FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2800

DATE FILMED 8/24/90 CAMERA NO. 3

CAMERAMAN AS

9004079227

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 29 June 1988

ANALYST: Anthony Raymond

I. COMMITTEE: League of Conservation Voters
(C00094870)
Tina Hobson, Treasurer
(1/7/88-Present)
Alden Meyer, Treasurer
(1/1/87-1/6/88)
2000 L Street, N.W., Suite 804 1/
Washington, DC 20036

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

III. BACKGROUND:

Receipt of Apparent Excessive Contributions

The League of Conservation Voters ("LCV") disclosed the receipt of four apparent excessive contributions totalling $20,750 from individuals during calendar year 1987.

A. Possible Violations Discovered During Initial Review

The League of Conservation Voters disclosed $20,000 in loans received on the Detailed Summary Page of its 1987 Year End Report filed on February 1, 1988. Only $10,000 of that total was itemized on the loan schedule -$5,000 loaned each by Alden M. Meyer and Nalinda J. Kehoe on August 7, 1987. None of the $20,000 in loans received was itemized on the receipt schedule. In addition, two $5,000 contributions, one from Mr. Meyer and one from Ms. Kehoe, were disclosed as being received on August 14, 1987. Also disclosed in the report were three (3) loan repayments totalling $15,000 and one "loan replacement" of $5,000 itemized as operating expenditures, all with the notations "check has not been cashed." The "loan replacement" was made to Ms. Kehoe on August 13, 1987, and one loan repayment of $5,000 was made to Mr. Meyer on the same date. The two additional loan repayments of $5,000 to each individual occurred on August 30, 1987. No loan repayments were recorded on the loan schedule, however (Attachment 2).

1/ On April 15, 1988, LCV changed its address from 320 Fourth Street, N.E., Washington, DC 20002 to the above.

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On March 25, 1988, the Reports Analysis Division ("RAD") analyst sent a Request For Additional Information ("RFAI") for the 1987 Year End Report noting the discrepancies listed above (Attachment 3).

On April 7, 1988, John J. Duffy, an attorney representing LCV, wrote to request a thirty (30) day extension to respond to the RFAI (Attachment 4). On April 8, 1988, the RAD analyst called and left Mr. Duffy a message explaining that extensions for responding to RFAIs were not granted, but that a Second Notice would be sent on April 14, 1988, giving LCV an additional fifteen (15) days to respond (Attachment 5).

On April 14, 1988, a Second Notice was sent to LCV for failure to adequately respond (Attachment 6).

On April 15, 1988, LCV filed the 1988 April Quarterly Report. The report disclosed four (4) $5,000 uncashed loan repayments as negative entries with Alden Meyer listed as the sole "Lender repaid". In addition, two (2) $10,000 disbursements were recorded as occurring on March 29, 1988 - one to Mr. Meyer, the other to Ms. Kehoe. On the loan schedule of the report, the two previously disclosed $5,000 loans by Mr. Meyer and Ms. Kehoe were negated and explained as follows:

> Please see note below; same applies to Ms. Kehoe...Mr. Meyer loaned LCV $10,000 in 1987 and contributed $5,000. The loans & contributions are reported on the 12/31/87 report. The loans were repaid with checks dated 8/87. As we noted at 12/31/87, those checks were never presented to the LCV's account for payment. The account was reported with a negative balance. Replacement certified checks were purchased & delived [sic] to Mr. Meyer (Attachment 7).

On May 12, 1988, Mr. Duffy came to RAD to discuss the March 25, 1988, RFAI. He explained that Claudia Schechter, LCV's assistant treasurer, had informed him that during the year 1987, LCV had experienced financial problems as evidenced on its reports. He stated that Alden Meyer and Nalinda Kehoe had each made a $10,000 loan to LCV which had been improperly reported. He stated that the loans had been repaid within the month of August 1987; however, the payees had not cashed the checks because Mr. Meyer and Ms. Kehoe were aware that LCV did not have sufficient funds in its accounts to cover the loan repayments. Subsequently, Mr. Duffy explained, the original loan repayments were voided

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and new loan repayments were reissued as certified checks. The items, he noted, had been presented for payment (Attachment 8).

On May 25, 1988, LCV filed an amended 1987 Year End Report that disclosed on both the receipt and loan schedules two (2) $10,000 loans received. One was from Mr. Meyer, and one from Ms. Kehoe, and both were incurred on August 7, 1987. Both loans disclosed a "on demand" due date. Four loan repayments of $5,000 each were also disclosed. These loan repayments, which had previously been disclosed as a loan replacement and loan repayments in the original 1987 Year End Report, listed Mr. Meyer in each itemization. Ms. Kehoe was listed with Mr. Meyer in two of the items. A note on the schedule stated, "Please note that these four checks were never presented to LCV for payment." (Attachment 9).

On May 26, 1988, the RAD analyst called Mr. Duffy. The RAD analyst stated that the public record remained ambiguous concerning the four uncashed items listed on the 1988 April Quarterly Report that listed Mr. Meyer as the original payee--possibly indicating that more than $10,000 was loaned by Mr. Meyer. Mr. Duffy said that the items the analyst mentioned were representative of the loan repayments originally made to Ms. Kehoe. He indicated his belief that the record appeared to be clear, but could submit a clarifying letter, if necessary (Attachment 10).

On June 10, 1988 the RAD analyst sent LCV an Informational Notice for the 1987 Year End Report noting the acceptance of apparent excessive contributions and subsequent refunds. The Notice stated that the Commission may take further legal steps concerning the apparent violation (Attachment 11).

To this date, no additional clarifying information has been submitted by LCV.

B. Additional Possible Violations Discovered During Referral Preparation

LCV's 1987 Year End and 1988 April Quarterly Reports disclosed additional apparent excessive contributions totalling $750. The 1987 Year End Report disclosed a $5,000 contribution from Jocelyn Alexander received on July 23, 1987. The report also disclosed a $250 contribution from Jocelyn Alexander received on November 2, 1987 resulting in an apparent $250 excessive contribution (Attachment 2). The 1987 Year End Report also disclosed a $5,000 contribution

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from Maitland A. Edey received on July 10, 1987 (Attachment 2). LCV's 1988 April Quarterly Report disclosed an additional $500 contribution from Mait Edey received on December 29, 1987 resulting in an apparent $500 excessive contribution (Attachment 7). LCV has not been notified of these apparent excessive contributions and to date has not refunded or transferred-out any of the excessive amounts.

IV. Other Pending Matters Initiated By RAD

None

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

DATE 29JUN88

COMMITTEE DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
			TYPE OF FILER		
LEAGUE OF CONSERVATION VOTERS			ID #C00094870 NON-PARTY QUALIFIED		
CONNECTED ORGANIZATION: CONSERVATION VOTERS: LEAGUE OF					
1987 MISCELLANEOUS REPORT TO FEC			29JAN87	1	87FEC/456/5046
MISCELLANEOUS REPORT FROM FEC			27FEB87	1	87FEC/461/4862
MID-YEAR REPORT	1,023,481	1,050,794	1JAN87 -30JUN87	527	87FEC/482/3314
MID-YEAR REPORT - AMENDMENT	-	-	1JAN87 -30JUN87	3	87FEC/493/1918
REQUEST FOR ADDITIONAL INFORMATION			1JAN87 -30JUN87	1	87FEC/492/2997
YEAR-END	914,593	925,156	1JUL87 -31DEC87	315	88FEC/504/4399
YEAR-END - AMENDMENT	914,593	905,156	1JUL87 -31DEC87	16	88FEC/528/0565
REQUEST FOR ADDITIONAL INFORMATION			1JUL87 -31DEC87	2	88FEC/512/107[illegible]
REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL87 -31DEC87	1	88FEC/518/50[illegible]
1'ST LETTER INFORMATIONAL NOTICE			1JUL87 -31DEC87	3	88FEC/529/01[illegible]
1988 MISCELLANEOUS REPORT TO FEC			7APR88	1	88FEC/516/1[illegible]
STATEMENT OF ORGANIZATION - AMENDMENT			15APR88	1	88FEC/519/2415
DEBT SETTLEMENT STATEMENT			15APR88	1	88FEC/529/2941
RFAI: DEBT SETTLEMENT FIRST			8JUN88	1	88FEC/528/4730
APRIL QUARTERLY	440,123	391,471	1JAN88 -31MAR88	75	88FEC/519/5241
APRIL QUARTERLY - AMENDMENT	440,107	391,471	1JAN88 -31MAR88	41	88FEC/524/0832
REQUEST FOR ADDITIONAL INFORMATION			1JAN88 -31MAR88	2	88FEC/529/1973
TOTAL	2,378,181 0	2,347,421 0		992	TOTAL PAGES

All reports have been reviewed

Cash-on-hand as of 3/31/88: $26,116

Debts and obligations owed to the committee as of 3/31/88: $1,500
Debts and obligations owed by the committee as of 3/31/88: $89,461

ATTACHMENT 1

DETAILED SUMMARY PAGE

of Receipts and Disbursements
(Page 2, FEC FORM 3X)

Name of Committee (in full): LEAGUE OF CONSERVATION VOTERS

Report Covering the Period From: 07/01/87 To: 12/31/87

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			
(i) Itemized (use Schedule A)	135,916.00	269,898.48	11(a)(i)
(ii) Unitemized	744,727.33	1,631,956.55	11(a)(ii)
(iii) Total of contributions from individuals	880,643.33	1,901,855.03	11(a)(iii)
(b) Political Party Committees			11(b)
(c) Other Political Committees (such as PACs)			11(c)
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	880,643.33	1,901,855.03	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES			12
13. ALL LOANS RECEIVED	20,000.00	20,000.00	13
14. LOAN REPAYMENTS RECEIVED			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	6,871.42	7,859.14	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	7,078.82	8,360.75	17
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	914,593.57	1,938,074.92	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	905,156.55	1,955,950.64	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			21
22. INDEPENDENT EXPENDITURES (use Schedule E)			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)			23
24. LOAN REPAYMENTS MADE	20,000.00	20,000.00	24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees (such as PACs)			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))			26(d)
27. OTHER DISBURSEMENTS			27
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	925,256.55	1,975,950.64	28
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans)(from Line 11(d))	880,643.33	1,901,855.03	29
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	--0--	--0--	30
31. NET CONTRIBUTIONS (other than loans)(subtract Line 30 from 29)	880,643.33	1,901,855.03	31
32. TOTAL OPERATING EXPENDITURES (from Line 19)	905,156.55	1,955,950.64	32
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)	6,871.42	7,859.14	33
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)	898,285.63	1,948,091.50	34

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SCHEDULE A **ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 22 OF 22

FOR LINE NUMBER 11a

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

NAME OF COMMITTEE (In Full)

League of Conservation Voters

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
A. J. Alan Frierson 3795 Princeton Medford, OR 97504 Receipt For: Primary / General / Other (specify)	info. requested info. requested Aggregate Year-to-Date $ 200.00	12/14/87	200.00
B. David D. Dayton Minneapolis, MN Receipt For: Primary / General / Other (specify)	info. requested info. requested Aggregate Year-to-Date $ 1700.00	12/30/87	1700.00
C. Jeannette Atkinson 6 Clement Circle Cambridge, MA 02138 Receipt For: Primary / General / Other (specify)	info. requested info. requested Aggregate Year-to-Date $ 1000.00	12/31/87	1000.00
D. Helen P. Ladd 34 Avon Street Cambridge, MA 02138 Receipt For: Primary / General / Other (specify)	info. requested info. requested Aggregate Year-to-Date $ 3000.00	12/31/87	3000.00
E. Robert J. Stein 4111 Argyle Terrace, N.W. Washington, DC 20011 Receipt For: Primary / General / Other (specify)	info. requested info. requested Aggregate Year-to-Date $ 5000.00	12/31/87	1500.00
F. Alden M. Meyer 15 Montgomery Ave. Takoma Park, MD 20912 Receipt For: Primary / General / Other (specify)	League of Conservation Voters Exec. Director Aggregate Year-to-Date $ 5000.00	8/14/87	5,000.00
G. Nalinda J. Kehoe 15 Montgomery Ave. Takoma Park, MD 20912 Receipt For: Primary / General / Other (specify)	EPI info. requested Aggregate Year-to-Date $ 5000.00	8/14/87	5000.00

SUBTOTAL of Receipts This Page (optional)	17,400
TOTAL This Period (last page this line number only)	135,916.00

3 3 7 3 0 4 4 4 2 2

SCHEDULE C
(Revised 2/88)

LOANS

Page 3 of 43 for
LINE NUMBER 10
(Use separate schedules for each numbered line)

Name of Committee (In Full)
LEAGUE OF CONSERVATION VOTERS

A. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
Adams National Bank 1627 K Street, NW Washington, DC 20006 Election: ☐ Primary ☐ General ☐ Other (specify):	24,000.00 1,000.00	- 0 -	25,000.00

Terms: Date Incurred 09/18/86 Date Due 09/18/88 Interest Rate Prime + 2 %(apr) ☐ Secured

List All Endorsers or Guarantors (if any) to Item A

1. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: $	
2. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: $	
3. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: $	

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B. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
Alden Meyer 15 Montgomery Ave. Takoma Park, MD 20912 Election: ☐ Primary ☐ General ☐ Other (specify):	5,000.00	-0-	5,000.00

Terms: Date Incurred 8/7/87 Date Due On Demand Interest Rate -0- %(apr) ☐ Secured

List All Endorsers or Guarantors (if any) to Item B

1. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: $	
2. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: $	
3. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: $	

SUBTOTALS This Period This Page (optional)	30,000.00
TOTALS This Period (for page in this line only)	$

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

9 9 0 3 3 0 4 4 6 9 3

SCHEDULE C
(Revised 3/80)

LOANS

Page 5 of 24 for
LINE NUMBER ____
(Use separate schedule for each numbered line)

Name of Committee (In Full)

A. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payments To Date	Balance Outstanding at Close of This Period
Nalinda J. Kehoe 15 Montgomery Ave. Takoma Park, MD 20912 Election: ☐ Primary ☐ General ☐ Other (specify):	5,000.00	-0-	5,000.00

Terms: Date Incurred 8/7/87 Date Due on demand Interest Rate -0- %(apr) ☐ Secured

List All Endorsers or Guarantors (if any) to item A

1. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: $	
2. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: $	
3. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: $	

B. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payments To Date	Balance Outstanding at Close of This Period
Election: ☐ Primary ☐ General ☐ Other (specify):			

Terms: Date Incurred _____ Date Due _____ Interest Rate _____ %(apr) ☐ Secured

List All Endorsers or Guarantors (if any) to item B

1. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: $	
2. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: $	
3. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: $	

SUBTOTAL This Period This Page (optional)	5,000.00
TOTALS This Period (last page in this line only)	41,670.00

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

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Schedule B — ITEMIZED DISBURSEMENTS — Page [illegible] of 266
FOR LINE NUMBER 19

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NAME OF COMMITTEE (In Full)
LEAGUE OF CONSERVATION VOTERS

Full Name, Mailing Address and Zip	Purpose of Disbursement	Date	Amount
BENISE ZECK 234 6TH ST SE WASH DC 20003	PAYROLL REPLACE FOR CHK214	08/17/1987	9775.40
FED OF AMER SCIENTISTS FUND	RENT	08/14/1987	04000.00
ZACHARY LEWIS PO BOX 5842 TAKOMA PARK MD	COMPUTER SUPPLIES	08/14/1987	[illegible]
MALINDA MENDE 15 MONTGOMERY AVENUE TAKOMA PARK MD 20912	LOAN REPLACEMENT Check has not been cashed	08/13/1987	03000.00
ALBEN MEYER 15 MONTGOMERY AVENUE TAKOMA PARK MD 20912	LOAN REPAYMENT Check has not been cashed	08/13/1987	03000.00
FED EXPRESS	DELIVERY DIRECT MAIL	08/12/1987	011.00
GEORGE D MAHEY SILVER SPRING MD 20910	REIMBURSE FOR POSTAGE, COPIES	08/13/1987	013.21
PROGRESSIVE DIRECTING MARKETIN	PROSPECTIVE MAILING INITIAL FEE	08/12/1987	[illegible]
SUBTOTAL			016125.41

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Schedule B

ITEMIZED DISBURSEMENTS

Page 007 of 266
FOR LINE NUMBER 19

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NAME OF COMMITTEE (In Full)
LEAGUE OF CONSERVATION VOTERS

Full Name, Mailing Address and Zip	Purpose of Disbursement	Date	Amount
ALDEN MEYER 15 MONTGOMERY AVENUE	LOAN REPAYMENT Check has not been cashed	08/20/1987	10000.00
TAKOMA PARK MD 20912			
US POSTMASTER	POSTAGE METER	08/21/1987	0500.00
MAYFLOWER HOTEL	ROOM DEPOSIT	08/20/1987	0500.00
PEOPLES BROWN	PARTIAL PAYMENT DIRECT MAIL	08/20/1987	02500.00
MIKE LANAGAN	SUBCONTRACTOR	08/26/1987	002.50
MICHAEL JOY	SUBCONTRACTOR	08/26/1987	050.00
BARBARA ZYLINSKI	SUBCONTRACTOR	08/26/1987	0257.00
MEREDITH MOSS	SUBCONTRACTOR	08/26/1987	0146.00
SUBTOTAL			00675.50

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Schedule B — ITEMIZED DISBURSEMENTS

Page 266 of 266
FOR LINE NUMBER 14

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NAME OF COMMITTEE (In Full)
LEAGUE OF CONSERVATION VOTERS

Full Name, Mailing Address and Zip	Purpose of Disbursement	Date	Amount
SMITH GROVICS	PRES INTERVIEW NOME PLATE	09/02/1987	604.01
DC NATURAL GAS	GA	09/02/1987	930.19
CAUSE CELEB	NOV 4 DINNER CELEBRITY	09/02/1987	6500.00
DON WELLS	CONSULTING	09/02/1987	1252.04
FEDERAL EXPRESS	DELIVERY	09/01/1987	133.00
ROB MORDWITZ	CONSULTING	09/02/1987	200.00
AARON CAPLAN	REPLACEMENT CHECK	09/02/1987	436.21
NALINDA KENOF 15 MONTGOMERY AVENUE TAKOMA PARK MD 20912	LOAN REPAYMENT Check has not been cashed	08/30/1987	5000.00
SUBTOTAL			17677.25

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SCHEDULE A — ITEMIZED RECEIPTS

For Commission staff use only: Line number for this page	22	Cumulative page total	

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NAME OF COMMITTEE (In Full)

League of Conservation Voters

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Maitland A. Bisy Receipt For: ☐ Primary ☐ General ☐ Other (specify):	info. requested info. requested Aggregate Year-to-Date > $ 5000.00	7/10/87	5000.00
Raymond B. Johnson c/o 1st National Bank of Atlanta Augusta, GA Receipt For: ☐ Primary ☐ General ☐ Other (specify):	info. requested info. requested Aggregate Year-to-Date > $ 250.00	7/13/87	250.00
Carol Bernstein Ferry Box 657 Scarsdale, NY 10583 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	info. requested info. requested Aggregate Year-to-Date > $ 500.00	7/15/87	200.00
Nathaniel P. Reed Jupiter Island, Box 375 Hobe Sound, FL 33455 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	info. requested info. requested Aggregate Year-to-Date > $ 500.00	7/15/87	500.00
Joan B. Overton 78 Balmville Road Newburgh, NY 12550 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	info. requested info. requested Aggregate Year-to-Date > $ 1500.00	7/17/87	1500.00
Mary Aiken Littauer P.O. Box 2 Syosset, NY 11791 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	info. requested info. requested Aggregate Year-to-Date > $ 2000.00	7/17/87	2000.00
Jocelyn Alexander 700 New Hampshire Ave., NW Washington, DC 20037 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	info. requested info. requested Aggregate Year-to-Date > $ 5000.00	7/23/87	5000.00

SUBTOTAL of Receipts This Page (optional)	14,450
TOTAL This Period (last page this line number only)	

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SCHEDULE A ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page

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FOR LINE NUMBER 11a

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NAME OF COMMITTEE (In Full)

League of Conservation Voters

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
A. Jocelyn Alexander 700 New Hampshire Ave., NW #421 Washington, DC 20037 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	info. requested info. requested Aggregate Year-to-Date > $ 250.00	11/2/87	250.00
B. John H. Adams 122 East 42nd Street New York, NY 10168 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	info. requested info. requested Aggregate Year-to-Date > $ 250.00	11/2/87	250.00
C. Lawrence & Judith Hobard 3900 Cathedral Ave., NW Washington, DC 20016 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	info. requested info. requested Aggregate Year-to-Date > $ 500.00	11/2/87	500.00
D. Wm. A. & Helga B. Butler 6810 Florida Street Chevy Chase, MD 20815 Receipt For ☐ Primary ☐ General ☐ Other (specify):	info. requested info. requested Aggregate Year-to-Date > $ 250.00	11/2/87	250.00
E. Janet L. Bearden 10515 Oak Place Fairfax, VA 22030 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	info. requested info. requested Aggregate Year-to-Date > $ 250.00	11/2/87	250.00
F. Charles & Jacqueline Warren 201 E. 87th Street New York, NY 10128 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	info. requested info. requested Aggregate Year-to-Date > $ 500.00	11/3/87	500.00
G. Anthony A. Lapham 2929 Woodland Drive, NW Washington, DC 20008 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	info. requested info. requested Aggregate Year-to-Date > $ 1250.00	11/3/87	1250.00

SUBTOTAL of Receipts This Page (optional) 3,250

TOTAL This Period (last page this line number only) .....

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

MAR 2 1988

Alden Meyer, Treasurer
League of Conservation Voters
320 Fourth Street, N.E.
Washington, DC 20002

Identification Number: C00096870

Reference: 1987 Year End Report (7/1/87-12/31/87)

Dear Mr. Meyer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report discloses a negative ending cash balance of $22,519.66. This suggests that you have either overdrawn your account, made a mathematical error, or incurred a debt. If your committee has incurred a debt or obligation, please show a zero balance on Line 8 of the Summary Page and reflect the amount and the nature of the debt on Schedule D and Line 10. 2 U.S.C. §434(b)(8).

-On Schedule B you disclose several payments to banks (ex. pgs. 116, 130, 136, 138, 144, 161, 168, and 180 of 266). These items, however, fail to include "purpose of disbursements." Please clarify the nature of these transactions.

-Please amend your report by providing the full address and purpose for each disbursement itemized on Schedule B supporting Line 19.

-On Schedule B supporting Line 19 of the Detailed Summary Page, you disclose several expenditures which may have been made on behalf of Federal candidates. Should any of these disbursements have been made to benefit a specifically identifed candidate, please list these disbursements as in-kind contributions on Line 21 or list them as independent expenditures on Line 22 and include a Schedule E.

-On Schedule B, Pages 246, 247 and 251 of 266 for Line 19, you disclose a loan replacement and three loan repayments totalling $20,000. Please clarify the nature of these transactions.

TR

88031011079

-On Schedule B, you disclose disbursements to a payroll service and disbursements to individual employees. Payments to payroll services should be itemized with accompanying memo-entry itemizations of specific salary payments. The memo-entry alleviates a double accounting problem which inflates disbursement totals. Please clarify if your disbursement totals have been inflated and if so, please adjust your financial figures and disbursement schedules accordingly. TR

-Please provide a Schedule A to support the entry reported on Line 13 of the Detailed Summary Page. All loans and loan repayments received by your committee must be itemized on Schedule A, regardless of the amount loaned or repaid. 2 U.S.C. §434(b)(3)(E).

-Please provide a Schedule B to support the entry reported on Line 24 of the Detailed Summary Page. All loans repaid by your committee must be itemized on Schedule B, regardless of the amount. 2 U.S.C. 434(b)(5)(D). TR

-Line 13 of the Detailed Summary Page discloses $20,000 in loans received; however, only $10,000 in new loans have been itemized on Schedule C. Please clarify this discrepancy. TR

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

Anthony Raymond

Anthony Raymond
Senior Reports Analyst
Reports Analysis Division

9813311 1093

ATTACHMENT 4

PIERSON, BALL & DOWD
ATTORNEYS AT LAW
1200 18TH STREET, N. W.
WASHINGTON, D. C. 20036

(202) 331-8566
CABLE ADDRESS "PIERBALL"
TELECOPIER (202) 331-1448/1449
TELEX NO. 64711

JOHN J. DUFFY
(202) 457-8816

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE SERVICES BRANCH
88 APR 7 PM 2:25

April 7, 1988

Hand Delivered

Mr. Anthony Raymond
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Dear Mr. Raymond:

On behalf of the League of Conservation Voters, I request a 30-day extension of time to respond to the questions the Commission has raised about the League's year-end report. Our response would then be due on or before May 9, 1988.

The League needs this extension of time because its administrative personnel have changed and the new personnel need to familiarize themselves with the committee's records before they can give an adequate response to the Commission's request.

If you have any questions concerning this matter, please contact me.

Sincerely,

PIERSON, BALL & DOWD

John J. Duffy

JJD:dp
cc: Ms. Claudia Schecter

ATTACHMENT 5

MEMORANDUM TO THE FILES:

COMMITTEE: League of Conservation Voters

I.D. NUMBER:

CONTACT: Ms. Price for John Duffy

DATE: 4/8/88

ANALYST: Tony Raymond

SUBJECT: Requested Extension

I called Mr. Duffy today to discuss his request for a 30-day extension in responding to my March 25, 1988 RFAI. I spoke to Ms. Price and left a message that extensions were not granted. I did explain, however, that a Second Notice would be sent on April 14, 1988, that would give Mr. Duffy an additional 15 days to respond from that date.

9114079225

ATTACHMENT 6

RQ-3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 14, 1988

Alden Meyer, Treasurer
League of Conservation Voters
2000 L Street, N.W., Suite #804
Washington, DC 20036

Identification Number: C00094870

Reference: 1987 Year End Report (7/1/87-12/31/87)

Dear Mr. Meyer:

On March 25, 1988 you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

The Commission is in receipt of your letter dated April 7, 1988. Please be advised that if the information requested by the Commission is not received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

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

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

SCHEDULE B: [illegible]

[illegible]

Lender Name	Street	City	St	Zip	Date	Check #	Amount
Adams National Bank	1627 K St NW	Washington	DC	[illegible]	3/1/88	07[illegible]2626181	$25000.00
Alden Meyer	15 Montgomery Ave	Takoma Park	MD	20912	3/15/87	7677	($5000.00)
Alden Meyer	15 Montgomery Ave	Takoma Park	MD	20912	3/29/88	CC[illegible] 31616	$10000.00
Alden Meyer	15 Montgomery Ave	Takoma Park	MD	20912	3/13/87	7678	($5000.00)
Alden Meyer	15 Montgomery Ave	Takoma Park	MD	20912	3/30/87	7714	($5000.00)
Alden Meyer	15 Montgomery Ave	Takoma Park	MD	20912	3/30/87	7715	($5000.00)
Melinda J. Kehoe	15 Montgomery Ave	Takoma Park	MD	20912	3/29/88	CC[illegible] 31617	$10000.00
Note 1: The checks shown for 3/87 as neg		atives are the	ov	which			
were footnoted as un		ashed in the 12-31-87		7 report.			
							$25000.00

TR

Subtotal This Page

Total This Period $25,000.00

8 8 0 3 3 1 9 5 2 9 7

SCHEDULE C

LOANS

Page 4 of 24 for LINE NUMBER 10

Name of Committee (In Full)
LEAGUE OF CONSERVATION VOTERS

A. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payments To Date	Balance Outstanding at Close of This Period
Adams National Bank 1627 K Street, NW Washington, DC 20006 Election: Primary General Other (specify):	24,000.00 1,000.00	25,000.00	0.00
Terms: Date Incurred 09/18/88 Date Due 09/18/88 Interest Rate Prime + 2 (%/year) Secured			

List All Endorsers or Guarantors (if any) to Item A

1. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding $	
2. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding $	
3. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding $	

TR

B. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
Alden Meyer 15 Montgomery Ave. Takoma Park, MD 20912 ALSO REPORTED AS 12-31-87 CONTRIBUTION. Please see note below; same applies to Ms. Kehr[illegible]	~~5,000.00~~	-0- .00	
Election: Primary General Other (specify)			
Terms: Date Incurred 8/7/87 Date Due On Demand Interest Rate -0- (%/year) Secured			

List All Endorsers or Guarantors (if any) to Item B

1. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding	
2. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding	
3. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding	

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward [illegible]

*Mr. Meyer loaned LCV $10,000.00 in 1987 and contributed $5000.00. The loans & contributions are reported on the 12-31-87 report. The loans were repaid with checks dated 8/87. As we noted at 12-31-87 those checks were never presented to the LCV's account for payment. The account was reported with a negative balance. Replacement certified checks were purchased & delivered to me. Please see Schedule B; item [illegible] loan [illegible]

8 0 3 5 1 7 5 2 9 3

SCHEDULE B
(Revised 3/88)

LOANS

Page 5 of 24 for LINE NUMBER ____
(Use separate schedules for each numbered line)

R

Name of Committee (In Full)

A. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
Melinda J. Kehoe 13 Montgomery Ave. Takoma Park, MD 20912 This loan was incorrectly reported as BOTH a loan and	ALSO REPORTED AS 5,000.00	-0- CONTRIBUTION.	12-31-87

Primary General Other (specify) Election: ... (Go to ... below)

Terms: Date Incurred 8/1/87 Date Due on demand Interest Rate ___ (Mo/yr) ☐ Secured

List All Endorsers or Guarantors (if any) to Item A

1. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding $	
2. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding $	
3. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding $	

** Ms. Kehoe loaned $10,000 and contributed $5,000 in 1987. The check repaying the loan was never cashed, as LCV footnote at 12-31-87. It has been replaced with a cancelled check in a time period.

B. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
Election: ☐ Primary ☐ General ☐ Other (specify)			

Terms: Date Incurred ____ Date Due ____ Interest Rate ____ (Mo/yr) ☐ Secured

List All Endorsers or Guarantors (if any) to Item B

1. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding $	
2. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding $	
3. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding $	

SUBTOTALS This Period This Page (optional)

TOTALS This Period (last page in this line only)

Carry outstanding balance only to LINE 3, Schedule D for this line (If no Schedule D is filed, forward ...)

3 8 0 0 0 5 1 9 5 2 9 7 4 2 6 7

9 0 0 4 0 7 9 2 2 7 0

SCHEDULE A ITEMIZED RECEIPTS 3 8 0 3 League of Conservation Voters 3 Page 1 of 1 for 11/90 xi)

Last Name	First Name	Street	City	Sta	Zip	Employer	Occupation	Check Date	Amount	Year To Date
Atelsor	[illegible]	841 W Fullerton Ave	Chicago	IL	60614	Self	entrepreneur	12/30/87	$500.00	
[illegible]	[illegible]	700 New Hampshire Ave NW #42	Washington	DC	20037		Requested	2/3/88	$5000.00	
[illegible]	[illegible]	2 Spaulding Ln	Riverdale	NY	10471		Requested	12/29/87	$500.00	
[illegible]	[illegible]	10030 Santa Monica Blvd #200	Los Angeles	CA	90025	Self	actor	2/24/88	$200.00	
Alery	Abigail	Box 246	Lincoln	MA	01773		Requested	2/29/88	$600.00	$1200.00
Alery	Abigail	Box 246	Lincoln	MA	01773		Requested	2/29/88	$600.00	$1200.00
Aspe	Richard	4627 Kenmore Dr	Washington	DC	20007		Requested	2/29/88	$200.00	
Burnett	Robert	141 Lucero Way	Portola Valley	CA	94025		Requested	12/31/87	$200.00	
[illegible]	Richard	5705 Woodland	Western Springs	IL	60558		Requested	12/31/87	$250.00	
[illegible]	Anne	317 9th St SE	Washington	DC	20003		Requested	2/18/88	$2500.00	
[illegible]	Anne	317 9th St SE	Washington	DC	20036		Requested	1/29/88	$2500.00	
[illegible]	Ruth	441 Morehouse Ln	Southport	CT	06490		Requested	3/11/88	$2000.00	
[illegible]	Brent	213 D St SE	Washington	DC	20003		Requested	1/21/88	$5000.00	
[illegible]	Robert	211 King Pl	Washington	DC	20007		Requested	1/27/88	$1000.00	
[illegible]	Nancy	[illegible] Camino Del Monte Sol	Santa Fe	NM	87501		Requested	12/30/87	$500.00	
[illegible]	Helen	15316 Clifton Blvd	Lakewood	OH	44107		Requested	3/25/88	$200.00	
[illegible]	[illegible]	1120 Park Ave	Rochester	NY	14610		Requested	3/14/88	$200.00	
[illegible]	Catherine	PO Box 460	Hanalei	HI	96714		Requested	1/29/88	$200.00	
Barwell	David	428 15th St SE	Washington	DC	20003		Requested	3/3/88	$200.00	
[illegible]	Alfred	471 Dawy Rd	Auburn	CA	95603		Requested	12/30/87	$250.00	
[illegible]	Hope	45 Carson Rd	Princeton	NJ	08540		Requested	3/25/88	$250.00	
[illegible]	George	7330 N 16th St #110	Phoenix	AZ	85020		Requested	2/26/88	$1000.00	
[illegible]	Edward	18 College Rd W	Princeton	NJ	08540		Requested	3/1/88	$250.00	
[illegible]	Alan	c/o Bank of San Francisco, Pine &	San Francisco	CA	94104		Requested	11/9/87	$1000.00	
[illegible]	Edward	1209 French Creek Dr	Wayzata	MN	55391		Requested	12/29/87	$500.00	
[illegible]	David	2335 California St NW	Washington	DC	20008		Requested	1/22/88	$1000.00	
[illegible]	Louise	477 Fairhaven Rd	Tracy's Landing	MD	20779		Requested	2/18/88	$1000.00	$2000.00
[illegible]	Louise	477 Fairhaven Rd	Tracy's Landing	MD	20779		Requested	2/18/88	$1000.00	$2000.00
[illegible]	Helen	Seven Gates Farm	Vineyard Haven	MA	02568		Requested	1/22/88	$5000.00	
[illegible]	Hart	Box 2681	Vineyard Haven	MA	02568		Requested	12/29/87	$500.00	
[illegible]	Hartland	Seven Gates Farm	Vineyard Haven	MA	02568		Requested	1/26/88	$5000.00	
[illegible]	[illegible]	10019 Menlo Ave	Silver Spring	MD	20910	None	unemployed	1/19/88	$1000.00	
[illegible]	[illegible]	c/o State St Bk Trust	Boston	MA	02105		Requested	1/22/88	$5000.00	
[illegible]	[illegible]	[illegible] 74th St	New York	NY	10021		Requested	2/8/88	$400.00	
[illegible]	Eleanor	[illegible] Eagle Ridge Rd	North Oaks	MN	55127		Requested	12/30/87	$200.00	

NOTE 1: INDIVIDUALS OUTLINED IN RED HAVE MADE MORE THAN ONE CONTRIBUTION IN THIS TIME PERIOD & THEREFORE HAVE SEPARATE Y-T-D TOTALS. FOR ALL OTHERS AMOUNT & Y-T-D ARE THE SAME.

Subtotal of Receipts This Page _____ Total This Period

ATTACHMENT 7
Page 4 of 4

ATTACHMENT 8

MEMORANDUM TO THE FILES: Representative visit

COMMITTEE: League of Conservation Voters

I.D. NUMBER:

CONTACT: Mr. Duffy

DATE: May 12, 1988

ANALYST: Tony Raymond with Brian Hancock

SUBJECT: Discussion of RFAI

Mr. Duffy came to RAD to discuss an RFAI I had sent on March 25, 1988, about the 1987 Year End report. Mr. Duffy explained that Claudia Schechter, the League for Conservation Voters' assistant treasurer, had informed him that during the calendar year 1987, LCV had experienced financial problems as evidenced on its reports. We discussed each item on the RFAI and Mr. Duffy addressed each issue. An entry on the Detailed Summary Page for $20,000 in loan receipts which had been improperly reported was mentioned. Mr. Duffy stated that two individuals, Alden Meyer and Nalinda Kehoe, had made a $10,000 loan each to LCV during 1987. He stated that the loans had been repaid within the month of August 1987. He also stated that those original repayments were not cashed by Mr. Meyer or Ms. Kehoe because they were aware that LCV had insufficient funds in its accounts to cover the repayments. Mr. Duffy then explained that the original repayments were subsequently voided and then reissued and cashed. The reissued checks were certified. Mr. Duffy stated that the voided checks and reissued repayments were recorded in the 1988 April Quarterly Report. Mr. Duffy stated that he would put an amendment together explaining the discrepancies and amend the report soon.

1.7.2.7.4.0.4.1.0.0

Amended 1987 Year End Report

SCHEDULE A **ITEMIZED RECEIPTS**

LOANS RECEIVED

Use separate schedule(s) for each category of the Detailed Summary Page
12-31-87
corrected 4-30-88

PAGE 1 OF 1

FOR LINE NUMBER 13

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

NAME OF COMMITTEE (in Full)

LEAGUE OF CONSERVATION VOTERS

	Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt this Period
A	Alden Meyer 15 Montgomery Ave. Takoma Park, MD 20912 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Name of Employer: League of Conservation Voters Occupation: Executive Director Aggregate Year-to-Date > $	8/87	10,000.00
B	Nalinda J. Kehoe 15 Montgomery Ave. Takoma Park, MD 20912 Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Name of Employer: Information requested Occupation: Aggregate Year-to-Date > $	8/87	10,000.00
C	Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Name of Employer: Occupation: Aggregate Year-to-Date > $	Date (month, day, year)	Amount of Each Receipt this Period
D	Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Name of Employer: Occupation: Aggregate Year-to-Date > $	Date (month, day, year)	Amount of Each Receipt this Period
E	Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Name of Employer: Occupation: Aggregate Year-to-Date > $	Date (month, day, year)	Amount of Each Receipt this Period
F	Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Name of Employer: Occupation: Aggregate Year-to-Date > $	Date (month, day, year)	Amount of Each Receipt this Period
G	Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Name of Employer: Occupation: Aggregate Year-to-Date > $	Date (month, day, year)	Amount of Each Receipt this Period

SUBTOTAL of This Page (optional)	20,000.00
TOTAL	20,000.00

SCHEDULE B **ITEMIZED DISBURSEMENTS**

LOAN REPAYMENTS MADE

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 1

FOR LINE NUMBER 24

12-31-87
corrected 4-30-88

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

NAME OF COMMITTEE (In Full)
LEAGUE OF CONSERVATION VOTERS

TR

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Alden Meyer 15 Montgomery Ave. Takoma Park, MD 20912	Repayment of Loan Disbursement for ☐ Primary ☐ General ☐ Other (specify)	8/13/87	5,000.00
B. Alden Meyer see above	Repayment of Loan Disbursement for ☐ Primary ☐ General ☐ Other (specify)	8/30/87	5,000.00
C. Nalinda Kehoe/Alden Meyer see above	Repayment of Loan Disbursement for ☐ Primary ☐ General ☐ Other (specify)	8/13/87	5,000.00
D. Nalinda Kehoe/Alden Meyer see above	Repayment of Loan Disbursement for ☐ Primary ☐ General ☐ Other (specify)	8/30/87	5,000.00
E. PLEASE NOTE THAT THESE FOUR CHECKS WERE NEVER PRESENTED TO LCV FOR PAYMENT.	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL (Disbursements This Page - Sub Total)	20,000.00
TOTAL (Disbursements This Reporting Period)	20,000.00

AMOUNT CHANGED FOR LINE 19 TOTAL
12-31-87 AMENDED 4-22-88

Schedule B — ITEMIZED DISBURSEMENTS — Page [illegible] of [illegible] FOR LINE [illegible]

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

NAME OF COMMITTEE (In Full)
LEAGUE OF CONSERVATION VOTERS

Full Name, Mailing Address and Zip	Purpose of Disbursement	Date	Amount
SMITH BROWNICS	PRES INTERVIEW NAME PLATE	09/02/1987	$84.01
BC NATURAL GAS	GAS	09/02/1987	$30.19
CBRUE CELEB	NOV 4 DINNER CELEBRITY	09/02/1987	$200.00
RON WELLS	CONSULTING	09/02/1987	$1352.84
FEDERAL EXPRESS	DELIVERY	09/01/1987	$133.00
ROD HOROWITZ	CONSULTING	09/02/1987	$200.00
AARON CAPLAN	REPLACEMENT CHECK	09/02/1987	$436.21
MR. NOR VENDE 15 MONTGOMERY AVENUE TAKOMA PARK MD 20912	LOAN REPAYMENT Check has not been cashed	08/30/1987	~~$5000.00~~
SUBTOTAL			~~$[illegible]~~ $2677.25

TR

REMOVED TO Schedule B loan repayments

9 0 0 0 4 0 7 9 2 2 2 7 4

Schedule B — ITEMIZED DISBURSEMENTS — Page 007 OF
FOR LINE NUMBER

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

NAME OF COMMITTEE (In Full)
LEAGUE OF CONSERVATION VOTERS

TR

Full Name, Mailing Address and Zip	Purpose of Disbursement	Date	Amount
~~ALDEN MEYER~~	~~LOAN REPAYMENT~~	~~08/30/1987~~	~~$5000.00~~
15 MONTGOMERY AVENUE	Check has not been cashed		
TAKOMA PARK MD 20912			
US POSTMASTER	POSTAGE METER	08/31/1987	$200.00
MAYFLOWER HOTEL	ROOM DEPOSIT	08/28/1987	$500.00
PEOPLES BROWN	PARTIAL PAYMENT DIRECT MAIL	08/28/1987	$2500.00
MIKE LANHAM	SUBCONTRACTOR	08/26/1987	$22.50
MICHAEL JOY	SUBCONTRACTOR	08/25/1987	$50.00
BARBARA ZYLINSKI	SUBCONTRACTOR	08/26/1987	$257.00
MEREDITH MOSS	SUBCONTRACTOR	08/26/1987	$146.00
SUBTOTAL			~~$6675.50~~ $3675.50

REMOVED TO SCHEDULE B LOAN REPAYMENTS

Schedule B — ITEMIZED DISBURSEMENTS — Page 001 OF
FOR LINE NUMBER

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

NAME OF COMMITTEE (In Full)
LEAGUE OF CONSERVATION VOTERS

Full Name, Mailing Address and Zip	Purpose of Disbursement	Date	Amount
BENISE ZECK 23A 6TH ST SE WASH DC 20003	PAYROLL REPLACE FOR CH0214	08/17/1987	6775.40
FED OF AMER SCIENTISTS FUND	RENT	08/14/1987	14000.00
ZACHARY LEWIS PO BOX 5842 TAKOMA PARK MD	COMPUTER SUPPLIES	08/14/1987	625.00
~~ALINDA KENDE~~ ~~15 MONTGOMERY AVENUE~~ TAKOMA PARK MD 20912	~~LOAN REPLACEMENT~~ Check has not been cashed	~~08/13/1987~~	~~08000.00~~
~~ALDEN MEYER~~ ~~15 MONTGOMERY AVENUE~~ TAKOMA PARK MD 20912	~~LOAN REPAYMENT~~ Check has not been cashed	~~08/13/1987~~	~~08000.00~~
FED EXPRESS	DELIVERY DIRECT MAIL	08/12/1987	911.00
GERAGE D RONEY SILVER SPRING MD 20910	REIMBURSE FOR POSTAGE, COPIES	08/13/1987	913.21
PROGRESSIVE DIRECTING MARKETIN	PROSPECTIVE MAILING INITIAL FEE	08/12/1987	0500.00
SUBTOTAL			~~06126.41~~ $6126.41

TR

REMOVED TO SCHEDULE B LOAN REPAYMENTS

SCHEDULE C
(Revised 3/80)

LOANS

Page 4 of 24 for LINE NUMBER 11
(Use separate schedule for each numbered line)

Name of Committee (In Full)
LEAGUE OF CONSERVATION VOTERS

A. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payments To Date	Balance Outstanding at Close of This Period
Adams National Bank 1627 K Street, NW Washington, DC 20006	24,000.00 1,000.00	- 0 -	25,000.00

Election: ☐ Primary ☐ General ☐ Other (specify):

Terms: Date Incurred 09/18/86 Date Due 09/18/53 Interest Rate Prime + 2 % (apr) ☐ Secured

List All Endorsers or Guarantors (if any) to Item A

1. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding $	
2. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding $	
3. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding $	

B. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payments To Date	Balance Outstanding at Close of This Period
Alden Meyer 15 Montgomery Ave. Takoma Park, MD 20912	10,000.00	10,000.00	-0-

Election: ☐ Primary ☐ General ☐ Other (specify):

Terms: Date Incurred 8/7/87 Date Due On Demand Interest Rate -0- % (apr) ☐ Secured

List All Endorsers or Guarantors (if any) to Item B

1. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding $	
2. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding $	
3. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding $	

SUBTOTALS This Period This Page (optional) 25,000.00

TOTALS This Period (last page in this line only) . . . . . $

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary

TR

SCHEDULE C
(Revised 2/88)

LOANS

Page 5 of 24
LINE NUMBER ____
(Use separate schedule for each numbered line)

TR

Name of Committee (in Full)

A. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
Malinda J. Kehoe 15 Montgomery Ave. Takoma Park, MD 20912 Election: ☐ Primary ☐ General ☐ Other (specify):	10,000.00	10,000.00	-0-

Terms: Date Incurred 8/7/87 Date Due on demand Interest Rate -0- (Mo/yr) ☐ Secured

List All Endorsers or Guarantors (if any) to item A

1. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: $		
2. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: $		
3. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: $		

B. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
Election: ☐ Primary ☐ General ☐ Other (specify):			

Terms: Date Incurred _____ Date Due _____ Interest Rate _____ (Mo/yr) ☐ Secured

List All Endorsers or Guarantors (if any) to item B

1. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: $		
2. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: $		
3. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: $		

SUBTOTALS This Period This Page (optional)	-0-
TOTALS This Period (last page in this line only)	31,070.00

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

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ATTACHMENT 10

MEMORANDUM TO THE FILES:

COMMITTEE: League of Conservation Voters

I.D. NUMBER: C00094870

CONTACT: Mr. Duffy

DATE: May 26, 1988

ANALYST: Tony Raymond

SUBJECT: Amended 1987 Year End Report

I called Mr. Duffy to discuss LCV's amended 1987 Year End Report filed as a response to an RFAI. I told Mr. Duffy that some ambiguity remained concerning the $20,000 in loans, repayments, voided repayments and reissued repayments. Specifically, I asked about the voided repayments. Mr. Duffy explained that the items were recorded on the April Quarterly report. I explained that Mr. Meyer appeared as the original payee in the voided repayments. Mr. Duffy stated that the items the analyst mentioned were representative of the loan repayments originally made to Ms. Kehoe. He indicated his belief that the transactions were clear, but that he could submit a clarifying letter if necessary.

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ATTACHMENT 11

RQ-5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Alden Meyer, Treasurer
League of Conservation Voters
2000 L Street, N.W., Suite 804
Washington, DC 20036

Identification Number: C00094870

Reference: 1987 Amended Year End Report (7/1/87-12/31/87)

Dear Mr. Meyer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Act precludes a committee from receiving contributions from another political committee or a person in excess of $5,000 per calendar year. 2 U.S.C. §441a(f).

The Commission notes your refund of the excessive contribution(s). Although the Commission may take further legal steps concerning the acceptance of an excessive contribution(s), your prompt action in refunding the contribution(s) will be taken into consideration.

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

Anthony Raymond

Anthony Raymond
Senior Reports Analyst
Reports Analysis Division

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RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
88 DEC -6 AM 10: 10
SENSITIVE

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

FIRST GENERAL COUNSEL'S REPORT

RAD REFERRAL: 88L-18
STAFF PERSON: Ivonne Cotto

SOURCE: **INTERNALLY GENERATED**

RESPONDENTS: League of Conservation Voters, and Tina Hubson, as treasurer

RELEVANT STATUTE: 2 U.S.C. § 441a(f)
2 U.S.C. § 441a(a)(1)(C)

INTERNAL REPORTS CHECKED: None

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The League of Conservation Voters ("LCV"),[1/] and Tina Hubson, as treasurer, were referred to the Office of General Counsel by the Reports Analysis ("RAD") for accepting excessive contributions totalling $20,750 from four (4) individuals during 1987.

A. Apparent Excessive Contributions from Alden M. Meyer and Nalinda J. Kehoe

LCV's Year End Report disclosed a total of $20,000 in loans received. Only $5,000 loaned by Alden M. Meyer[2/] and $5,000 loaned by Nalinda J. Kehoe on August 7, 1987, were itemized on

---

1/ The League of Conservation Voters, as listed in the index of multicandidate PACs - July, 1988, has a qualification date of January 1, 1975.

2/ Alden M. Meyer is presently the Executive Director of LCV and was treasurer from January 1, 1987 to January 6, 1988. Tina Hubson is the present treasurer of LCV.

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the loan schedule. In addition, two (2) $5,000 contributions, one from Mr. Meyer and one from Ms. Kehoe were disclosed on Schedule A as being received on August 14, 1987. Also disclosed in the report on Schedule B were three (3) loan repayments totalling $15,000 and one "loan replacement" of $5,000 itemized as operating expenditures, all with the notation "check has not been cashed." The "loan replacement" was made to Ms. Kehoe on August 13, 1987, and one loan repayment of $5,000 was made to Mr. Meyer on the same date. The two additional loan repayments on August 30, 1987, of $5,000 to each of these individuals were reported on Schedule B.

RAD sent a letter on March 25, 1988, noting the discrepancies on the 1987 Year End Report. On April 15, 1988, LCV filed the 1988 April Quarterly Report. This report disclosed four (4) $5,000 uncashed loan repayments as negative entries with Alden M. Meyer listed as the sole "Lender repaid." It also disclosed two (2) $10,000 disbursements on March 29, 1988, one to Mr. Meyer and one to Ms. Kehoe.

On May 12, 1988, Counsel for LCV explained that because the Committee was experiencing financial difficulties Mr. Meyer and Ms. Kehoe had each made a $10,000 loan to LCV which had been improperly reported. He stated that the loans had been repaid within the month of August, 1987; however, the payees had not cashed the checks because Mr. Meyer and Ms. Kehoe were aware that LCV did not have sufficient funds in its accounts to cover the

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loan repayments. In addition, he explained that the original loan repayments were voided and new loan repayments were issued as certified checks.

Subsequently, LCV amended the 1987 Year End Report to disclose on both the receipt and loan schedules two (2) $10,000 loans received. One was from Mr. Meyer, and the other from Ms. Kehoe, during August, 1987. The loans were disclosed with an "on demand" due date. In addition, four (4) loan repayments of $5,000 each were also disclosed. The loan repayments listed Mr. Meyer in each itemization. Ms. Kehoe was listed with Mr. Meyer in two of the items.

RAD contacted counsel in reference to the uncashed loan repayments disclosed on the 1988 April Quarterly Report. RAD stated that the four (4) repayment items listed on this report were not clear, since Mr. Meyer was listed as the original payee of each, possibly indicating that more than $10,000 was loaned by Mr. Meyer. However, according to the RAD analyst's conversation with counsel, two (2) of the four (4) items which listed Mr. Meyer as the original payee were repayments made to Ms. Kehoe.

B. Additional Apparent Excessive Contributions

The 1987 Year End and 1988 April Quarterly Report disclosed additional apparent excessive contributions from two (2) individuals totalling $750. According to the 1987 Year End Report, a $5,000 contribution was received from Jocelyn Alexander

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on July 23, 1987, and a $5,000 contribution from Maitland A. Edey on July 10, 1987. The report disclosed an additional $250 contribution from Ms. Alexander on November 2, 1987, resulting in an apparent $250 excessive contribution. The 1988 April Quarterly Report disclosed an additional $500 contribution from Mr. Edey, on July 10, 1987, resulting in an apparent $500 excessive contribution. RAD has not notified LCV about these apparent excessive contributions, and LCV has not refunded the excessive amounts.

C. DISCUSSION

2 U.S.C. § 441a(a)(1)(C) limits the contributions a person may make to a political committee other than a candidate committee or a national party committee to $5,000. Pursuant to 2 U.S.C. § 441a(f), no political committee can knowingly accept a contribution or make any expenditure in violation of the provisions of 2 U.S.C. § 441a. LVC apparently received $10,000 in loans from Mr. Meyer and $10,000 in loans from Ms. Kehoe on August 7, 1987; both individuals also contributed $5,000 each to LCV, resulting in a $10,000 excessive contribution[3/] from each of the individuals. The loans were repayed on August 13, 1987, and August 30, 1987, but these checks were not cashed. It was not until second checks were issued and cashed that the loans were

3/ Pursuant to 2 U.S.C. § 431(8)(A), the term "contribution" includes any gift, subscription, loan ... or anything of value made by any person for the purpose of influencing any election for Federal office.

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actually repaid, 235 days after the date of the original loan receipt. LVC also received a $250 excessive contribution from Ms. Alexander and an excessive contribution of $500 from Mr. Edey. LCV has not refunded the excessive amounts to the latter two individuals.[4/]

The Committee accepted apparent excessive contributions in violation of 2 U.S.C. § 441a(f). This Office recommends that the Commission find reason to believe that the League of Conservation Voters and Tina Hubson, as treasurer, violated 2 U.S.C. § 441a(f), by accepting excessive contributions totalling $20,750.

Pursuant to 2 U.S.C. § 441a(a)(1)(C), no person shall make contributions to any political committee other than a candidate committee or committee for a national political party in any calendar year, which in the aggregate, exceed $5,000. Mr. Meyer and Ms. Kehoe both made contributions totalling $15,000, with the excess not being actually returned until 235 days after the date of the original receipt. This Office recommends that the Commission find reason to believe that Alden M. Meyer and Nalinda J. Kehoe violated 2 U.S.C. 441a(a)(1)(C) by making excessive contributions of $10,000 each to the League of Conservation Voters.

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III. RECOMMENDATIONS

1. Open a MUR.

2. Find reason to believe that the League of Conservation Voters and Tina Hubson, as treasurer, violated 2 U.S.C. § 441a(f).

3. Find reason to believe that Nalinda J. Kehoe violated 2 U.S.C. § 441a(a)(1)(C).

4. Find reason to believe that Alden M. Meyer violated 2 U.S.C. § 441a(a)(1)(C).

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

Lawrence M. Noble
General Counsel

12-5-88
Date

BY: [signature]
Lois G. Lerner
Associate General Counsel

Attachments
1. RAD Referral
2. Letter to respondents and Factual and Legal Analyses (3)

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BEFORE THE FEDERAL ELECTION COMMISSION

(MUR 2800)

In the Matter of	)	
	)	
	)	
League of Conservation Voters, and	)	RAD Ref. 88L-18
Tina Hubson, as treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on December 8, 1988, the Commission decided by a vote of 4-0 to take the following actions in RAD Ref. 88L-18:

1. Open a MUR.

2. Find reason to believe that the League of Conservation Voters and Tina Hubson, as treasurer, violated 2 U.S.C. § 441a(f).

3. Find reason to believe that Nalinda J. Kehoe violated 2 U.S.C. § 441a(a)(1)(C).

4. Find reason to believe that Alden M. Meyer violated 2 U.S.C. § 441a(a)(1)(C).

(Continued)

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5. Approve the letters and Factual and Legal Analyses, as recommended in the First General Counsel's report signed December 5, 1988.

Commissioners Aikens, Elliott, McDonald and McGarry voted affirmatively for the decision;

Commissioners Josefiak and Thomas did not vote.

Attest:

12/8/88
Date

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

Received in the Office of Commission Secretary:	Tues.,	12-6-88,	10:10
Circulated on 48 hour tally basis:	Tues.,	12-6-88,	4:00
Deadline for vote:	Thurs.,	12-8-88,	4:00

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

December 16, 1988

Tina Hubson, Treasurer
League of Conservation Voters
2000 L Street, N.W., Suite 804
Washington, D.C. 20036

RE: MUR 2800
League of Conservation Voters
and Tina Hubson, as treasurer

Dear Ms. Hubson:

On December 8, 1988, the Federal Election Commission found that there is reason to believe the League of Conservation Voters ("Committee"), and you, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for

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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

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: **League of Conservation Voters and Tina Hubson, as treasurer** **MUR: 2800**

I. GENERATION OF MATTER

The League of Conservation Voters ("LCV"),[1/] and Tina Hubson, as treasurer, were referred to the Office of General Counsel by the Reports Analysis ("RAD") for accepting excessive contributions totalling $20,750 from four (4) individuals during 1987.

A. Apparent Excessive Contributions from Alden M. Meyer and Nalinda J. Kehoe

LCV's Year End Report disclosed a total of $20,000 in loans received. Only $5,000 loaned by Alden M. Meyer[2/] and $5,000 loaned by Nalinda J. Kehoe on August 7, 1987, were itemized on the loan schedule. In addition, two (2) $5,000 contributions, one from Mr. Meyer and one from Ms. Kehoe were disclosed on Schedule A as being received on August 14, 1987. Also disclosed in the report on Schedule B were three (3) loan repayments totalling $15,000 and one "loan replacement" of $5,000 itemized as operating expenditures, all with the notation "check has not been cashed." The "loan replacement" was made to Ms. Kehoe on

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1/ The League of Conservation Voters, as listed in the index of multicandidate PACs - July, 1988, has a qualification date of January 1, 1975.

2/ Alden M. Meyer is presently the Executive Director of LCV and was treasurer from January 1, 1987 to January 6, 1988. Tina Hubson is the present treasurer of LCV.

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August 13, 1987, and one loan repayment of $5,000 was made to Mr. Meyer on the same date. The two additional loan repayments on August 30, 1987, of $5,000 to each of these individuals were reported on Schedule B.

RAD sent a letter on March 25, 1988, noting the discrepancies on the 1987 Year End Report. On April 15, 1988, LCV filed the 1988 April Quarterly Report. This report disclosed four (4) $5,000 uncashed loan repayments as negative entries with Alden M. Meyer listed as the sole "Lender repaid." It also disclosed two $10,000 disbursements on March 29, 1988, one to Mr. Meyer and one to Ms. Kehoe.

On May 12, 1988, Counsel for LCV explained that because the Committee was experiencing financial difficulties Mr. Meyer and Ms. Kehoe had each made a $10,000 loan to LCV which had been improperly reported. He stated that the loans had been repaid within the month of August, 1987; however, the payees had not cashed the checks because Mr. Meyer and Ms. Kehoe were aware that LCV did not have sufficient funds in its accounts to cover the loan repayments. In addition, he explained that the original loan repayments were voided and new loan repayments were issued as certified checks.

Subsequently, LCV amended the 1987 Year End Report to disclose on both the receipt and loan schedules two (2) $10,000 loans received. One was from Mr. Meyer, and the other from Ms. Kehoe, during August, 1987. The loans were disclosed with an

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"on demand" due date. In addition, four (4) loan repayments of $5,000 each were also disclosed. The loan repayments listed Mr. Meyer in each itemization. Ms. Kehoe was listed with Mr. Meyer in two of the items.

RAD contacted counsel in reference to the uncashed loan repayments disclosed on the 1988 April Quarterly Report. RAD stated that the four (4) repayment items listed on this report were not clear, since Mr. Meyer was listed as the original payee of each, possibly indicating that more than $10,000 was loaned by Mr. Meyer. However, according to the RAD analyst's conversation with counsel, two (2) of the four (4) items which listed Mr. Meyer as the original payee were repayments made to Ms. Kehoe.

B. Additional Apparent Excessive Contributions

The 1987 Year End and 1988 April Quarterly Report disclosed additional apparent excessive contributions from two individuals totalling $750. According to the 1987 Year End Report, a $5,000 contribution was received from Jocelyn Alexander on July 23, 1987, and a $5,000 contribution from Maitland A. Edey on July 10, 1987. The report disclosed an additional $250 contribution from Ms. Alexander on November 2, 1987, resulting in an apparent $250 excessive contribution. The 1988 April Quarterly Report disclosed an additional $500 contribution from Mr. Edey, on July 10, 1987, resulting in an apparent $500 excessive contribution. RAD has not notified LCV about these apparent

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excessive contributions, and LCV has not refunded the excessive amounts.

C. DISCUSSION

2 U.S.C. § 441a(a)(1)(C) limits the contributions a person may make to a political committee other than a candidate committee or a national party committee to $5,000. Pursuant to 2 U.S.C. § 441a(f), no political committee can knowingly accept a contribution or make any expenditure in violation of the provisions of 2 U.S.C. § 441a. LVC apparently received $10,000 in loans from Mr. Meyer and $10,000 in loans from Ms. Kehoe on August 7, 1987; both individuals also contributed $5,000 each to LCV, resulting in a $10,000 excessive contribution[3/] from each of the individuals. The loans were repayed on August 13, 1987 and August 30, 1987, but these checks were not cashed. It was not until second checks were issued and cashed that the loans were actually repaid, 235 days after the date of the original loan receipt. LVC also received a $250 excessive contribution from Ms. Alexander and an excessive contribution of $500 from Mr. Edey. LCV has not refunded the excessive amounts to the latter two individuals.

The Committee accepted apparent excessive contributions in violation of 2 U.S.C. § 441a(f). Therefore, there is reason to

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3/ Pursuant to 2 U.S.C. § 431(8)(A), the term "contribution" includes any gift, subscription, loan ... or anything of value made by any person for the purpose of influencing any election for Federal office.

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to believe that the League of Conservation Voters and Tina Hubson, as treasurer, violated 2 U.S.C. § 441a(f), by accepting excessive contributions totalling $20,750.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 16, 1988

Alden M. Meyer
15 Montgomery Avenue
Takoma Park, MD 20912

RE: MUR 2800

Dear Mr. Meyer:

On December 8, 1988, the Federal Election Commission found that there is reason to believe that you violated 11 C.F.R. § 441a(a)(1)(C), a provision of the Commission's Regulations. 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 and agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

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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

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Alden M. Meyer **MUR:** 2800

I. GENERATION OF MATTER

The League of Conservation Voters ("LCV"),[1/] and Tina Hubson, as treasurer, were referred to the Office of General Counsel by the Reports Analysis ("RAD") for accepting excessive contributions totalling $20,750 from four (4) individuals during 1987.

A. Apparent Excessive Contributions from Alden M. Meyer and Nalinda J. Kehoe

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1/ The League of Conservation Voters, as listed in the index of multicandidate PACs - July, 1988, has a qualification date of January 1, 1975.

2/ Alden M. Meyer is presently the Executive Director of LCV and was treasurer from January 1, 1987 to January 6, 1988. Tina Hubson is the present treasurer of LCV.

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August 13, 1987, and one loan repayment of $5,000 was made to Mr. Meyer on the same date. The two additional loan repayments on August 30, 1987, of $5,000 to each of these individuals were reported on Schedule B.

RAD sent a letter on March 25, 1988, noting the discrepancies on the 1987 Year End Report. On April 15, 1988, LCV filed the 1988 April Quarterly Report. This report disclosed four (4) $5,000 uncashed loan repayments as negative entries with Alden M. Meyer listed as the sole "Lender repaid."

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Subsequently, LCV amended the 1987 Year End Report to disclose on both the receipt and loan schedules two (2) $10,000 loans received. One was from Mr. Meyer, and the other from Ms. Kehoe, during August, 1987. The loans were disclosed with an "on demand" due date. In addition, four (4) loan repayments of $5,000 each were also disclosed. The loan repayments listed

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Mr. Meyer in each itemization. Ms. Kehoe was listed with Mr. Meyer in two of the items.

RAD contacted counsel in reference to the loan repayments disclosed on the 1988 April Quarterly Report. RAD stated that the four (4) repayment items listed on this report were not clear, since Mr. Meyer was listed as the original payee of each, possibly indicating that more than $10,000 was loaned by Mr. Meyer. However, according to the RAD analyst's conversation with counsel, two (2) of the four (4) items which listed Mr. Meyer as the original payee were repayments originally made to Ms. Kehoe.

B. DISCUSSION

2 U.S.C. § 441a(a)(1)(c) limits the contributions a person may make to a political committee other than a candidate committee or a national party committee to $5,000. Pursuant to 2 U.S.C. § 441a(a)(1)(C), no person shall make contributions to any political committee other than a candidate committee or committee for a national political party in any calendar year, which in the aggregate, exceed $5,000. Mr. Meyer made contributions totalling $15,000, with the excess not being actually returned, 235 days after the date of the original receipt. Therefore, there is reason to believe that Alden M. Meyer violated 2 U.S.C. 441a(a)(1)(C) by making excessive contributions totalling $10,000 to the League of Conservation Voters.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 16, 1988

Nalinda J. Kehoe
15 Montgomery Avenue
Takoma Park, MD 20912

RE: MUR 2800

Dear Ms. Kehoe:

On December 8, 1988, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441a(a)(1)(C), a provision of the Commission's Regulations. The Factual and Legal Analysis, which formed a basis for the Commission's findings, 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 and agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

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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

9004079430

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Nalinda Kehoe **MUR:** 2800

I. GENERATION OF MATTER

The League of Conservation Voters ("LCV"),[1/] and Tina Hubson, as treasurer, were referred to the Office of General Counsel by the Reports Analysis ("RAD") for accepting excessive contributions totalling $20,750 from four (4) individuals during 1987.

A. Apparent Excessive Contributions from Alden M. Meyer and Nalinda J. Kehoe

LCV's Year End Report disclosed a total of $20,000 in loans received. Only $5,000 loaned from Alden M. Meyer[2/] and $5,000 loaned from Nalinda J. Kehoe on August 7, 1987, were itemized on the loan schedule. In addition, two (2) $5,000 contributions, one from Mr. Meyer and one from Ms. Kehoe were disclosed on Schedule A as being received on August 14, 1987. Also disclosed in the report on Schedule B were three (3) loan repayments totalling $15,000 and one "loan replacement" of $5,000 itemized as operating expenditures, all with the notation "check has not been cashed." The "loan replacement" was made to Ms. Kehoe on

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1/ The League of Conservation Voters, as listed in the index of multicandidate PACs - July, 1988, has a qualification date of January 1, 1975.

2/ Alden M. Meyer is presently the Executive Director of LCV and was treasurer from January 1, 1987 to January 6, 1988. Tina Hubson is the present treasurer of LCV.

9004079230

August 13, 1987, and one loan repayment of $5,000 was made to Mr. Meyer on the same date. The two additional loan repayments on August 30, 1987, of $5,000 to each of these individuals were reported on Schedule B.

RAD sent a letter on March 25, 1988, noting the discrepancies on the 1987 Year End Report. On April 15, 1988, LCV filed the 1988 April Quarterly Report. This report disclosed four (4) $5,000 uncashed loan repayments as negative entries with Alden M. Meyer listed as the sole "Lender repaid."

On May 12, 1988, Counsel for LCV explained that because the Committee was experiencing financial difficulties Mr. Meyer and Ms. Kehoe had each made a $10,000 loan to LCV which had been improperly reported. He stated that the loans had been repaid within the month of August, 1987; however, the payees had not cashed the checks because Mr. Meyer and Ms. Kehoe were aware that LCV did not have sufficient funds in its accounts to cover the loan repayments. In addition, he explained that the original loan repayments were voided and new loan repayments were issued as certified checks.

Subsequently, LCV amended the 1987 Year End Report to disclose on both the receipt and loan schedules two (2) $10,000 loans received. One was from Mr. Meyer, and the other from Ms. Kehoe, during August, 1987. The loans were disclosed with an "on demand" due date. In addition, four (4) loan repayments of $5,000 each were also disclosed. The loan repayments listed

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Mr. Meyer in each itemization. Ms. Kehoe was listed with Mr. Meyer in two of the items.

RAD contacted counsel in reference to the loan repayments disclosed on the 1988 April Quarterly Report. RAD stated that the four (4) repayment items listed on this report were not clear, since Mr. Meyer was listed as the original payee of each, possibly indicating that more than $10,000 was loaned by Mr. Meyer. However, according to the RAD analyst's conversation with counsel, two (2) of the four (4) items which listed Mr. Meyer as the original payee were repayments originally made to Ms. Kehoe.

B. DISCUSSION

2 U.S.C. § 441a(a)(1)(C) limits the contributions a person may make to a political committee other than a candidate committee or a national party committee to $5,000. Pursuant to 2 U.S.C. § 441a(a)(1)(C), no person shall make contributions to any political committee other than a candidate committee or committee for a national political party in any calendar year, which in the aggregate, exceed $5,000. Ms. Kehoe made contributions totalling $15,000, with the excess not being actually returned, 235 days after the date of the original receipt. Therefore, there is reason to believe that Nalinda J. Kehoe violated 2 U.S.C. 441a(a)(1)(C) by making excessive contributions totalling $10,000 to the League of Conservation Voters.

OGC 1423

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2800

NAME OF COUNSEL: John J. Duffy

ADDRESS: Piper & Marbury
1200 19th Street, NW, Suite 7
Washington, DC 20036

TELEPHONE: (202) 861-3934

88 DEC 21 AM 11:48

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.

12-20-88
Date

Signature
ASSISTANT TREASURER
LEAGUE OF CONSERVATION VOTERS

RESPONDENT'S NAME: Tina Hobson

ADDRESS: League of Conservation Voters
2000 L Street, NW, Suite 804
Washington, DC 20036

HOME PHONE: (202) 543-5743

BUSINESS PHONE: (202) 466-6880

00040792305

06C 1426

PIPER & MARBURY
1200 NINETEENTH STREET, N.W.
WASHINGTON, D.C. 20036
202-861-3900
TELECOPIER 202-223-2085
CABLE PIPERMAR WSH
TELEX 904246

JOHN J. DUFFY
DIRECT DIAL NUMBER
202-861-3938

1100 CHARLES CENTER SOUTH
36 SOUTH CHARLES STREET
BALTIMORE, MARYLAND 21201
301-539-2530

December 21, 1988

88 DEC 21 PM 5:06

Chairman Thomas J. Josefiak
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Attn: Ms. Ivonne Cotto

Re: MUR 2800
League of Conservation Voters and Tina Hobson, as treasurer

Dear Chairman Josefiak:

We submit, on behalf of the League of Conservation Voters and Tina Hobson, as treasurer, a request for an extension of time, up to and including January 20, 1989, to respond to the Commission's reason to believe finding. The Committee's response is now due on January 4, 1989.

Good cause exists to support the extension requested. The holiday season and the pressure of other work, including responses to several other MURs, require additional time to enable counsel to prepare an adequate response.

Sincerely,

John J. Duffy

JJD:dp

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Thm

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 5, 1989

John J. Duffy, Esquire
Piper & Marbury
1200 19th St., N.W.
Suite 7
Washington, D.C. 20036

RE: MUR 2800
League of Conservation Voters
and Tina Hobson, as treasurer

Dear Mr. Duffy:

This is in response to your letter dated and received on December 21, 1988, requesting an extension of time until January 20, 1989, to respond to the Commission's letter dated December 16, 1988. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due no later than January 21, 1989.

If 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

By: Lois G. Lerner
Associate General Counsel

9004072306

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RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

89 JAN 11 AM 9:48

January 6, 1989

89 JAN 12 PM 12:47

Ivonne Cotto
Federal Election Commission
Washington, DC 20463

Dear Ms. Cotto:

I am writing in regard to the Commission's letter of December 18th, referencing MUR 2800.

As I explained to you on the phone earlier this week, I did not receive the letter until my return from vacation in California on December 30. Thus my response would normally be due on January 14.

However, I would like to request an extension for the due date of my response until January 31, so that I may have time to consult with counsel, decide if I wish to be represented by counsel in this matter, and prepare an appropriate response to the Commission's letter and factual and legal analysis.

I look forward to your response to this request.

Sincerely,

Alden M. Meyer

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Plan

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 13, 1989

Alden M. Meyer
15 Montgomery Avenue
Takoma Park, MD 20912

RE: MUR 2800
League of Conservation Voters
and Tina Hubson, as treasurer

Dear Mr. Meyer:

This is in response to your letter received on January 6, 1989, requesting an extension of time to respond to the Commission's letter dated December 16, 1988. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on January 31, 1989.

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

Sincerely,

Lawrence M. Noble
General Counsel

By: Lois G. Lerner
Associate General Counsel

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Plem

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 13, 1989

Nalinda J. Kehoe
15 Montgomery Avenue
Takoma Park, MD 20912

RE: MUR 2800
League of Conservation Voters
and Tina Hubson, as treasurer

Dear Mr. Meyer:

This is in response to your letter received on January 6, 1989, requesting an extension of time to respond to the Commission's letter dated December 16, 1988. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on January 31, 1989.

If 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

By: Lois G. Lerner
Associate General Counsel

9004079231

06C 1649

PIPER & MARBURY
1200 NINETEENTH STREET, N.W.
WASHINGTON, D.C. 20036
202-861-3900
TELECOPIER 202-223-2085
CABLE PIPERMAR WSH
TELEX 904246

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
89 JAN 24 PM 3:50

JOHN J. DUFFY
DIRECT DIAL NUMBER
202-861-1938

1100 CHARLES CENTER SOUTH
36 SOUTH CHARLES STREET
BALTIMORE, MARYLAND 21201
301-539-2530

January 23, 1989

89 JAN 24 PM 4:26

Chairman Danny L. McDonald
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Attn: Ms. Ivonne Cotto

Re: MUR 2800
League of Conservation Voters and Tina L. Hobson, as treasurer

Dear Chairman McDonald:

This is in response to your letter dated December 16, 1988, in which you informed the League of Conservation Voters (LCV) that the Commission had found reason to believe that LCV had violated 2 U.S.C. §441a(f). For the reasons given below, we believe that this matter should be closed without further action.

Background

LCV is an independent political action committee that, for liability purposes, has been incorporated as a not-for-profit corporation. Pursuant to its Articles of Incorporation and By-Laws, LCV is governed by a Board of Directors. LCV's day to day operations, however, are controlled by a full-time Executive Director, who reports to the Board. For approximately two years, until he resigned, effective December 11, 1987, Mr. Alden Meyer was the Executive

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Director of LCV.[1] On December 11, he was replaced by Mr. James M. Maddy. By February 1988, the entire staff of LCV had resigned and been replaced by new employees hired by Mr. Maddy.

By the latter part of 1987, for reasons that have been explained previously to the Commission,[2] LCV's expenditures for the year had exceeded its revenues by several hundred thousand dollars. On August 7, 1987, in the face of this financial crisis, Alden Meyer and his wife, Linda J. Kehoe, loaned $20,000 to LCV, $10,000 from Mr. Meyer and $10,000 from Ms. Kehoe. At that time Mr. Meyer did not disclose to the Board either LCV's financial condition or that he and his wife were making loans to the organization. Subsequently, on August 13, 1987, at Mr. Meyer's direction, and also without the knowledge of the Board, LCV issued a $5,000 check to Mr. Meyer and a $5,000 check to Ms. Kehoe. On August 30, LCV issued another $5,000 check to Mr. Meyer and another $5,000 check to Ms. Kehoe. Each of these checks was designated as a loan repayment. Mr. Meyer and Ms. Kehoe never negotiated these checks.

On March 31, 1988, at Mr. Maddy's direction, LCV had bank checks issued to Mr. Meyer and Ms. Kehoe in the amount of $10,000 each.

Discussion

The General Counsel suggests in his Factual and Legal Analysis that LCV violated §441a(f) when Mr. Meyer deposited the Meyer and Kehoe loan checks in LCV's bank account, because when aggregated and combined with contributions that Mr. Meyer and Ms. Kehoe had made previously, these loans exceeded the $5,000 annual individual limitation on contributions. We submit, however, that even if the General Counsel is correct, no further enforcement action should be taken against LCV.

1/ Mr. Meyer was also LCV's treasurer until January 1988, when he was replaced by Ms. Tina Hobson.

2/ Letter from John J. Duffy, Esq. to Anthony Raymond, Senior Reports Analyst, dated July 15, 1988.

Section 441a(f) provides that a committee shall not knowingly accept a contribution in excess of the contribution limitations. Its counterpart, §441a(a)(1), provides that no person shall make a contribution in excess of the contribution limitations. When Congress enacted these two provisions, it contemplated that separate persons would be involved in the giving and receiving of excess contributions, and it wanted the Commission to have the authority to punish both parties to the transaction. In this case, however, only a single person, Mr. Meyer, has been involved in the giving and receiving of the contribution. LCV's Board of Directors had no actual knowledge of the receipt of the loans from Mr. Meyer and Ms. Kehoe. LCV was a passive participant, whose liability derives solely from vicarious or implied liability for Mr. Meyer's action. In the past, where, as here, one of the parties to an excessive contribution has been only passively or vicariously responsible for a violation, the Commission has often proceeded only against the active party. Since we understand the Commission intends to proceed against Mr. Meyer, we submit respectfully that the Commission should not also proceed against LCV and that, with respect to LCV, this matter should be closed without further action.

With respect to the alleged excessive contributions from Mr. Maitland Edy, LCV's investigation has revealed that Maitland Edy and Mait Edy are not the same person and, consequently, their contributions should not be aggregated.

Mrs. Alexander's contribution was refunded on December 30, 1988.

Sincerely,

John J. Duffy

JJD:dp

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FEDERAL ELECTION COMMISSION
89 JAN 31 PM 2:36

January 30, 1989

Lawrence M. Noble
General Counsel
Federal Election Commission
Washington, DC 20463

RE: MUR 2800

Dear Mr. Noble:

I am writing to provide you with my perspective on the events under investigation in this matter, and to suggest that we pursue pre-probable cause conciliation.

I am writing on behalf of myself and my wife, Nalinda J. Kehoe, as indicated by her accompanying letter of endorsement.

First, my perspective. I became Director of the League of Conservation Voters in June, 1985. One of my many goals for the League was to develop a fundraising base sufficient to avoid the "boom-and-bust" cycle typical of many political committees, with mass staff layoffs following each election.

In the wake of a highly successful 1986 election season, I proposed, and the League's Board adopted, an aggressive budget for 1987 designed to maintain our fundraising and political programs full speed ahead into the "off-year." Unfortunately, the budget was much too aggressive; by mid-1987, the League was in a financial crunch so severe that it threatened not only the programs of the League, but the staff, as well.

I attempted to address the situation with a hiring freeze, some expense cuts, and several new fundraising initiatives. In hindsight, I should have made major staff and expense cuts much earlier in the game.

By the time we entered August, traditionally a very slow month for fundraising, it was clear to me that we would have a hard time covering the League's payroll and basic operating expenses over the next several weeks, while waiting for the results of our new fundraising initiatives. It was in this context that I gave the League a check for $10,000 on August 7, 1987, representing loans of $5,000 each from myself and my wife, Nalinda.

We were scheduled to leave for a three-week vacation in Canada on August 14. Frankly, the League's chronic fundraising and financial problems had drained me mentally, physically, and emotionally, and I was desperate to get that break.

But several days before I was due to leave, it became clear that the League would likely still have difficulty meeting its payroll while I was gone, confronting me with the serious

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financial, legal, and staff morale problems that would ensue from any failure to make the payroll.

In what was an attempt to buy myself and the League some time, while (I thought) technically complying with the FEC's regulations on contribution and loan limits, I had the League's bookkeeper issue two loan repayment checks of $5,000 each to myself and my wife on August 13, and then gave him a check for $10,000 dated August 14 representing two new $5,000 loans from myself and my wife.

I also left behind a signed blank check on our joint account in case an additional similar transaction was necessary to meet the early September payroll just before my planned return, which it was: on August 30, the League's bookkeeper again issued $5,000 loan repayment checks to myself and my wife, and on August 31 deposited a third $10,000 check representing a third set of $5,000 loans from the two of us.

My intention was to deposit the four $5,000 loan repayment checks in late September or early October, once fundraising picked up post-Labor Day. But the financial situation did not improve, and at its October 5th meeting, the League's Board created a special finance committee to meet weekly to develop a plan to get the League out of its debt trap.

That committee instructed me not to cash the loan repayment checks, and placed repayment of the loans made by me and my wife at the bottom of its financial priority list.

After shutting down two of the League's regional offices and laying off two-thirds of its national staff, I resigned as Executive Director effective December 12, 1987 (and implicitly as Treasurer as well, although it's my assumption from your Factual and Legal Analysis footnote 2 that the League didn't appoint Tina Hobson Treasurer until January 6, 1988).

The League issued new repayment checks of $10,000 each to myself and my wife in late March, 1988, which were, I believe, reported on the April quarterly report. Two additional checks of $2,500 each were issued to me in August and October, 1988, representing refunds of my final $5,000 1987 contribution to the League. Based on conversations with the League's current Director, Jim Maddy, I anticipate that a similar refund will be made to my wife by the end of the first quarter of this year, thus concluding this entire unfortunate episode.

In support of my suggestion that we pursue pre-probable cause conciliation in this matter, I would ask you to consider the following points:

-- I made these transactions out of concern for the very real personal financial needs of my staff, people I had worked closely

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with and cared deeply about, not to allow the League to spend money supporting candidates in violation of the campaign laws. In fact, none of the funds that were loaned to the League were used to support candidates; all the funds were used to pay staff salaries.

-- I made what was clearly, in hindsight, a bad judgment while operating in an atmosphere of extreme personal stress and uncertainty (for myself and the League both). I was under the mistaken impression that the issuance of the refund checks by the League, even though they were not cashed, was, at the least, in technical compliance with the federal campaign laws -- I realize now that that understanding was mistaken.

-- Any violation that occurred was corrected by the League as soon as it was financially feasible. The timing of the repayments was not within my control and, while I had come to understand that the failure to repay the loans was a violation of the campaign laws, I, perhaps more than anyone, understood the need for the League to get its financial house in order by prioritizing its debts and obligations. I therefore did not press for immediate repayment.

-- Neither my wife nor I are independently wealthy; the sums involved represented a very significant part of our assets.

-- Finally, this was a one-time mistake, made out of desperation, that, I can assure you, won't happen again.

I thank you for granting me an extension of time to prepare this response, and I await your reply.

Sincerely,

Alden M. Meyer

90040792317

January 30, 1989

Lawrence M. Noble
General Counsel
Federal Election Commission
Washington, DC 20463

RE: MUR 2800

Dear Mr. Noble:

This letter is simply to state that I have reviewed my husband's letter of January 30 regarding the above-referenced matter, and that I endorse the presentation made by him as to the facts and circumstances involved, as well as his suggestion that we pursue pre-probable cause conciliation.

Sincerely,

Nalinda J. Rehoe

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PIPER & MARBURY
1200 NINETEENTH STREET, N.W.
WASHINGTON, D.C. 20036
202-861-3900
TELECOPIER 202-223-2085
CABLE PIPERMAR WSH
TELEX 904246

JOHN J. DUFFY
DIRECT DIAL NUMBER
202-861-3938

1100 CHARLES CENTER SOUTH
36 SOUTH CHARLES STREET
BALTIMORE, MARYLAND 21201
301-539-2530

February 28, 1989

89 FEB 28 PM 4:28

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

Re: MUR 2800
League of Conservation Voters and
Tina L. Hobson, as treasurer

Dear Ms. Cotto:

On January 23, 1989, we submitted on behalf of the League of Conservation Voters and Tina L. Hobson, as treasurer, a response to the Commission's reason to believe finding. In that response, we indicated that the excess portion of the contribution made by Jocelyn Alexander, which was noted in the reason to believe finding, was refunded on December 30, 1988. A further check of the records has revealed, however, that the refund check was actually dated December 31, 1988.

Sincerely,

John J. Duffy

JJD:dp

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FEDERAL ELECTION COMMISSION
SECRETARIAT
89 AUG 14 PM 3:59

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Alden M. Meyer	)	MUR 2800
Nalinda J. Kehoe	)	

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

The League of Conservation Voters ("LCV"), and Tina Wilson, as treasurer, were referred to the Office of General Counsel by the Reports Analysis Division ("RAD") for accepting excessive contributions totaling $20,750 from four (4) individuals during 1987. Two of the individuals making excessive contributions were Alden M. Meyer, then treasurer of LCV, [1/] and Nalinda J. Kehoe ("Respondents").

On December 8, 1988, the Federal Election Commission found reason to believe that Respondents had made excessive contributions to the LCV, thereby violating Section 441a(a)(1)(C) of the Federal Election Campaign Act of 1971, as amended ("the Act"). Respondents have requested pre-probable cause conciliation (Attachment I).

II. ANALYSIS

2 U.S.C. § 441a(a)(1)(C) limits to $5,000 the contributions a person may make to a political committee other than a candidate committee or a national party committee in a calendar year.

On August 7, 1987, Mr. Meyers gave LCV a check for $10,000 representing loans of $5,000 each from Ms. Kehoe and himself. On August 14, 1987, Mr. Meyers once again gave LCV a check for

1/ Alden M. Meyer was treasurer of LCV from January 1, 1987 to January 6, 1988. Tina Hobson is the present treasurer of LCV.

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$10,000 representing loans from Respondents. On August 31, 1987, a third $10,000 check representing a third set of $5,000 loans from Respondents was issued to LCV.

LCV's 1987 Year End Report disclosed a total of $20,000 in loans received. Only $5,000 loaned by Alden M. Meyer and $5,000 loaned by Nalinda J. Kehoe on August 7, 1987, were itemized on the loan schedule. In addition, two (2) $5,000 contributions, one from Mr. Meyer and one from Ms. Kehoe were disclosed on Schedule A as being received on August 14, 1987. Also disclosed in this report on Schedule B were three (3) loan repayments totaling $15,000 and one "loan replacement" of $5,000 itemized as an operating expenditure, all with the notation "check has not been cashed." The "loan replacement" was made to Ms. Kehoe on August 13, 1987, and one loan repayment of $5,000 was made to Mr. Meyer on the same date. Two additional loan repayments, assertedly made on August 30, 1987, of $5,000 to each of these individuals were reported on Schedule B.

The Reports Analysis Division (RAD) sent a letter to LCV on March 25, 1988, noting the discrepancies on the 1987 Year End Report. On April 15, 1988, LCV filed the 1988 April Quarterly Report. This report disclosed four (4) $5,000 uncashed loan repayments as negative entries with Alden M. Meyer listed as the sole "Lender repaid."

On May 12, 1988, Counsel for LCV explained that because the Committee was experiencing financial difficulties in August, 1987, Mr. Meyer and Ms. Kehoe had each made a $10,000 loan to LCV

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which had been improperly reported. He stated that the loans had been repaid within the month of August, 1987; however, the payees had not cashed the checks because Mr. Meyer and Ms. Kehoe were aware that LCV did not have sufficient funds in its accounts to cover the loan repayments. In addition, he explained that the original loan repayments had been voided and new loan repayments issued as certified checks. According to Mr. Meyers, the League issued new repayment checks of $10,000 each to Mr. Meyers and Ms. Kehoe in late March, 1988. Two additional checks in the amount of $2,500 each were issued to Mr. Meyers in August and October of 1988. Two additional checks for $2,500 were issued to Ms. Kehoe in February of 1989.

On May 25, 1988, LCV amended its 1987 Year End Report to disclose on both the receipt and loan schedules two (2) $10,000 loan received. One was received from Mr. Meyer, and the other from Ms. Kehoe, during August, 1987. The loans were disclosed with an "on demand" due date. In addition, four (4) loan repayments of $5,000 each were also disclosed. The loan repayments listed Mr. Meyer in each itemization. Ms. Kehoe was listed with Mr. Meyer in two of the items.

RAD contacted counsel in reference to the loan repayments disclosed on the 1988 April Quarterly Report. RAD stated that the four (4) repayments items listed on this report were not clear, since Mr. Meyer was listed as the original payee of each, possibly indicating that they involved more than $10,000 in loans by Mr. Meyer. However, according to the RAD analyst's conversation with counsel, two (2) of the four (4) items which

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listed Mr. Meyer as the original payee were repayments of loans originally made by Ms. Kehoe.

In their letter requesting pre-probable cause conciliation Mr. Meyers, speaking on behalf of himself and his wife, Ms. Kehoe, states that the August, 1987 loans to LCV were made to cover LCV's payroll and basic operating expenses. In an attempt to buy LCV some time, Mr. Meyer had LCV's bookkeeper issue two loan repayment checks of $5,000 each to both Respondents that same month. Mr. Meyers explains that his intention was to deposit four $5,000 loan repayment checks in late September or early October; however, LCV's financial situation did not improve and LCV's Board created a special financial committee to develop a plan to get LCV out of its "debt trap." According to Mr. Meyers the committee instructed him not to cash the loan repayment checks.

Mr. Meyers requests in his letter that certain factors concerning this matter be taken into consideration. First, he made these transaction out of concern for the personal financial needs of the LCV staff. Also, he was under extreme personal stress and believed that the issuance of the refund checks was in technical compliance with the federal campaign laws. He further adds that any violation that occurred was corrected by LCV as soon as it was financially feasible.

Mr. Meyer and Ms. Kehoe each made loans to LCV totaling $15,000, with the excess not being actually returned until

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235 days after the date of the first loan receipt and not until the original loan repayment checks had been voided and new loan repayments issued. Therefore, Respondents violated 2 U.S.C. § 441a(a)(1)(C) by making excessive contributions totaling $10,000 each to the League of Conservation Voters.

III. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

IV. RECOMMENDATIONS

1. Enter into conciliation with Alden M. Meyer and Nalinda J. Kehoe prior to findings of probable cause to believe.

2. Approve the attached proposed conciliation agreements and letters.

Lawrence M. Noble
General Counsel

Date

By: Lois G. Lerner
Associate General Counsel

Attachments
1. Request for conciliation dated January 30, 1989
2. Proposed conciliation agreements and letters

Staff Person: Mary Ann Bumgarner

9004079324

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Alden M. Meyer	)	MUR 2800
Nalinda J. Kehoe	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 17, 1989, the Commission decided by a vote of 6-0 to take the following actions in MUR 2800:

1. Enter into conciliation with Alden M. Meyer and Nalinda J. Kehoe prior to findings of probable cause to believe, as recommended in the General Counsel's Report to the Commission dated August 11, 1989.

2. Approve the proposed conciliation agreements and letters, as recommended in the General Counsel's Report to the Commission dated August 11, 1989.

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

Attest:

8-18-89
Date

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

Received in the Secretariat: Monday, August 14, 1989 at 3:59 p.m.
Circulated to the Commission: Tuesday, August 15, 1989 at 4:00 p.m.
Deadline for vote: Thursday, August 17, 1989 at 4:00 p.m.

cmj

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 22, 1989

Mr. Alden M. Meyer
15 Montgomery Avenue
Takoma Park, MD 20912

RE: MUR 2800

Dear Mr. Meyer:

On December 8, 1988, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(C). At your request on August 17, 1989, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Mary Ann Bumgarner, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 22, 1989

Ms. Nalinda J. Kehoe
15 Montgomery Avenue
Takoma Park, MD 20912

RE: MUR 2800

Dear Ms. Kehoe:

On December 8, 1988, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(C). At your request on August 17, 1989, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Mary Ann Bumgarner, the attorney assigned to this matter, at (202) 376-5690.

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

SENSITIVE

In the Matter of	)	
	)	MUR 2800
League of Conservation Voters	)	
Tina Hobson, treasurer	)	

GENERAL COUNSEL'S REPORT

The Office of the General Counsel is prepared to close the investigation in this matter as to the League of Conservation Voters and Tina Hobson, as treasurer, based on the assessment of the information presently available.

10/4/89
Date

Lawrence M. Noble
General Counsel

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WASHINGTON, D.C. 20463

SENSITIVE

MEMORANDUM

November 14, 1989

TO: The Commission

FROM: Lawrence M. Noble
General Counsel

SUBJECT: MUR 2800

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 November 14, 1989. 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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 14, 1989

Mr. John J. Duffy, Esquire
Piper & Marbury
1200 Nineteenth Street, N.W.
Washington, D.C. 20036

RE: MUR 2800
League of Conservation Voters
and Tina Hobson, as treasurer

Dear Mr. Duffy:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on December 8, 1988, the Federal Election Commission found reason to believe that your clients, the League of Conservation Voters and Tina Hobson, as treasurer, violated 2 U.S.C. § 441a(f), 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 a violation has 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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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 Mary Ann Bumgarner, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Brief

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BEFORE THE FEDERAL ELECTION COMMISSION

In the matter of	)	
	)	MUR 2800
League of Conservation Voters	)	
Tina Hobson, treasurer	)	

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

This matter arose as a referral from the Reports Analysis Division ("RAD"). RAD indicated that the League of Conservation Voters and Tina Hobson, as treasurer, ("LCV") accepted excessive contributions totaling $20,750 from four (4) individuals during 1987.

On December 8, 1988, the Commission found reason to believe that the Respondents violated 2 U.S.C. § 441a(f) by accepting excessive contributions. In their response, Respondents did not request pre-probable cause conciliation.

II. LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), limits the contributions a person may make to a political committee other than a candidate committee or a national party committee to $5,000. 2 U.S.C. § 441a(a)(1)(C). Section 441a(f) further provides that no political committee can knowingly accept a contribution or make any expenditure in violation of the provisions of 2 U.S.C. § 441a.

Two contributors to LCV, Jocelyn Alexander and Maitland A. Edey, exceeded their contribution limitations by $250 and $500 respectively. The $250 excessive portion of the contribution made by Ms. Alexander to LCV was refunded to her on

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December 31, 1988. The $500 excessive contribution made by Mr. Edey has apparently not yet been refunded by LCV.

Two other individuals making excessive contributions in this matter were Alden M. Meyer and Nalinda J. Kehoe. Mr. Meyer was the treasurer of LCV from January 1, 1987 to January 6, 1988. On August 7, 1987, Mr. Meyer gave LCV a check for $10,000 representing loans of $5000 each from his wife, Ms. Kehoe, and himself. On August 14, 1987, Mr. Meyer once again gave LCV a check for $10,000 representing loans from Ms. Kehoe and himself. On August 31, 1987 a third $10,000 check representing a third set of loans from Mr. Meyer and Ms. Kehoe was issued to LCV, for a total of $15,000 each.

LCV's 1987 Year End Report disclosed a total of $20,000 in loans received. Only the $5000 loaned by Alden M. Meyer and the $5,000 loaned by Nalinda J. Kehoe on August 7, 1987, were itemized on the loan schedule. In addition, two $5,000 contributions, one from Mr. Meyer and one from Ms. Kehoe were disclosed on Schedule A as being received on August 14, 1987. Also disclosed in the report on Schedule B were three (3) loan repayments totaling $15,000 and one "loan replacement" of $5,000 itemized as an operating expenditure, all with the notation "check has not been cashed." The "loan replacement" was made to Ms. Kehoe on August 13, 1987, and one loan repayment of $5,000 was made to Mr. Meyer on the same date. Two additional loan repayments, assertedly made on August 30, 1987, of $5,000 to each of these individuals were reported on Schedule B.

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RAD sent a letter to LCV on March 25, 1988, noting the discrepancies on the 1987 Year End Report. On April 15, 1988, LCV filed the 1988 April Quarterly Report. This report disclosed four (4) uncashed $5,000 loan repayments as negative entries with Alden M. Meyer listed as the sole "Lender repaid."

On May 12, 1988, counsel for LCV explained that, because the Committee was experiencing financial difficulties, Mr. Meyer and Ms. Kehoe had each made a $10,000 loan to LCV which had been improperly reported. He stated that the loans had been repaid within the month of August; however, the payees had not cashed the checks because Mr. Meyer and Ms. Kehoe were aware that LCV did not have sufficient funds in its accounts to cover the loan repayments. In addition, he explained that these loan repayments had been voided and new loan repayments issued as certified checks. According to Mr. Meyer, the League issued new repayment checks of $10,000 each to Mr. Meyer and Ms. Kehoe in late March, 1988. Two additional checks of $2,500 were issued to Mr. Meyer in August and October of 1988. Two additional checks of $2,500 each were issued to Ms. Kehoe in February of 1989.

LCV amended its 1987 Year End Report to disclose on both the receipt and loan schedules two (2) $10,000 loans received. One was reported as received from Mr. Meyer, and the other from Ms. Kehoe, during August, 1987. The loans were disclosed with an "on demand" due date. In addition, four (4) loan repayments listed Mr. Meyer in each itemization. Ms. Kehoe was listed with Mr. Meyer in two of the items.

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On May 26, 1988, RAD contacted counsel in reference to the loan repayments disclosed on the 1988 April Quarterly Report. RAD stated that the four (4) repayments items listed on this report were not clear, since Mr. Meyer was listed as the original payee of each, possibly indicating that more that $10,000 was loaned by Mr. Meyer. However, according to the RAD analyst's conversation with counsel, two (2) of the four items which listed Mr. Meyer as the original payee were repayments of loans originally made by Ms. Kehoe.

On January 23, 1989, LCV, through counsel, submitted a response to the Commission's reason to believe finding. Counsel for LCV argues that, even if Mr. Meyer deposited in the LCV account Meyer and Kehoe loan checks which, when aggregated with contributions that Mr. Meyer and Ms. Kehoe had made previously, exceeded the $5000 individual limitation on contributions to unauthorized political committees, no further enforcement action should be taken. LCV notes that Section 441a(f) provides that a committee shall not knowingly accept a contribution in excess of the contribution limitations and that its counterpart, Section 441a(a)(1), provides that no person shall make a contribution in excess of the contribution limitations. According to the response, when Congress enacted these two provisions it contemplated that separate persons would be involved in the giving and receiving of excess contributions, and it wanted the Commission to have the authority to punish both parties to the transaction. LCV argues that, in this case, only a single person, Mr. Meyer, has

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been involved in the giving and receiving of the contribution. LCV further states that LCV's Board of Directors had no actual knowledge of the receipt of the loans from Mr. Meyer and Ms. Kehoe. LCV was assertedly a passive participant, whose liability derives solely from vicarious or implied liability for Mr. Meyer's action.

The response further argues that in the past, where, as here, one of the parties to an excessive contribution has been only passively or vicariously responsible for a violation, the Commission has often proceeded only against the active party. LCV does not provide any examples to support this assertion. LCV submits that the Commission should not proceed against LCV and that this matter should be closed without further action.

Section 441a(f) provides that a committee shall not knowingly accept a contribution in excess of the contribution limitations and Section 441a(a)(1) provides that no person shall make a contribution in excess of the contribution limitations. As stated by the Respondents, these provisions assume that two separate persons or entities will be involved in the giving and receiving of excessive contributions. That is in fact the case in this present matter. LCV received $15,000 in loans from each of two individuals, Mr. Meyer and Ms. Kehoe, resulting in a $10,000 excessive contribution from each. At the time LCV received the Meyer and Kehoe loans, Mr. Meyer was acting in his capacity as treasurer and on behalf of LCV. Therefore, as argued by Respondents, there were actually two separate parties to the action. Mr. Meyer and

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Ms. Kehoe made contributions in excess of the contribution limitations and LCV, acting through Mr. Meyer as its agent, accepted contributions in excess of the contribution limitations. Therefore, this Office recommends that the Commission find there is probable cause to believe that the League of Conservation Voters and Tina Hobson, as treasurer, violated 2 U.S.C. § 441a(f), by accepting excessive contributions from Mr. Meyer and Ms. Kehoe, as well as from Jocelyn Alexander and Maitland A. Edey, totaling $20,750.

III. RECOMMENDATION

1. Find there is probable cause to believe that the League of Conservation Voters and Tina Hobson, as treasurer, violated 2 U.S.C. § 441a(f).

11/13/89
Date

Lawrence M. Noble
General Counsel

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Before the
FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
League of Conservation Voters	)	MUR 2800
and Tina Hobson, as Treasurer	)	

REPLY BRIEF OF THE LEAGUE OF CONSERVATION VOTERS

The League of Conservation Voters and Tina Hobson, its treasurer, ("LCV") submits this response to the General Counsel's Brief. The General Counsel contends that LCV violated 2 U.S.C. §441a(f) by accepting excess contributions from four individuals, Maitland A. Edey, Jocelyn Alexander, Alden Meyers and, his wife, Nalinda J. Kehoe. For the reasons indicated below, we submit that the Commission should take no further action in this matter.

A. Alleged Excessive Contribution from Maitland A. Edey

Maitland A. Edey did not make, and LCV did not accept, an excessive contribution. Although Maitland A. Edey made a $5,000 contribution to LCV in 1987, he did not also make the $500 contribution received on July 10, 1987. This contribution was made by his adult son, Mait Edey. (See the attached Statement of Claudia P. Schechter). LCV reported the July 10 contribution as a contribution from Mait Edey. In addition, the address reported for Maitland A. Edey, and Mait Edey are

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different. Finally, LCV noted in its response to The Factual and Legal Analyst that Maitland Edey and Mait Edey are different people.

B. Excessive Contribution from Jocelyn Alexander

LCV concedes that it accepted a single $250 excess contribution from Jocelyn Alexander on November 2, 1987. At that time, as the Commission is aware (see Letter from John J. Duffy, Esquire to Anthony Raymond, Senior Reports Analyst, dated July 15, 1988), LCV was near collapse from a serious financial crisis. The Committee had a large and growing debt, and most of its staff had resigned or been released. During this crises, LCV apparently failed to discover, when it accepted Ms. Alexander's $250 contribution, that she had previously made a $5,000 contribution in that calendar year, and that, consequently, her $250 contribution caused her to exceed the contribution limit.

LCV first learned of the excess contribution when it received the Commision's reason to believe finding in MUR 2800, which was dated December 16, 1988. The Factual and Legal Analysis states (p.3) that "RAD has not notified LCV about these apparent excessive contributions . . ." LCV refunded Ms. Alexander's excess contribution on December 31, 1988. Since LCV's failure to discover this excess contribution was understandable under the circumstances, since the acceptance of the excess contribution from Ms. Alexander was not part of a

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pattern of behavior, and since LCV returned the contribution promptly when it received notification from the Commission, no further action should be taken (see e.g. Greater Los Angeles Zoo Association (MUR 2306).

C. Alleged Excessive Contributions from Alden M. Meyer and his wife Nalinda J. Kehoe

The General Counsel states in his brief that during calendar year 1987 Mr. Meyer and his wife, Ms. Kehoe, each made three $5,000 loans to LCV. These loans were made on August 7, August 14 and August 31, 1987. On August 13, the day before Mr. Meyer and his wife made their August 14 set of loans, however, Mr. Meyer caused LCV to issue and deliver a $5,000 loan repayment check to himself and a $5,000 loan repayment check to Ms. Kehoe, presumably to repay the August 7 loans. Similarly on August 30, 1987, the day before Mr. Meyer and Ms. Kehoe made their August 31 set of loans to LCV, Mr. Meyer again caused LCV to issue and deliver a $5,000 loan repayment check both to himself and to his wife. Mr. Meyer and Ms. Kehoe did not present for payment either the August 13 loan repayment checks or the August 30 loan repayment checks. [1/] (See the

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1/ On August 7, 1987, Mr. Meyer gave LCV a check for $10,000, which represented a $5,000 loan from Alden M. Meyer and a $5,000 loan from Linda J. Kehoe, his wife. On August 13, 1987, Mr. Meyer caused LCV to write a check to Mr. Meyer and Ms. Kehoe for $5,000 each, presumably to repay the August 7 "loan." Mr. Meyer and Ms. Kehoe never cashed these checks.

[Footnote continued on following page]

attached Statement of Claudia P. Schecter.) In late November 1987 at the request of LCV's Board of Directors, Mr. Meyer resigned as the Executive Director of LCV. He was replaced as Treasurer on January 6, 1988. By the time the Board took control of LCV, in late November 1987, LCV's checking account was overdrawn, and Mr. Meyer and Ms. Kehoe still had not presented their checks for payment. LCV acted promptly, as soon as sufficient cash was available, to issue in March, 1988 certified loan repayment checks to Mr. Meyer and Ms. Kehoe totalling $20,000.

1/ [Footnote continued]

On August 14, 1987, Mr. Meyer once again gave LCV a check for $10,000, which at Mr. Meyer's direction, LCV cashed. The General Counsel states that this check also represented loans from Ms. Kehoe and Mr. Meyer to LCV. In its 1987 Year End Report, however, LCV reported the monies received on August 14, 1987 as "contributions" (i.e. "gifts" rather than loans) from Mr. Meyer and Ms. Kehoe. LCV's characterization of these monies as "contributions" from Mr. Meyer and Ms. Kehoe was provided by persons who were in the employ of LCV at the time the event occurred, and it was believed by LCV to be correct.

Subsequently, on August 30, 1987, Mr. Meyer again caused LCV to issue a check to Mr. Meyer and Ms. Kehoe for $5,000 each, presumably to repay the August 14 "loan." Mr. Meyer and Ms. Kehoe never cashed these checks. On August 31, 1987, a third $10,000 check representing a third set of loans from Mr. Meyer and Ms. Kehoe was given to LCV, which at Mr. Meyer's direction, LCV cashed. In its 1987 Year End Report, LCV failed to disclose directly this additional loan, although it did report on Schedule B $20,000 of loan repayments, three loan repayments totalling $15,000 and one loan repayment of $5,000 itemized as an operating expenditure, all of which were followed by the notation that the check has not been cashed. In other words, LCV reported $20,000 in outstanding loans which had been repaid by checks that had not been cashed, and $10,000 in contributions from Mr. Meyer and Ms. Kehoe.

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In his Factual and Legal Analysis the General Counsel contended that LCV violated §441a(f) when it accepted the August 7, August 14 and August 31 checks from Mr. Meyers and Ms. Kehoe. In its response, LCV urged the Commission to take no further action in this matter, arguing that Mr. Meyer, and not LCV, was the culprit here and that LCV was a victim, rather than a co-perpetrator, of his actions. LCV noted also that when Congress enacted § 441a(f) and 441a(a)(1), it contemplated that separate persons would be involved in the giving and receiving of excess contributions, and it wanted the Commission to have the authority to punish both parties to the transaction. In this case, however, only a single person, Mr. Meyer, was involved in the giving and receiving of the contributions. LCV's Board of Directors had no actual knowledge of the receipt of the loans from Mr. Meyer and Ms. Kehoe. LCV was a passive participant, whose liability, if any, derived solely from vicarious or implied liability for Mr. Meyer's action. Since it understood that the Commission intended to proceed against Mr. Meyer, LCV submitted, that the General Counsel should not also proceed against LCV and that, with respect to LCV, this matter should be closed without further action.

In his Brief, the General Counsel did not dispute that LCV took no action separate from Mr. Meyer's actions and that LCV's alleged liability rests solely on its vicarious or

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implied liability for Mr. Meyer's action. Indeed he explained the factual basis of LCV's alleged violation of § 441a(f) as follows: "LCV, acting through Mr. Meyer as its agent, accepted contributions in excess of the contribution limitations." (Brief at 6, emphasis supplied). Nevertheless, the General Counsel recommended that the Commission continue to pursue this matter against LCV, although he made no effort to explain what regulatory purpose he thought would be served in these circumstances by continuing this enforcement action. He simply stated that, in his opinion, LCV had committed, vicariously, through Mr. Meyer, a violation of § 441a(f). Presumably he believes that this is sufficient to justify his recommendation to the Commission. We believe, however, that something more should be required of him. Contrary to the General Counsel's apparent assumption, the Commission does not pursue enforcement actions against a party every time a technical violation can be made out against that party. (See 200 MUR.) Similarly, in the circumstance of this case, we submit that the Commission ought to require the General Counsel, to provide a rationale for pursuing a vicarious violation against LCV other than that "its there."

Moreover, we believe the General Counsel may have too quickly reached the conclusion that LCV committed even a technical violation of § 441a(f). Although Mr. Meyer caused LCV to accept a $5,000 contribution for himself and his wife on

August 7, August 14 and August 31, he also caused LCV to issue and deliver $5,000 checks to himself and Ms. Kehoe on August 13 and on August 30 to repay respectively the August 7 and the August 14 loans. Thus, LCV's acceptance of the August 14 and August 31 loan checks did not technically constitute the acceptance of an excess contribution from Mr. Meyer and Ms. Kehoe, because, when the checks were accepted, LCV had already "paid back" the prior loans. Although Mr. Meyer and Ms. Kehoe never presented these checks for payment, in failing to do so they were not acting as "agents" for LCV. Ms. Kehoe was not employed by LCV, and Mr. Meyer's decision to hold his checks rather than present them for payment was not an action within the scope of his employment with LCV, consequently, in doing so Mr. Meyer was not acting as LCV's agent, and LCV has no vicarious or implied liability for that decision.

Therefore, for the reasons given above, we urge the Commission to find no probable cause to believe that LCV violated § 441a(f) or, in the alternative, to take no further action in this matter.

Respectfully submitted,

John J. Duffy
PIPER & MARBURY
1200 Nineteenth Street, N.W.
Washington, D.C. 20036
(202) 861-3938

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STATEMENT OF CLAUDIA P. SCHECHTER
Deputy Director and Assistant Treasurer, League of Conservation Voters

I am the staff person at the League of Conservation Voters responsible for accounting and financial reporting. I have reviewed the 1987 and 1988 records and, based upon that review, I make the following statements:

1. I found check stubs on account # 17-861-15-268, American Security Bank, in the following amounts labeled as loan repayments:

8/13/87	Ck # 7877	$5000	Alden Meyer
8/13/87	Ck # 7878	$5000	Nalinda Kehoe
8/30/87	Ck # 7914	$5000	Alden Meyer
8/30/87	Ck # 7915	$5000	Nalinda Kehoe

2. I found no cancelled checks matching these stubbed entries in the bank statements received subsequently.

3. I found bank reconciliation forms for August, 1987, through December, 1987 indicating that these checks were outstanding.

4. I reported these findings to the Commission on amended statements for the report for the period ended 12/31/87.

Regarding the contributions of Mait Edey(12/29/87, P.2 of 4 for line 11a, April, 1988 report) and Maitland Edey(7/10/87, P.2 of 22 for line 11a, January, 1988 report) cited by the Commission, these are two separate contributions, one from the father and one from the son, as follows:

1. Father: Maitland Edey, Seven gates Farm, Vineyard Haven, MA 02568
2. Son: Mait Edey, P O Box 2681, Vineyard Haven, MA 02568
This information was ascertained from Marion Edey, Mr. Edey Sr's daughter upon receipt of the Commission's letter by the Committee's Executive Director, James D. Maddy.

I affirm under penalty of perjury that the statements contained herein are true to the best of my knowledge.

Claudia P. Schechter, 12/4/89

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BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE
EXECUTIVE SESSION
JAN 23 1990

In the Matter of	)	
	)	
League of Conservation Voters	)	MUR 2800
and Tina Hobson, as treasurer	)	

GENERAL COUNSEL'S REPORT

I. **BACKGROUND**

On December 8, 1988, the Commission found reason to believe that the League of Conservation Voters and Tina Hobson, as treasurer, ("LCV") violated 2 U.S.C. § 441a(f) by accepting excessive contributions totaling $20,750 from four (4) individuals during 1987. A General Counsel's Brief was sent to LCV on November 14, 1989, and a response was received on December 4, 1989.

II. **ANALYSIS** (The General Counsel's Brief is incorporated by reference)

The Federal Election Campaign Act of 1971, as amended ("the Act"), limits the contributions a person may make to a political committee other than a candidate committee or a national party committee to $5,000. 2 U.S.C. § 441a(a)(1)(c). Section 441a(f) further provides that no political committee can knowingly accept a contribution or make any expenditure in violation of the provisions of 2 U.S.C. § 441a.

The Commission found reason to believe that LCV received a $250 excessive contribution from Jocelyn Alexander and an excessive contribution of $500 from Maitland A. Edey. The $250

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excessive portion of the contribution made by Ms. Alexander to LCV was refunded to her on December 31, 1988.

The Commission also found reason to believe that LCV received excessive contributions from two other individuals, Alden M. Meyer and Nalinda J. Kehoe. Mr. Meyer was the treasurer of the Committee from January 1, 1987 to January 6, 1988. On August 7, and August 14, 1987, Mr. Meyer gave LCV checks for $10,000, each check representing loans of $5,000 each from his wife, Ms. Kehoe, and himself. On August 31, 1987, a third $10,000 check representing a third set of loans from Mr. Meyer and Ms. Kehoe was issued to LCV, for a total of $15,000 from each.

A. Maitland A. Edey

In their response to the General Counsel's Brief recommending probable cause, received December 4, 1989, Counsel argues that the Commission should take no further action in this matter. In the case of Maitland A. Edey, counsel asserts that Mr. Edey did not make, and thus LCV did not accept, an excessive contribution. Rather, the $500 contribution made on July 10, 1987, was assertedly made by Mr. Edey's son, Mait Edey. LCV reported the July 10 contribution as a contribution from Mait Edey. This assertion by counsel is supported by a statement attached to Respondent's brief from Claudia P. Schechter, Deputy Director and Assistant Treasurer of the League of Conservation Voters (Attachment I). Because it

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appears that the $500 contribution at issue was not in fact made by Maitland A. Edey, this Office has reduced by $500 the amount of excessive contributions received by LCV.

B. Jocelyn Alexander

In the responsive brief, counsel for LCV concedes that the committee accepted a single $250 excessive contribution from Jocelyn Alexander on November 2, 1987. Counsel argues that at that time, LCV was near collapse from a serious financial crisis and most of its staff had resigned or been released. As a result, LCV assertedly failed to discover that the $250 contribution from Ms. Alexander had caused her to exceed the contribution limit. Counsel argues that based on the financial crisis at the time, the assertion that this was not a regular pattern of behavior for LCV, and LCV's prompt return of the contribution after receiving notification from the Commission, no further action should be taken.

The reasons cited by counsel for the acceptance of the excessive contribution from Ms. Alexander serve at most as mitigating factors, but do not erase the violation. Therefore, the $250 excessive contribution from Ms. Alexander should continue to be included in the total amount of excessive contributions received by LCV in violation of Section 441a(f).

C. Alden M. Meyer and Nalinda J. Kehoe

As discussed above, LCV received $15,000 each in loans from Mr. Meyer and Ms. Kehoe, resulting in a $10,000 excessive

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contribution from each. In the response to the General Counsel's Brief, counsel for LCV reiterates the arguments which were set out previously in response to the Commission's reason to believe finding. These arguments include the assertion that "Mr. Meyer, and not LCV, was the culprit here and that LCV was a victim, rather than a co-perpetrator, of his actions."

Counsel also argues once again that when it enacted 2 U.S.C. § 441a(a)(1) and 441a(f), Congress contemplated that separate persons would be involved in the giving and receiving of excessive contributions, and it wanted the Commission to have the authority to hold both parties to the transactions accountable. In the present matter, counsel argues that only a single person, Mr. Meyer, was involved in the giving and receiving of the contributions. Counsel further asserts that LCV's Board of Directors had no actual knowledge of the receipt of the loans from Mr. Meyer and Ms. Kehoe and that, therefore, LCV was a passive participant, whose liability, if any, derived solely from vicarious or implied liability for Mr. Meyer's action.

As set out in the General Counsel's Brief, at the time LCV received the Meyer and Kehoe loans, Mr. Meyer was acting in his capacity as treasurer and on behalf of LCV. Therefore, there were actually two separate parties to each loan at issue. Mr. Meyer and Ms. Kehoe made contributions in excess of the contribution limitations and LCV, acting through Mr. Meyer as

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its agent, accepted contributions in excess of the contribution limitations. LCV received and used the loan monies and thus was more than a "passive participant."

Counsel further argues in response to the Brief that, while the General Counsel has stated that LCV committed, vicariously, through Mr. Meyer, a violation of Section 441a(f), the General Counsel should explain what regulatory purpose would be served by continuing this enforcement action. Counsel cites MUR 200 in support of the statement that the Commission does not pursue enforcement actions against a party every time a technical violation can be made out against that party.

While the Commission may choose to exercise prosecutorial discretion in not pursuing minor violations of the Act, this Office does not believe that the acceptance of $20,250 in excessive contributions from three individuals comes within this category of violations.

Counsel for LCV also alleges that a technical violation may not even exist in this case. Counsel asserts that although Mr. Meyer caused LCV to accept $5,000 contributions from himself and his wife on August 7, 14 and August 31, he also caused LCV to issue and deliver $5,000 checks to himself and Ms. Kehoe on August 13 and August 30 to repay respectively the August 7 and the August 14 loans. Therefore, Counsel argues that LCV's acceptance of the August 14 and August 31 loan checks did not technically constitute the acceptance of an

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excessive contribution from Meyer and Kehoe, because, when the checks were accepted, LCV had already "paid back" the prior loans. Counsel does acknowledge that Mr. Meyer and Ms. Kehoe never presented the loan checks for payment. As stated by Counsel, in not presenting the checks for payment Mr. Meyer and Ms. Kehoe were not acting as "agents" for LCV and therefore, LCV has no vicarious or implied liability for that decision.

According to the response submitted by Mr. Meyer and Ms. Kehoe to the Commission's reason to believe findings, Mr. Meyer explains that his intention was to deposit the loan repayment checks; however, LCV's financial situation did not improve and LCV's Board created a special financial committee to develop a plan to get LCV out of its "debt trap." According to Mr. Meyer, the committee instructed him not to cash the loan repayment checks. Mr. Meyer and Ms. Kehoe did not receive the first installment of actual repayment until late March, 1988.

At the time the first series of loan repayment checks were issued, it was known to both Mr. Meyer and LCV, through its agent, Mr. Meyer, that LCV was not financially able to cover these checks. Therefore, the issuance of the loan repayment checks did not constitute actual repayment because of the known lack of sufficient funds in LCV's accounts to cover the amounts of the checks. While Mr. Meyer made the initial decision not to deposit the loan repayment checks on behalf of himself and his wife, based on his knowledge of insufficient funds, this decision was later affirmed by the committee when he was

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instructed not to cash the loan repayment checks.

This Office recommends that the Commission find probable cause to believe that the League of Conservation Voters and Tina Hobson, as treasurer, violated 2 U.S.C. § 441a(f), by accepting excessive contributions, totaling $20,250.

III. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

IV. RECOMMENDATIONS

1. Find probable cause to believe that the League of Conservation Voters and Tina Hobson, as treasurer, violated 2 U.S.C. § 441a(f).

2. Approve the attached proposed conciliation agreement and letter.

1/16/90
Date

Lawrence M. Noble
General Counsel

Attachments
1. Statement by Claudia P. Schechter, Deputy Director and Assistant Treasurer of the League of Conservation Voters.
2. Conciliation Agreement
3. Letter

Staff Assigned: Mary Ann Bumgarner

9004079235 2

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 2800
League of Conservation Voters	)	
and Tina Hobson, as treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on January 30, 1990, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in MUR 2800:

1. Find probable cause to believe that the League of Conservation Voters and Tina Hobson, as treasurer, violated 2 U.S.C. § 441a(f).

2. Approve the proposed conciliation agreement and letter attached to the General Counsel's report dated January 16, 1990.

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

Attest:

Jan 31, 1990
Date

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

9004079235

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Febuary 2, 1990

Mr. John J. Duffy, Esquire
Piper & Marbury
1200 Nineteenth Street, N.W.
Washington, D.C. 20036

RE: MUR 2800
League of Conservation Voters and Tina Hobson, as treasurer

Dear Mr. Duffy:

On January 31, 1990, the Federal Election Commission found that there is probable cause to believe your clients, the League of Conservaton Voters and Tina Hobson, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended.

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 agreement, please contact Mary Ann Bumgarner, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

9004079235 4

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

90 MAR -5 AM 10:31

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Alden M. Meyer	)	MUR 2800
Nalinda J. Kehoe	)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached are conciliation agreements which have been signed by Alden M. Meyer and Nalinda J. Kehoe ("Respondents").

9004079235 3

II. **RECOMMENDATIONS**

1. Accept the attached conciliation agreements with Alden M. Meyer and Nalinda J. Kehoe.

2. Close the file as to these Respondents.

3. Approve the attached letters.

Lawrence M. Noble
General Counsel

3/2/90
Date

Lois G. Lerner
Associate General Counsel

Attachments
1. Conciliation Agreements
2. Letters to Respondents

Staff Assigned: Mary Ann Bumgarner

9004079235

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 2800
Alden M. Meyer	)	
Nalinda J. Kehoe	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 7, 1990, the Commission decided by a vote of 5-0 to take the following actions in MUR 2800:

1. Accept the conciliation agreements with Alden M. Meyer and Nalinda J. Kehoe, as recommended in the General Counsel's report dated March 2, 1990.

2. Close the file as to these Respondents.

3. Approve the letters, as recommended in the General Counsel's report dated March 2, 1990.

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

Attest:

3-7-90
Date

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

Received in the Secretariat: Monday, March 5, 1990 10:30 a.m.
Circulated to the Commission: Monday, March 5, 1990 4:00 p.m.
Deadline for vote: Wednesday, March 7, 1990 4:00 p.m.

90040792357

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 9, 1990

Ms. Nalinda J. Kehoe
15 Montgomery Avenue
Takoma Park, MD 20912

RE: MUR 2800

Dear Ms. Kehoe:

On March 7, 1990, the Federal Election Commission accepted the signed conciliation agreement submitted on your behalf in settlement of a violation of 2 U.S.C. § 441a(a)(1)(C), 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 you. This matter will become a part of the public record within 30 days after it has been closed with respect to all other respondents involved. 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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questions, please contact Mary Ann Bumgarner, the attorney assigned to this matter, at (202) 376-5690.

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	)	
	)	
Nalinda J. Kehoe	)	MUR 2800
	)	

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 Nalinda J. Kehoe ("Respondent"), violated 2 U.S.C. § 441a(a)(1)(C).

NOW, THEREFORE, the Commission and the Respondent, 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 Respondent 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. The Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. 2 U.S.C. § 441a(a)(1)(C) limits to $5,000 the contributions a person may make to a political committee other than a candidate committee or a national party committee, in any calendar year.

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2. The League of Conservation Voters ("LCV"), received a loan from Ms. Nalinda J. Kehoe in the amount of $5,000 on August 7, 1987.

3. On August 13, 1987, LCV issued a check in the amount of $5,000 to Ms. Kehoe in repayment of this loan; however, said check was not deposited by Ms. Kehoe.

4. Respondent made another loan of $5,000 to LCV on August 14, 1987.

5. On August 30, 1987, LCV issued another check in the amount of $5,000 to Respondent; which check again was not deposited by Respondent.

6. On August 31, 1987, an additional loan of $5,000 to LCV was made by Respondent.

7. Respondent made loans to LCV totaling $15,000 with the excessive amount not being returned until 235 days after the date of the first loan.

V. Respondent violated 2 U.S.C. § 441a(a)(1)(C), by making excessive contributions totaling $10,000 to the League of Conservation Voters. Respondent contends that this violation was not knowing and willful.

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of One Thousand Three Hundred and Seventy-Five ($1,375.00) Dollars 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.

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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 the same and the Commission has approved the entire agreement.

IX. Respondent shall have no more than thirty (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: _____ Date 3/9/90
Lois G. Lerner
Associate General Counsel

FOR THE RESPONDENT:

_____ Date 2/10/90
Nalinda J. Kehoe

90040792362

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 9, 1990

Mr. Alden M. Meyer
15 Montgomery Avenue
Takoma Park, MD 20912

RE: MUR 2800

Dear Mr. Meyer:

On March 7, 1990, the Federal Election Commission accepted the signed conciliation agreement submitted on your behalf in settlement of a violation of 2 U.S.C. § 441a(a)(1)(C), 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 you. This matter will become a part of the public record within 30 days after it has been closed with respect to all other respondents involved. 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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questions, please contact Mary Ann Bumgarner, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

90040792364

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Alden M. Meyer	)	MUR 2800
	)	

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 Alden M. Meyer ("Respondent"), violated 2 U.S.C. § 441a(a)(1)(C).

NOW, THEREFORE, the Commission and the Respondent, 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 Respondent 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. The Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. 2 U.S.C. § 441a(a)(1)(C) limits to $5,000 the contributions a person may make to a political committee other than a candidate committee or a national party committee, in any calendar year.

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2. The League of Conservation Voters ("LCV"), received a loan from Mr. Alden M. Meyer in the amount of $5,000 on August 7, 1987.

3. On August 13, 1987, LCV issued a check in the amount of $5,000 to Mr. Meyer in repayment of this loan; however, said check was not deposited by Mr. Meyer.

4. Respondent made another loan of $5,000 to LCV on August 14, 1987.

5. On August 30, 1987, LCV issued another check in the amount of $5,000 to Respondent; which check again was not deposited by Respondent.

6. On August 31, 1987, an additional loan of $5,000 to LCV was made by Respondent.

7. Respondent made loans to LCV totaling $15,000, with the excessive amount not being returned until 235 days after the date of the first loan.

V. Respondent violated 2 U.S.C. § 441a(a)(1)(C), by making excessive contributions totaling $10,000 to the League of Conservation Voters. Respondent contends that this violation was not knowing and willful.

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of One Thousand Three Hundred and Seventy-Five ($1,375.00) Dollars 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.

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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 the same and the Commission has approved the entire agreement.

IX. Respondent shall have no more than thirty (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: _____ Date 3/8/90
Lois G. Lerner
Associate General Counsel

FOR THE RESPONDENT:

_____ 2/16/90
Alden M. Meyer Date

90040725567

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 22, 1990

Mr. John J. Duffy, Esquire
Piper & Marbury
1200 Nineteenth Street, N.W.
Washington, D.C. 20036

RE: MUR 2800
League of Conservation
Voters and Tina Hobson, as
treasurer

Dear Mr. Duffy:

On February 2, 1990, you were notified that the Federal Election Commission found probable cause to believe that your clients, the League of Conservation Voters and Tina Hobson, as treasurer, violated 2 U.S.C. § 441a(f). On that same date, you were sent a conciliation agreement offered by the Commission in settlement of this matter.

Please note that pursuant to 2 U.S.C. § 437g(a)(4)(A)(i), the conciliation period in this matter may not extend for more than 90 days, but may cease after 30 days. Insofar as more than 30 days have elapsed without a written response from you, a recommendation concerning the filing of a civil suit will be made to the Commission by the Office of the General Counsel unless we receive a response from you within 10 days of receipt of this letter.

Should you have any questions, please contact Mary Ann Bumgarner, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

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PIPER & MARBURY

1200 NINETEENTH STREET, N.W.
WASHINGTON, D.C. 20036
202-861-3900
TELECOPIER 202-223-2085
CABLE PIPERMAR WSH
TELEX 904246

JOHN J. DUFFY
DIRECT DIAL NUMBER
202-861-3938

1100 CHARLES CENTER SOUTH
36 SOUTH CHARLES STREET
BALTIMORE, MARYLAND 21201
301-539-2530

April 30, 1990

FEDERAL ELECTION COMMISSION
ADMINISTRATIVE OFFICE DIVISION
90 APR 30 PM 5:17

Mary Ann Bumgarner, Esquire
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2800
<u>League of Conservation Voters</u>

Dear Mary Ann:

I enclose, in response to your request, the information on the four creditors mentioned in the League of Conservation of Voters in debt settlement filing.

Page 3 is the best copy LCV has; but it comes from a document that LCV filed with the Commission.

Sincerely,

John J. Duffy

Enclosures

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 MAY -1 PM 3:46

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Wegman and Hoff, Successor firm to Wollford, Wegman, Krulwich, Gold & Hoff, reported on Schedule D:Page 22, Box B
Amount Due: $1,546.95
Amount Paid:$ 310.00
Percent Paid: 20%
Attachment: Database information

BHW Leasing Partners, Ltd., reported on Schedule D, Page 6, Box A.
Amount Due: $11,960
Amount Settled: $ 2,392
Percent Settled: 20%
Attachment: Database information

90 APR 30 PM 5: 17
FEDERAL ELECTION COMMISSION
ADMINISTRATIVE DIVISION

2. Additional reporting of three newly identified creditors:

The first two creditors listed below both supplied the League's Seattle, Washington, office and the third supplied the League's New Jersey office. None was originally identified as a creditor in my research. They are:

Seattle Times
Amount Due: $1,234.30
Amount Paid:$ 432.00
Percent Paid: 35%
Attachment: Database information

The Weekly
Amount Due: $ 61.56
Amount Paid:$ 30.78
Percent Paid: 50%
Attachment: Database information

Downtown Print Center
Amount Due: $ 568.28
Amount Paid:$ 114.00
Percent Paid: 20%
Attachment: Database information

3. Creditors to be removed from Schedule D's due to research:

Aaron Caplan Page 7, Box B., Schedule D
Amount Listed as Due: $22.33
This amount was included in the reimbursement check for travel expenses totalling $37.30 on 11/9/87, listed on Schedule B: Operating Expense Page 38 for line #19, FEC report 12/31/87.

Congressional Quarterly Page 8, Box C., Schedule D
Amount Listed as Due: $642.45
The service billed was cancelled according to the correspondence I found. The creditor is not billing the League nor pursuing any outstanding bills.

August 15, 1988

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Creditor Name BHW Leasing Partners Ltd.
Amount Due$ $11,960.
Terms Net 30
Creditor Steps 1. Invoices
2. Collection letters
3. Creditor phone calls
Classification Agreed **% Settled** 20
Amt. Settled$ $2,392.00 **Date Settled** 8/16/88
Comments Settlement agreed; paperwork taking place as of 8/16/88.

Creditor Name Seattle Times
Amount Due$ $1,234.30
Terms Net 30
Creditor Steps 1. Invoices
2. Statements
3. Collection calls
4. Collection agency
5. Collection attorney
6. Suit against Chairman, personally
Classification Settled **% Settled** 35
Amt. Settled$ $432.00 **Date Settled** 7/18/88
Comments

Creditor Name The Weekly
Amount Due$ $61.56
Terms Net 30
Creditor Steps 1. Invoice
2. Address search
3. Collection letter
Classification Settled **% Settled** 50
Amt. Settled$ $30.78 **Date Settled** 7/8/88
Comments

0004079237 1

Burrelle's Clipping Service, aka SECC, aka Safe Energy Communication Council

The amounts reported on the debt settlement statement of $171.90 and $[illegible] are correct. The timing and the amounts on the invoices reported on the 12/87 Schedule D did not take into account the nature of this account. As a utility service, from January, 1988, invoices were incurred before we could stop the service. The following corrections have been made:

1. Amount amended on 12/87 Schedule D for correct total.
2. Amount [illegible] on 3/88 Sched. D and 1/88 invoice amount [illegible].

Central Supply Network

The amount reported on the debt settlement statement did not include delivery charges. The amount reported on the Schedule D's of $199.75 is the correct amount due.

Century Telephone Communications

This firm was not reported on the debt settlement statement because we were aware that it had inadvertently been paid twice [illegible], thus making the payment full payment. The following correction [illegible]:

1. Amount [illegible] on 12/87 Schedule D for correct total.
2. Amount due [illegible] on 3/88 and 5/88 reports.

Digital Microcomputer Connection (aka DMC)

This was reported in the debt settlement statement correctly. However, until we received this recollection, I never connected the [illegible] debts with this firm. We have a credit and the order. The payment [illegible] 5/88, Schedule D2, page 10 of 33 for line 10, I did not properly [illegible] the debt to the separate Schedule D and Obligation payments, but the amount should be reported in the debt settlement. The following corrections have been made:

1. Payment [illegible] on 5/88 Schedule D.
2. 5/88 [illegible] amount withdrawn [illegible] total.

Galaxy Electric

The amount of $112.00 shown on both the debt settlement statement and the Schedule D's picks up an addition error made by [illegible] Bill of 5/88. The payment of $36.00 (50%) took into account the actual amount [illegible] the bill. [illegible] corrections [illegible] settlement statement. The [illegible] have been made:

1. [illegible] total
2. [illegible]

Kinko's of DC

The debt settlement statement correctly reports the amount paid as $155.00; the correct payment of $156.00 is shown on the Schedule D's.

Leslie Wolcock

The amount of $196.00 reported on the debt settlement was incorrect. The $264.00 reported on the Schedule D's is the correct amount, and is in compliance with this creditor.

Pacific Northwest Bell

Schedule D for 3/88 and 5/88, which reported $[illegible], show the final corrected bill and the correct amount due. The debt settlement statement shows the uncorrected 12/87 amount of $1,222.25 and should be corrected to read $1,263.06. The 12/87 Schedule D also shows the older, uncorrected amount. The following corrections have been made:

1. Amount amended on 12/87 Schedule D for correct total.

Princeton Packet

Letter Anthony Raymond 12-18-88 P. 2

2. Letter dated November 2, 1988.

The debts disclosed in the amended July Quarterly Report (4/1/88-6/30/88), dated 8-15-88, on page 31 of 31 were incurred during the second half of 1987. Attached are amended forms 3X for the periods ending 12/31/87 and 3/31/88, with attached pages 30 and 31 of 31 for each time period's report.

My letter of 8/15/88 supplying additional debt settlement information was incorrect with regard to the amount paid The Seattle Times. The correct amount paid, as reported on Schedule D of the August Monthly Report (7/1/88-7/31/88), page 30 of 30, and on Schedule B of the same report, page 18 of 18 for line 19, Operating Expense, is $511.00. This represents a 41% debt settlement. A corrected page 2 of the referenced letter is enclosed.

3. Letter dated November 9, 1988, referencing 1988 September Monthly Report (8/1/88-8/31/88)

Please find enclosed a copy of the separate letter requesting approval of the computerized Schedule E.

I am not sure I understand the next request. I have attached a photographic copy of the final page 6 of 6 for line 22, Independent Expenditures, with my signature and that of the notary. However, I do need to amend Schedule E for this report. I have erroneously reported in-kind expenditures on behalf of the campaign of Chester Atkins, Atkins for Congress, MA #05, 1988 primary on line 21 rather than on line 22. I have, after the error was brought to my attention by LCV's staff, ascertained that there has been no contact at all with any authorized member of Mr. Atkins campaign, whether candidate, agent or committee. Therefore, an amended schedule B: Candidate Contributions, line 21, and schedule E: Independent Expenditures, line 22, and form 3X for the 1988 September Monthly Report (8/1/88-8/31/88) are attached.

I have attached pages of Schedule D for this time period, corrected to delete those entries carried forward from previous time periods rather than removed.

The corrected form 3X for this time period mentioned above also has been corrected in line 10 to reflect the reported total of Schedules C and D.

4. Letter dated November 9, 1988, referencing Amended 1988 September Monthly Report (8/1/88-8/31/88)

The total of itemized receipts for this time period was reported correctly on the Schedule A: Itemized receipts and incorrectly on the form 3X. The enclosed amended form 3X has corrected this discrepancy.

Thank you for your patience on these items. Please let me know if you have any questions.

Sincerely,

Claudia P. Schechter
Assistant Treasurer

0004079237

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

90 JUL 11 PM 4:25

SENSITIVE

JUL 17 1990

EXECUTIVE SESSION

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
League of Conservation Voters and Tina Hobson, as treasurer	)	MUR 2800

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement received on June 7, 1990, which has been signed by Claudia Schechter, Deputy Director of the League of Conservation Voters. (Attachment I).

On December 8, 1988, the Commission found reason to believe that the League of Conservation Voters ("LCV") and Tina Hobson, as treasurer ("Respondents") violated 2 U.S.C. § 441a(f) by accepting excessive contributions totaling $20,250. The Commission found probable cause to believe in this matter on January 30, 1990, and a proposed conciliation agreement was sent to Respondents.

00004079237 4

9 0 0 4 0 7 9 2 3 7 5

9 0 0 4 0 7 9 2 3 7 5

Because the 90 day period allowed for negotiation of probable cause conciliation has run in this matter

, it is recommended that the Commission authorize this Office to file a civil suit against Respondents in this matter.

II. RECOMMENDATIONS

1. Reject the counterproposal offered on behalf of the League of Conservation Voters and Tina Hobson, as treasurer.

2. Authorize the Office of the General Counsel to file a civil suit for relief in United States District Court against the League of Conservation Voters and Tina Hobson, as treasurer.

3. Approve the appropriate letter.

7/11/90
Date

Lawrence M. Noble
General Counsel

Attachment
1. Response dated June 7, 1990.

Staff Assigned: Mary Ann Bumgarner

9004074377

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
League of Conservation Voters and Tina Hobson, as treasurer	)	MUR 2800
	)	

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on July 17, 1990, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in MUR 2800:

1. Accept the counterproposal offered on behalf of the League of Conservation Voters and Tina Hobson, as treasurer.

2. Direct the Office of General Counsel to send an appropriate letter.

3. Close the file.

Commissioners Aikens, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision; Commissioner Elliott was not present.

Attest:

7-17-90
Date

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

9 0 0 4 0 7 9 2 5 7 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CLOSED

July 19, 199

Mr. Alden M. Meyer
15 Montgomery Avenue
Takoma Park, MD 20912

RE: MUR 2800
Alden M. Meyer

Dear Mr. Meyer:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Mary Ann Bumgarner, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9004074574

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 19, 1990

Ms. Nalinda J. Kehoe
15 Montgomery Avenue
Takoma Park, MD 20912

RE: MUR 2800
Nalinda J. Kehoe

Dear Ms. Kehoe:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Mary Ann Bumgarner, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9004079253 0

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 19, 1990

John J. Duffy, Esquire
Piper & Marbury
1200 Nineteenth Street, N.W.
Washington, D.C. 20036

RE: MUR 2800
League of Conservation
Voters and Tina Hobson,
as treasurer

Dear Mr. Duffy:

On July 17, 1990, 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. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter.

This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel. Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Mary Ann Bumgarner, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

00040792381

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
League of Conservation Voters	)	MUR 2800
and Tina Hobson, 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 the League of Conservation Voters ("LCV") and Tina Hobson, as Treasurer ("Respondents"), violated 2 U.S.C. § 441a(f).

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. The 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.

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IV. The pertinent facts in this matter are as follows:

1. 2 U.S.C. § 441a(a)(1)(c) limits to $5,000 the contributions a person may make to a political committee other than a candidate committee or a national party committee.

2. 2 U.S.C. § 441a(f) provides that no political committee may knowingly accept a contribution or make any expenditure in violation of the provisions of 2 U.S.C. § 441a.

3. On July 23, 1987, and November 2, 1987, LCV received contributions from Jocelyn Alexander in the amounts of $5,000 and $250, respectively.

4. The $250 excessive portion of the contributions from Jocelyn Alexander was refunded on December 31, 1988.

5. On August 7, 1987, LCV received a check for $10,000 from Alden M. Meyer representing loans of $5,000 each from Mr. Meyer and Nalinda J. Kehoe. Mr. Meyer was, at the time of the occurrence of the violations described herein, the Treasurer of LCV. Mr. Meyer resigned as Treasurer of LCV in January, 1988.

6. On August 13, 1987, LCV issued a $5,000 loan repayment check to Mr. Meyer and a $5,000 loan repayment check to Ms. Kehoe, which Mr. Meyer and Ms. Kehoe never cashed.

7. On August 14, 1987, LCV received a check for $10,000 from Alden M. Meyer representing loans of $5,000 each from Mr. Meyer and Ms. Kehoe.

9004072638

8. On August 30, 1987, LCV issued a $5,000 loan repayment check to Mr. Meyer and a $5,000 loan repayment check to Ms. Kehoe, which Mr. Meyer and Ms. Kehoe never cashed.

9. On August 31, 1987, LCV received a check for $10,000 from Alden M. Meyer representing a third set of loans of $5,000 each from Mr. Meyer and Ms. Kehoe.

10. In March, 1988, LCV issued certified bank checks to Mr. Meyer and Ms. Kehoe in the amount of $10,000 each.

V. Respondents violated 2 U.S.C. § 441a(f) by accepting excessive contributions totaling $20,250.

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Two Thousand Two Hundred Fifty Dollars ($2,250) 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 Section VI of this agreement. If the Commission believes that Section VI of this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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

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

9004079238

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
Associate General Counsel

Date 7/19/90

FOR THE RESPONDENTS:

Claudia Schechter
Deputy Director

Date June 6, 1990

00407 2 3 8 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2800

DATE FILMED 8/27/90 CAMERA NO. 3

CAMERAMAN AS

9004072380

FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 2800.

1/29/92

92040892124

OGC 4125

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

CLOSED

Jan 16, 1992

TWO WAY MEMORANDUM

TO: Fabrae Brunson
OGC, Docket

FROM: Philomena Brooks PB
Accounting Technician

SUBJECt: Account Determination for Funds Received

We recently received a check from Alden M. Meyer, check number 0773, dated Jan 13, 1992, and in the amount of $ 1,375.00. Attached is a copy of the check and any correspondence that was forwarded. Please indicate below the account into which it should be deposited, and the MUR number and name.

RECEIVED FEDERAL ELECTION COMMISSION 92 JAN 16 PM 3:42

TO: Philomena Brooks
Accounting Technician

FROM: Fabrae Brunson FB
OGC, Docket

In reference to the above check in the amount of $ 1,375, the MUR number is 2800 and in the name of Alden M. Meyer. The account into which it should be deposited is indicated below:

__ Budget Clearing Account (OGC), 95F3875.16

✓ Civil Penalties Account, 95-1099.160

__ Other: _____

Fabrae D. Brunson
Signature

Jan. 16, 1992
Date

92040392125

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

92 JAN 15 AM 9:58

CLOSED

January 13, 1992

Office of General Counsel
Federal Election Commission
999 E St., NW,
Washington, DC 20463

Re: MUR #2800

Dear Sir or Madam:

Please find enclosed my check in the amount of $1,375.00 in payment of the civil penalty in the above-referenced matter.

As I told Ms. Baumgarner in our phone conversation last week, my ex-wife, Nalinda J. Kehoe, is travelling in Asia until April or May. Upon her return, I will let her know that the file on this matter has been closed and that she should submit her civil penalty as well.

Sincerely,

Alden M. Meyer

enclosure: check #773

92 0 4 0 8 9 2 1 2 6

ALDEN M. MEYER
15 MONTGOMERY AVENUE
TAKOMA PARK, MD 20912

JAN 13 1992 0773

65-234
550

PAY TO THE ORDER OF FEDERAL ELECTION COMMISSION $ 1,375.00

THIRTEEN HUNDRED SEVENTY-FIVE AND NO/100 DOLLARS

SOVRAN BANK.
Sovran Bank / Maryland Bethesda, Maryland 20817
2432

MEMO MUR # 2800

⑆055002346⑆ 72 5604 ⑈ 0773

92040692127

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 2800.

6/10/92

92040210006

CLOSED

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 18, 1992

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Nalinda J. Kehoe
15 Montgomery Avenue
Takoma Park, Maryland
20912

RE: 2800

Dear Ms. Kehoe:

On March 9, 1990 the Federal Election Commission and Nalinda J. Kehoe entered into a conciliation agreement in settlement of a violation 2 U.S.C § 441a(a)(1)(C). According to the agreement, you were required to pay a civil penalty of one thousand three hundred and seventy-five ($1,375.00) dollars within thirty days of the effective agreement.

According to Commission records, no payments have been received. Please be advised that pursuant to 2 U.S.C. § 437g (a)(5)(D), a violation of any provision of the conciliation agreement may result in the institution of a civil suit for relief in the United States District Court. Unless we receive payment from you in five days, this office will recommend that the Commission file suit to remedy this violation.

If you believe the Commission's records are in error, or if you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary Ann Bumgarner

Mary Ann Bumgarner
Attorney

92040910007

CLOSED

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

MAY 26 9 59 AM '92

May 15, 1992

Office of General Counsel
Federal Election Commission
999 E Street,, NW
Washington, DC 20463

Re: MUR #2800

Dear Sir or Madam:

Please find enclosed my check in the amount of $1,375.00 in payment of the civil penalty in the above-referenced matter.

Sincerely,

Nalinda J. Kehoe

Nalinda J. Kehoe

RECEIVED
OFFICE OF FEDERAL ELECTION COMMISSION
GENERAL COUNSEL

92 MAY 27 PM 3:46

92040910008

Folder copy
OGC 4724

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 26, 1992

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 MAY 27 PM 3:45

TWO WAY MEMORANDUM

TO: Virginia Whitted
OGC, Docket

FROM: Philomena Brooks PB
Accounting Technician

SUBJECt: Account Determination for Funds Received

We recently received a check from Nalinda J. Kehoe, check number 150, dated May 5, 1992, and in the amount of $ 1375.00. Attached is a copy of the check and any correspondence that was forwarded. Please indicate below the account into which it should be deposited, and the MUR number and name.

TO: Philomena Brooks
Accounting Technician

FROM: Virginia Whitted
OGC, Docket

In reference to the above check in the amount of $ 1,375.00, the MUR number is 2800 and in the name of NALINDA J. KEHOE. The account into which it should be deposited is indicated below:

__ Budget Clearing Account (OGC), 95F3875.16

XX Civil Penalties Account, 95-1099.160

__ Other: _____

Virginia Whitted
Signature

May 27, 1992
Date

92040710009

NALINDA J KEHOE
404 PATRICIAN WAY
PASADENA, CALIF. 91105
818/792-8612

9 2 0 4 0 2 1 0 0 1 0150

CMA® Cash Management Account®

15 MAY 1992

25-80/440

PAY TO THE ORDER OF FEDERAL ELECTION COMMISSION $ 1,375.00

ONE THOUSAND THREE HUNDRED AND SEVENTY FIVE DOLLARS

Merrill Lynch

BANK ONE

MEMO MUR #2800

Nalinda J. Kehoe

[redacted]

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

92 MAY 27 PM 3:45