



FEDERAL ELECTION COMMISSION  
WASHINGTON DC 20463

THIS IS THE BEGINNING OF MUR # 2499  
DATE FILMED 4/13/88 CAMERA NO. 3  
CAMERAMAN AS

89040671165

PUBLIC RECORD INDEX - MUR 2499

1. Memo, 22 May 87, John D. Gibson (Report Analysis Division) to Lawrence M. Noble (Acting General Counsel), subj: Referral of Mountain Bell Political Action Committee, w/atch (RAD Referral Pkge).
2. First General Counsel's Report, 10 Jun 87.
3. Certification of Commission Action, 16 Jun 87.
4. Ltr, 29 Jun 87, Scott E. Thomas (Chairman, FEC) to William T. Danner (Treasurer, Mountain Bell PAC), w/atch (Factual and Legal Analysis).
5. Ltr, 15 Jul 87, Lane E. Hammond (Attorney for Respondent) to FEC, w/atch.
6. General Counsel's Report, 26 Aug 87.
7. Certification of Commission Action, 28 Aug 87.
8. Ltr, 31 Aug 87, L.M. Noble to L.E. Hammond.
9. General Counsel's Report, 13 Oct 87.
10. Certification of Commission Action, 16 Oct 87.
11. Ltr, 20 Oct 87, L.M. Noble to L.E. Hammond, w/encl. (extended 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.

89040671166



## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

May 22, 1987

MEMORANDUM

**TO:** LAWRENCE M. NOBLE  
ACTING GENERAL COUNSEL

**THROUGH:** JOHN C. SURINA  
STAFF DIRECTOR

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

**SUBJECT:** QUARTERLY FILERS (UNAUTHORIZED COMMITTEES) WHICH  
FAILED TO FILE THE 1986 12 DAY PRE-GENERAL REPORT  
BY ELECTION DAY

The attached list of unauthorized committees consists of forty-nine (49) quarterly filers which failed to file a 1986 12 Day Pre-General Report by Election Day, November 4, 1986. In accordance with Standard 3 of the RAD Review and Referral Procedures, further examination is required by your office.

Unlike the mandatory reporting requirement placed upon monthly filers, 2 U.S.C. §434(a)(4)(A)(ii) requires quarterly filers to submit 12 Day Pre-General Reports only if the committees make contributions to or expenditures on behalf of federal candidates involved in the general election. All unauthorized committees were sent prior notification regarding the pre- and post-general filing requirements on September 29, 1986 (Attachment 50).

The Party/Non-Party Branch conducted a thorough examination to identify quarterly filers disclosing contributions or expenditures between October 1 and October 15, 1986. The research revealed committees that submitted:

- a) 12 Day Pre-General Reports in an untimely manner;
- b) 30 Day Post-General Reports indicating that 12 Day Pre-General Reports should have been filed; and
- c) Year End Reports indicating that 12 Day Pre-General Reports should have been filed.

ATTACHMENT 1

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For your information, the pertinent supporting documentation on each committee has been arranged in alphabetical order. Statistics on all C indices only reflect activity through December 31, 1986. Any reports disclosing activity in 1987 have not been reviewed.

The following committees were previously referred either to your office or to the Audit Division for a possible 2. U.S.C. §438(b) audit.

8 9 0 4 0 6 7 1 1 5 8

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

Attachments

83040571169

C00087718

Mountain Bell Political Action  
Committee

87NF-119

/

**MOUNTAIN BELL POLITICAL ACTION COMMITTEE**

**(Attachments 34a - 34f)**

89040671170

/

8 8 0 4 0 5 7 1 1 7 1

FEDERAL ELECTION COMMISSION  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-86)DATE 5MAY87  
PAGE 1

| COMMITTEE   | DOCUMENT                              | RECEIPTS | DISBURSEMENTS | TYPE OF FILER<br>COVERAGE DATES | # OF<br>PAGES | MICROFILM<br>LOCATION |
|---|---------------------------------------|----------|---------------|---------------------------------|---------------|-----------------------|
| MOUNTAIN BELL POLITICAL ACTION COMMITTEE<br>CONNECTED ORGANIZATION: US WEST |                                       |          |               | NON-PARTY QUALIFIED             |               | ID #C00087718         |
| 1985  | STATEMENT OF ORGANIZATION - AMENDMENT |          |               | 5AUG85                          | 2             | 85FEC/384/1188        |
|   | MID-YEAR REPORT                       | 18,283   | 7,440         | 1JAN85 -30JUN85                 | 18            | 85FEC/382/0056        |
|   | YEAR-END                              | 24,152   | 10,271        | 1JUL85 -31DEC85                 | 22            | 86FEC/397/1503        |
|   | 1'ST LETTER INFORMATIONAL NOTICE      |          |               | 1JUL85 -31DEC85                 | 2             | 86FEC/404/2127        |
| 1986  | APRIL QUARTERLY                       | 13,920   | 11,755        | 1JAN86 -31MAR86                 | 13            | 86FEC/409/5323        |
|   | PRE-PRIMARY                           | 4,140    | 7,993         | 1APR86 - 7MAY86                 | 10            | 86FEC/416/3107        |
|   | PRE-PRIMARY                           | 485      | 1,750         | 8MAY86 -21MAY86                 | 6             | 86FEC/416/3117        |
|   | JULY QUARTERLY                        | 7,082    | 23,179        | 22MAY86 -30JUN86                | 11            | 86FEC/420/0009        |
|   | PRE-PRIMARY                           | 3,745    | 8,572         | 1JUL86 -23JUL86                 | 13            | 86FEC/426/1308        |
|   | PRE-PRIMARY                           | 3,747    | 9,346         | 24JUL86 -27AUG86                | 13            | 86FEC/429/4530        |
|   | OCTOBER QUARTERLY                     | 3,716    | 5,596         | 28AUG86 -30SEP86                | 12            | 86FEC/437/2215        |
|   | POST-GENERAL                          | 5,753    | 6,606         | 1OCT86 -24NOV86                 | 13            | 86FEC/450/5152        |
|   | YEAR-END                              | 10,921   | 255           | 25NOV86 -31DEC86                | 16            | 87FEC/456/4966        |
|   | TOTAL                                 | 95,944   | 0 92,763      | 0                               | 151           | TOTAL PAGES           |

All reports have been reviewed.  
Ending cash-on-hand as of 12/31/86: \$11,937  
Outstanding debts owed by the committee as of 12/31/86: \$0

REPORT OF RECEIPTS AND DISBURSEMENTS  
FOR MOUNTAIN BELL POLITICAL ACTION COMMITTEE  
(SUMMARY PAGE)

SECRET 401: 97

1. NAME OF COMMITTEE: MOUNTAIN BELL PAC  
ADDRESS: 1801 California Street  
SUITE 3040  
DENVER, CO. 80202

( ) CHECK IF NEW ADDRESS

2. FEC IDENTIFICATION NUMBER: 00007710

3. THIS COMMITTEE QUALIFIED AS A MULTICANDIDATE COMMITTEE  
DURING THIS REPORTING PERIOD ON 6/20/70.

4. TYPE OF REPORT: POST GENERAL REPORT 1966

AMENDMENT ( ) YES (X) NO

COVERING THE PERIOD FROM OCTOBER 1, 1966 THROUGH NOVEMBER 30, 1966.

CALENDAR  
THIS PERIOD YEAR-TO-DATE

|  |          |           |
|--|----------|-----------|
| 6. (A) CASH ON HAND JANUARY 1, 1966 .....      | REVENUE  | 20,070.01 |
| 7. (B) CASH AT BEGINNING OF PERIOD .....       | 2,120.00 | REVENUE   |
| (C) TOTAL RECEIPTS .....                       | 0,720.00 | 42,000.00 |
| (D) SUBTOTAL .....                             | 7,070.00 | 70,007.00 |
| 7. TOTAL DISBURSEMENTS .....                   | 6,000.00 | 70,707.00 |
| 8. CASH ON HAND AT CLOSE OF REPORTING PERIOD . | 1,070.00 | 1,070.00  |
| 9. DEBTS AND OBLIGATIONS OWED TO COMMITTEE ..  | 0.00     | 0.00      |
| 10. DEBTS AND OBLIGATIONS OWED BY COMMITTEE .. | 0.00     | 0.00      |

I CERTIFY THAT I HAVE EXAMINED THIS REPORT AND TO THE BEST OF MY  
KNOWLEDGE AND BELIEF IT IS TRUE, CORRECT, AND COMPLETE.

..... *J. Edgar Fox* ..... AGG'S TREASURER  
SIGNATURE: ..... J. Edgar Fox ..... DATE: 11/2/66

03040371172  
57152



DETAILED SUMMARY OF DISBURSEMENTS AND CONTRIBUTIONS  
(FDC FORM 28 (PAGE 2) - DISBURSEMENTS, 500.)

NAME OF COMMITTEE: MOUNTAIN BELL PAC

REPORT COVERING THE PERIOD FROM OCTOBER 1, 1966 THROUGH NOVEMBER 30, 1966.

II. DISBURSEMENTS

CALENDAR  
THIS PERIOD YEAR-TO-DATE

|  |          |           |
|--|----------|-----------|
| 19. OPERATING EXPENDITURES .....   | 0.00     | 26.00     |
| 20. TRANSFERS TO AFFILIATES .....  | 0.00     | 0.00      |
| 21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND ..<br>OTHER POLITICAL COMMITTEES ..... | 5,616.00 | 73,761.00 |
| 22. INDEPENDENT EXPENDITURES .....   | 0.00     | 0.00      |
| 23. COORDINATED EXPENDITURES BY PARTY COMM. ..                                     | 0.00     | 0.00      |
| 24. LOAN REPAYMENTS MADE .....   | 0.00     | 0.00      |
| 25. LOANS MADE .....   | 0.00     | 0.00      |
| 26. REFUNDS OF CONTRIBUTIONS TO:   |          |           |
| (A) INDIVIDUALS .....  | 990.00   | 990.00    |
| (B) POLITICAL PARTY COMMITTEES .....   | 0.00     | 0.00      |
| (C) OTHER POLITICAL COMMITTEES .....   | 0.00     | 0.00      |
| (D) TOTAL CONTRIBUTION REFUNDS .....   | 990.00   | 990.00    |
| 27. OTHER DISBURSEMENTS .....  | 0.00     | 0.00      |
| 28. TOTAL DISBURSEMENTS .....  | 6,606.00 | 74,797.00 |

III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES

|  |          |           |
|--|----------|-----------|
| 29. TOTAL CONTRIBUTIONS (LINE 11D) .....       | 5,753.00 | 42,855.00 |
| 30. TOTAL CONTRIBUTIONS REFUNDS (LINE 26D) ... | 990.00   | 990.00    |
| 31. NET CONTRIBUTIONS .....                    | 4,763.00 | 41,865.00 |
| 32. TOTAL OPERATING EXPENDITURES (LINE 19).... | 0.00     | 26.00     |
| 33. OFFSETS TO OPERATING EXPENDITURES(LINE 18) | 0.00     | 0.00      |
| 34. NET EXPENDITURES .....                     | 0.00     | 26.00     |

SCHEDULE B ITEMIZED DISBURSEMENTS

NAME OF COMMITTEE: MOUNTAIN BELL PAC

| NAME, ADDRESS AND ZIP CODE   | PURPOSE  | DATE     | AMOUNT    |
|--|--|----------|-----------|
| A. JIN SOLBE FOR U S CONGRESS<br>P O BOX 31568<br>TUCSON, AZ 85761<br>DONOR: MOUNTAIN BELL PAC<br>MOUNTAIN BELL PAC<br>MOUNTAIN BELL PAC | JIN SOLBE<br>U S HOUSE OF REPRESENTATIVES<br>AZ AYTD 3,000.00  |          |           |
|  | GENERAL 06   | 10/18/06 | 2,000.00  |
|  | GENERAL 06   | 10/30/06 | 2,000.00  |
|  |  | 10/31/06 | -2,000.00 |
| B. COMM TO RE-EL JIN HANSEN<br>P O BOX 684<br>FRANKINGTON, UT 84026<br>DONOR: MOUNTAIN BELL PAC  | JIN HANSEN<br>U S HOUSE OF REPRESENTATIVES<br>UT AYTD 3,500.00 |          |           |
|  | GENERAL 06   | 10/26/06 | 500.00    |
| C. JOHN MCCAIN FOR SENATE<br>P O BOX 710<br>PHOENIX, AZ 85001<br>DONOR: BRUCE D HAVENS   | JOHN MCCAIN<br>U S SENATE<br>AZ AYTD 3,065.00                  |          |           |
|  |  | 10/31/06 | 5.00      |
| D. RHODES FOR CONGRESS COMM<br>P O BOX 1361<br>MESA, AZ 85201<br>DONOR: MOUNTAIN BELL PAC  | JAY RHODES<br>U S HOUSE OF REPRESENTATIVES<br>AZ AYTD 2,000.00 |          |           |
|  | GENERAL 06   | 10/20/06 | 2,000.00  |
| E. COMM FOR TIM WIRTH INC<br>P O BOX 300399<br>DENVER, CO 80203<br>DONOR: JANIS STAHLNUT   | TIM WIRTH<br>U S SENATE<br>CO AYTD 25.00                       |          |           |
|  |  | 10/15/06 | 25.00     |

SUB-TOTAL THIS PAGE @ 4,530.00

TOTAL THIS PERIOD @ 5,616.00

RECEIVED

86 DEC 11

7693, 450 5164

CERTIFIED MAIL  
P 121 369 834

John Bell

6C 3080

01-9004

Public Records Office  
Federal Election Commission  
779 St. N.W.  
Washington, D.C. 20463

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

FIRST GENERAL COUNSEL'S REPORT

RAD REFERRALS: 87NF-86-134  
STAFF MEMBER: George F. Rishel

97 NOV 11 P12

SOURCE OF MUR: INTERNALLY GENERATED

88040571177

83040571178

Mountain Bell Political Action Committee and  
William T. Danner, as treasurer

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

**INTERNAL REPORTS CHECKED:** Referral Materials

**FEDERAL AGENCIES CHECKED:** None

**I. GENERATION OF MATTER**

The Report Analysis Division ("RAD") referred the above-listed 49 committees to the Office of the General Counsel on May 22, 1987. The basis of the attached referrals is their failure to either file a 12-day Pre-Election Report or file such report in a timely fashion.

**II. FACTUAL AND LEGAL ANALYSIS**

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that for unauthorized committees filing quarterly, such committees shall file a Pre-Election Report before any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election. Such report shall be filed no later than the 12th day before (or posted by registered or certified mail no later than the 15th day before) such election and shall be complete as of the 20th day before the election. 2 U.S.C. § 434(a)(4)(A)(ii).

The 1986 Pre-Election Report for the 1986 General Election was due on October 23, 1986, complete as of October 15, 1986. Quarterly

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filers were notified on September 29, 1986, of the requirement for filing the Pre-Election Report.

The following committees filed a 12-Day Pre-Election Report, but did not file it in a timely fashion:

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The following committees filed a 1986 Post-General Report that disclosed activity indicating a 12-Day Pre-Election Report should have been filed:

| <u>Committee</u> | <u>Date Filed</u> <sup>1/</sup> | <u>Pre-Election Activity</u> |
|------------------|---------------------------------|------------------------------|
|------------------|---------------------------------|------------------------------|

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<sup>1/</sup> The date filed is that on which the Post-General Election Report was filed. The number of days late is that for the filing of the 12-Day Pre-Election Report. In some cases, the Post-General Election Report was filed after December 4, 1986. The late filings of such reports, however, were not included as a basis for these referrals. Therefore, no recommendations have been made with respect to the late filing of any Post-General Election Report.

Mountain Bell PAC

12-8-86  
(46 days late)

\$2,025 in contributions  
to two candidates

88040571192

The following committees filed a Year End Report disclosing activity indicating that 12-Day Pre-Election Report should have been filed:

Accordingly, with regard to 48 of these 49 committees, the Office of the General Counsel recommends that the Commission open Matter Under Review and find reason to believe these committees

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**III. RECOMMENDATIONS**

1. Open Matters Under Review with respect to the following committees and find reason to believe the following committees and their treasurers violated 2 U.S.C. § 434(a)(4)(A)(ii):

8 3 0 4 0 5 7 1 1 8 4

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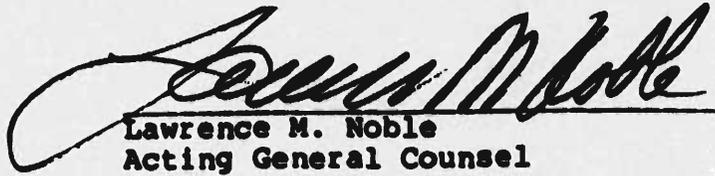
Mountain Bell Political Action Committee and William T.  
Danner, as treasurer

83040371185

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2. Approve and send the attached letters and factual and legal analyses to the respective committees listed in recommendation 1.
- 3.

6/10/57  
Date

  
Lawrence M. Noble  
Acting General Counsel

**Attachments**

1. Referral Materials
2. Letters and Factual and Legal Analyses (48)

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Federal Election Commission  
Certification for RAD Ref.'s 87NF-86  
through 87NF-134  
June 15, 1987

Page 2

33040671198

Mountain Bell Political Action Committee and  
William T. Danner, as treasurer

(continued)

3



Federal Election Commission  
Certification for RAD Ref.'s 87NF-86  
through 87NF-134  
June 15, 1987

Page 4

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Federal Election Commission  
Certification for RAD Ref.'s 87NF-86  
through 87NF-134  
June 15, 1987

Page 5

Mountain Bell Political Action Committee and William T. Danner,  
as treasurer

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2. Approve and send the letters and factual and legal analyses to the respective committees listed in recommendation 1.

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

Attest:

6-16-87  
Date

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

Received in Office of Commission Secretary: Thurs., 6-11-87, 12:34  
Circulated on 48 hour tally basis: Thurs., 6-11-87, 4:00  
Deadline for vote: Mon., 6-15-87, 4:00

33040571192



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 29, 1987

William T. Danner, Treasurer  
Mountain Bell Political Action Committee  
1801 California Street, Room 3040  
Denver, CO 80202

RE: MUR 2499  
Mountain Bell Political Action  
Committee and William T.  
Danner, as treasurer

Dear Mr. Danner:

On June 15, 1987, the Federal Election Commission found that there is reason to believe Mountain Bell Political Action Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The 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-

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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 will not ordinarily 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 Sandra Dunham, the staff member 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

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Mountain Bell Political Action Committee and William T. Danner, as treasurer MUR: 2499

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The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that for unauthorized committees filing quarterly, such committees shall file a Pre-Election Report before any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election. Such report shall be filed no later than the 12th day before (or posted by registered or certified mail no later than the 15th day before) such election and which shall be complete as of the 20th day before the election. 2 U.S.C. § 434(a)(4)(A)(ii).

The 1986 Pre-Election Report for the 1986 General Election was due on October 23, 1986, and complete as of October 15, 1986. Quarterly filers were notified on September 29, 1986, of the requirement for filing the Pre-Election Report. The committee filed a 1986 Post-General Election Report that disclosed \$2,025 in contributions to two candidates between October 1, 1986, and October 15, 1986. Thus, the committee was required to file a 12-Day Pre-Election Report by October 23, 1986, and complete as of October 15, 1986. The Committee did not file a report disclosing this activity until it filed its 1986 Post-General Election Report on December 8, 1986. Accordingly, the committee and its treasurer have violated 2 U.S.C. § 434(a)(4)(A)(ii).

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000# 3933  
RECEIVED AT THE FEC  
**HAND DELIVERED**  
07 JUL 16 09:32

**Mountain Bell**

Lane E. Hammond  
Attorney

1801 California Street  
Suite 5100  
Denver, Colorado 80202  
Phone (303) 896-2200

July 15, 1987

Sandra Dunham, Staff Member  
Office of the General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

FEDERAL EXPRESS

07 JUL 16 A10:21

Re: MUR 2499  
Mountain Bell Political Action Committee  
and William T. Danner, as Treasurer

Dear Ms. Dunham:

Please be advised that I am the attorney who will be representing the Respondents in the above-referenced Matter Under Review. Enclosed is the completed Statement of Designation of Counsel.

Also enclosed is the Affidavit of Joan M. Nuanes, with attached Exhibits, which sets forth facts demonstrating that a Pre-Election Report for 1986 was not due from these Respondents. The disbursements in question were actually made after October 15, 1986, which was the cutoff date for that Pre-Election Report. The only financial activity during the October 1-15 time period was receipt of a \$25.00 earmarked contribution. As you are aware, under 11 C.F.R. § 104.5(c)(1)(ii)(A), Pre-Election Reports are required only if there are disbursements which have not previously been disclosed, and which are made during the period covered by the Pre-Election Report.

The Respondents wish to apologize for the misleading information furnished in the Post-General Election Report which was filed December, 1986. That Report made it appear that there were disbursements during the October 1-15, 1986, time period, when in fact there were not. These errors were the result of having a computer program which did not adequately permit total accuracy with respect to dates of disbursements and did not permit explanation of unusual situations, and of having the Reports prepared by a person who was at that time quite new to her job and

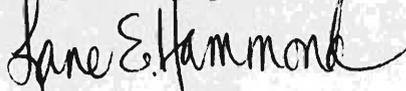
83040571196

Sandra Dunham, Staff Manager  
Office of the Attorney General  
July 15, 1987  
Page 2

responsibilities. (See Affidavit of Joan M. Nuanes, paragraph 1.) The MB-PAC is currently undertaking a thorough review of its procedures and its controls over the reporting process, in order to be certain that this error does not occur again.

We trust that this will take care of this matter, and that it can be closed without any need for further action. Please let me know if you need any further information, or if additional steps need to be undertaken. If any further action is needed, the Respondents would be interested in pursuing pre-probable cause conciliation.

Very truly yours,



Lane E. Hammond

LEH:skg

Enclosures

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**STATEMENT OF DESIGNATION OF COUNSEL**

**MUR** 2499

**NAME OF COUNSEL:** Lane E. Hammond or Susan Keesen

**ADDRESS:** Mountain Bell Law Department

1801 California St., MBC 5100

Denver, Colorado 80202

**TELEPHONE:** 303/896-2200

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.

MOUNTAIN BELL POLITICAL ACTION COMMITTEE

7/14/87  
Date

By: William T. Danner  
Signature  
William T. Danner, as Treasurer

**RESPONDENT'S NAME:** MOUNTAIN BELL  
POLITICAL ACTION COMMITTEE and  
William T. Danner, as Treasurer

**ADDRESS:** 1801 California St.

MBC 3050

Denver, Colorado 80202

**HOME PHONE:** 303/797-9097

**BUSINESS PHONE:** 303/896-5110

89040671198

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RE: MUR 2499  
Mountain Bell Political Action Committee  
and William T. Danner, as Treasurer

AFFIDAVIT OF JOAN M. NUANES

STATE OF COLORADO )  
 ) ss.  
CITY AND COUNTY OF DENVER )

I, Joan M. Nuanes, being the undersigned, hereby declare and state as follows:

1. I am currently employed by the Mountain States Telephone and Telegraph Company ("Mountain Bell"), as Acting Assistant Cashier, and my business address is 1801 California Street, Room 3040, Denver, Colorado, 80202. I have been employed by Mountain Bell for sixteen (16) years, and have held my present position since February, 1987. Before that, I was Records Assistant, from August, 1986 until February, 1987. Prior to that, I was Reports Clerk for approximately four years. In those positions, I am and have been responsible for preparing reports for the Mountain Bell Political Action Committee ("MB-PAC") for filing with the Federal Election Commission. I have had that responsibility since January, 1985. However, the first time I prepared a report by myself without supervision or guidance from a more experienced person was in April, 1986.

2. I prepared the 1986 Post-General Election Report for the MB-PAC, which was filed with the Federal Election Commission in December, 1986. I also prepared the MB-PAC Quarterly Reports for the third and fourth quarters of 1986, which were filed with the Federal Election Commission.

3. I considered the question of whether the MB-PAC was required to file a 1986 Pre-Election Report, and I determined that that report was not required. My reasons for making that decision were:

- A. As shown by the attached copies of the front and back of the check made out to Committee for Tim Wirth, Inc., which copies are marked as Exhibits A and B, the MB-PAC disbursement to that Committee was not actually made until October 19, 1986; and
- B. MB-PAC check number 1995 payable to Jim Kolbe to Congress and dated October 15, 1986, was

93040571199

mailed on or about October 15, 1986. However, a few days later, I was notified that it had not been received, and that it should have been hand delivered and not mailed to that committee. I was told to stop payment on that check and to issue a new check. As shown by the attached copy of a memorandum from Colorado State Bank, which is marked Exhibit C, on October 28, 1986, I requested a Stop Payment Order on that check. As shown by the attached copies of the front and back of MB-PAC check number 1999, payable to Jim Kolbe to Congress, and dated October 28, 1986, which are marked Exhibits D and E, a new check was issued to that committee. It was hand delivered to that committee shortly after October 28, 1986. Therefore, the disbursement by the MB-PAC was not on October 15, 1986, but was instead after October 28, 1986. The original check, numbered 1995, has never been found, has never been cashed, and has never been returned to the MB-PAC.

Further affiant saith naught.

Joan M. Nuanes  
Joan M. Nuanes

Subscribed and sworn to before me this 15<sup>th</sup> day of July, 1987, by Joan M. Nuanes.

Sarah K. Green  
Notary Public

MY COMMISSION EXPIRES: OCTOBER 16, 1990  
ADDRESS: 1801 California Street  
Address Suite 5100  
sg Denver, Colorado 80202

My Commission Expires sg

33040571200

SEAL

MOUNTAIN BELL POLITICAL  
ACTION COMMITTEE  
931 FOURTEENTH STREET - ROOM 1120  
DENVER, COLORADO 80202

578

01997

23-60/1020

0 2 0 1 5 October 19 86

Pay to the  
order of Committee for Tim Wirth Inc.

\$25.00

Twenty-five and 00/100\*\*\*\*\* Dollars

 **COLORADO STATE BANK**  
of Denver, Colorado 80217

PAC Disbursement

For

*J. Roy Fox*  
*for W. W. Gant*

⑆001997⑆ ⑆102000607⑆ 25-8349⑆ ⑆0000002500⑆

EXHIBIT A

2 2 0 4 0 5 7 1 2 0 1

EXHIBIT B

8 8 0 4 0 4 7 1 2 0 2

101050104

23-19  
DT 86 28  
FBI DENVER  
1030-0019-8  
PAY ADV BANK  
23-19

OCT 27 86

28-01 10-309

0015 14317

For Deposit Only  
Committee for Tim Wirth, Inc.  
JoAnne Bryan, Treasurer  
Acct #55 587 91

5



**COLORADO STATE BANK**

16th and Broadway  
P.O. Box 5848, TA  
Denver, Colorado 80217  
303851-2111

EXHIBIT C

Date 10-28-86

**Memorandum**

Mtn Bell Political Action Comm.  
1801 California St Rm 3040  
Denver Co 80202

Today you requested a Stop Payment Order on the following check:

|  |                       |        |          |
|--|-----------------------|--------|----------|
| Payee  | Jim Kolbe to Congress |        |          |
| Check number (If not numbered, state "none") | 1995                  |        |          |
| Check date                                   | 10-15-86              | Amount | 2,000.00 |

Please examine the information above to confirm that it is exact and complete in every respect.

The Bank requests your cooperation in preventing this check from being presented for payment. Please notify the Payee immediately of this Stop Payment Order and if the check is recovered, notify the Bank at once.

Do not use the same number or date of the original check when issuing a new check.

A charge of nc is made for each Stop Payment to partially cover handling cost. A Stop Payment Order will remain in effect without additional charge for a period of 6 months, unless a written release is presented before that time. Thank you.

The Colorado State Bank of Denver

**Notice: Please sign and return immediately under UCC-CRS 155-4-403.  
"An oral order is binding upon the bank only for fourteen calendar days,  
unless confirmed in writing within that period."**

83040571203

MOUNTAIN BELL POLITICAL  
ACTION COMMITTEE  
931 FOURTEENTH STREET - ROOM 1120  
DENVER, COLORADO 80202

NOV 5 1986

01999

23-60/1020

578

October 28 1986

Pay to the  
order of Jim Kolbe to Congress

PAID

\$ 2000.00

Two Thousand and 00/100\*\*\*\*\*9\*\*\*\*\* Dollars



COLORADO STATE BANK  
of Denver, Colorado 80217

PAID

*YTR [Signature]*  
*JW [Signature]*

PAC Disbursement

For

⑆001999⑆ ⑆102000607⑆ 25⑈83457⑈

⑆0000200000⑆

EXHIBIT D

8 8 0 4 0 5 7 1 2 0 4

EXHIBIT E

3 3 0 4 0 7 1 2 0 5

12210:010 PAY ANY BANK OF ARIZONA  
INTEREST BANK OF ARIZONA  
NOVEMBER 13, 1986

NO 86 13 2  
PROCESSED  
PAY ANY BANK  
VALLEY NATIONAL BANK  
PHOENIX, ARIZONA

NO 86 14  
PAY ANY BANK

140-3358-3

PAY TO THE ORDER OF  
UNION BANK  
TUCSON, ARIZONA  
FOR DEPOSIT ONLY  
140-3358-3

**SENSITIVE**

**BEFORE THE FEDERAL ELECTION COMMISSION**

|                                  |   |          |
|----------------------------------|---|----------|
| In the Matter of                 | ) |          |
|                                  | ) |          |
| Mountain Bell Political Action   | ) | MUR 2499 |
| Committee and William T. Danner, | ) |          |
| as treasurer                     | ) |          |

07 NOV 26 11:39

**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND**

On June 15, 1987, the Commission found reason to believe that Mountain Bell Political Action Committee and William T. Danner, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii) by failing to file the 1986 Pre-Election Report in a timely manner. When the Mountain Bell Political Action Committee filed its 1986 Post-Election Report, it disclosed \$2,025 in contributions to two candidate's between October 1, 1986 and October 15, 1986.<sup>1/</sup> Thus, the Committee was required to file a Pre-Election Report by October 23, 1986, and complete as of October 15, 1986. The Committee did not file a report disclosing this activity until it filed its 1986 Post-Election Report on December 8, 1986. By

<sup>1/</sup> In its response, the Mountain Bell Political Action Committee provided documentation which indicated the \$25 check to the Committee for Tim Wirth, Inc. was actually dated October 19, 1986, not October 15, 1986 as indicated on the Post-Election Report. Therefore, it was not necessary to include this contribution in the Pre-Election Report. However, the \$2,000 check to Jim Kolbe to Congress should have been reported in the Pre-Election Report. The original check was dated October 15, 1986, and a stop payment was not made on that check until October 28, 1986. Even though the check that was reissued was dated October 28, 1986, this contribution should have been listed on the Pre-Election Report because the original check was issued and considered a contribution on October 15. The information which should have been reported on the Pre-Election Report should then have been amended on the Post-Election Report.

89040671206

letter dated July 15, 1978, respondents requested to settle this matter prior to a finding of probable cause to believe (Attachment 1).

23040471207

6

**III. RECOMMENDATIONS**

1. Enter into conciliation with Mountain Bell Political Action Committee and William T. Danner, as treasurer, prior to a finding of probable cause to believe.
2. Approve the attached proposed conciliation agreement and letter.

8/26/87  
Date

Lawrence M. Noble (2/2)  
Lawrence M. Noble  
Acting General Counsel

**Attachments**

1. Request for conciliation
2. Proposed agreement and letter

89040371208

6

88740571299

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  
2 18  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Mountain Bell Political Action ) MUR 2499  
Committee and William T. Danner, )  
as treasurer )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 28, 1987, the Commission decided by a vote of 4-0 to take the following actions in MUR 2499:

1. Enter into conciliation with Mountain Bell Political Action Committee and William T. Danner, 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 August 26, 1987.

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

Attest:

8-28-87  
Date

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

Received in the Office of Commission Secretary: Wed., 8-26-87, 1:39  
Circulated on 48 hour tally basis: Wed., 8-26-87, 4:00  
Deadline for vote: Fri., 8-28-87, 4:00

89040571210



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

August 31, 1987

Lane E. Hammond, Esquire  
Mountain Bell Law Department  
1801 California Street  
MBC 5100  
Denver, Colorado 80202

RE: MUR 2499  
Mountain Bell Political  
Action Committee and  
William T. Danner, as  
treasurer

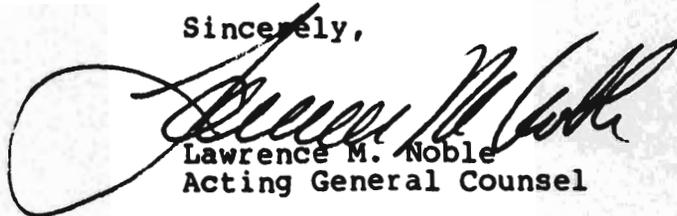
Dear Ms. Hammond:

On June 15, 1987, the Federal Election Commission found reason to believe that Mountain Bell Political Action Committee and William T. Danner, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii). At your request, on August 28, 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 your clients agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Sandra Dunham, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

  
Lawrence M. Noble  
Acting General Counsel

Enclosure  
Conciliation Agreement

93740571211

*Fuller*

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE 87 OCT 13 PM 4:39

RECEIVED  
FEDERAL ELECTION COMMISSION  
SECRETARIAT

In the Matter of )  
Mountain Bell Political Action ) MUR 2499  
Committee and William T. Danner, )  
as treasurer )

GENERAL COUNSEL'S REPORT

I. BACKGROUND

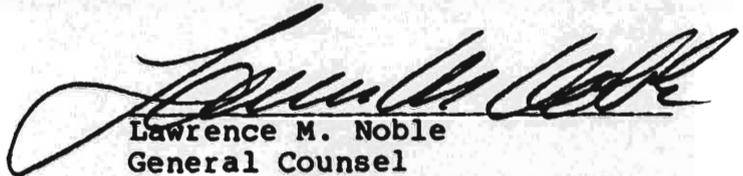
Attached is a conciliation agreement which has been signed by Lane E. Hammond, the attorney for the Mountain Bell Political Action Committee and William T. Danner, as treasurer.

The attached agreement contains no changes from the agreement approved by the Commission on August 28, 1987. A \$500.00 check for the civil penalty has also been received.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Mountain Bell Political Action Committee and William T. Danner, as treasurer.
2. Close the file.
3. Approve the attached letter.

10/13/87  
Date

  
Lawrence M. Noble  
General Counsel

Attachments

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

83040571212

Dunham



TO THE TREASURER  
**Mountain Bell**  
A US WEST COMPANY  
UNITED BANK OF GRAND JUNCTION (NA) GRAND JUNCTION, CO

7039390

82-91 5236  
1021 (12-86) W

CHECK DATE  
09-25-87

CHECK NO.  
7039390

FIVE HUNDRED

AND 00/100 DOLLARS

PAY TO FEDERAL ELECTION COMMISSION  
ORDER OF  
WASHINGTON, DC 20463

AMOUNT  
\$500.00\*\*\*\*\*

*Debra A. Trimiew*

⑈ 7039390⑈ ⑆ 102100918⑆ 002 7529⑈

CC# 4468

MEMORANDUM

TO: DEBRA A. TRIMIEW

TO: CECILIA LIEBER

FROM: CECILIA LIEBER

FROM: DEBRA A. TRIMIEW

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
87 SEP 30 AM 9:33

CHECK NO. 7039390 { A COPY OF WHICH IS ATTACHED } RELATING TO  
MUR 2499 AND NAME Mountain Bell PAC and William T. Danner, as treas.

WAS RECEIVED ON 9/30/87. 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 9/30/87

Attachment II (1)

8 9 0 4 0 6 7 1 2 1 4

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 Attachments 11 3 see 11

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) MUR 2499  
Mountain Bell Political Action )  
Committee and William T. Danner, )  
as treasurer )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 16, 1987, the Commission decided by a vote of 4-0 to take the following actions in MUR 2499:

1. Accept the conciliation agreement with Mountain Bell Political Action Committee and William T. Danner, as treasurer, as recommended in the General Counsel's report signed October 13, 1987.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's report signed October 13, 1987.

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

Attest:

10-16-87

Date

*Marjorie W. Emmons*

Marjorie W. Emmons  
Secretary of the Commission

|   |        |           |       |
|---|--------|-----------|-------|
| Received in the Office of Commission Secretary: | Tues., | 10-13-87, | 4:39  |
| Circulated on 48 hour tally basis:              | Wed.,  | 10-14-87, | 11:00 |
| Deadline for vote:                              | Fri.,  | 10-16-87, | 11:00 |

R 9 7 4 0 5 7 1 2 1 5



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

20 October 1987

Lane E. Hammond, Esquire  
Mountain Bell Law Department  
1801 California Street  
MBC 5100  
Denver, Colorado 80202

RE: MUR 2499  
Mountain Bell Political Action  
Committee and William T.  
Danner, as treasurer

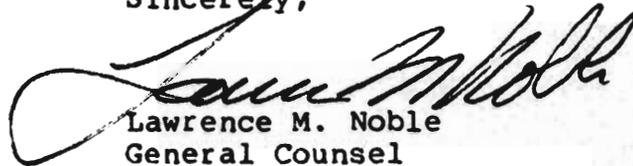
Dear Ms. Hammond:

On October 16, 1987, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your client's behalf in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(ii), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to your client. 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 Sandra Dunham, the staff member assigned to this matter at (202) 376-8200.

Sincerely,

  
Lawrence M. Noble  
General Counsel

Enclosure  
Conciliation Agreement

89040571216

nm

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**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of )  
 )  
Mountain Bell Political Action ) MUR 2499  
Committee and William T. Danner, )  
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 Mountain Bell Political Action Committee and William T. Danner, as treasurer ("Respondents") violated 2 U.S.C. § 434(a)(4)(A)(ii).

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, Mountain Bell Political Action Committee, is a political committee within the meaning of 2 U.S.C. § 431(4).

89040571217

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2. Respondent, William T. Danner, is the treasurer of Mountain Bell Political Action Committee.

3. Respondents filed a 1986 Post-Election Report indicating a contribution was made to a federal candidate between October 1, 1986 and October 15, 1986.

4. Thus, Respondents were required to file a Pre-Election Report by October 23, 1986, and complete as of October 15, 1986.

5. Respondents did not file a report disclosing this contribution until it filed its 1986 Post-Election Report on December 8, 1986.

V. Respondents failed to file their 1986 Pre-Election Report in a timely manner, in violation of 2 U.S.C. § 434(a)(4)(A)(ii).

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

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

88040471218

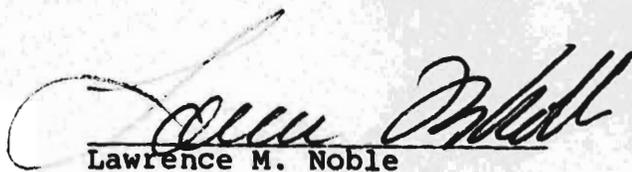
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VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

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.

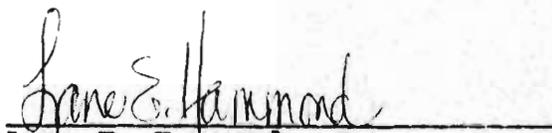
FOR THE COMMISSION:



Lawrence M. Noble  
General Counsel

10/20/87  
Date

FOR THE RESPONDENTS:



Lane E. Hammond  
Attorney for Respondents

September 25, 1987  
Date

38040571219

//



FEDERAL ELECTION COMMISSION  
WASHINGTON DC 20547

THIS IS THE END OF MUR # 2499

DATE FILMED 1/13/88 CAMERA NO. 3

CAMERAMAN AS

88040671220



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20461

M03-14-88

THE FOLLOWING MATERIAL IS BEING ADDED TO THE  
PUBLIC FILE OF CLOSED MUR 2499

93040580046



TO THE TREASURER  
**Mountain Bell**  
 A US WEST COMPANY  
 UNITED BANK OF GRAND JUNCTION (NA) GRAND JUNCTION, CO

7039390

82-91 5236  
 1021 (12-86) W

CHECK DATE  
 09-25-87

CHECK NO.  
 7039390

FIVE HUNDRED

AND 00/100 DOLLARS

PAY TO THE ORDER OF FEDERAL ELECTION COMMISSION  
 WASHINGTON, DC 20463

AMOUNT  
 \$500.00\*\*\*\*\*

*Debra A. Trimiew*

⑈ 7039390⑈ ⑆ 102100918⑆ 002 7529⑈

CC# 4468

MEMORANDUM

TO: DEBRA A. TRIMIEW TO: CECILIA LIEBER  
 FROM: CECILIA LIEBER FROM: DEBRA A. TRIMIEW

RECEIVED  
 FEDERAL ELECTION COMMISSION  
 OFFICE OF GENERAL COUNSEL  
 87 SEP 30 AM 9:33

CHECK NO. 7039390 { A COPY OF WHICH IS ATTACHED } RELATING TO  
MUR 2499 AND NAME Mountain Bell PAC and William T. Danner, as treas.  
 (Dunham)

WAS RECEIVED ON 9/30/87. 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 9/30/87

600#4468

**HAND DELIVERED**  
RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

87 SEP 29 PM 12:24

**Mountain Bell**

**Lane E. Hammond**  
Attorney

1801 California Street  
Suite 5100  
Denver, Colorado 80202  
Phone (303) 896-2200

September 28, 1987

Lawrence M. Noble, Esq.  
Acting General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

FEDERAL EXPRESS

Re: MUR 2499  
Mountain Bell Political Action Committee and  
William T. Danner, as Treasurer

Dear Mr. Noble:

The Respondents in the above-referenced Matter Under Review have decided to enter into the Conciliation Agreement which you sent, and to pay the civil penalty. Enclosed are the signed original of the Agreement and a check to cover the penalty in the amount of Five Hundred Dollars (\$500.00).

Please forward a fully-executed copy of the Agreement to me. A self-addressed, stamped envelope has been included with this correspondence for your convenience.

Very truly yours,

*Lane E. Hammond*  
Lane E. Hammond

LEH:skg

Enclosures

cc: William T. Danner  
William R. O'Brien  
Joan M. Nuanes

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
87 SEP 30 AM 9:33

8374030048