



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2258

DATE FILMED 7/21/89 CAMERA NO. 4

CAMERAMAN AS

89040755164



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

March 17, 1989

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

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

SUBJECT: REFERRAL OF UNAUTHORIZED COMMITTEES THAT FAILED
TO TIMELY FILE THE 1988 30 DAY POST-GENERAL REPORT

This is a referral of four (4) unauthorized committees that failed to file the 1988 30 Day Post-General Report

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

For your information, prior notice of the due date of the report was sent to each committee on October 3, 1988 (Attachment 5) and Non-Filer Notices were sent on January 6, 1989 (Attachment 6).

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

Attachment

8 2 0 4 0 7 5 5 1 6 5

C00078196

Rhode Island Republican State Central
Committee

89NF-49

8 2 0 4 0 7 5 5 1 6 6

8 9 0 4 0 7 5 5 1 6 7

page 1

COMMITTEE ID, NAME AND ADDRESS

CONTACTS
WITH FILER ATCH

REPORTS FILED/
RESPONSES

.....
C00078196
RHODE ISLAND REPUBLICAN STATE CENTRAL COMMITTEE
TREASURER'S NAME: MRS VIRGINIA KALAT
400 SMITH STREET SUITE 200
PROVIDENCE RI 02908

Telecons
1/31/89
02/02/89
02/02/89

3b
3c
3d

30 Day Post-General
Report Filed
2/06/89 3e

.....

C00078196

Rhode Island Republican State Central
Committee

89NF-49

89040755168

89040755169

Rhode Island Republican State Central Committee

(Attachments 3a - 3e)

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

DATE 15MAR89

PAGE 3

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
					TYPE OF FILER	
RHODE ISLAND REPUBLICAN STATE CENTRAL COMMITTEE						
CONNECTED ORGANIZATION:						
	1987 MISCELLANEOUS REPORT TO FEC			2JAN87	2	87FEC/452/3675
	STATEMENT OF ORGANIZATION - AMENDMENT			30APR87	2	87FEC/466/3655
	STATEMENT OF ORGANIZATION - AMENDMENT			18AUG87	2	87FEC/483/2573
	STATEMENT OF ORGANIZATION - AMENDMENT			5NOV87	2	87FEC/492/5390
	MID-YEAR REPORT	125	13,872	1JAN87 - 30JUN87	6	87FEC/481/2988
	MID-YEAR REPORT - AMENDMENT	125	13,872	1JAN87 - 30JUN87	11	88FEC/527/1480
	REQUEST FOR ADDITIONAL INFORMATION			1JAN87 - 30JUN87	2	87FEC/495/2559
	REQUEST FOR ADDITIONAL INFORMATION 2ND YEAR-END	14	14	1JAN87 - 30JUN87	3	87FEC/497/1692
	1988 MISCELLANEOUS REPORT TO FEC			1JUL87 - 31DEC87	7	88FEC/501/3254
	STATEMENT OF ORGANIZATION - AMENDMENT			11JAN88	3	88FEC/498/2467
	MISCELLANEOUS REPORT TO FEC			13JAN88	2	88FEC/498/2839
	APRIL QUARTERLY	7	7	1FEB88	2	88FEC/503/5081
	JULY QUARTERLY	7	183	1JAN88 - 31MAR88	7	88FEC/520/2287
	OCTOBER QUARTERLY	7	811	1APR88 - 30JUN88	7	88FEC/535/5328
	POST-GENERAL	156	333	1JUL88 - 30SEP88	7	88FEC/556/4027
	NOTICE OF FAILURE TO FILE			1OCT88 - 28NOV88	7	89FEC/584/3227
	YEAR-END	2	4	28NOV88	1	89FEC/576/2079
				29NOV88 - 31DEC88	7	89FEC/584/3220
	TOTAL	318	15,224		80	TOTAL PAGES

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All reports except the 1988 30 Day Post-General and Year End Reports have been reviewed.

Ending cash-on-hand as of 12/31/88: \$719

Outstanding debts owed by the committee as of 12/31/88: \$51,483

TELECON

ANALYST: Donald L. Averett

CONVERSATION WITH: Lee Mills

COMMITTEE: Rhode Island Republican State Central Committee (C00078196)

DATE: 1/31/89

SUBJECT: Failure to File the 30 day Post-General Election Report

I telephoned the committee and asked to speak to Virginia Kalat, the treasurer. Ms. Mills informed me that Mrs. Kalat was out of town. I advised her that the Commission had not received the committee's 30 day Post-General Election Report. I also advised her that the Year End Report was due and requested that she ask Robert Anderson, the assistant treasurer, to return my call.

89040755171

TELECON

ANALYST: Donald L. Averett

CONVERSATION WITH: Lee Mills

COMMITTEE: Rhode Island Republican State Central Committee (C00078196)

DATE: 2/2/89

SUBJECT: Failure to File the 30 day Post-General Election Report

I telephoned the committee and asked to speak to Mr. Anderson, the assistant treasurer. Ms. Mills informed me that Mr. Anderson was not in the office and that she did not know where to reach him. I asked Ms. Mills to tell Mr. Anderson that the report had to be filed no later than 2/5/89.

89040755174

TELECON

ANALYST: Donald L. Averett

CONVERSATION WITH: Robert Anderson, Assistant Treasurer

COMMITTEE: Rhode Island Republican State Central Committee (000078196)

DATE: 2/2/89

SUBJECT: Failure to File the 30 day Post-General Election Report

Mr. Anderson phoned the Commission. I informed him that the Commission had not received the committee's 30 day Post-General Election Report.

Mr. Anderson stated that the treasurer's husband had become ill and that, to the surprise of the committee, the treasurer and her family had moved to Florida. He also stated that he could guarantee that the report would be filed by Monday, 2/6/89 and that it would have no activity other than administrative expenses.

I advised Mr. Anderson to file the report as soon as possible and urged him to file it by Saturday, 2/4/89.

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FEDERAL ELECTION COMMISSION
ADMINISTRATIVE DIVISION

REPORT OF COMMITTEE TO THE COMMISSION

Rhode Island Business Education Fund

400 South Street - Suite 200
Providence, RI 02908

STATE OF RHODE ISLAND

REGISTRATION NUMBER: **60002896**

DATE: **FEB - 8 1989**

TYPE OF REPORT

- April 15 Quarterly Report
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year End Report
- July 31 Mid Year Report (Non-eligible Year Only)
- Termination Report

- Monthly Report Due On:
- February 28
 - March 31
 - April 30
 - May 31
 - June 30
 - July 31
 - August 31
 - September 30
 - October 31
 - November 30
 - December 31
 - January 31

Twelve day report preceding _____ (Type of Report) ending on _____ in the State of _____

Twelve day report following the General Election on 11-2-88 in the State of RI covering period from 10-1-88 to 11-2-88

(b) Is this Report an Amendment? YES NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	<u>10-1-88</u> through <u>11-28-88</u>		
6. (a) Cash on Hand January 1, 19 <u>88</u>			\$ <u>1879.34</u>
(b) Cash on Hand at Beginning of Reporting Period		\$ <u>898.39</u>	
(c) Total Receipts (from Line 10)		\$ <u>156.06</u>	\$ <u>178.14</u>
(d) Subtotal (add Lines 6(a) and 6(c) for Column A and Lines 6(b) and 6(c) for Column B)		\$ <u>1054.45</u>	\$ <u>2052.88</u>
7. Total Disbursements (from Line 20)		\$ <u>833.01</u>	\$ <u>1336.44</u>
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ <u>221.44</u>	\$ <u>721.44</u>
9. Debts and Obligations Owed TO the Committee (Report all on Schedule C and/or Schedule D)		\$	
10. Debts and Obligations Owed BY the Committee (Report all on Schedule C and/or Schedule D)		\$ <u>4668.54</u>	

For further information contact:
Federal Election Commission
900 E Street, NW
Washington, DC 20423
Toll Free 800-424-9820
Local 202-576-3120

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

Type or Print Name of Treasurer
ROBERT A. ANDERSON, JR. DEPUTY TREASURER

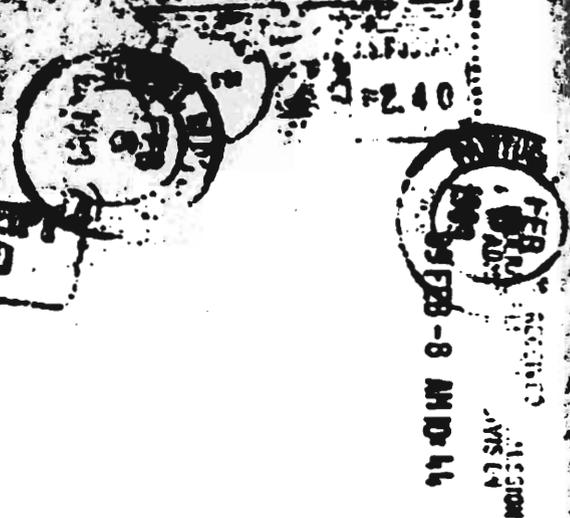
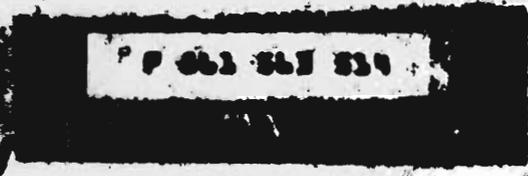
Signature of Treasurer: *Robert A. Anderson, Jr.* Date: 2-3-89

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

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8903584322

Rhode Island
Republican Party



Federal Election Commission
ATTN DONALD AVERATT
999 E Street NW
Washington DC 20463

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89 APR 28 AM 10:23

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD Referral # 89NF-47
89NF-48
89NF-49
89NF-50

Staff Member Kenneth Kellner

SOURCE: I N T E R N A L L Y G E N E R A T E D

RESPONDENTS:

Rhode Island Republican State Central Committee and
Mrs. Virginia Kalat, as treasurer (89NF-49)

1d

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

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred the above four committees to the Office of the General Counsel on March 20, 1989. The basis for the attached referral is the committees' failure to file the 1988 30 Day Post-General Report in a timely fashion.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended (the "Act"), at Section 434(a)(4)(A)(iii) requires unauthorized committees to file a post-general election report no later than the 30th day after the general election delineating the

89040755176

committee's receipts and disbursements as of the 20th day after the general election. Thus, the due date for the 1988 30 Day Post-General Report was December 8, 1988.

The following committees did not file the 1988 30 Day Post-General Report by this date:

Name of Committee	Date Report Filed
Rhode Island Republican State Central Committee	2/06/89

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Accordingly, the Office of the General Counsel recommends that the Commission open Matters Under Review and find reason to believe that the

the Rhode Island Republican State Central Committee and Mrs. Virginia Kalat, as treasurer;

, violated 2 U.S.C. § 434(a)(4)(A)(iii).

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

This Office also recommends that the Commission offer to

enter into conciliation with

the Rhode
Island Republican State Central Committee and Mrs. Virginia
Kalat, as treasurer,

prior to a finding of
probable cause to believe. Attached for the Commission's
approval are proposed conciliation agreements (Attachment 2).
The proposed agreements provide for an admission of the violation
and the payment of a civil penalty as follows:

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V. RECOMMENDATIONS

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

a.

b.

c. Rhode Island Republican State Central Committee and Mrs. Virginia Kalat, as treasurer; and

d.

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

a.

b.

c. Rhode Island Republican State Central Committee and Mrs. Virginia Kalat, as treasurer; and

d.

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- 8 9 0 4 0 7 5 5 1 8 1
- c. Rhode Island Republican State Central Committee and Mrs. Virginia Kalat, as treasurer; and
 - d.
2. Enter into conciliation with the following committees and their treasurers prior to a finding of probable cause to believe:
- a.
 - b.
 - c. Rhode Island Republican State Central Committee and Mrs. Virginia Kalat, as treasurer; and
 - d.
3. Approve the letters, factual and legal analyses, and proposed conciliation agreements to the respective committees listed in action 2 above, as recommended in the General Counsel's report signed April 27, 1989.

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

Attest:

May 3, 1989
Date

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

Received in the Office of Commission Secretary:	Fri.,	4-28-89,	10:23
Circulated on 48 hour tally basis:	Fri.,	4-28-89,	12:00
Deadline for vote:	Tues.,	5-02-89,	4:00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 8, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mrs. Virginia Kalat, Treasurer
Rhode Island Republican State
Central Committee
400 Smith Street
Suite 200
Providence, RI 02908

RE: MUR 2858
Rhode Island Republican
State Central Committee
and Mrs. Virginia Kalat, as
treasurer

Dear Mrs. Kalat:

On May 3, 1989, the Federal Election Commission found that there is reason to believe the Rhode Island Republican State Central Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii), 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.

8 9 0 4 0 7 5 5 1 8 2

plum

Mrs. Virginia Kalat
Page 2

In order to expedite the resolution of this matter, the Commission has also decided to offer to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. Enclosed is a conciliation agreement that the Commission has approved.

If you are interested in expediting the resolution of this matter by pursuing preprobable cause conciliation and if you agree with the provisions of the enclosed agreement, please sign and return the agreement, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

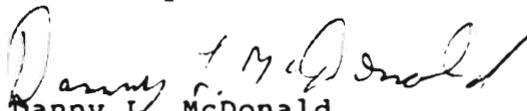
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Keith V. Morgan, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form
Conciliation Agreement

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Rhode Island Republican State
Central Committee and Mrs. Virginia
Kalat, as treasurer

MUR 2858

Under 2 U.S.C. § 434(a)(4)(A)(iii), unauthorized committees are required to file a post-general election report no later than the 30th day after the general election delineating the committee's receipts and disbursements as of the 20th day after the general election.

The Respondents were required to file the 1988 30 Day Post-General Report on December 8, 1988. The Respondents, however, did not file the 1988 30 Day Post-General Report by December 8, 1988.

Therefore, there is reason to believe the Rhode Island Republican State Central Committee and Mrs. Virginia Kalat, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii).

89040755184



06C 2837

FEDERAL ELECTIONS COMMISSION
ADMINISTRATIVE SERVICES

89 MAY 22 PM 2:43

Michael Vallante
Chairman

May 18, 1989

Federal Elections Commission
999 E Street, NW
6th Floor
Washington, DC 20463

SUBJECT: MUR 2858

ATTENTION: Keith Morgan, Esq.

RECEIVED
FEDERAL ELECTIONS COMMISSION
MAY 21 PM 3:18

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Dear Keith:

I am in receipt of the communication of May 8th regarding MUR 2858. Although I did not become Republican State Chairman until after this occurred, I do recognize the need to settle this problem.

I reviewed the situation with our Controller, who was on board at the State Party at the time this filing should have taken place. He indeed informed me that the FEC is accurate in finding that the filing did not take place until two months after the proper date.

Therefore as requested in the settlement proposal I am enclosing a check for the amount of \$250 to settle this problem. This should meet the stated requirements.

Thank you for your attention in this matter.

Sincerely,

Michael Vallante
Chairman
Rhode Island Republican Party

ENCLOSURE



0603058

FEDERAL ELECTION COMMISSION
ADMINISTRATIVE SERVICES

89 JUN 14 AM 8:42

MUR2858

Michael Vallante
Chairman

June 12, 1989

Mr. Keith Morgan, Esq.
Federal Elections Commission
999 E Street, NW
6th Floor
Washington, DC 20463

Dear Mr. Morgan:

Enclosed you will find the signed conciliation agreement concerning the late filing by the Rhode Island Republican Party. My apologies for not including this document with the check that was sent to settle this case.

I hope this meets with your approval. If there is anything else please do not hesitate to contact me.

Thank you.

Sincerely,

Michael A. Vallante
Chairman
Rhode Island Republican Party

89040755180

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
89 JUN 14 AM 10:08

89 JUN 21 AM 9:02

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)	
)	
Rhode Island Republican)	MUR 2858
State Central Committee and)	
Virginia Kalat, as treasurer)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement, which has been signed by Michael Vallante, the Chairman of the Rhode Island Republican Party.

The attached agreement contains no changes from the agreement approved by the Commission on May 3, 1989. A check for the civil penalty has been received.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with the Rhode Island Republican State Central Committee and Virginia Kalat, as treasurer.
2. Close the file.
3. Approve the attached letter.

Lawrence M. Noble
General Counsel

Date 6/20/89

BY: 
Lois G. Lerner
Associate General Counsel

Attachments

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

Staff assigned: Keith V. Morgan

89040755187

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Rhode Island Republican)	MUR 2858
State Central Committee and)	
Virginia Kalat, as treasurer)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 23, 1989, the Commission decided by a vote of 5-0 to take the following actions in MUR 2858:

1. Accept the conciliation agreement with the Rhode Island Republican State Central Committee and Virginia Kalat, as treasurer, as recommended in the General Counsel's report signed June 20, 1989.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's report signed June 20, 1989.

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

Attest:

June 23, 1989
Date

Hilda Arnold
for Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary:	Wed.,	6-21-89,	9:02
Circulated on 48 hour tally basis:	Wed.,	6-21-89,	4:00
Deadline for vote:	Fri.,	6-23-89,,	4:00

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 29, 1989

Virginia Kalat, Treasurer
Rhode Island Republican
State Central Committee
400 Smith Street, Suite 200
Providence, Rhode Island 02908

RE: MUR 2858
Rhode Island Republican
State Central Committee and
Virginia Kalat, as treasurer

Dear Mrs. Kalat:

On June 23, 1989, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your behalf in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(iii), 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 Keith V. Morgan, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

89040755189

Attachment 1)

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Rhode Island Republican) MUR 2858
State Central Committee and)
Mrs. Virginia Kalat, as treasurer)
)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Rhode Island Republican State Central Committee and Mrs. Virginia Kalat, as treasurer, ("Respondents") violated 2 U.S.C. § 434(a)(4)(A)(iii).

NOW, THEREFORE, the Commission and the Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enter voluntarily into this agreement with the Commission.

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

1. The Rhode Island Republican State Central Committee is a political committee within the meaning of 2 U.S.C. § 431(4).

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(1, 1)

2. Mrs. Virginia Kalat is the treasurer of the Rhode Island Republican State Central Committee.

3. 2 U.S.C. § 434(a)(4)(A)(iii) requires unauthorized committees to file a post-general election report no later than the 30th day after the general election delineating the committee's receipts and expenditures as of the 20th day after the general election.

4. Respondents were required to file the 1988 30 Day Post-General Report on December 8, 1988. Respondents filed the 1988 30 Day Post-General Report on February 6, 1989, 60 days late, disclosing \$156 in receipts and \$833 in disbursements.

V. Respondents failed to file the 1988 30 Day Post-General Report in a timely manner, in violation of 2 U.S.C. § 434(a)(4)(A)(iii).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of two hundred and fifty dollars (\$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 this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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

(1, 2)

89040755191

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

X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY:

Original Signed
Lois G. Lerner

Associate General Counsel

Date

FOR THE RESPONDENTS:

Neil Vallance, Chairman

Name

Position

6/12/89

Date

3 0 4 0 7 5 5 1 9 2

(1, 3)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 0858

DATE FILMED 2/24/89 CAMERA NO. 7

CAMERAMAN AS

89040755193