



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2867

DATE FILMED 2/29/89 CAMERA NO. 4

CAMERAMAN AS

89040761525



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 11, 1989

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA *JCS*
STAFF DIRECTOR

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

SUBJECT: REFERRAL OF UNAUTHORIZED COMMITTEES FOR LATE/NON-
FILING OF THE 1988 OCTOBER QUARTERLY REPORT

Attached is a listing of eleven (11) unauthorized committees which failed to file the 1988 October Quarterly Report by Election Day, November 8, 1988.

For your information, each committee was sent prior notice of the due date of the report on September 21, 1988 (Attachment 12). Non-filer notices were sent to the committees on November 8, 1988 (Attachment 13).

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

Attachment

89090761526

89040761527

89040761528

C00114439: Washington State Democratic Central
Committee

89NF-15

Washington State Democratic Central Committee
(Attachments 10a - 10c)

8 9 0 4 0 7 6 1 5 2 9

8 9 0 4 0 7 6 1 5 3 0

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

DATE 22DEC88

PAGE 3

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES TYPE OF FILER	MICROFILM LOCATION
WASHINGTON STATE DEMOCRATIC CENTRAL COMMITTEE CONNECTED ORGANIZATION:				ID #C00114439	PARTY QUALIFIED	
1987	MID-YEAR REPORT	125,440	106,580	1JAN87 -30JUN87	23	87FEC/481/3592
	YEAR-END	133,638	148,894	1JUL87 -31DEC87	24	88FEC/504/0670
	YEAR-END - AMENDMENT	132,138	148,894	1JUL87 -31DEC87	14	88FEC/520/3360
	YEAR-END - AMENDMENT	133,638	148,894	1JUL87 -31DEC87	11	88FEC/533/4370
	REQUEST FOR ADDITIONAL INFORMATION			1JUL87 -31DEC87	4	88FEC/512/0810
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL87 -31DEC87	5	88FEC/515/1715
	REQUEST FOR ADDITIONAL INFORMATION			1JUL87 -31DEC87	2	88FEC/528/2574
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL87 -31DEC87	3	88FEC/530/4606
1988	APRIL QUARTERLY	42,834	59,902	1JAN88 -31MAR88	18	88FEC/520/1475
	APRIL QUARTERLY - AMENDMENT	42,834	61,402	1JAN88 -31MAR88	5	88FEC/533/4381
	REQUEST FOR ADDITIONAL INFORMATION			1JAN88 -31MAR88	1	88FEC/543/2366
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN88 -31MAR88	2	88FEC/545/5293
	JULY QUARTERLY	75,838	70,537	1APR88 -30JUN88	11	88FEC/536/2952
	OCTOBER QUARTERLY	196,489	121,516	1JUL88 -30SEP88	18	88FEC/574/2271
	NOTICE OF FAILURE TO FILE			1JUL88 -30SEP88	1	88FEC/564/5408
	PRE-GENERAL	64,189	70,019	1OCT88 -19OCT88	10	88FEC/574/2261
	TOTAL	638,428	0 578,948	0	152	TOTAL PAGES

All reports except the 1988 October Quarterly and 12 Day
Pre-General Reports have been reviewed.
Ending cash-on-hand as of 10/19/88: \$74,807
Outstanding debts owed to or by the committee as of 10/19/88: \$0

Attachment 10A
p.52

ATTACHMENT 10A

TELECON

ANALYST: Donald L. Averett

CONVERSATION WITH: Jeff Smith, Executive Director

COMMITTEE: Washington State Democratic Central Committee
(C00114439)

DATE: 12/5/88

SUBJECT: Non-filing of the October Quarterly Report (7/1/88-9/30/88)

I called the committee and asked to speak to Cla. Black, the treasurer. Mr. Black was not available and I was transferred to Mr. Jeff Smith. I advised Mr. Smith that the Commission had not received the committee's October Quarterly Report. Mr. Smith indicated that he was aware of the problem and that the report was being prepared.

I asked Mr. Smith whether the committee had any federal activity during the period 10/1/88 through 10/31/88. He indicated that he was sure that it did and I advised him of the necessity of filing a Pre-Election Report to cover that period.

890407615

Attach. 1, p. 53

FEDERAL ELECTION COMMISSION
MAIL ROOM

DEC 13 11 17

1. NAME OF COMMITTEE
 Washington State Democratic Central Committee

ADDRESS (number and street) Check if different than previously reported
 1701 Smith Tower Bldg.

CITY, STATE and ZIP CODE
 Seattle, WA 98101

2. FEC IDENTIFICATION NUMBER
 CC 00114439

3. The committee qualified as a non-federally financed committee DURING THIS Reporting Period on (date)

4. 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-election Year Only)
 - Termination Report
- Monthly Report Due On**
- | | | |
|--------------------------------------|---------------------------------------|--------------------------------------|
| <input type="checkbox"/> February 20 | <input type="checkbox"/> June 20 | <input type="checkbox"/> October 20 |
| <input type="checkbox"/> March 20 | <input type="checkbox"/> July 20 | <input type="checkbox"/> November 20 |
| <input type="checkbox"/> April 20 | <input type="checkbox"/> August 20 | <input type="checkbox"/> December 20 |
| <input type="checkbox"/> May 20 | <input type="checkbox"/> September 20 | <input type="checkbox"/> January 31 |
- Tenth day report preceding _____ (Type of Election) election on _____ in the State of _____
- Tenth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? YES NO

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>July 1, 1988</u> through <u>Sept. 30, 1988</u>		
6. (a) Cash on Hand January 1, 1988		\$ 18,039.01
(b) Cash on Hand at Beginning of Reporting Period	\$ 5,664.03	
(c) Total Receipts from Line 18	\$ 106,480.76	\$ 315,154.76
(d) Subtotal: add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B	\$ 202,253.79	\$ 331,003.77
7. Total Disbursements from Line 28	\$ 121,516.20	\$ 253,456.18
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 80,637.59	\$ 80,637.59
9. Debts and Obligations Owed TO the Committee (Item 28 a) of Schedule C and of Schedule D	\$	
10. Debts and Obligations Owed BY the Committee (Item 28 b) of Schedule C and of Schedule D	\$	

For further information contact:
 Federal Election Commission
 999 E Street NW
 Washington DC 20543
 Tel: Free 800 424 9532
 Local 202 376 3121

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:

Clay Black
 Signature of Treasurer

[Handwritten Signature]

Date: 12/8/88

NOTE: Submit this report to the Federal Election Commission by the date specified on the back of this form. Report to the date of the election.

FEC FORM 3X

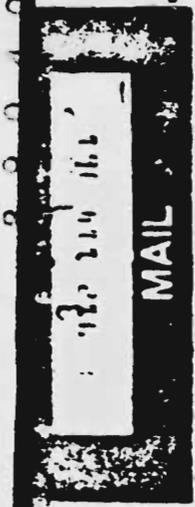
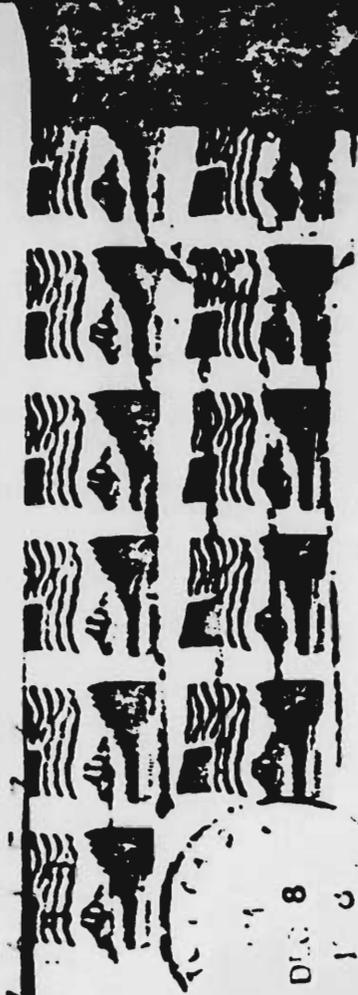
Attach 1, p. 54

9 9 0 3 3 7 4 2 2 7 1

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

00 DEC 13 AM 9:17

Federal Election Commission
999 F Street NW
Washington, D.C. 20463



DEC 8
In your mailbox
on weekdays only

NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

Attach 1, P. 55

FEDERAL RECEIVED

FEDERAL ELECTION COMMISSION
999 E STREET, NW 89 APR 18 PM 3:33
WASHINGTON, D.C. 20463

EXECUTIVE SESSION
SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD REFERRAL # 89NF 06-16 MAY 02 1989
STAFF MEMBER: Jeffrey Long

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

RESPONDENTS:

89040761534

Washington State Democratic Central Committee and
Clay Block, as treasurer (89NF-15)

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

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred the above eleven committees to the Office of the General Counsel on January 12, 1989. The basis for the attached referral is the committees' failure to file the 1988 October Quarterly Reports, or to do so in a timely fashion.

II. FACTUAL AND LEGAL ANALYSIS

A. Filing of Reports

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

Name of Committee

Date Report Filed

89040761535

Washington State Democratic
Central Committee

December 8, 1988

8 9 0 4 0 7 6 1 5 3 0
Accordingly, the Office of the General Counsel recommends that the Commission open Matters Under Review and find reason to believe with respect to the above committees and their treasurers, with the exclusion of the Jefferson County Republican Central Committee.

B. Other Matters Involving These Committees

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

89040701537

89040761538

" 89040761539

89040761540

"

8 9 0 4 0 7 6 1 5 4 1

"

8 9 0 4 0 7 6 1 5 4 2

"

"

8 9 0 4 0 7 6 1 5 4 3

III. RECOMMENDATIONS

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

89NF-15 i) Washington State Democratic Central Committee
and Clay Bleck, as treasurer

2. Enter into conciliation prior to a finding of probable
cause to believe with respect to the committees and treasurers as
listed in recommendation 1.

3. Approve the attached letters, Factual and Legal Analyses,
and proposed conciliation agreements to the committees listed in
recommendation 1.

Lawrence M. Noble
General Counsel

April 18, 1989
Date

BY: George F. Rishel
George F. Rishel
Acting Associate General Counsel

Attachments

1. Referral Materials
2. Proposed Conciliation Agreements (10),
Letters (10), and Factual and Legal Analyses (10)

89040761544

Washington State Democratic Central
Committee and Clay Beck, as treasurer
(89NF-15)

)
)
)
)
)
)
)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the
Federal Election Commission executive session of May 2,
1989, do hereby certify that the Commission decided by a
vote of 4-2 to take the following actions with respect to
the above-captioned referrals:

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)(i):

(continued)

8 9 0 4 0 7 6 1 5 4 6

Federal Election Commission
Certification for RAD Referrals
#89NF 06-16
May 2, 1989

Page 3

89040761547

89NF-15 i) Washington State Democratic
Central Committee and Clay
Bleck, as treasurer

2. Enter into conciliation prior to a finding of probable cause to believe with respect to the committees and treasurers listed in action 1 above.

(continued)

Federal Election Commission
Certification for RAD Referrals
#89NF 06-16
May 2, 1989

Page 4

3. Approve the letters, Factual and Legal Analyses, and proposed conciliation agreements to the committees listed in action 1 above, as recommended in the General Counsel's report dated April 18, 1989.

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

Attest:

May 3, 1989
Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

89040761548



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 10, 1989

Clay Bleck, Treasurer
Washington State Democratic
Central Committee
1701 Smith Tower
Seattle, WA 98104

RE: MUR 2869
Washington State Democratic
Central Committee and Clay Bleck,
as treasurer

Dear Mr. Bleck:

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

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.

87040761549

flm

Clay Bleck, Treasurer
Page 2

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.

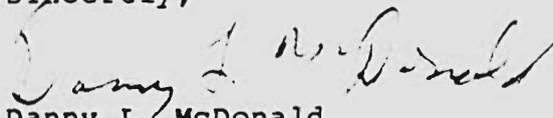
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 Jim Brown, the staff member 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

89040701550

0602826

WASHINGTON STATE DEMOCRATIC CENTRAL COMMITTEE

KAREN MARCHIORO
STATE CHAIR

JEFF SMITH

1 - MUR 2869

May 19, 1989

COPIES 23
MAY 19 1989

Jim Brown
Legal Division
Federal Election Commission
Washington, D.C. 20463

RE: MUR 2859 and MUR 2869
Washington State
Democratic Central
Committee

Dear Mr. Brown:

This letter is a request for an extension of 10 (ten) days to June 5, 1989, to respond to MUR's 2859 and 2869.

We do not dispute that the reports required of this committee were not timely filed. We do believe, however, that there are circumstances that the Commission may want to consider before coming to a final determination in this case. These potentially mitigating factors center around our bookkeeper who failed to file numerous forms (including to Washington State's Public Disclosure Commission, Washington State Employment Security, and the I.R.S.) in a timely fashion, even though the forms were completed and signed by the responsible persons. We anticipate that the Committee will be fined for each of these infractions.

At this time we are doing a thorough audit of our 1989 contributions to, deposits in and expenditures from our Federal Accounts. This will allow us to make any necessary amendments to our F.E.C. reports. Under the circumstances we feel that this review is warranted.

Our request for an extension is to ensure that this review is completed before we respond to the MUR's. In any event, it is the intention of the Committee to enter into a conciliation agreement with the F.E.C. on these matters.

Sincerely yours,

Jeff Smith
for Clay Bleck, Treasurer

89040761551



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 25, 1989

Clay Bleck, Treasurer
Washington State Democratic
Central Committee
1701 Smith Tower
Seattle, WA 98104

RE: MUR 2859 and MUR 2869
Washington State
Democratic Central
Committee and Clay
Bleck, as treasurer

Dear Mr. Bleck:

This is in response to a letter dated May 19, 1989, submitted on behalf of the Washington State Democratic Central Committee and yourself by Jeff Smith, which we received on May 23, 1989, requesting an extension of 10 days until June 5, 1989, to respond in MURs 2859 and 2869. 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 June 5, 1989.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

8 9 0 4 0 7 6 1 5 5 2

plan

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

89 JUL -3 AM 11:23

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Washington State Democratic) MUR 2869
Central Committee, and)
Clay Bleck, as treasurer)

GENERAL COUNSEL'S REPORT

On May 2, 1989, the Commission found reason to believe that the Washington State Democratic Central Committee and Clay Bleck, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), and entered into pre-probable cause conciliation. On May 10, 1989, the Committee was notified of the Commission's findings. Based on several contacts with Committee staff, it appears that the matter can be resolved through conciliation. Accordingly, this Office will continue conciliation for another 30 days.

89040761555

Lawrence M. Noble
General Counsel

Date 6/30/89

BY: 
Lois G. Lerner
Associate General Counsel

Staff assigned: James A. Brown

89 JUL 26 PM 2:02

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)
Washington State Democratic) MURs 2859 and 2869
Central Committee and Clay)
Bleck, as treasurer)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Karen Marchioro¹, Chair of the Washington State Democratic Central Committee ("the Committee"). See Attachment I.

89040701554

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with the Washington State Democratic Central Committee and Clay Bleck, as treasurer.
2. Close the file.
3. Approve the attached letter.

Lawrence M. Noble
General Counsel

7/25/89
Date

BY:


Lois G. Lerner
Associate General Counsel

Attachments

1. Conciliation Agreement.
2. June 5, 1989 Response of Washington State Democratic Party.
3. Letter to Respondent.

Staff Assigned: J. Albert Brown

3 9 0 4 0 7 6 1 5 5 5

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Washington State Democratic) MURS 2859 and 2869
Central Committee and Clay)
Bleck, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 31, 1989, the Commission decided by a vote of 6-0 to take the following actions in MURs 2859 and 2869:

1. Accept the conciliation agreement with the Washington State Democratic Central Committee and Clay Bleck, as treasurer, as recommended in the General Counsel's Report dated July 25, 1989.
2. Close the file.
3. Approve the letter as recommended in the General Counsel's Report dated July 25, 1989.

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

Attest:

7-31-89
Date

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

Received in the Office of Commission Secretary: Wed., July 26, 1989 2:02
Circulated on 48 hour tally basis: Thur., July 27, 1989 11:00
Deadline for vote: Mon., July 31, 1989 11:00

89040761550



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20461

August 8 1989

Clay Bleck, Treasurer
Washington State Democratic
Central Committee
1701 Smith Tower
Seattle, WA 98104

RE: MUR 2859 and 2869
Washington State Democratic
Central Committee and Clay
Bleck, as treasurer

Dear Mr. Bleck:

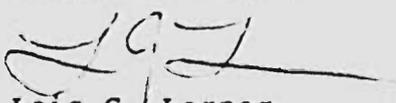
On July 31, 1989, the Federal Election Commission accepted the signed conciliation agreement submitted on your behalf in settlement of violations of 2 U.S.C. §§ 434(a)(4)(A)(i) and (iii), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter. This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

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

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Jim Brown, 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

89040761357

06 C 3450
RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

89 JUL 18 AM 10:46

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Washington State Democratic) MURS 2859 and 2869
Central Committee and Clay)
Bleck, 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 Washington State Democratic Central Committee and Clay Bleck, as treasurer, ("Respondents") violated 2 U.S.C. § 434(a)(4)(A)(i) & (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 Washington State Democratic Central Committee

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK
89 JUL 18 PM 12:15

89090761558

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

2. Clay Bleck is the treasurer of the Washington State Democratic 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 a 1988 Year End Report which incorporated the 1988 30 Day Post-General Report reporting period on February 9, 1989, 63 days late. The report disclosed \$137,911 in receipts and \$93,128 in disbursements during the 1988 30 Day Post-General Report reporting period.

5. 2 U.S.C. § 434(a)(4)(A)(i) provides that unauthorized committees filing quarterly shall file quarterly reports in a calendar year in which a regularly scheduled election is held. Quarterly reports are to be filed no later than the 15th day after the last day of each calendar quarter.

6. Respondents were required to file the 1988 October Quarterly Report no later than October 15, 1988. Respondents did not file the October Quarterly Report until December 8, 1988, 54 days late, disclosing \$196,489.76 in receipts and \$121,516.20 in disbursements.

V. Respondents failed to file the 1988 30 Day Post-General

89090761559

Report in a timely manner, in violation of 2 U.S.C.

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

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of five thousand dollars (\$5,000), pursuant to 2 U.S.C. § 437g(a)(5)(A), such penalty to be paid as follows:

1. One initial payment of seventeen hundred dollars (\$1,700) due on August 15, 1989;
2. Thereafter, beginning on September 15, 1989, three (3) consecutive monthly installment payments of eleven hundred dollars (\$1,100) each;
3. Each such installment shall be paid on the fifteenth day of the month in which it becomes due;
4. In the event that any installment payment is not received by the Commission by the fifth day after the date it becomes due, the Commission may, at its discretion, accelerate the remaining payments and cause the entire amount to become due upon ten days written notice to the respondents. Failure by the Commission to accelerate the payments with regard to any overdue installment shall not be construed as a waiver of its right to do so with regard to future overdue installments.

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

89040761560

or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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

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

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

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

8/8/89
Date

FOR THE RESPONDENTS:

Karen Bachman, Chair
Name
Position

8/8/89
Date

89040761561



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2869

DATE FILMED 2/22/89 CAMERA NO. 4

CAMERAMAN AS

89040701562