonathan Levin, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,



Scott E. Thomas
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Plan

June 10, 1987

Bonnie Reiss, Treasurer
Hollywood Women's Political Committee
2029 Century Park East, Suite 600
Los Angeles, CA 90067

Re: MUR 2460
Hollywood Women's
Political Committee
Bonnie Reiss, as
treasurer

98040590370

Dear Ms. Reiss:

On June 4, 1987, the Federal Election Commission found that there is reason to believe the Hollywood Women's Political Committee ("the Committee") and you, as treasurer, violated 2 U.S.C. § 441a(f), 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 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.

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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 Jonathan Levin, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,



Scott E. Thomas
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form

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CCC #3744

WILMER, CUTLER & PICKERING

2445 M STREET, N. W.
WASHINGTON, D. C. 20037-1420

INTERNATIONAL TELEX: 440 239 WCPI UI
TELEX: 89-2402 WICRING WSH
TELEPHONE 202 663-6000

EUROPEAN OFFICE
4 CARLTON GARDENS
PALL MALL
LONDON, SW1Y 5AA, ENGLAND
TELEPHONE 011-441-839-4466
TELEX: 8813918 WCPLDN
TELCOPY: 839-3537
CABLE ADDRESS: WICRING LONDON

ROGER M. WITTEN
DIRECT LINE (202)
663-6170

June 29, 1987

BY HAND

Jonathan Levin, Esq.
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20436

37 JUN 29 4:31 PM '87

RECEIVED
GENERAL COUNSEL
FEDERAL ELECTION COMMISSION

Re: MUR 2460 -- Hollywood Women's Political Committee,
Bonnie Reese, Treasurer; Paula Weinstein; and
Marilyn Bergman

Dear Mr. Levin:

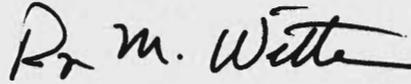
As I advised you in our telephone call on June 26, we have been retained by the Hollywood Women's Political Committee, Paula Weinstein, and Marilyn Bergman to represent them in connection with MUR 2460. I am enclosing Statements of Designation of Counsel from each of them.

On behalf of our clients, we respectfully request an extension of 20 days beyond the June 29 deadline until July 20 for responding to the MUR. As I explained on the phone, we were just retained on June 25. We will need some time to familiarize ourselves with the matter and to consult with our clients. I can see no prejudice to the Commission that could arise from the grant of this extension.

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I look forward to meeting you and working with you on this matter. As I mentioned, I will be at the Commission on another matter on Wednesday and will try to stop by to introduce myself.

Very truly yours,



Roger M. Witten

Enclosure

cc: Ms. Reese
Ms. Bergman
Ms. Weinstein

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STATEMENT OF DESIGNATION OF COUNSEL

MUR 2460

NAME OF COUNSEL: Roger Witten

ADDRESS: Wilmer Cutler & Pickering,
245 M. Street N.W.
Washington, D.C. 20037-1422

TELEPHONE: _____

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

June 25, 1987
Date

Paula Weinstein
Signature

RESPONDENT'S NAME: PAULA WEINSTEIN

ADDRESS: 1422 CARRI DRIVE.
PACIFIC PALISADES
CALIFORNIA 90272

HOME PHONE: 213-459-0338

BUSINESS PHONE: 213-280-6187

93040670390

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2460

NAME OF COUNSEL: ROGER WITTEN

ADDRESS: Wilmer, Cutler & Pickering
2445 "M" Street N.W.
Washington, D.C. 20037

TELEPHONE: 202-663-6000

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.

6/25/87
Date


Signature

RESPONDENT'S NAME: MARILYN BERGMAN

ADDRESS: 714 North Maple Drive
Beverly Hills, California 90210

HOME PHONE: 213- 276-3885

BUSINESS PHONE: _____

98040690381

STATEMENT OF DESIGNATION OF COUNSEL

MTR 2460

NAME OF COUNSEL: Roger Witten

ADDRESS: 2445 M Street, N.W.

Washington, D.C. 20037-1420

TELEPHONE: _____

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

6/25/87
Date

Bonnie Reiss
Signature

RESPONDENT'S NAME: Bonnie M. Reiss - Hollywood Women's Political
Committee

ADDRESS: 10960 Wilshire Boulevard

Suite 2100

Los Angeles, California 90024

HOME PHONE: (213) 396-4820

BUSINESS PHONE: (213) 478-3022

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Tulun



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 1, 1987

Roger M. Witten, Esquire
Wilmer, Cutler & Pickering
2445 M Street, N.W.
Washington, D.C. 20037-1420

RE: MUR 2460
Hollywood Women's Political
Committee, et al.

Dear Mr. Witten:

Pursuant to your request of June 29, 1987, this Office is granting a twenty-day extension of time for you to respond to the reason to believe notifications in the above-captioned matter. Your response is due, therefore, on July 20, 1987, as stated in your letter.

If you have any questions, please contact Jonathan Levin, the attorney assigned to this matter, at 376-5690.

Sincerely,

Lawrence M. Noble
Acting General Counsel

BY: Lois G. Lerner
Associate General Counsel

8 9 0 4 0 5 9 0 3 8 3

GCC 3958

WILMER, CUTLER & PICKERING

2445 M STREET, N. W.
WASHINGTON, D. C. 20037-1420

INTERNATIONAL TELEX: 440 239 WCPI UI
TELEX: 88-2402 WICRNG WSH
TELEPHONE 202 683-8000

EUROPEAN OFFICE
4 CARLTON GARDENS
PALL MALL
LONDON, SW1Y 5AA, ENGLAND
TELEPHONE 011-441-638-4466
TELEX: 8813918 WCPLDN .
TELECY: 838-3837
CABLE ADDRESS: WICRNG LONDON

ROGER M. WITTEN

DIRECT LINE (202)

663-6170

July 20, 1987

Jonathan Levin, Esq.
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Room 657
Washington, D.C.

Re: MUR 2460

Dear Mr. Levin:

Thank you for meeting with us on July 16. I write now, on behalf of our clients, the Hollywood Women's Political Committee ("HWPC"), Paula Weinstein, and Marilyn Bergman, to request an opportunity to engage in pre-probable cause conciliation with the Commission to resolve MUR 2460.

Assuming, without conceding, that the respondents violated 2 U.S.C. § 441a as alleged, the violations were unquestionably inadvertent, fully disclosed in HWPC's duly filed reports to the Commission, and quickly remedied once they were discovered. None of the respondents have previously violated the

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6/21/87

ED

FECA. All three now offer their fullest cooperation, so that this matter can be closed with little additional expenditure of the Commission's enforcement resources.

As you have acknowledged, the alleged violations plainly were not knowing or willful. This conclusion is readily inferrable from the fact that the loan and the guarantees were fully and promptly reported to the Commission and the further fact that there was no effort to conceal the loan or the guarantees. Moreover, HWPC makes every effort to comply with the FECA. Indeed, HWPC had counsel (other than ourselves) at the time of the loan guarantees, but apparently they escaped counsel's attention.

The amount of the allegedly excessive contributions is not large, and the alleged violation was of short duration. Although \$30,000 in loans were guaranteed, HWPC used only \$4,000-5,000 of the proceeds. HWPC repaid the entire amount within two months of receipt.

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Very truly yours,

Roger M. Witten
Roger Witten

cc: Hollywood Women's Political Committee
Marilyn Bergman
Paula Weinstein

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Hollywood Women's Political)	
Committee)	MUR 2460
Bonnie Reiss, as treasurer)	
)	
Paula Weinstein)	
)	
Marilyn Bergman)	

RECEIVED
 FEDERAL ELECTION COMMISSION
 NOV 11 1986

GENERAL COUNSEL'S REPORT

I. BACKGROUND

This matter involves allegations of the receipt by the Hollywood Women's Political Committee ("the Committee") of excessive contributions from Paula Weinstein and Marilyn Bergman. The Committee's 1986 October Quarterly Report disclosed the receipt of a \$30,000 loan from Western Bank of Los Angeles and listed Marilyn Bergman and Paula Weinstein as guarantors. An amended October Quarterly Report listed Mrs. Bergman and Ms. Weinstein as each guaranteeing \$15,000. The Committee's 1986 12 Day Pre-General Report disclosed that the loan was fully repaid on October 14, 1986.

Other 1986 reports of the Committee indicate that Mrs. Bergman and Ms. Weinstein each made non-loan contributions to the Committee as well. At the time that the loan was outstanding, Ms. Weinstein had already contributed \$3,014.99. At that time, Mrs. Bergman had already contributed \$2,305, \$880 of which was repaid before the repayment of the loan.

On June 4, 1987, the Commission found reason to believe that Mrs. Bergman and Ms. Weinstein each violated 2 U.S.C. § 441a(a)(1)(C) and that the Committee and Bonnie Reiss, as

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treasurer, violated 2 U.S.C. § 441a(f). On July 20, 1987, this Office received a letter from counsel for the respondents responding to the allegations and requesting pre-probable cause conciliation. (See Attachment 1.)

In his response, counsel states that the Committee is willing to resolve this matter by paying a \$500 civil penalty. Counsel states that, "without conceding" that violations were committed, "the violations were unquestionably inadvertent, fully disclosed in [the Committee's] duly filed reports to the Commission, and quickly remedied once they were discovered." Counsel states that none of the respondents has violated the Act previously and that "[a]ll three now offer their fullest cooperation."

Counsel asserts that the alleged violations are not large and were "of short duration." Counsel claims that, although \$30,000 in loans were guaranteed, the Committee "used only \$4,000 - 5,000 of the proceeds."

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III. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

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IV. RECOMMENDATIONS

1. Enter into conciliation prior to a finding of probable cause to believe with the Hollywood Women's Political Committee and Bonnie Reiss, as treasurer.
2. Enter into conciliation prior to a finding of probable cause to believe with Paula Weinstein.
3. Enter into conciliation prior to a finding of probable cause to believe with Marilyn Bergman.
4. Approve the attached proposed conciliation agreements and letters.

8/24/87
Date

Lawrence M. Noble (H7)
Lawrence M. Noble
Acting General Counsel

Attachments

1. Letter from counsel for respondents
2. Proposed letter and conciliation agreements

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Hollywood Women's Political) MUR 2460
Committee)
Bonnie Reiss, as treasurer)
Paula Weinstein)
Marilyn Bergman)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 27, 1987, the Commission decided by a vote of 4-0 to take the following actions in MUR 2460:

1. Enter into conciliation prior to a finding of probable cause to believe with the Hollywood Women's Political Committee and Bonnie Reiss, as treasurer, as recommended in the General Counsel's report signed August 24, 1987.
2. Enter into conciliation prior to a finding of probable cause to believe with Paula Weinstein, as recommended in the General Counsel's report signed August 24, 1987.
3. Enter into Conciliation prior to a finding of probable cause to believe with Marilyn Bergman, as recommended in the General Counsel's report signed August 24, 1987.
4. Approve the proposed conciliation agreements and letters, as recommended in the General Counsel's report signed August 24, 1987.

(continued)

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

Attest:

8-27-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Mon., 8-24-87, 4:32
Circulated on 48 hour tally basis: Tues., 8-25-87, 11:00
Deadline for vote: Thurs., 8-27-87, 11:00

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 28, 1987

Roger M. Witten, Esquire
Wilmer, Cutler & Pickering
2445 M Street, N.W.
Washington, D.C. 20037-1420

RE: MUR 2460
Hollywood Women's Political
Committee
Bonnie Reiss, as treasurer

Paula Weinstein

Marilyn Bergman

Dear Mr. Witten:

On June 4, 1987, the Federal Election Commission found reason to believe that the Hollywood Women's Political Committee violated 2 U.S.C. § 441a(f) and that Paula Weinstein and Marilyn Bergman each violated 2 U.S.C. § 441a(a)(1)(C). At your request, on August 27, 1987, the Commission determined to enter into negotiations directed toward reaching conciliation agreements in settlement of this matter prior to findings of probable cause to believe.

Enclosed are conciliation agreements that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreements, please have them sign and return them, along with the civil penalties, 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 Jonathan Levin, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble (L.M.N.)
Lawrence M. Noble
Acting General Counsel

Enclosure
Conciliation Agreements(3)

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plm

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RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

WILMER, CUTLER & PICKERING
2445 M STREET, N. W.
WASHINGTON, D. C. 20037-1420
87 NOV 31 PM 1:54

INTERNATIONAL TELEX: 440 239 WCPH UI
TELEX: 88-2402 WICRNG WSH
TELEPHONE 202 663-6000

EUROPEAN OFFICE
4 CARLTON GARDENS
PALL MALL
LONDON, SW1Y 5AA, ENGLAND
TELEPHONE 011-441-839-4466
TELEX: 8813918 WCPLON
TELECY: 839-3537
CABLE ADDRESS: WICRNG LONDON

ROGER M. WITTEN
DIRECT LINE (202)
663-6170

December 1, 1987

BY HAND

Jonathan Levin, Esq.
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2460 -- Hollywood Women's Political Committee,
Bonnie Reiss, Treasurer; Paula Weinstein; and
Marilyn Bergman

Dear Jon:

I enclose a copy of the Conciliation Agreement I received from the Commission with Lois Lerner's letter of November 4, 1987. I have signed it on behalf of all respondents. When Larry Noble has signed it for the Commission, please send me a copy as executed by both parties. We will send you a check for \$6,000 made out to "Federal Election Commission" within 30 days. I appreciate your cooperation in this matter.

Very truly yours,

Roger M. Witten

Enclosure

cc: Susan A. Grode, Esq. (w/enc.)

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RECEIVED
FEDERAL ELECTION COMMISSION

BEFORE THE FEDERAL ELECTION COMMISSION

87 DEC -9 PM 1:50

In the Matter of)
Hollywood Women's Political)
Committee)
Bonnie Reiss, as treasurer)
Paula Weinstein)
Marilyn Bergman)

MUR 2460

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

This matter involves allegations of the receipt by the Hollywood Women's Political Committee ("the Committee") of excessive contributions in the form of loan guarantees and non-loan contributions from Paula Weinstein and Marilyn Bergman. On June 4, 1987, the Commission found reason to believe that Ms. Weinstein and Mrs. Bergman each violated 2 U.S.C. § 441a(a)(1)(C) and that the Committee and Bonnie Reiss, as treasurer, violated 2 U.S.C. § 441a(f).

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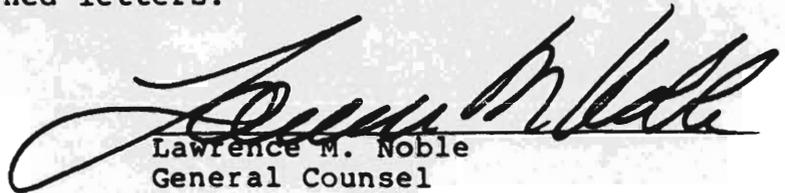
Based on the foregoing analysis, the Office of the General Counsel recommends the acceptance of the attached agreement and the closing of the file in this matter.

III. RECOMMENDATIONS

- 1. Accept the attached agreement.
- 2. Close the file.
- 3. Approve the attached letters.

Date

12/8/87


 Lawrence M. Noble
 General Counsel

Attachments

- 2. Proposed letter to counsel for the respondents

Staff: Jonathan Levin

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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 2 see 15

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
Hollywood Women's Political)	MUR 2460
Committee)	
Bonnie Reiss, as treasurer)	
)	
Paula Weinstein)	
)	
Marilyn Bergman)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on December 14, 1987, the Commission decided by a vote of 5-0 to take the following actions in MUR 2460:

1. Accept the agreement, as recommended in the General Counsel's report signed December 8, 1987.
2. Close the file.
3. Approve the letters, as recommended in the General Counsel's report signed December 8, 1987.

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

Attest:

12-14-87
Date

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

Received in the Office of Commission Secretary:	Wed.,	12-09-87,	1:50
Circulated on 48 hour tally basis:	Thurs.,	12-10-87,	11:00
Deadline for vote:	Mon.,	12-14-87,	11:00

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WILMER, CUTLER & PICKERING

2445 M STREET, N. W.
WASHINGTON, D. C. 20037-1420

INTERNATIONAL TELEX: 440 239 WCPI UI
TELEX: 89-2402 WICRING WSH
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LONDON, SW1Y 5AA, ENGLAND
TELEPHONE 011-441-639-4466
TELEX: 8613910 WCPLDN
TELCOPY: 830-3837
CABLE ADDRESS: WICRING LONDON

ROGER M. WITTEN
DIRECT LINE (202)
663-6170

December 16, 1987

BY HAND

Jonathan Levin, Esquire
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C.

Re: Hollywood Women's Political Committee - MUR 2460

Dear Jonathan:

I enclose herewith a check in the amount of \$6,000 from the Hollywood Women's Political Committee made out to the Federal Election Commission. The check is for a payment of the civil penalty imposed in connection with the Conciliation Agreement reached in MUR 2460. I have enclosed a form of receipt and would appreciate it if you would execute it and return it to me.

I have not yet received a copy of the Conciliation Agreement as signed by Larry Noble. Last week when I was at the Commission on another matter, Larry told me he had signed it. I would appreciate it if you would send it to me as promptly as possible.

Thank you for your cooperation.

Very truly yours,



Roger M. Witten

Enclosure

cc: Susan A. Grode, Esq.

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
87 DEC 17 AM 10:06

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HOLLYWOOD WOMEN'S POLITICAL COMMITTEE

1524

FEDERAL ACCOUNT
% BONNIE REISS
10960 WILSHIRE BLVD., STE. 2100
LOS ANGELES, CA 90024

12/4 19 87

16-3327-1222

PAY TO THE ORDER OF FEDERAL ELECTION COMMISSION

\$ 6,000.00

-----SIX THOUSAND AND no/100----- DOLLARS



WESTWOOD OFFICE
WESTERN BANK
1251 WESTWOOD BOULEVARD
LOS ANGELES, CALIFORNIA 90024

Bonnie Reiss
Maureen [Signature]

FOR FEC Penalty

⑈001524⑈ ⑆122233276⑆ 691⑈675793⑈

GCC#4955

MEMORANDUM

TO: DEBRA A. TRIMIEW

TO: CECILIA LIEBER

FROM: CECILIA LIEBER

FROM: DEBRA A. TRIMIEW

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
87 DEC 17 AM 10:06

CHECK NO. 1524 { A COPY OF WHICH IS ATTACHED } RELATING TO

MUR 2460 AND NAME Hollywood Women's Political Committee
(Levin)

WAS RECEIVED ON 12/17/87. 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 12/17/87

RELEASE

I hereby acknowledge receipt of a check in the amount of \$6,000 from Hollywood Women's Political Committee to the Federal Election Commission, which I have received in connection with MUR 2460 this _____ day of December, 1987.

Jonathan Levin

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

17 December 1987

Roger M. Witten, Esquire
Wilmer, Cutler & Pickering
2445 M Street, N.W.
Washington, D.C. 20037-1430

RE: MUR 2460
Hollywood Women's Political
Committee
Bonnie Reiss, as treasurer

Paula Weinstein

Marilyn Bergman

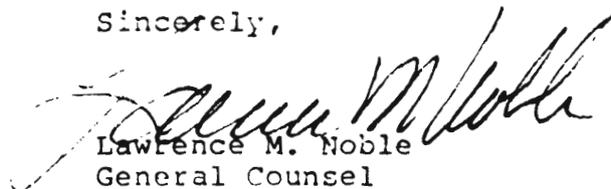
Dear Mr. Witten:

On December 14, 1987, the Federal Election Commission accepted the signed conciliation agreement submitted on behalf of your clients in settlement of violations of 2 U.S.C. § 441a(a)(1)(C) and 441a(f), 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 Jonathan Levin, the attorney assigned to this matter, at 202) 376-5690.

Sincerely,


Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

98040590403

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Hollywood Women's Political)	
Committee)	
Bonnie Reiss, as treasurer)	MUR 2460
)	
Paula Weinstein)	
)	
Marilyn Bergman)	

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 Respondents Hollywood Women's Political Committee and Bonnie Reiss, as treasurer, violated 2 U.S.C. § 441a(f), and that Respondents Paula Weinstein and Marilyn Bergman each violated 2 U.S.C. § 441a(a)(1)(C).

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:

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1. Respondent Hollywood Women's Political Committee ("the Committee") is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Respondent Bonnie Reiss is the treasurer of the Hollywood Women's Political Committee.

3. Respondents Paula Weinstein and Marilyn Bergman are persons under 2 U.S.C. § 431(11).

4. The Committee's 1986 October Quarterly Report disclosed that, on August 18, 1986, the Committee received a \$30,000 loan from Western Bank of Los Angeles. This loan was guaranteed in the amount of \$15,000 by Paula Weinstein and guaranteed in the amount of \$15,000 by Marilyn Bergman.

5. The Committee repaid the loan on October 14, 1986, before the Committee was notified by the Reports Analysis Division that the loan guarantees appeared to exceed the statutory limits.

6. Prior to October 14, 1986, the Committee received non-loan contributions totalling \$3,014.99 from Paula Weinstein in 1986.

7. Prior to October 14, 1986, the Committee received non-loan contributions totalling \$2,305 from Marilyn Bergman in 1986, \$880 of which was repaid on October 8, 1986.

8. Section 441a(a)(1)(C) of Title 2 states that no person shall make contributions to any political committee other than a candidate's authorized political committee or a national party committee which, in the aggregate in any calendar year,

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exceed \$5,000. Section 441a(f) of Title 2 prohibits a political committee from knowingly accepting a contribution made in violation of section 441a.

9. Section 431(8)(A)(i) of Title 2 states that the term "contribution" includes a loan. Section 100.7(a)(1)(i) of the Commission Regulations states that the term "loan" includes a guarantee, endorsement, and any other form of security. Section 100.7(a)(1)(i)(C) provides that each endorser or guarantor shall be deemed to have contributed that portion of the total amount of the loan for which he or she agreed to be liable in the written agreement, or, in the absence of such written stipulation, the loan shall be considered a loan by each endorser or guarantor in the proportion to the unpaid balance that each bears to the total number of endorsers or guarantors.

V. Respondents Hollywood Women's Political Committee and Bonnie Reiss, as treasurer, accepted contributions in excess of the limit of 2 U.S.C. § 441a(a)(1)(C) in the form of loan guarantees and non-loan contributions in violation of 2 U.S.C. § 441a(f). Respondents contend that this violation was not knowing and willful and that they did not conceal the loan transaction.

VI. Respondent Paula Weinstein contributed \$18,014.99 to the Committee in violation of 2 U.S.C. § 441a(a)(1)(C). Respondent Marilyn Bergman contributed \$17,305 to the Committee in violation of 2 U.S.C. § 441a(a)(1)(C). Respondents contend

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that these violations were not knowing and willful and that they did not conceal the loan transaction.

VII. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Six Thousand Dollars (\$6,000), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

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

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

XI. This Conciliation Agreement constitutes the entire agreement between the Commission and the Respondents on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by any party or by agents

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of any party, that is not contained in this written agreement,
shall be enforceable.

FOR THE COMMISSION:

Lawrence M. Noble
Lawrence M. Noble
General Counsel

12/17/87
Date

FOR THE RESPONDENTS:

R. M. Witten
(Name)
(Position)
Counsel for Respondents

December 1, 1987
Date

38040690408



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2460
DATE FILMED 3/30/88 CAMERA NO. 4
CAMERAMAN GRC

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