



FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

THIS IS THE BEGINNING OF MUR # 2661

DATE FILMED 1/5/89 CAMERA NO. 4

CAMERAMAN AS

89040730021



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 23, 1988

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

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

SUBJECT: REFERRAL OF APRIL QUARTERLY NON-FILER UNAUTHORIZED
COMMITTEES

Attached, for referral to your office, are seven (7) unauthorized committees that failed to file the 1988 April Quarterly Report

In accordance with Standard 3 of the 1987-1988 RAD Review and Referral Procedures for Unauthorized Committees, this matter requires further examination by your office.

All seven committees were sent prior notice of the due date of the report on March 22, 1988 and were sent Non-Filer Notices on May 6, 1988 (see Attachments 1 and 2).

Included in this document is a chart which lists each committee in alphabetical order along with the address and name of treasurer, any contacts with the committees, responses and/or reports filed by the committee and the attachment number where the items can be located within the document.

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

Attachments

82040730022

Committees Involved in 1985-1986/1987-1988 Election Cycle OGC Referrals

1.

2.

3.

4.

89040730023

1.

2.

3.

4.

5.

6. **88NF-28: United Virginia Bankshares Responsible Government Fund (C00214965)**

7.

89040730024

8 3 0 4 0 7 3 0 0 2 5

page 1

COMMITTEE ID, NAME AND ADDRESS

CONTACTS
WITH FILER ATCH

REPORTS FILED/
RESPONSES

.....

.....

.....

.....

.

COMMITTEE ID, NAME AND ADDRESS

CONTACTS
WITH FILER ATCHREPORTS FILED/
RESPONSES

.....

C00214965
 UNITED VIRGINIA BANKSHARES RESPONSIBLE GOVERNMENT FUND*
 TREASURER'S NAME: J THOMAS VAUGHAN
 919 EAST MAIN STREET
 RICHMOND VA 23219

Telecon
 5/31/88

8a-d

Letter filed 6/9/88

April Quarterly
 Report filed 6/14/88

*The committee's name is listed on the Summary Page of the 1987 Year End and 1988 April Quarterly Reports as Crestar Financial Corporation Responsible ... Government Fund. The Commission, however, has not received an amended Statement of Organization indicating a change in the name or connected organization.

QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

March 22, 1988

REPORT	REPORTING PERIOD	REG./CERT. MAILING DATE*	FILING DATE
April Quarterly	01/01/88**-03/31/88	04/15/88	04/15/88

WHO MUST FILE

PARTY COMMITTEES AND PACS (NONCONNECTED COMMITTEES AND SEPARATE SEGREGATED FUNDS) filing on a quarterly basis must file their next report in April.

WHAT MUST BE REPORTED

All financial activity (not previously reported) that occurred during the reporting period..

REPORTING FORMS

Party committees and PACs use Form 3X (enclosed).

WHERE TO FILE

Consult the instructions on the back of the Form 3X Summary Page. Note state filing requirements also.

LABEL

Committees should affix the peel-off label from the envelope to Line 1 of the report. Corrections should be made on the label.

PRE-ELECTION REPORTING

Committees which make contributions or expenditures (including independent expenditures) in connection with a candidate's primary election, must also file a 12-day Pre-Election Report if the activity was not previously reported. See the January Record.

LAST-MINUTE INDEPENDENT EXPENDITURES

Committees which make an independent expenditure of \$1,000 or more, after the 20th day, but more than 24 hours before an election, must report it within 24 hours.

COMPLIANCE

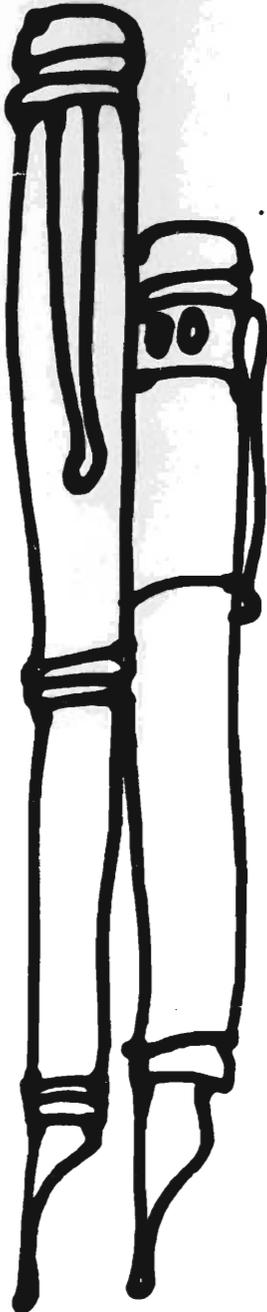
TREASURERS OF POLITICAL COMMITTEES ARE RESPONSIBLE FOR FILING ALL REPORTS ON TIME. FAILURE TO DO SO IS SUBJECT TO ENFORCEMENT ACTION. COMMITTEES FILING ILLEGIBLE REPORTS OR USING NON-FEC FORMS WILL BE REQUIRED TO REFILE.

*Reports sent by registered or certified mail must be postmarked by the mailing date. Otherwise, they must be received by the filing date.

**From the date of registration, or the close of books of the last report filed, whichever is later.

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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-7

May 6, 1988

**TREASURER
COMMITTEE
STREET ADDRESS
CITY STATE ZIP**

Identification Number: XX

Reference: April Quarterly Report (1/1/88-3/31/88)

Dear **TREASURER**:

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, 99 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 **ANALYST** 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

89040730028

**United Virginia Bankshares Responsible
Government Fund (C00214965)**

(Attachments 8a - d)

89040730029

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FEDERAL ELECTION COMMISSION
1987-1988

DATE 16JUN88

COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

PAGE 2

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	0 OF PAGES	MICROFILM LOCATION TYPE OF FILES
UNITED VIRGINIA BANKSHARES RESPONSIBLE GOVERNMENT FUND				ID 0C00214965 NON-PARTY NON-QUALIFIED		
CONNECTED ORGANIZATION: UNITED VIRGINIA BANKSHARES INC						
	1987 STATEMENT OF ORGANIZATION			4MAY87	3	87FEC/467/0039
	MID-YEAR REPORT	17,491	0	1JAN87 -30JUN87	6	87FEC/482/2638
	YEAR-END	50,636	31,854	1JAN87 -31DEC87	13	88FEC/515/34214
	YEAR-END - AMENDMENT	50,636	31,854	1JUL87 -31DEC87	15	88FEC/529/0059
	REQUEST FOR ADDITIONAL INFORMATION			1JAN87 -31DEC87	2	88FEC/525/0637
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN87 -31DEC87	3	88FEC/528/31
1988	MISCELLANEOUS NOTICE FROM FEC			25MAY88	1	88FEC/528/01
	MISCELLANEOUS REPORT TO FEC			9JUN88	2	88FEC/528/4898
	MISCELLANEOUS REPORT TO FEC			10JUN88	2	88FEC/529/0315
	APRIL QUARTERLY	200	7,900	1JAN88 -31MAR88	4	88FEC/529/0075
	NOTICE OF FAILURE TO FILE			1JAN88 -31MAR88	1	88FEC/524/4888
	JULY QUARTERLY	14,292	1,825	1APR88 -31MAY88	5	88FEC/529/1363
	TOTAL	82,619	0		57	TOTAL PAGES

All reports have been reviewed.

Ending cash-on-hand balance as of 5/31/88: \$41,042

Debts and obligations owed by the committee as of 5/31/88: \$0

MEMORANDUM TO THE FILES:

COMMITTEE: United Virginia Bankshares Resonsible Government Fund
I.D. NUMBER: C00214965
CONTACT: J. Thomas Vaughan, Treasurer
DATE: May 31, 1988
ANALYST: Robert B. DiNardo
SUBJECT: 1988 April Quarterly Report

29040730031
I called Mr. Vaughan at 4:05 P.M. Mr. Vaughan was not available, so I left a message that the Commission had not received his committee's 1988 April Quarterly Report, and to call me back if he had any questions. The secretary said the report was mailed, and that she would give Mr. Vaughan the message.

1000 Main Street
Arlington, Virginia 22202
Tel 6865

FEB 27

88 JUN - 11 11:20

J Thomas Vaughan



June 10, 1988

Mr. John D. Gibson
Assistant Staff Director
Reports Analysis Director
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Gibson:

In response to your letter of June 2, we have been in contact with Mr. DiNardo by telephone on two occasions, first we notified him we were unaware of the necessity to file more than once a year; but were told because 1988 being an election year, that we had to file quarterly. Our second call to Mr. DiNardo was for clarification of our 1987 year-end filing that he had questioned.

The corrected year-end, April 14 and June 10th reports will be sent to your attention by June 14, 1988. I am very sorry for the inconvenience and the misunderstanding regarding the filings.

Sincerely,

J. Thomas Vaughan, Treasurer
Crestar Responsible Government Fund

cc: Mr. Robert B. DiNardo
Reports Analyst

REPORT OF RECEIPTS AND DISBURSEMENTS HAND DELIVERED

For Other Than An Authorized Committee
(Summary Page)

FEC FORM 3X
REVISED 4-87

SEE FEC REGULATIONS ON TYPE OR PRINT

1. NAME OF COMMITTEE (in full) Greater Financial Corporation Responsible Government Fund ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 919 East Main Street CITY, STATE and ZIP CODE Richmond, Virginia 23219		2. FEC IDENTIFICATION NUMBER COO214865 3. <input type="checkbox"/> This committee qualified as a subordinate 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 (Non-election Year Only)
 Termination Report

Monthly Report Due On

<input type="checkbox"/> February 20	<input type="checkbox"/> June 20	<input type="checkbox"/> October 20
<input type="checkbox"/> March 20	<input type="checkbox"/> July 20	<input type="checkbox"/> November 20
<input type="checkbox"/> April 20	<input type="checkbox"/> August 20	<input type="checkbox"/> December 20
<input type="checkbox"/> May 20	<input type="checkbox"/> September 20	<input type="checkbox"/> January 31

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
4. Covering Period <u>January 1, 1988 through March 31, 1988</u>		
5. (a) Cash on Hand January 1, '88		
(b) Cash on Hand at Beginning of Reporting Period		
(c) Total Receipts (from Line 18)	\$ 200.00	\$ 200.00
(d) Subtotal (add Lines 5(b) and 5(c) for Column A and Lines 5(a) and 5(c) for Column B)	\$ 36,473.90	\$ 36,473.90
6. Total Disbursements (from Line 28)	\$ 7,900.00	\$ 7,900.00
7. Cash on Hand at Close of Reporting Period (subtract Line 6 from Line 5(d))	\$ 28,573.90	\$ 28,573.90
8. Debts and Obligations Owed TO the Committee (itemize all on Schedule C and or Schedule D)	\$ None	
9. Debts and Obligations Owed BY the Committee (itemize all on Schedule C and or Schedule D)	\$ None	

I certify that 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:
William C. Lewiston Assistant Treasurer

 Date: 6-13-88

NOTE: Submission of false, erroneous or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g

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FEDERAL ELECTION COMMISSION

83 JUL 21 PM 4:00

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD Referral 88NF 23-29
Staff Member: Susan Beard

SOURCE: INTERNALLY GENERATED

RESPONDENTS:

United Virginia Bankshares Responsible Government
Fund and J. Thomas Vaughan, as treasurer

RELEVANT STATUTES: 2 U.S.C. § 432(e)(5)
2 U.S.C. § 433(c)
2 U.S.C. § 434(a)(4)(A)(i)

INTERNAL REPORTS CHECKED: Referral Materials

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred the above seven-committees to the Office of the General Counsel on June 23, 1988. The basis for the attached referral is the committees' failure to file the 1988 April Quarterly Report or to do so in a timely fashion.

39040730034

II. FACTUAL AND LEGAL ANALYSIS

A. Filing of Reports

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that for unauthorized committees filing quarterly, such committees shall file quarterly reports, in a calendar year in which a regularly scheduled general election is held. 2 U.S.C. § 434(a)(4)(A)(i). Quarterly Reports are to be filed no later than the 15th day after the last day of each calendar quarter. Thus, the due date for the 1988 April Quarterly Report was April 15, 1988. The following committees did not file the 1988 April Quarterly Report by this date:

Name of Committee

Date Report Filed

United Virginia Bankshares
Responsible Government Fund

June 14, 1988

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8 7 0 4 0 7 3 0 0 3 6

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The RAD Referral Materials indicate that United Virginia Bankshares Responsible Government Fund listed its name as "Crestar Financial Corporation Responsible Government Fund" on its 1987 Year End and 1988 April Quarterly Reports. An amended Statement of Organization indicating a change in the Committee's name or the connected organization's name has not been received.

Accordingly, the office of the General Counsel recommends that the Commission find reason to believe that United Virginia Bankshares Responsible Government Fund and J. Thomas Vaughan, as treasurer, violated 2 U.S.C. § 432(e)(5).

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III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

8 2 0 4 0 7 3 0 0 3 9

39040730040

III. RECOMMENDATIONS

1.

2.

3. 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)(i):

a.

b.

c.

d. United Virginia Bankshares Responsible Government Fund and J. Thomas Vaughan, as treasurer; and,

4.

5. Find reason to believe that United Virginia Bankshares Responsible Government Fund and J. Thomas Vaughan, as treasurer, violated 2 U.S.C. § 432(e)(5).

6.

7.

8. Enter into conciliation with the following committees and their treasurers prior to a finding of probable cause to believe:

a.

b.

c.

d. United Virginia Bankshares Responsible Government Fund and J. Thomas Vaughan, as treasurer; and,

e.

9. Approve the attached letters, factual and legal analyses, and proposed conciliation agreements to the respective committees listed in recommendation 8.

Lawrence M. Noble
General Counsel

July 21, 1988
Date

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

Attachments

- 1. Referral Materials
- 2. Proposed Conciliation Agreements (5),
Letters (5), and Factual and Legal Analyses (5)

9 2 0 4 0 7 3 0 0 4 1

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

RAD Ref. 88NF 23-29

(MURS 2658-2662)

United Virginia Bankshares Responsible
Government Fund and J. Thomas Vaughan,
as treasurer

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 27, 1988, the Commission decided by a vote of 5-1 to take the following actions in RAD Ref. 88NF 23-29:

- 1.

(Continued)

3 2 0 4 0 7 3 0 0 4 2

2.

3. 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)(i):

a.

b.

c.

d. United Virginia Bankshares Responsible Government Fund and J. Thomas Vaughan, as treasurer; and,

e.

4.

5. Find reason to believe that United Virginia Bankshares Responsible Government Fund and J. Thomas Vaughan, as treasurer, violated 2 U.S.C. § 432(e)(5).

6.

7.

32040730043

8. Enter into conciliation with the following committees and their treasurers prior to a finding of probable cause to believe:

a.

b.

c.

d. United Virginia Bankshares Responsible Government Fund and J. Thomas Vaughan, as treasurer; and,

e.

9. Approve the letters, factual and legal analyses, and proposed conciliation agreements to the respective committees listed in action 8 above.

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

Attest:

7-28-88

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Thurs., 7-21-88, 4:00
Circulated on 48 hour tally basis: Fri., 7-22-88, 12:00
Deadline for vote: Tues., 7-27-88, 4:00
JMcF.

89040730044



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 2, 1988

J. Thomas Vaughan
United Virginia Bankshares Responsible
Government Fund
919 East Main Street
Richmond, VA 23219

RE: MUR 2661
United Virginia Bankshares
Responsible Government
Fund and J. Thomas
Vaughan, as treasurer

Dear Mr. Vaughan:

On July 27, 1988, the Federal Election Commission found that there is reason to believe United Virginia Bankshares Responsible Government Fund ("Committee") and you, as treasurer, violated 2 U.S.C. §§ 432(e)(5) and 434(a)(4)(A)(i), provisions 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.

In order to expedite the resolution of this matter, the Commission has also decided to offer 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.

If you are interested in expediting the resolution of this matter by pursuing preprobable cause conciliation and if you agree with the provisions of the enclosed agreement, please sign and return the agreement, along with the civil penalty, to the

89040730045

flm

J. Thomas Vaughan
Page 2

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.

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 Michael Marinelli, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Thomas J. Josefiak
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Conciliation Agreement

30040730046

Crestar Bank
919 East Main Street
P.O. Box 26665
Richmond, Virginia 23261-6665
(804) 782-7906

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

08 SEP -8 AM 8:59

600#337

J. Thomas Vaughan
Senior Vice President and
Corporate Government Relations Officer

CRESTAR

September 1, 1988

Mr. George F. Rishel
Assistant General Counsel
Federal Election Commission
Washington, D.C. 20463

RE: MUR 2661
United Virginia Bankshares
Responsible Government
Fund and J. Thomas
Vaughan, as Treasurer

88 SEP -9 PM 12:01

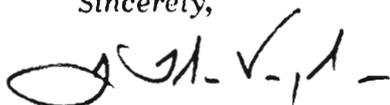
RECEIVED
FEDERAL ELECTION COMMISSION

Dear Mr. Rishel:

Enclosed is the signed Conciliation Agreement and our check for \$600.00.

I appreciate your assistance and consideration and apologize for the inconvenience this matter has caused the Commission. We will make every effort to assure that future filings are made on time.

Sincerely,



J. Thomas Vaughan

/sds

Enclosure

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2661
United Virginia Bankshares Responsible)
Government Fund and J. Thomas Vaughan,)
as treasurer)

SENSITIVE
EXECUTIVE SESSION
OCT 04 1988

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by J. Thomas Vaughan, the treasurer of United Virginia Bankshares Responsible Government Fund (the "Committee").

On July 27, 1988, the Commission found reason to believe that the Committee had violated 2 U.S.C. §§ 432(e)(5) and 434(a)(4)(A)(i) by failing to timely file its 1988 April Quarterly Report and failing to amend its Statement of Organization to reflect a change in the name of its connected organization.

In accordance with the provisions of the conciliation

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agreement on August 17, 1988, the Committee amended its Statement of Organization to change the Committee's name from United Virginia Bankshares Responsible Government Fund to Crestar Financial Corporation Responsible Government Fund.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with United Virginia Bankshares Responsible Government Fund and J. Thomas Vaughan, as treasurer.
2. Close the file
3. Approve the attached letter.

Lawrence M. Noble
General Counsel

9/22/88
Date

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

Attachments

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

Staff Assigned: Michael Marinelli

89040730050



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS / CANDACE M. JONES *omy*
COMMISSION SECRETARY

DATE: September 27, 1988

SUBJECT: Objection to MUR 2661 - General Counsel's Report
Signed September 22, 1988

The above-captioned document was circulated to the
Commission on Monday, September 26, 1988 at 11:00 A.M..

Objection(s) have been received from the Commissioner(s)
as indicated by the name(s) checked below:

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

This matter will be placed on the meeting agenda
for Tuesday, October 4, 1988.

Please notify us who will represent your Division before the
Commission on this matter.

2 2 0 4 0 7 3 0 0 5 1

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
United Virginia Bankshares Responsible) MUR 2661
Government Fund and J. Thomas Vaughan,)
as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of October 4, 1988, do hereby certify that the Commission decided by a vote of 6-0 to return the September 22, 1988 report on MUR 2661 to the Office of General Counsel in order that a report can be submitted with the amended conciliation agreement.

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

Attest:

10-4-88
Date

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

89040730052

TJL



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 12, 1988

J. Thomas Vaughan, Treasurer
United Virginia Bankshares Responsible
Government Fund
919 East Main Street
Richmond, VA 23219

RE: MUR MUR 2661
United Virginia Bankshares
Responsible Government
Fund and J. Thomas
Vaughan, as treasurer

Dear Mr. Vaughan:

Enclosed is the corrected conciliation agreement.
As per conversation with staff from this Office, the signed
conciliation agreement will be brought before the Commission for
a final vote with the Office of the General Counsel's
recommendation for approval.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

8 9 0 4 0 7 3 0 0 5 3

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2661
United Virginia Bankshares Responsible)
Government Fund and J. Thomas Vaughan,)
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 reason to believe that United Virginia Bankshares Responsible Government Fund and J. Thomas Vaughan, as treasurer, ("Respondents") violated 2 U.S.C. §§ 432(e)(5) and 434(a)(4)(A)(i).

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. United Virginia Bankshares Responsible Government

99040730054

Fund is a political committee within the meaning of 2 U.S.C. § 431(4).

2. J. Thomas Vaughan is the treasurer of United Virginia Bankshares Responsible Government Fund.

3. Section 434(a)(4)(A)(i) of Title 2 provides that unauthorized committees filing quarterly shall file quarterly reports in a calendar year in which a regularly scheduled election is held. Quarterly reports are to be filed no later than the 15th day after the last day of each calendar quarter.

4. Respondents were required to file the 1988 April Quarterly Report no later than April 15, 1988. Respondents did not file the 1988 April Quarterly Report until June 14, 1988, disclosing receipts of \$200 and disbursements of \$7,900.

5. Section 432(e)(5) of Title 2 provides that the name of any separate segregated fund established pursuant to Section 441b(b) shall include the name of its connected organization.

6. Respondents have not filed an Amended Statement of Organization indicating a change in Respondents' name or its connected organization's name.

V. 1. Respondents failed to file the 1988 April Quarterly Report in a timely fashion in violation of 2 U.S.C. § 434(a)(4)(A)(i).

2. Respondents' name does not contain the name of Respondents' connected organization in violation of 2 U.S.C. § 432(e)(5).

VI. 1. Respondents will pay a civil penalty to the Federal

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Election Commission in the amount of six hundred dollars (\$600.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

2. Respondents will file an Amended Statement of Organization indicating a change in Respondents' name or the name of Respondents' connected organization.

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

VIII. This agreement shall become effective as of the date that all parties hereto 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

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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
Associate General Counsel

Date

FOR THE RESPONDENTS:

(Name)
(Position)

Date

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR • 2661

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
United Virginia Bankshares Responsible) MUR 2661
Government Fund and J. Thomas Vaughan,)
as treasurer)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by J. Thomas Vaughan, the treasurer of United Virginia Bankshares Responsible Government Fund (the "Committee").

On July 27, 1988, the Commission found reason to believe that the Committee had violated 2 U.S.C. §§ 432(e)(5) and 434(a)(4)(A)(i) by failing to timely file its 1988 April Quarterly Report and failing to amend its Statement of Organization to reflect a change in the name of its connected organization.

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In accordance with the provisions of the conciliation agreement on August 17, 1988, the Committee amended its Statement of Organization to change the Committee's name from United Virginia Bankshares Responsible Government Fund to Crestar Financial Corporation Responsible Government Fund.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with United Virginia Bankshares Responsible Government Fund and J. Thomas Vaughan, as treasurer.
2. Close the file
3. Approve the attached letter.

Lawrence M. Noble
General Counsel

11-1-88
Date

BY: 
Lois G. Lerner
Associate General Counsel

Attachments

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

Staff Assigned: Michael Marinelli

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

United Virginia Bankshares Responsible)
Government Fund and J. Thomas Vaughan,)
as treasurer)

MUR 2661

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 4, 1988, the Commission decided by a vote of 6-0 to take the following actions in MUR 2661:

1. Accept the conciliation agreement with United Virginia Bankshares Responsible Government Fund and J. Thomas Vaughan, as treasurer, as recommended in the General Counsel's report signed November 1, 1988.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's report signed November 1, 1988.

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

Attest:

Nov. 4, 1988

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary:	Wed.,	11-2-88,	10:55
Circulated on 48 hour tally basis:	Wed.,	11-2-88,	4:00
Deadline for vote:	Fri.,	11-4-88,	4:00

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 10, 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

J. Thomas Vaughan, Treasurer
United Virginia Bankshares Responsible
Government Fund
919 East Main Street
Richmond, VA 23219

RE: MUR 2661
United Virginia Bankshares
Responsible Government
Fund and J. Thomas
Vaughan, as treasurer

Dear Mr. Vaughan:

On November 4, 1988, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your behalf in settlement of a violation of 2 U.S.C. §§ 432(e)(5) and 434(a)(4)(A)(i), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter. This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

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

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J. Thomas Vaughan
Page 2

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Michael Marinelli, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel



BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2661
United Virginia Bankshares Responsible)
Government Fund and J. Thomas Vaughan,)
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 reason to believe that United Virginia Bankshares Responsible Government Fund and J. Thomas Vaughan, as treasurer, ("Respondents") violated 2 U.S.C. §§ 432(e)(5) and 434(a)(4)(A)(i).

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. United Virginia Bankshares Responsible Government

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Fund is a political committee within the meaning of 2 U.S.C. § 431(4).

2. J. Thomas Vaughan is the treasurer of United Virginia Bankshares Responsible Government Fund.

3. Section 434(a)(4)(A)(i) of Title 2 provides that unauthorized committees filing quarterly shall file quarterly reports in a calendar year in which a regularly scheduled election is held. Quarterly reports are to be filed no later than the 15th day after the last day of each calendar quarter.

4. Respondents were required to file the 1988 April Quarterly Report no later than April 15, 1988. Respondents did not file the 1988 April Quarterly Report until June 14, 1988, disclosing receipts of \$200 and disbursements of \$7,900.

5. Section 432(e)(5) of Title 2 provides that the name of any separate segregated fund established pursuant to Section 441b(b) shall include the name of its connected organization.

6. Respondents have not filed an Amended Statement of Organization indicating a change in Respondents' name or its connected organization's name.

V. 1. Respondents failed to file the 1988 April Quarterly Report in a timely fashion in violation of 2 U.S.C. § 434(a)(4)(A)(i).

2. Respondents' name does not contain the name of Respondents' connected organization in violation of 2 U.S.C. § 432(e)(5).

VI. 1. Respondents will pay a civil penalty to the Federal

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Election Commission in the amount of six hundred dollars (\$600.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

2. Respondents will file an Amended Statement of Organization indicating a change in Respondents' name or the name of Respondents' connected organization.

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

VIII. This agreement shall become effective as of the date that all parties hereto 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

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oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

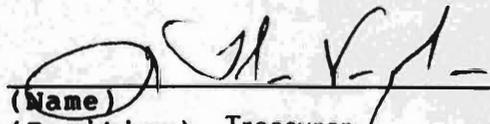
FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

4/10/88
Date

FOR THE RESPONDENTS:


(Name)
(Position) Treasurer

10-17-88
Date

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2661

DATE FILMED 11/5/89 CAMERA NO. 4

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