



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3083

DATE FILMED 9/13/90 CAMERA NO. 2

CAMERAMAN AS

90040301163

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 25 May 1990

ANALYST: Donald Averett

I. COMMITTEE: Enron Political Action Committee
(FKA HNG/Internorth PAC)
(C00104810)
Robbie Leaver, Treasurer
1400 Smith Street, Suite 4428
Houston, TX 77002

II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(B)
11 CFR §104.5(c)(3)

III. BACKGROUND:

Failure to Timely File the 1990 March Monthly Report

The Enron Political Action Committee (FKA HNG/Internorth PAC) ("the Committee") failed to file the 1990 March Monthly Report of Receipts and Disbursements covering the period from February 1, 1990 to February 28, 1990 in a timely manner. The Committee was notified on February 28, 1990 that the report was due on March 20, 1990 (Attachment 2). A Non-Filer Notice was sent to the Committee on April 9, 1990 (Attachment 3).

On May 3, 1990 the Reports Analysis Division ("RAD") analyst telephoned Ms. Robbie Leaver, the treasurer. Ms. Leaver was not available, so the RAD analyst left a message on her answering machine informing her that the Commission had not received the Committee's March Monthly Report (Attachment 4). On May 15, 1990 the RAD analyst contacted Ms. Leaver and advised her that the March Monthly Report had not been received. Ms. Leaver stated that the report would be filed immediately (Attachment 5).

On May 16, 1990, the Committee filed the 1990 March Monthly Report (Attachment 6).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

90040301164

FEDERAL ELECTION COMMISSION
1989-1990
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 17MAY90

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
				TYPE OF FILER		
ENRON POLITICAL ACTION COMMITTEE (EKA HNG/INTERNORTH PAC)				ID #C00104810 NON-PARTY QUALIFIED		
CONNECTED ORGANIZATION: HNG/INTERNORTH						
1989 STATEMENT OF ORGANIZATION - AMENDMENT				12JAN89	1	89FEC/578/0785
	FEBRUARY MONTHLY	10,681	5,200	1JAN89 -31JAN89	16	89FEC/585/5132
	MARCH MONTHLY	10,391	2,425	1FEB89 -28FEB89	16	89FEC/588/1699
	1'ST LETTER INFORMATIONAL NOTICE			1FEB89 -28FEB89	1	89FEC/610/3830
	APRIL MONTHLY	15,331	12,850	1MAR89 -31MAR89	27	89FEC/591/3873
	1'ST LETTER INFORMATIONAL NOTICE			1MAR89 -31MAR89	1	89FEC/610/3829
	MAY MONTHLY	13,617	14,500	1APR89 -30APR89	29	89FEC/595/2571
	1'ST LETTER INFORMATIONAL NOTICE			1APR89 -30APR89	1	89FEC/610/3828
	JUNE MONTHLY	13,977	10,150	1MAY89 -31MAY89	28	89FEC/597/4758
	1'ST LETTER INFORMATIONAL NOTICE			1MAY89 -31MAY89	1	89FEC/610/3827
	JULY MONTHLY	14,117	18,850	1JUN89 -30JUN89	29	89FEC/600/5570
	1'ST LETTER INFORMATIONAL NOTICE			1JUN89 -30JUN89	1	89FEC/610/3826
	AUGUST MONTHLY	14,087	7,200	1JUL89 -31JUL89	28	89FEC/607/5203
	SEPTEMBER MONTHLY	13,827	19,200	1AUG89 -31AUG89	28	89FEC/609/4670
	SEPTEMBER MONTHLY - AMENDMENT	13,827	19,200	1AUG89 -31AUG89	2	89FEC/617/3341
	REQUEST FOR ADDITIONAL INFORMATION			1AUG89 -31AUG89	1	89FEC/616/4730
	OCTOBER MONTHLY	13,792	6,200	1SEP89 -30SEP89	27	89FEC/613/1242
	OCTOBER MONTHLY - AMENDMENT	13,792	6,200	1SEP89 -30SEP89	2	89FEC/617/3352
	REQUEST FOR ADDITIONAL INFORMATION			1SEP89 -30SEP89	1	89FEC/616/4729
	NOVEMBER MONTHLY	13,832	30,461	1OCT89 -31OCT89	31	89FEC/617/0908
	NOTICE OF FAILURE TO FILE			1OCT89 -31OCT89	1	89FEC/616/4300
	DECEMBER MONTHLY	13,702	13,750	1NOV89 -30NOV89	28	89FEC/617/2674
	YEAR-END	13,677	10,325	1DEC89 -31DEC89	27	90FEC/623/0966
1990	MISCELLANEOUS NOTICE FROM FEC			10MAY90	2	90FEC/639/1349
	FEBRUARY MONTHLY	13,982	19,350	1JAN90 -31JAN90	27	90FEC/634/0490
	NOTICE OF FAILURE TO FILE			1JAN90 -31JAN90	1	90FEC/630/3013
	MARCH MONTHLY	14,047	27,750	1FEB90 -28FEB90	30	90FEC/639/4151
	NOTICE OF FAILURE TO FILE			1FEB90 -28FEB90	1	90FEC/633/1187
	NOTICE OF FAILURE TO FILE			1MAR90 -31MAR90	1	90FEC/639/1342
	TOTAL	189,060	0	198,211	0	389 TOTAL PAGES

All reports listed above have been reviewed.
Cash on Hand balance as of 2/28/90 was disclosed as a negative \$3822.51
Total debts owed by/to the committee as of 2/28/90-- \$0.00

59110807006

February 28, 1990

**REPORTING NOTICE FOR MONTHLY FILERS
ELECTION YEAR 1990**

The Commission's records indicate that your committee will file monthly reports during 1990. This notice will assist you in complying with the monthly filing requirements.

* * * *

MONTHLY REPORTS

Monthly reports must be filed no later than the 20th day of each month. 11 CFR 104.5(c)(3). Each report must include all financial activity that occurred during the previous month. For example, the next monthly report due in 1990 should be filed by March 20, 1990, and should include all activity between February 1 and February 28, 1990. NOTE: During November, December and January, monthly filers must file Pre- and Post-General election reports and a Year-End report instead of their monthly reports. (See chart on reverse side.)

You are required to use FEC Form 3X to file each report. Two of them have been enclosed for your use. You may duplicate these forms, or you may call the Information Services Division for additional copies (800/424-9530 or 202/376-3120).

(over)

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MONTHLY REPORTS 1990

REPORT	PERIOD COVERED	REG./CERT. MAILING DATE*	FILING DATE
February	01/01 - 01/31	02/20/90	02/20/90
March	02/01 - 02/28	03/20/90	03/20/90
April	03/01 - 03/31	04/20/90	04/20/90
May	04/01 - 04/30	05/20/90	05/20/90
June	05/01 - 05/31	06/20/90	06/20/90
July	06/01 - 06/30	07/20/90	07/20/90
August	07/01 - 07/31	08/20/90	08/20/90
September	08/01 - 08/31	09/20/90	09/20/90
October	09/01 - 09/30	10/20/90	10/20/90
Pre-General	10/01 - 10/17	10/22/90	10/25/90
Post-General	10/18 - 11/26	12/06/90	12/06/90
Year-End	11/27 - 12/31	01/31/91	01/31/91

COMPLIANCE

Treasurers of political committees are responsible for filing all reports on time. Failure to do so is subject to enforcement action. Committees filing illegible reports or using non-FEC forms will be required to refile.

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

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20541

BQ-7

April 9, 1990

APR 9 1990

Robbie Leaver, Treasurer
Enron Political Action Committee
(FKA MNG/Internorth PAC)
1400 Smith Street, Suite 4428
Houston, TX 77002

Identification Number: C00104810

Reference: March Monthly Report (2/1/90-2/28/90)

Dear Mr. Leaver:

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

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR §§108.2, 108.3, 108.4).

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

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

Sincerely,


John D. Gibson
Assistant Staff Director
Reports Analysis Division

TYPE ENRON. 2

TELECON

ANALYST: Donald L. Averett

CONVERSATION WITH: N/A

COMMITTEE: Enron Political Action Committee
(00104810)

DATE: 5/3/90

SUBJECT: Non-filing of the March Monthly Report--due 3/20/90

I telephoned Ms. Robbie Leaver, the committee treasurer.

Ms. Leaver was not available, so I left a message on her answering machine. I informed her that the Commission had not received the committee's March Monthly and April Monthly reports and asked her to contact me in reference to this matter.

90040801

TYPE ENRON.;3

TELECON

ANALYST: Donald L. Averett

CONVERSATION WITH: Robbie Leaver, Treasurer

COMMITTEE: Enron Political Action Committee
(COO104810)

DATE: 5/15/90

SUBJECT: Non-filing of the March Monthly Report--due 3/20/90

I phoned Ms. Robbie Leaver, the treasurer, and informed her that the Commission had not received the committee's March Monthly and April Monthly Reports. Ms. Leaver indicated that she had just returned from vacation and had only recently received my previous message. I advised Ms. Leaver to file the reports as soon as possible. She stated that the March Monthly Report would be filed by May 16, 1990.

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HAND DELIVERED

Attachment 6
Page 1 of 1
02/15/90 14:02

1. NAME OF COMMITTEE (Print)
Earon Political Action Committee

ADDRESS (number and street) Check if different than previously reported
1400 Smith Street, Suite 402B

CITY, STATE and ZIP CODE
Houston, TX 77002

2. FEC IDENTIFICATION NUMBER
000104810

3. This committee qualified as a subordinate committee (SEEFORM THIS Reporting Period)

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:**
- February 20
 - March 20
 - April 20
 - May 20
 - June 20
 - July 20
 - August 20
 - September 20
 - October 20
 - November 20
 - December 20
 - January 31
- Twelfth day report preceding _____ (Type of Election)
 election on _____ in the State of _____
- Thirtieth day report following the General Election on _____ in the State of _____

5. Is this Report an Amendment? YES NO

SUMMARY		COLUMN A	COLUMN B
6. Covering Period <u>February 1</u> through <u>February 28, 1990</u>		This Period	Calendar Year-to-Date
6. (a)	Cash on Hand January 1, 19 <u>90</u>		\$ 10,247.83
(b)	Cash on Hand at Beginning of Reporting Period	\$ 4,880.16	
(c)	Total Receipts (from Line 1B)	\$ 14,847.33	\$ 28,029.66
(d)	Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 18,927.49	\$ 38,277.49
7.	Total Disbursements (from Line 2B)	\$ 27,780.00	\$ 47,100.00
8.	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ (8,822.51)	\$ (8,822.51)
9.	Debits and Obligations Owed TO the Committee (Provide all on Schedule C and/or Schedule D)	\$ - 0 -	
10.	Debits and Obligations Owed BY the Committee (Provide all on Schedule C and/or Schedule D)	\$ - 0 -	

For further information contact:
 Federal Election Commission
 999 E Street, NW
 Washington, DC 20463
 Toll Free 800-424-9610
 Local 202-576-3180

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
Robbie Leaver

Signature of Treasurer
Robbie Leaver

Date
 5/5/90

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 9437c

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FEC FORM 3X
 (Rev. 11-87)

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

FIRST GENERAL COUNSEL'S REPORT

RAD Referral: 90NF-6
Staff Member: Noriega E. James

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

RESPONDENTS: Enron Political Action Committee
(FKA HNG/Internorth PAC) and
Robbie Leaver, as treasurer

RELEVANT STATUTES: 2 U.S.C. § 434(a)(4)(B)

INTERNAL REPORTS CHECKED: Referral Materials

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred the Enron Political Action Committee (FKA HNG/Internorth PAC) ("the Committee") and its treasurer, to the Office of the General Counsel on May 25, 1990. The basis of the attached RAD referral is the failure of the Committee to file its 1990 March Monthly Report of Receipts and Disbursements, in a timely manner, in violation of 2 U.S.C. § 434(a)(4)(B). The 1990 March Monthly Report was filed on May 16, 1990.

II. FACTUAL AND LEGAL ANALYSIS

For the factual and legal analysis, see Attachment 3.

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

This Office also recommends that the Commission offer to enter into conciliation with the respondents prior to a finding of probable cause to believe. Attached for the Commission's approval is the proposed conciliation agreement.

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IV. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that Enron Political Action Committee (FKA HNG/Internorth PAC) and Robbie Leaver, as treasurer, violated 2 U.S.C. § 434(a)(4)(B), and enter into conciliation prior to a finding of probable cause to believe.

3. Approve the appropriate letter, the attached Factual and Legal Analysis and proposed conciliation agreement.

Lawrence M. Noble
General Counsel

7/3/90
Date

BY: 
Lois G. Lerner
Associate General Counsel

Attachments:

1. RAD Referral
2. Factual and Legal Analysis
3. Conciliation Agreement

90040801174

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Enron Political Action Committee) RAD Referral 90NF-6 (MUR) 3083
(FKA HNG/Internorth PAC) and)
Robbie Leaver, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 10, 1990, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 90NF-6:

1. Open a MUR.
2. Find reason to believe that Enron Political Action Committee (FKA HNG/Internorth PAC) and Robbie Leaver, as treasurer, violated 2 U.S.C. § 434(a)(4)(B), and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the appropriate letter, the Factual and Legal Analysis and proposed conciliation agreement, as recommended in the General Counsel's Report dated July 3, 1990.

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

Attest:

July 10, 1990
Date

Hilda Arnold
for Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Thursday, July 5, 1990 3:30 p.m.
Circulated to the Commission: Friday, July 6, 1990 12:00 p.m.
Deadline for vote: Tuesday, July 10, 1990 4:00 p.m.

dh

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 12, 1990

Robbie Leaver, Treasurer
Enron Political Action Committee
(FKA HNG/Internorth PAC)
1400 Smith Street, Suite 4428
Houston, TX 77002

RE: MUR 3083

Dear Ms. Leaver:

On July 10, 1990, the Federal Election Commission found that there is reason to believe Enron Political Action Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(B), 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.

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

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Robbie Leaver, Treasurer
Page 2

Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

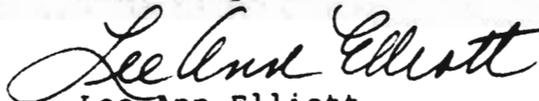
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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

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

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

Sincerely,


Lee Ann Elliott
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 3083
Enron Political Action)
Committee (FKA HNG/Internorth)
PAC) and Robbie Leaver, as)
treasurer)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Robbie Leaver, the treasurer of Enron Political Action Committee.

The attached agreement contains no changes from the agreement approved by the Commission on July 10, 1990. The civil penalty payment of \$825, which is due no more than 30 days from the date this agreement becomes effective, has not been received.

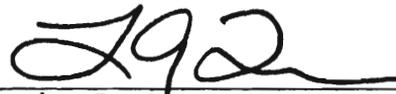
II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Enron Political Action Committee and Robbie Leaver, as treasurer.
2. Close the file.
3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

Date 7/26/90

BY:


Lois G. Lerner
Associate General Counsel

Attachment
Conciliation Agreement

Staff Assigned: Noriega E. James

90040301178

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Enron Political Action Committee) MUR 3083
(FKA HNG/Internorth PAC) and)
Robbie Leaver, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 1, 1990, the Commission decided by a vote of 4-0 to take the following actions in MUR 3083:

1. Accept the conciliation agreement with Enron Political Action Committee and Robbie Leaver, as treasurer, as recommended in the General Counsel's Report dated July 26, 1990.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's Report dated July 26, 1990.

Commissioners Aikens, Josefiak, McGarry and Thomas voted affirmatively for the decision. Commissioners Elliott and McDonald did not cast votes.

Attest:

8-1-90
Date

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

Received in the Secretariat:	Fri., July 27, 1990	12:14 p.m.
Circulated to the Commission:	Mon., July 30, 1990	11:00 a.m.
Deadline for vote:	Wed., Aug. 1, 1990	11:00 a.m.

dr

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 6, 1990

Robbie Leaver, Treasurer
Enron Political Action Committee
(FKA HNG/Internorth PAC)
1400 Smith Street, Suite 4428
Houston, TX 77002

CLOSED

RE: MUR 3083
Enron Political Action
Committee and
Robbie Leaver as treasurer

Dear Ms. Leaver:

On August 1, 1990, the Federal Election Commission accepted the signed conciliation agreement submitted on your behalf in settlement of a violation of 2 U.S.C. § 434(a)(4)(B), 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 Noriega E. James, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

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CGC 6792

90 JUL 19 PM 2:30

FEDERAL ELECTION COMMISSION
OFFICE OF THE GENERAL COUNSEL

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 3083
 Enron Political Action)
 Committee (FKA HNG/Internorth)
 PAC) and Robbie Leaver, 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 Enron Political Action Committee and Robbie Leaver, as treasurer, ("Respondents") violated 2 U.S.C. § 434(a)(4)(B).

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. Respondent, Enron Political Action Committee (FKA HNG/Internorth PAC) is a political committee within the meaning of 2 U.S.C. § 431(4).

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2. Respondent Robbie Leaver is the treasurer of Enron Political Action Committee.

3. Section 434(a)(4)(B) provides that all political committees, other than authorized committees of a candidate, shall file monthly reports no later than the 20th day after the last day of each month delineating all receipts and disbursements made during the preceding month and complete as of the last day of the month.

4. Respondents were required to file the 1990 March Monthly Report no later than March 20, 1990. Respondents did not file the report until May 16, 1990, fifty-seven (57) days late, disclosing \$14,047.33 in receipts and \$27,750 in disbursements.

V. Respondents failed to file the 1990 March Monthly Report in a timely fashion in violation of 2 U.S.C. § 434(a)(4)(B).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of eight hundred twenty-five dollars (\$825), 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 have executed same and the Commission has approved the entire agreement.

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

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

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

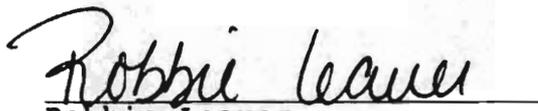
BY:


Lois G. Lerner
Associate General Counsel

Date

8/16/90

FOR THE RESPONDENTS:


Robbie Leaver
Treasurer

Date

7/16/90

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3083

DATE FILMED 9/13/90 CAMERA NO. 2

CAMERAMAN AS

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