



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2605

DATE FILMED 4/13/89 CAMERA NO. 4

CAMERAMAN AS

89040744918

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 12 April 1988

ANALYST: Robert DiNardo

I. COMMITTEE: 21st Century Republican Fund
(C00211227)
John P. Bond, Treasurer
316 Pennsylvania Avenue, SE
Suite 400
Washington, DC 20003

II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(A)(iv)
11 CFR 104.5(c)(2)(i)(A), and (B)

III. BACKGROUND:

Late/Non- Filing of Reports

The 21st Century Republican Fund (the "Fund") failed to file the 1987 Mid-Year Report in a timely manner, and failed to file the 1987 Year End Report.

The Fund was notified on July 7, 1987, that the Mid-Year Report was due on July 31, 1987 (Attachment 2). A Non-Filer Notice was sent to the Fund on August 20, 1987 (Attachment 3). The Fund filed the 1987 Mid-Year Report on October 14, 1987 (Attachment 4).

The Fund was notified on December 18, 1987, that the Year End Report was due on January 31, 1988 (Attachment 5). A Non-Filer Notice was sent to the Fund on February 19, 1988 (Attachment 6).

On March 14, 1988, the Reports Analysis Division ("RAD") analyst attempted to contact the Fund. The treasurer was not available, so the RAD analyst left a message that he had called (Attachment 7).

To date, no response has been received.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

99040742819

FEDERAL ELECTION COMMISSION
1987-1988
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 7APR88

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
						TYPE OF FILER
21ST CENTURY REPUBLICAN FUND						ID #C00211227 NON-PARTY NON-QUALIFIED
CONNECTED ORGANIZATION: BLANK						
	1987 MID-YEAR REPORT	250	244	1JAN87 -30JUN87	6	87FEC/486/5295
	NOTICE OF FAILURE TO FILE			1JAN87 -30JUN87	1	87FEC/484/0781
	NOTICE OF FAILURE TO FILE			31DEC87	1	88FEC/510/2950
	1988 MISCELLANEOUS NOTICE FROM FEC			22MAR88	1	88FEC/515/0277
	TOTAL	250	0	244	0	9 TOTAL PAGES

All reports listed have been reviewed

Ending cash on hand as of 6/30/87: \$18.53

Outstanding debts and obligations owed by the Fund as of 6/30/87: \$22,829.72

89040742820

8 9 0 4 0 7 4 2 8 2 1

FEDERAL ELECTION COMMISSION

1985-1986

DATE 22MAR88

COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

PAGE 2

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES TYPE OF FILER	MICROFILM LOCATION
21ST CENTURY REPUBLICAN FUND				ID #C00211227 NON-PARTY NON-QUALIFIED		
CONNECTED ORGANIZATION: BLANK						
1986 STATEMENT OF ORGANIZATION				25SEP86	1	86FEC/432/0532
24 HOUR CONTRIBUTION NOTICE				24OCT86	2	86FEC/442/1440
OCTOBER QUARTERLY				22SEP86 -30SEP86	5	86FEC/436/4151
PRE-GENERAL				1OCT86 -15OCT86	6	86FEC/442/5072
PRE-GENERAL - AMENDMENT				1OCT86 -15OCT86	6	86FEC/451/4551
PRE-GENERAL - AMENDMENT				1OCT86 -15OCT86	1	87FEC/461/1864
REQUEST FOR ADDITIONAL INFORMATION				1OCT86 -15OCT86	2	87FEC/454/1830
REQUEST FOR ADDITIONAL INFORMATION 2ND				1OCT86 -15OCT86	5	87FEC/459/5264
POST-GENERAL				16OCT86 -24NOV86	7	86FEC/451/4551
POST-GENERAL - AMENDMENT				16OCT86 -24NOV86	1	87FEC/461/2000
REQUEST FOR ADDITIONAL INFORMATION				16OCT86 -24NOV86	2	87FEC/454/1830
REQUEST FOR ADDITIONAL INFORMATION 2ND				16OCT86 -24NOV86	1	87FEC/459/5264
YEAR-END				25NOV86 -31DEC86	4	87FEC/461/3598
YEAR-END - AMENDMENT				25NOV86 -31DEC86	4	87FEC/486/5294
TOTAL		33,143	0	33,130	0	47 TOTAL PAGES

All reports listed have been reviewed

Ending cash on hand as of 12/31/86: \$12.64

Outstanding debts and obligations owed by the committee as of 12/31/86: \$22,108.85

SEMI-ANNUAL REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

July 7, 1987

WHO MUST FILE

ALL PARTY COMMITTEES AND PACS (NONCONNECTED COMMITTEES AND SEPARATE SEGREGATED FUNDS) must file a report in July.

REPORTING DATES

Semiannual. The Mid-Year Report is due July 31 and must disclose financial activity that occurred from January 1 through June 30, 1987. Committees which have previously filed 1987 reports should only report activity from the closing date of the last report filed.

Monthly. If the committee chooses to file on a monthly basis, the next monthly report is due July 20 and must disclose financial activity from June 1 through June 30, 1987. Monthly reports are due by the 20th of each month and cover all financial activity of the previous month.

WHAT MUST BE REPORTED

A report must disclose all receipts and disbursements (not previously reported) that occurred during the reporting period. A newly registered political committee filing its first report should also include all amounts received and expended before the committee registered. See 11 CFR 104.3. For more detailed information on reporting instructions, consult your Campaign Guide.

WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed FEC FORM 3X for details. Affix the peel-off label from the envelope to line 1 of the report. Any corrections should be made directly on the label.

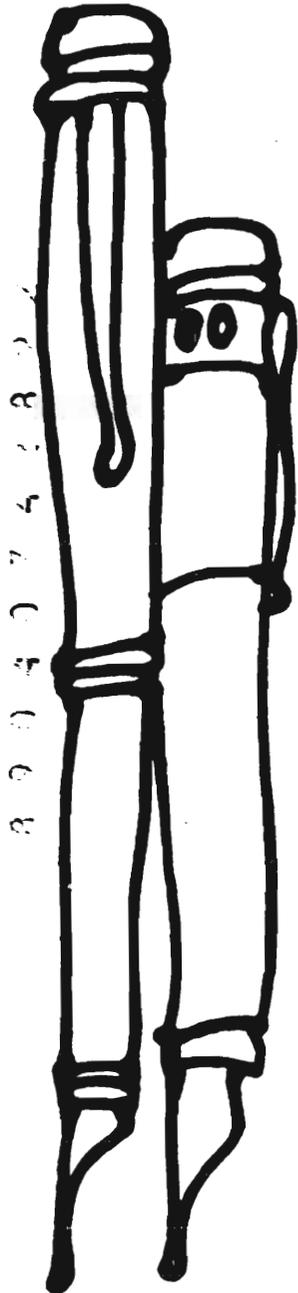
CHANGE IN FILING FREQUENCY

Committees that wish to change their reporting schedule (for example, from monthly to semiannual) must notify the Commission by sending a letter with the next report due under their current reporting schedule. Committees may change their filing frequency only once a year.

COMPLIANCE

Political committees are responsible for filing all reports required under the Act in a timely fashion. Committees and treasurers who file late reports, or fail to file reports, are subject to enforcement action. Illegible reports and reports submitted on non-FEC forms will not be accepted; committees filing such documents will be required to refile.

(over)



**1987 UPCOMING FILING SCHEDULE
PARTIES AND PACS**

Retain this report notice for future reference. The next notice will be sent December 18, 1987. Also, see the January 1987 issue of the FEC Record, which lists 1987 reporting dates.

SEMIANNUAL FILERS

<u>Report</u>	<u>Period Covered 1/</u>	<u>Reg./Cert. Mailing Date 2/</u>	<u>Filing Date 2/</u>
Mid-Year	01/01 - 06/30	07/31/87	07/31/87
Year-End	07/01 - 12/31	01/31/88	01/31/88

MONTHLY FILERS

<u>Report</u>	<u>Period Covered 1/</u>	<u>Reg./Cert. Mailing Date 2/</u>	<u>Filing Date 2/</u>
July	06/01 - 06/30	07/20/87	07/20/87
August	07/01 - 07/31	08/20/87	08/20/87
September	08/01 - 08/31	09/20/87	09/20/87
October	09/01 - 09/30	10/20/87	10/20/87
November	10/01 - 10/31	11/20/87	11/20/87
December	11/01 - 11/30	12/20/87	12/20/87
Year-End	12/01 - 12/31	01/31/88	01/31/88

1/ A newly registered committee should refer to "WHAT MUST BE REPORTED," on the reverse side.

2/ Reports sent by certified or registered mail must be postmarked by the mailing date. Reports mailed first class or hand delivered must be received by the filing date.

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

89040742823



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

RQ-7

AUG 20 1987

John P. Bond, Treasurer
21st Century Republican Fund
316 Pennsylvania Avenue, SE, Suite 400
Washington, DC 20003

Identification Number: C00211227

Reference: Mid-Year Report (1/1/87-6/30/87)

Dear Mr. Bond:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may be in violation of 2 U.S.C. §434(a) for failing to file the above referenced Report of Receipts and Disbursements. You were notified previously of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or the relevant portions should also be filed with the Secretary of State or equivalent State officer. See 2 U.S.C. §439.

Although the Commission may initiate an audit or legal enforcement action concerning this matter, your prompt response and a letter of explanation will be taken into consideration.

If you have any questions, please contact Anthony Raymond on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

ATTACHMENT 4

FEC FORM 278 (1987)

87 OCT 14 PM 11:06

USE FEC MAILING LABEL
OR
TYPE ON PRINT

00011227
JOHN P. BOND
1987 CENTURY REPUBLICAN FUND
310 PENNSYLVANIA AVE. 7TH FLOOR
WASHINGTON DC 20007

2 FEC IDENTIFICATION NUMBER
C00211227

3 The committee qualified as a multi-state committee DURING THIS Reporting Period on _____ (date)

4. TYPE OF REPORT

(a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year-End Report
 July 31 Mid-Year Report (Re-election Year On)
 Termination Report

Monthly Report Due On:
 February 20 June 20 October 20
 March 20 July 20 November 20
 April 20 August 20 December 20
 May 20 September 20 January 1

Twelfth day report preceding _____ Type of Election _____
 election on _____ in the State of _____
 Twelfth day report following the General Election on _____
 in the State of _____

(b) Is this Report an Amendment? YES NO

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5 Covering Period <u>Jan. 1, 1987</u> through <u>June 30, 1987</u>		
6 a. Cash on hand January 1, '87 _____		\$ 12.64
b. Cash on hand at Beginning of Reporting Period	\$ 12.64	
c. Total Receipts from Line 18	\$ 250.00	\$ 250.00
d. Similar adjustments to and 6 c for Column A and to and 6 b for Column B	\$ 262.64	\$ 262.64
7 Total Disbursements from Line 23	\$ 244.11	\$ 244.11
8 Cash on hand at Close of Reporting Period (subtract Line 7 from Line 6 d)	\$ 18.53	\$ 18.53
9 Debts and Obligations Owed TO the Committee (itemize on Schedule C and/or Schedule D)	\$	
10 Debts and Obligations Owed BY the Committee (itemize on Schedule C and/or Schedule D)	\$ 2099.72	

For further information contact:
Federal Election Commission
999 E Street, N.W.
Washington, DC 20543
Tel: (202) 453-4350
TDD: (202) 453-4350

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

Type or Print Name of Treasurer:

John P. Bond

Signature

John P. Bond

Date

July 12, 1987

FEC FORM 278

8-9-90 4974342823

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 18, 1987

WHO MUST FILE

ALL PARTY COMMITTEES and PACs (NON-CONNECTED COMMITTEES AND SEPARATE SEGREGATED FUNDS) must file a Year End Report in January.

REPORTING DATES

Semiannual. The Year End Report is due January 31, 1988, and must disclose financial activity that occurred from July 1 through December 31, 1987. Committees which have previously filed 1987 reports should only report activity from the closing date of the last report filed.

Monthly. Committees that choose to file on a monthly basis must file the Year End Report due January 31, 1988. The report must disclose financial activity from December 1 through December 31, 1987. All other monthly reports are due by the 20th of each month and cover all financial activity of the previous month.

WHAT MUST BE REPORTED

A report must disclose all receipts and disbursements that occurred during the reporting period. A newly registered political committee filing its first report should also include all amounts received and expended before the committee registered. See 11 CFR 104.3. For more detailed information on reporting instructions, consult your Campaign Guide.

WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed FEC Form 3X for details. Affix the peel-off label from the envelope to line 1 of the report. Any corrections in the information should be made directly on the label.

CHANGE IN FILING FREQUENCY

Committees that wish to change their reporting schedule (for example, from semiannual to monthly) must notify the Commission by sending a letter with the next report due under their current reporting schedule. Committees may change their filing frequency only once a year.

COMPLIANCE

Political committees are responsible for filing all reports required under the Act in a timely fashion. Committees and treasurers who file late reports, or fail to file reports, are subject to enforcement action. Illegible reports and reports submitted on non-FEC forms will not be accepted; committees filing such documents will be required to refile.

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





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

80-7

FEB 19 1988

John P. Bond, Treasurer
21st Century Republican Fund
316 Pennsylvania Avenue SE, Suite 400
Washington, DC 20003

Identification Number: C00211227

Reference: Year End Report (through 12/31/87)

Dear Mr. Bond:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may be in violation of 2 U.S.C. §434(a) for failing to file the above referenced Report of Receipts and Disbursements. You were notified previously of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or the relevant portions should also be filed with the Secretary of State or equivalent State officer. See 2 U.S.C. §439.

Although the Commission may initiate an audit or legal enforcement action concerning this matter, your prompt response and a letter of explanation will be taken into consideration.

If you have any questions, please contact Robert DiWardo on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

98735172930

MEMORANDUM TO THE FILES:

COMMITTEE: 21st Century Republican Fund
I.D. NUMBER: C00211227
CONTACT: John P. Bond, treasurer
DATE: March 14, 1988
ANALYST: Robert B. DiNardo
SUBJECT: 1987 Year End Report

I called Mr. Bond at 9:45 to notify him that the FEC has not received the Committee's 1987 Year End Report. Mr. Bond was not available so I left a message that I called.

8904074828

RECEIVED
FEDERAL ELECTION COMMISSION

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

88 MAY -9 AM 9:42

FIRST GENERAL COUNSEL'S REPORT

RAD REFERRAL: 88NF-12
STAFF MEMBER: Ivonne Cotto

SOURCE OF MUR: INTERNALLY GENERATED

NAME OF RESPONDENT: The 21st Century Republican Fund and John P. Bond, as treasurer

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

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The 21st Century Republican Fund and John P. Bond, as treasurer, were referred to the Office of the General Counsel by the Reports Analysis Division for failure to file its 1987 Mid-Year Report in a timely manner and failure to file its 1987 Year End Report, in violation of 2 U.S.C. § 434(a)(4)(A)(iv). (Attachment 1).

II. FACTUAL AND LEGAL ANALYSIS

A. LATE FILER

The 21st Century Republican Fund (the "Fund") failed to file its 1987 Mid-Year Report of Receipts and Disbursements covering the period from January 1, 1987 to June 30, 1987, in a timely manner. The Fund was notified on July 7, 1987 that the report was due on July 31, 1987. A Non-Filer Notice was sent to the Fund on August 20, 1987. (Attachment 1 (f)). The Fund filed the 1987 Mid-Year Report on October 14, 1987. (Attachment 1(g)). The report was filed seventy-four days late.

89040746829

Pursuant to 2 U.S.C. § 434(a)(4)(A)(iv) all political committees other than authorized committees of a candidate shall file, in any calendar year without a regularly scheduled general election, a report covering the period beginning January 1 and ending June 30, which shall be filed no later than July 31.

The Fund's failure to file its 1987 Mid-Year Report by July 31, 1987 is a violation of 2 U.S.C. § 434(a)(4)(A)(iv).

B. NON-FILER

The Fund failed to file its 1987 Year End Report of Receipts and Disbursements covering the period of July 1, 1987 to December 31, 1987. The Fund was notified on December 18, 1987 that the Year End Report was due on January 31, 1988. A Non-Filer Notice was sent to the Fund on February 19, 1988. (Attachment 1(i)).

On March 14, 1988, the Reports Analysis Division ("RAD") analyst attempted to contact the Fund. The treasurer was not available, so the RAD analyst left a message that he had called. (Attachment 1(j)). As of this date, the 1987 Year End Report has not been filed.

Pursuant to 2 U.S.C. § 434(a)(4)(A)(iv) all political committees other than authorized committees of a candidate shall file, in any calendar year without a regularly scheduled general election, a report covering the period beginning July 1 and ending December 31, 1987, which shall be filed no later than January 31, 1988.

3 0 0 4 0 7 4 2 8 3 0

The Fund's failure to file its 1987 Year End Report by January 31, 1988 is a violation of 2 U.S.C. § 434(a)(4)(A)(iv).

III. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that the 21st Century Republican Fund and John P. Bond, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv).
3. Approve the attached letter and Factual and Legal Analysis.

Lawrence M. Noble
General Counsel

Date

5/6/88

BY:


Lois G. Lerner
Associate General Counsel

Attachments

- 1 - Referral Materials
- 2 - Proposed Letter and Factual and Legal Analysis

Staff Person: Ivonne Cotto

99040742831

BEFORE THE FEDERAL ELECTION COMMISSION

(MUR 2605)

In the Matter of)
)
The 21st Century Republican Fund and)
John P. Bond, as treasurer)

RAD Ref. 88NF-12

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 11, 1988, the Commission decided by a vote of 5-0 to take the following actions in RAD Ref. 88NF-12:

1. Open a MUR.
2. Find reason to believe that the 21st Century Republican Fund and John P. Bond, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv).
3. Approve the letter and Factual and Legal Analysis, as recommended in the **First** General Counsel's report signed May 6, 1988.

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

Attest:

5-11-88
Date

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

Received in the Office of Commission Secretary:	Mon.,	5-9-88,	9:42
Circulated on 48 hour tally basis:	Mon.,	5-9-88,	4:00
Deadline for vote:	Wed.,	5-11-88,	4:00

8 2 7 4 0 7 4 2 8 3 2



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 1, 1988

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

John P. Bond, Treasurer
316 Pennsylvania Avenue, S.E.
Suite 400
Washington, D.C. 20003

RE: MUR 2605
21st Century Republican Fund
and John P. Bond, as treasurer

Dear Mr. Bond:

On May 11, 1988, the Federal Election Commission found that there is reason to believe 21st Century Republican Fund and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv), 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.

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

9 9 0 4 0 7 4 2 8 3 3

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Letter to John P. Bond, Treasurer
Page 2

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.

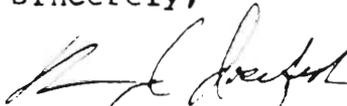
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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.

This matter will remain 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 Ivonne Cotto, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,


Thomas J. Josefiak
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form

3 9 0 4 0 7 4 8 3 4

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: The 21st Century Republican Fund and MUR: 2605
John P. Bond, as treasurer

The 21st Century Republican Fund (the "Fund") failed to file its 1987 Mid-Year Report of Receipts and Disbursements covering the period from January 1, 1987 to June 30, 1987, in a timely manner. The Fund was notified on July 7, 1987 that the report was due on July 31, 1987. A Non-Filer Notice was sent to the Fund on August 20, 1987. The Fund filed the 1987 Mid-Year Report on October 14, 1987. The report was filed seventy-four days late.

Pursuant to 2 U.S.C. § 434(a)(4)(A)(iv) all political committees other than authorized committees of a candidate shall file, in any calendar year without a regularly scheduled general election, a report covering the period beginning January 1 and ending June 30, which shall be filed no later than July 31.

The Fund's failure to file its 1987 Mid-Year Report by July 31, 1987 is a violation of 2 U.S.C. § 434(a)(4)(A)(iv).

The Fund failed to file its 1987 Year End Report of Receipts and Disbursements covering the period of July 1, 1987 to December 31, 1987. The Fund was notified on December 18, 1987 that the Year End Report was due on January 31, 1988. A Non-Filer Notice was sent to the Fund on February 19, 1988.

Pursuant to 2 U.S.C. § 434(a)(4)(A)(iv) all political committees other than authorized committees of a candidate shall file, in any calendar year without a regularly scheduled general

890040742835

election, a report covering the period beginning July 1 and ending December 31, 1987, which shall be filed no later than January 31, 1988.

On March 14, 1988, the Reports Analysis Division ("RAD") analyst attempted to contact the Fund. The treasurer was not available, so the RAD analyst left a message that he had called. As of this date, the 1987 Year End Report has not been filed.

The Fund's failure to file its 1987 Year End Report by January 31, 1988 is a violation of 2 U.S.C. § 434(a)(4)(A)(iv). Therefore, there is reason to believe that the Fund violated 2 U.S.C. § 434(a)(4)(A)(iv).

3 3 7 4 0 7 4 4 8 3 0

plm



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 6, 1988

John P. Bond, Treasurer
316 Pennsylvania Avenue, S.E.
Suite 400
Washington, D.C. 20003

Re: MUR 2605
21st Century Republican Fund
and John P. Bond, as treasurer

Dear Mr. Bond:

By letter dated June 1, 1988, the 21st Century Republican Fund ("the Fund") and you, as treasurer, were notified that on May 11, 1988, the Federal Election Commission found reason to believe that the Committee and you, as treasurer, had violated 2 U.S.C. § 434(a)(4)(A)(iv), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act").

To date, the Fund and you, as treasurer, have not responded to the notification. Unless we receive a response from you within 5 days, this Office will proceed to the next stage of the enforcement process.

Should you have any questions, please contact Ivonne Cotto, the staff person assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

By: Lois G. Lerner
Associate General Counsel

89040741837

HAND DELIVERED *Scot*
9997
RECEIVED
FEDERAL ELECTION COMMISSION

88 AUG -1 PM 2:24
MUR 2605

Ms. Ivone Cotto
Staff, Federal Election Commission
999 E Street, N.W.
Washington, D.C. 200

Dear Ms. Cotto:

On behalf of the Federal Election Commission, you have requested a written explanation for the delay in the Commission receiving the year end report for 1987 for the 21st Century Republican Fund.

In late January I mailed to the Commission by regular first class mail, the 1987 year end report and an amended Statement of Organization indicating a change of address. The Commission asserts that it never received that report. The Commission apparently attempted to notify me that this report was not received, but sent the notice to my previous address. For whatever reason, the post office did not forward that mail according to the change of address order which I filed with U.S. Postal Service. Not until several months later when a certified letter was addressed to my previous address and subsequently forwarded to me, did I learn that my original report did not arrive.

At that time I spoke by telephone with a reports analyst and was informed that a photocopy of the report would be sufficient for the required filing and he requested that I mail a photocopy by certified mail. Shortly thereafter, I hand delivered a photocopy of the report to the FEC mail room.

As the reports indicate, the 21st Century Republican Fund is a very small PAC which has only been active in one election. Activity since the 1986 elections have consisted entirely of retiring debt. There is no professional or even part time paid staff for the Fund as all activities are undertaken on a voluntary basis. It is the interest of the members of the Fund to participate in federal Republican and general elections and do wish to abide with all of the many burdensome requirements of participating in our electoral system and would be pleased to discuss with appropriate staff members any reporting questions the Commission may have.

Sincerely,
John Bond
John Bond
Treasurer
21st Century Republican Fund

89040742838

88 AUG -3 PM 4:59

RECEIVED
FEDERAL ELECTION COMMISSION

88 SEP -9 AM 9:21



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 8, 1988

SENSITIVEMEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble *LM*
General Counsel

SUBJECT: MUR #2605

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondent of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe were mailed on September 8, 1988. Following receipt of the respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

- 1-Brief
- 2-Letter to respondent

39040742859



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 8, 1988

John P. Bond, Treasurer
21st Century Republican Fund
36 E. Linden Avenue
Alexandria, VA 22301

RE: MUR 2605
21st Century Republican
Fund and John P. Bond, as
treasurer

Dear Mr. Bond:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission found reason to believe that the 21st Century Republican Fund ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv), and instituted an investigation in this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that violations have occurred.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of the General Counsel, if possible). The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

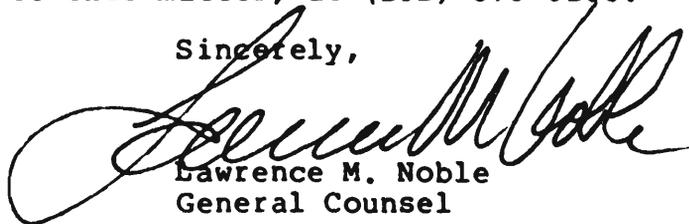
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John P. Bond
Page 2

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Ivonne Cotto the staff member assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
21st Century Republican Fund) MUR 2605
and John P. Bond, as treasurer)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

This matter arose as a referral from the Reports Analysis Division (hereinafter, "RAD"). RAD indicated that the 21st Century Republican Fund and John P. Bond, as treasurer, (hereinafter, "Respondents") failed to file its 1987 Mid-Year Report and 1987 Year End Report in a timely manner, in violation of 2 U.S.C. § 434(a)(4)(A)(iv).

On May 11, 1988, the Commission found reason to believe that the Respondents violated 2 U.S.C. § 434(a)(4)(A)(iv). A letter notifying Respondents of the Commission's finding was mailed on June 1, 1988. Respondent, John P. Bond, as shown on the green return receipt, received this notification on June 8, 1988. No response has been received to this notification. On July 6, 1988, this Office by certified mail forwarded an additional notice to Respondents informing them of the Commission's finding and, in addition, giving notice that if no response were forthcoming within five (5) days, this Office would proceed to the next stage of the enforcement process.

On August 1, 1988, a response was received from Respondents who contend that the 1987 Year End Report was sent in a timely manner; however, the respondents have furnished no certified return receipt or other record proving that they have filed on time. Respondents also contend that the notifications from RAD

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were never received since the letters were sent to the treasurer's previous address. Respondents eventually received a certified letter from RAD and filed the 1987 Year End Report on July 15, one hundred sixty-five days late. Respondents have not addressed the late filing of the 1987 Mid-Year Report.

II. LEGAL ANALYSIS

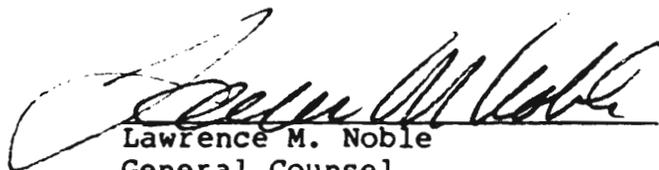
The Federal Election Campaign Act of 1971, as amended ("the Act"), pursuant to 2 U.S.C. § 434(a)(4)(A)(iv), requires a political committee to file, in any calendar year without a regularly scheduled general election, a report covering the period beginning January 1 and ending June 30, 1987, which shall be filed no later than July 31, 1987, and a report covering the period beginning July 1, and ending December 31, 1987, which should be filed no later than January 31, 1988.

The Respondents' failure to file its 1987 Mid-Year Report by July 31, 1987 and to file its 1987 Year End Report by January 31, 1988, is in violation of 2 U.S.C. § 434(a)(4)(A)(iv).

III. GENERAL COUNSEL'S RECOMMENDATION

Find probable cause to believe the 21st Century Republican Fund and John P. Bond, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv).

9/8/88
Date _____


Lawrence M. Noble
General Counsel

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FEDERAL ELECTION COMMISSION

In the matter of

21st Century Republican Fund,)
John P. Bond, Treasurer) MUR 2605

As stated in previous correspondence, the 1987 Year End Report was mailed to the FEC in a timely manner via first class U.S. Mail. As is commonly known, no receipt is available for this class of mail and, therefore, it is not possible to produce proof of mailing.

The Fund is a volunteer organization which has no paid staff or paid consultants assisting in administrative or operational activities.

It is the Fund's desire to reach a conciliation agreement and we request settlement discussions begin with the General Counsel's office at their earliest convenience.

September 24, 1988
Date

John P. Bond
John P. Bond
Treasurer

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BEFORE THE FEDERAL ELECTION COMMISSION

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In the Matter of)
)
21st Century Republican Fund)
and John P. Bond, as treasurer)

MUR 2605

EXECUTIVE SESSION

DEC 01 1988

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On May 11, 1988, the Commission found reason to believe that the 21st Century Republican Fund and John P. Bond, as treasurer (hereinafter "Respondents"), violated 2 U.S.C.

§ 434(a)(4)(A)(iv), by failing to file its 1987 Mid-Year Report and 1987 Year End Report in a timely manner.

Respondents were notified on July 7, 1987, that the 1987 Mid-Year Report was due on July 31, 1987, and were notified on December 18, 1987, that the 1987 Year End Report was due on January 31, 1988. Respondents filed the 1987 Mid-Year Report on October 14, 1987, seventy-four (74) days late and filed the 1987 Year End Report on July 15, 1988, one hundred sixty-five (165) days late.

A letter notifying the Respondents of reason to believe was mailed on June 1, 1988. On August 1, 1988, a response was received from Respondents who contend that the 1987 Year End Report was sent in a timely manner; however, Respondents furnished no certified return receipt or other evidence which would show that they filed on time. Respondents also contend that the notifications from the Reports Analysis Division ("RAD") were never received since the letters were sent to the treasurer's previous address. Respondents eventually received a

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certified letter from RAD and filed the 1987 Year End Report on July 15, 1988. Respondents did not address the late filing of the 1987 Mid-Year Report. Respondents did not request pre-probable cause in this letter.

A brief notifying Respondents that this Office would recommend to the Commission a finding of probable cause to believe was subsequently mailed on September 8, 1988. On September 28, 1988, a response was received from Respondents requesting to enter into negotiations for a conciliation agreement prior to a finding of probable cause. (Attachment 1). On October 20, 1988, this Office attempted to contact Respondents by telephone to explain that it was now too late to enter into pre-probable cause conciliation negotiations, therefore, this Office was recommending that the Commission find probable cause that they violated the Act. This Office, however, was unable to reach Respondents.

II. ANALYSIS

2 U.S.C. § 434(a)(4)(A)(iv), requires a political committee other than an authorized committee, to file in any calendar year without a regularly scheduled general election, a report covering the period beginning January 1 and ending June 30, which shall be filed no later than July 31, and a report covering the period beginning July 1, and ending December 31, which should be filed no later than January 31.

The Respondents' failure to file its 1987 Mid-Year Report by July 31, 1987, and failure to file its 1987 Year End Report by January 31, 1988, is in violation of 2 U.S.C. § 434(a)(4)(A)(iv).

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In a response to the General Counsel's Brief dated September 28, 1988, Respondents continue to argue that the 1987 Year End Report was filed in a timely manner by being mailed by regular mail, in late January. Because it was sent by regular mail, Respondents do not have a return receipt. However, this does not offset the fact that the report was filed late. Respondents again failed to address the 1987 Mid-Year Report which was also filed late.

Therefore, this Office recommends that the Commission find probable cause to believe that the 21st Century Republican Fund and John P. Bond, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv).

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

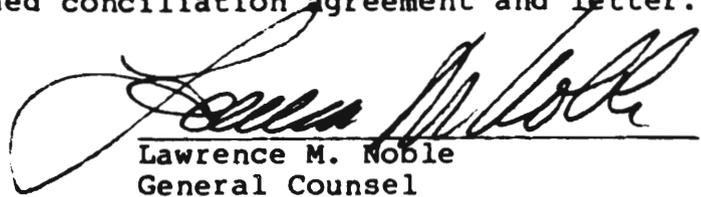
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IV. RECOMMENDATIONS

1. Find probable cause to believe that the 21st Century Republican Fund and John P. Bond, as treasurer violated 2 U.S.C. § 434(a)(4)(A)(iv).
2. Approve the attached conciliation agreement and letter.

4/16/88
Date


Lawrence M. Noble
General Counsel

Attachments:

1. Response
2. Conciliation Agreement
3. Letter

Staff Assigned: Ivonne Cotto

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
21st Century Republican Fund) MUR 2605
and John P. Bond, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of November 30, 1988, do hereby certify that the Commission decided by a vote of 4-0 to take the following actions in MUR 2605:

1. Find probable cause to believe that the 21st Century Republican Fund and John P. Bond, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv).
2. Approve the conciliation agreement and letter attached to the General Counsel's report dated November 16, 1988.

Commissioners Aikens, Elliott, McDonald, and McGarry voted affirmatively for the decision; Commissioners Josefiak and Thomas were not present at the time of the vote.

Attest:

12-1-88
Date

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

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FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20461

December 5, 1988

John P. Bond, Treasurer
21st Century Republican Fund
316 Pennsylvania Avenue, S.E.
Suite 400
Washington, D.C. 20003

RE: MUR 2605
21st Century Republican Fund
and John P. Bond, as
treasurer

Dear Mr. Bond:

On November 30, 1988, the Federal Election Commission found that there is probable cause to believe the 21st Century Republican Fund and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv), a provision of the Federal Election Campaign Act of 1971, as amended, in connection with the late filing of the 1987 Mid-Year Report and 1987 Year End Report.

The Commission has a duty to attempt to correct such violations for a period of 30 to 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement during that period, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission within ten days. I will then recommend that the Commission accept the agreement. Please make your check for the civil penalty payable to the Federal Election Commission.

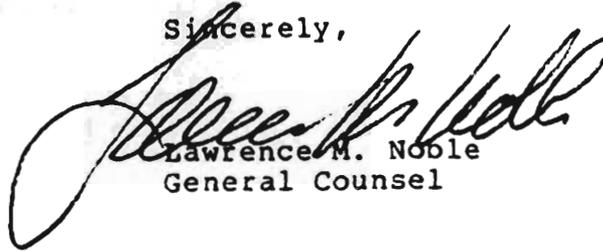
If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation

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John P. Bond
Page 2

agreement, please contact Ivonne Cotto, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

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FEDERAL ELECTION COMMISSION
MAIL ROOM

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January 11, 1989

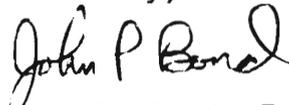
Federal Election Commission
Attn: Ms. Ivonne Cotto
999 E Street, N.W.
Washington, D.C. 20463

Dear Ms. Cotto:

As stated in today's phone conversation, I did not receive the mailing sent to me regarding MUR 2605 until last Friday afternoon, January 6, 1989. The mailing was addressed to a previous address of mine and was not forwarded.

Because of the delay in receiving the mailing, I request a thirty (30) day extension of time to resolve this matter.

Sincerely,



John P. Bond, Treasurer
21st Century Republican Fund

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
21st Century Republican Fund) MUR 2605
and John P. Bond, as treasurer)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by John P. Bond, the treasurer of the 21st Century Republican Fund ("Respondents").

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II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with the 21st Century Republican Fund and John P. Bond, as treasurer.
2. Close the file.

3. Approve the attached letter.

Lawrence M. Noble
General Counsel

3/15/87
Date

By: 
Lois G. Lerner
Associate General Counsel

Attachments

1. Conciliation Agreement
2. Letter to Respondent

Staff Assigned: Ivonne Cotto

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
21st Century Republican Fund) MUR 2605
and John P. Bond, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 20, 1989, the Commission decided by a vote of 6-0 to take the following actions in MUR 2605:

1. Accept the conciliation agreement with the 21st Century Republican Fund and John P. Bond, as treasurer, as recommended in the General Counsel's report signed March 15, 1989.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's report signed March 15, 1989.

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

Attest:

March 20, 1989

Date

Hilda Arnold
for Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary:	Wed.,	3-15-89,	4:00
Circulated on 48 hour tally basis:	Thurs.,	3-16-89,	11:00
Deadline for vote:	Mon.,	3-20-89,	11:00

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 27, 1989

John P. Bond, Treasurer
36 E Linden Avenue
Alexandria, VA 22301

RE: MUR 2605
21st Century Republican
Fund and John P. Bond
as treasurer

Dear Mr. Bond:

On March 20, 1989, the Federal Election Commission accepted the signed conciliation agreement submitted on your behalf in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(iv), 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 21st Century Republican Fund and you, as treasurer. 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.

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

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any

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John P. Bond
Page 2

questions, please contact Ivonne Cotto, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

Lois G. Lerner
BY: Lois G. Lerner *by LGL*
Associate General Counsel

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

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In the Matter of)
)
21st Century Republican Fund) MUR 2605
and John P. Bond, as treasurer)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found probable cause to believe that 21st Century Republican Fund and John P. Bond, as treasurer, ("Respondents") violated 2 U.S.C. § 434(a)(4)(A)(iv).

NOW, THEREFORE, the Commission and the Respondents, having duly entered into conciliation, pursuant to 2 U.S.C. § 437g(a)(4)(A)(i), do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents, and the subject matter of this proceeding.

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, 21st Century Republican Fund is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Respondent, John P. Bond is the treasurer of 21st Century Republican Fund.

3. Section 434(a)(4)(A)(iv) of Title 2 provides that unauthorized committees filing quarterly shall file a Mid-Year

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Report in which no regularly scheduled elections are held, no later than July 31 of that year.

4. Respondents were required to file the 1987 Mid-Year Report no later than July 31, 1987. Respondents filed the 1987 Mid-Year Report on October 14, 1987, seventy five days late. The total activity for the period was \$3,626.

5. Section 434(a)(4)(A)(iv) of Title 2 provides that unauthorized committees filing quarterly shall file a Year End Report in which no regularly scheduled elections are held, no later than January 31, 1988.

6. Respondents were required to file the 1987 Year End Report no later than January 31, 1988. Respondents filed the 1987 Year End Report on July 15, 1988, one hundred sixty-five days late. The total activity for the period was \$494.

V. 1. Respondents failed to file the 1987 Mid-Year Report in a timely fashion in violation of 2 U.S.C. § 434(a)(4)(A)(iv).

2. Respondents failed to file the 1987 Year End Report in a timely fashion in violation of 2 U.S.C. § 434(a)(4)(A)(iv).

3. Respondents contend that the above violations were not knowing and willful.

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Three Hundred Dollars (\$300), 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

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herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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

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

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

BY: Lois G. Lerner
Lois G. Lerner
Associate General Counsel

March 24, 1989
Date

FOR THE RESPONDENTS:

John P. Bond
John P. Bond
Treasurer

Feb. 10, 1989
Date

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2605

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