



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20543

THIS IS THE BEGINNING OF MUR # 3836

DATE FILMED 5/10/91 CAMERA NO. 4

CAMERAMAN AS

91040841237

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: February 22, 1991

ANALYST: KEVIN SALLEY

I. COMMITTEE: **Wolpe for Congress**
(C00091462)
Marilyn S. Graber, Treasurer
P.O. Box 751
Kalamazoo, MI 49005

II. RELEVANT STATUTE: **2 U.S.C. §434(a)(6)**
11 CFR §104.5(f)

III. BACKGROUND:

Failure to File Forty-Eight Hour Notifications

The Wolpe for Congress committee ("the Committee") has failed to file the required Forty-Eight (48) Hour Notifications ("48-Hour Notices") for seven (7) contributions totaling \$15,500 received prior to the 1990 General Election.

The candidate was involved in the 1990 General Election held on November 6, 1990. Prior Notice was sent to the Committee on October 1, 1990 (Attachment 2). The Notice includes a section titled "Last-Minute Contributions". This section reads "Committees must also file special notices if contributions of \$1,000 or more are received during the period October 18 through November 3, 1990. The notices must reach the appropriate Federal and State offices within 48 hours of the committee's receipt."

Schedules A of the 1990 30 Day Post-General Report indicate that the Committee failed to file seven (7) 48-Hour Notices for contributions received during the aforementioned period (Attachment 3). The following is a list of the contributions for which no 48-Hour Notices were filed:

<u>Contributor Name</u>	<u>Date</u>	<u>Amount</u>
Roger A & Jane Rapaport	11/03/90	\$1,000
Ronald & Patricia Rapaport	11/03/90	\$1,000
Ironworkers Pol Act League	11/03/90	\$4,500

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**WOLPE FOR CONGRESS
REPORTS ANALYSIS OGC REFERRAL
PAGE 2**

<u>Contributor Name</u>	<u>Date</u>	<u>Amount</u>
Kostmayer 1990 Campaign	11/03/90	\$1,000
Oakland Democratic Campaign Comm	11/03/90	\$4,000
San Franciscans for Good Govt	11/03/90	\$3,000
Service Employees Intl Union COPE	11/03/90	\$1,000

On December 24, 1990, a Request for Additional Information ("RFAI") was sent to the Committee (Attachment 4). The RFAI notes on an informational basis that the Committee may have failed to file one or more of the required 48-Hour Notices for "last minute" contributions of \$1,000 or more. The notice requests the Committee to review their procedures for checking contributions received during the aforementioned time period. In addition, the notice states that although the Commission may take legal steps, any response would be taken into consideration.

On January 18, 1991, the Committee responded by letter (Attachment 5). A Committee representative stated that 48-Hour Notices had not been filed for contributions of \$1,000 or more, received on November 3, 1990.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

91040841239

CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/	PARTY	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION TYPE OF FILER
			PRIMARY	GENERAL	PRIMARY	GENERAL			
WOLPE, HOWARD E	HOUSE 03	DEMOCRATIC PARTY					1990 ELECTION	109	H6H103073
1. STATEMENT OF CANDIDATE									
1989 DISAVOWAL NOTICE							6SEP89	1	89FEC/608/4642
STATEMENT OF CANDIDATE							22SEP89	1	89HSE/384/4817
2. PRINCIPAL CAMPAIGN COMMITTEE									
WOLPE FOR CONGRESS									ID #C00091462 HOUSE
1989 MID-YEAR REPORT			44,434		64,505		1JAN89 -30JUN89	19	89HSE/383/1520
YEAR-END			119,415		64,738		1JUL89 -31DEC89	25	90HSE/390/0861
YEAR-END - AMENDMENT			-		-		1JUL89 -31DEC89	2	90HSE/395/1443
1990 48 HOUR CONTRIBUTION NOTICE							31JUL90	1	90HSE/405/1267
48 HOUR CONTRIBUTION NOTICE							31JUL90	2	90HSE/405/1525
48 HOUR CONTRIBUTION NOTICE							1AUG90	1	90HSE/405/1553
48 HOUR CONTRIBUTION NOTICE							6AUG90	1	90HSE/405/2775
48 HOUR CONTRIBUTION NOTICE							8AUG90	1	90HSE/405/3100
48 HOUR CONTRIBUTION NOTICE							8AUG90	1	90HSE/405/3110
48 HOUR CONTRIBUTION NOTICE							29OCT90	2	90HSE/416/3607
48 HOUR CONTRIBUTION NOTICE							30OCT90	2	90HSE/416/3902
MISCELLANEOUS REPORT TO FEC							5NOV90	3	90HSE/417/1066
48 HOUR CONTRIBUTION NOTICE							6NOV90	2	90HSE/417/2014
48 HOUR CONTRIBUTION NOTICE							6NOV90	2	90HSE/417/2016
48 HOUR CONTRIBUTION NOTICE							8NOV90	2	90HSE/417/2914
48 HOUR CONTRIBUTION NOTICE							8NOV90	2	90HSE/417/2903
APRIL QUARTERLY			36,937		47,816		1JAN90 -31MAR90	14	90HSE/395/4768
APRIL QUARTERLY - AMENDMENT			36,937		47,816		1JAN90 -31MAR90	3	90HSE/397/2455
APRIL QUARTERLY - AMENDMENT			-		-		1JAN90 -31MAR90	4	90HSE/407/1826
1'ST LETTER INFORMATIONAL NOTICE							1JAN90 -31MAR90	1	90FEC/638/3345
JULY QUARTERLY			122,476		64,242		1APR90 -30JUN90	25	90HSE/402/4928
JULY QUARTERLY - AMENDMENT			-		-		1APR90 -30JUN90	2	90HSE/405/1087
JULY QUARTERLY - AMENDMENT			-		-		1APR90 -30JUN90	3	90HSE/407/1830
JULY QUARTERLY - AMENDMENT			-		-		1APR90 -30JUN90	5	90HSE/416/2002
REQUEST FOR ADDITIONAL INFORMATION							1APR90 -30JUN90	9	90FEC/657/3490
REQUEST FOR ADDITIONAL INFORMATION 2ND							1APR90 -30JUN90	10	90FEC/669/2721
PRE-PRIMARY			12,854		34,875		1JUL90 -18JUL90	10	90HSE/405/0282
PRE-PRIMARY - AMENDMENT			-		-		1JUL90 -18JUL90	2	90HSE/416/3637
1'ST LETTER INFORMATIONAL NOTICE							1JUL90 -18JUL90	1	90FEC/658/3514
OCTOBER QUARTERLY				192,494	203,070		19JUL90 -30SEP90	39	90HSE/411/3176
OCTOBER QUARTERLY - AMENDMENT				-	-		-19JUL90 -30SEP90	7	90HSE/422/1031
REQUEST FOR ADDITIONAL INFORMATION							19JUL90 -30SEP90	9	90FEC/671/3028
REQUEST FOR ADDITIONAL INFORMATION 2ND							19JUL90 -30SEP90	10	90FEC/679/0071
PRE-GENERAL				46,128	92,060		10OCT90 -17OCT90	18	90HSE/416/2817
POST-GENERAL				214,365	213,257		18OCT90 -26NOV90	44	90HSE/420/0053
POST-GENERAL - AMENDMENT				214,365	213,257		18OCT90 -26NOV90	14	91HSE/423/2943
REQUEST FOR ADDITIONAL INFORMATION							18OCT90 -26NOV90	4	90FEC/679/1530
REQUEST FOR ADDITIONAL INFORMATION 2ND							18OCT90 -26NOV90	5	91FEC/681/3524
YEAR-END				2,582	30,681		27NOV90 -31DEC90	10	91HSE/425/1754

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CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/	PARTY	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES TYPE OF FILER	# OF MICROFILM LOCATION
			PRIMARY	GENERAL	PRIMARY	GENERAL			
TOTAL			336,116	455,569	276,176	539,068		317	TOTAL PAGES
3. AUTHORIZED COMMITTEES									
4. JOINT FUNDRAISING COMMITTEES AUTHORIZED BY THE CAMPAIGN									

All reports have been reviewed.

Cash-on-Hand as of 12/31/90: \$59,327.36

Debts and Obligations owed by the Committee as of 12/31/90: \$3,000

21040341241

GENERAL ELECTION REPORT NOTICE

FEDERAL ELECTION COMMISSION

CONGRESSIONAL CANDIDATES

October 1, 1990

Report	Reporting Period	Reg./Cert. Mailing Date*	Filing Date
Pre-General	10/01/90** - 10/17/90	10/22/90	10/25/90
Post-General	10/18/90 - 11/26/90	12/06/90	12/06/90

WHO MUST FILE

All 1990 general election principal campaign committees must file the pre- and post-general election reports.

WHO NEED NOT FILE

Principal campaign committees of candidates not active in the 1990 elections (i.e., committees active in past or future elections) and 1990 campaign committees not participating in the general election do not file the pre- and post-general reports.

WHAT MUST BE REPORTED

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

REPORTING FORMS

Candidate committees use FORM 3 (enclosed). If the campaign has more than one authorized committee, the principal campaign committee must also file a consolidated report on FORM 32.

WHERE TO FILE

Consult the instructions on the back of the FORM 3 Summary Page. Note State filing requirements also.

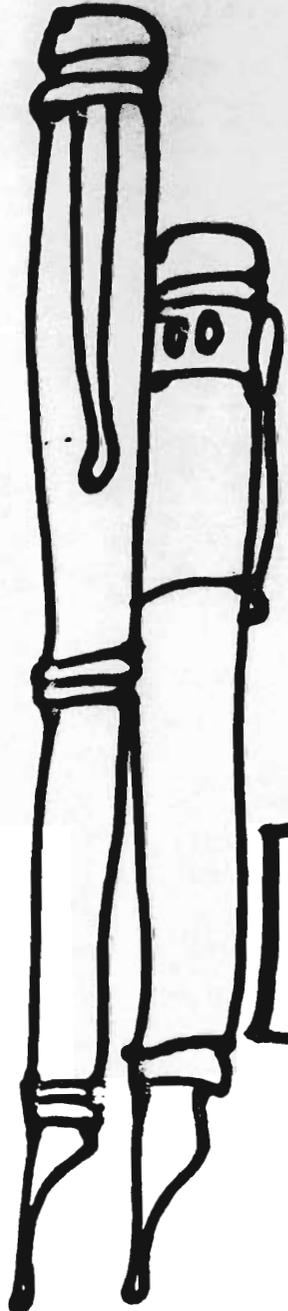
LAST-MINUTE CONTRIBUTIONS

Committees must also file special notices if contributions of \$1,000 or more are received during the period of October 18 through November 3, 1990. The notices must reach the appropriate Federal and State offices within 48 hours of the committee's receipt of the contributions.

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

**The period begins with the close of the last report filed by the committee. If the committee has filed no previous reports, the period begins with the date of the committee's first activity.

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KRS

CONGRESSIONAL CANDIDATES

GENERAL ELECTION

LABEL

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

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.

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SCHEDULE A

**ITEMIZED RECEIPTS
 (INDIVIDUALS)**

(Use separate schedule for each category of the Detailed Summary Page)
 PAGE 711
 FOR LINE NUMBER 11(a)

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

NAME OF COMMITTEE in Full

WOLPE FOR CONGRESS (076490)

09704900040444

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Segundo A Mercado-Llorens 329 D St, SE Washington, DC 20003		10/19/90	\$ *****500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 0*500.00	
B. Full Name, Mailing Address and ZIP Code Bernard Mindell 3700 Penobscot Bldg Detroit, MI 48226	Mindell & Panzer	10/23/90	\$ *****250.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Attorney	Aggregate Year-to-Date > \$ **500.00	
C. Full Name, Mailing Address and ZIP Code Mark & Louise Novitch 7204 Glade Trail Kalamazoo, MI 49009	The Upjohn Co	10/23/90	\$ *****250.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Corp Officer	Aggregate Year-to-Date > \$ **425.00	
D. Full Name, Mailing Address and ZIP Code Owen Z Periman 1300 Wolverhampton Lane Ann Arbor, MI 48105		10/18/90	\$ *****500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ **500.00	
E. Full Name, Mailing Address and ZIP Code Roger A & Jane Rapaport P O Box 24127 Lansing, MI 48909	Rapaport/Pollok/Farrar/Sablich	11/03/90	\$ **1,000.00 KRS
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Attorney	Aggregate Year-to-Date > \$ 1,000.00	
F. Full Name, Mailing Address and ZIP Code Ronald & Patricia Rapoport P O Box 208 Waco, TX 76797	William & Mary College	11/03/90	\$ **1,000.00 KRS
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Professor	Aggregate Year-to-Date > \$ 1,000.00	
G. Full Name, Mailing Address and ZIP Code Jonathan E & Leslie S Raven 2556 Dustin Rd Okemos, MI 48864	Nuvision Inc	10/24/90	\$ *****250.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation CEO	Aggregate Year-to-Date > \$ **250.00	

SUBTOTAL of Receipts This Page (optional) \$ 983,750.00
TOTAL This Period (last page this line number only)

SCHEDULE A

ITEMIZED RECEIPTS (PACS)

Use these schedules for each category of the Detailed Summary Form	PAGE 7 OF 14
	FOR LINE NUMBER 11(c)

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

NAME OF COMMITTEE (in Full)

WOLPE FOR CONGRESS (076490)

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Human Rights Campaign Fund 1013 14th St NW 5th Floor Washington, DC 20005		10/22/90	\$ 1,500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$2,000.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Intl Assn of Fire Fighters PAC 1750 New York Ave NW Washington, DC 20006		10/22/90	\$ 500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$1,000.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Intl Bro of Boilermakers PAF local 169 5936 Chase Rd Dearborn, MI 48126		10/20/90	\$ 2,500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$6,600.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Intl Bro of Electrical Workers COPE 1125 15th St NW Washington, DC 20005		10/20/90 10/24/90 10/29/90	\$ 2,500.00 \$ 1,000.00 \$ 1,500.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$7,500.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Intl Ladies Garment Workers Camp COMM 815 16th st NW Ste 103 Washington, DC 20006		11/06/90	\$ 500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$1,000.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Ironworkers Pol Act League 1750 New York Ave NW Washington, DC 20006		11/03/90	\$ 4,500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$5,000.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
John Lewis for Congress COMM P O Box 2323 Atlanta, GA 30310		11/02/90	\$ 500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$5500.00	

SUBTOTAL of Receipts This Page (optional) \$ 15,000.00

TOTAL This Period (Use page 14b line number only)

97040341245
97040341243

KRS

SCHEDULE A

ITEMIZED RECEIPTS

(PACS)

Use separate schedules for each category of the Detailed Summary Page

PAGE **8** OF **14**
FOR LINE NUMBER **11(C)**

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NAME OF COMMITTEE (in Full)

WOLPE FOR CONGRESS (076490)

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (the Period)
Joint Action Comm for Pol Affairs P O Box 105 Highland Park, IL 60035	Occupation	10/26/90	\$ 1,500.00
		11/02/90	\$ 1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 4,500.00		
B. Full Name, Mailing Address and ZIP Code Kids PAC Inc 80 Trowbridge St Cambridge, MA 02138	Name of Employer	Date (month, day, year)	Amount of Each Receipt (the Period)
	Occupation	10/22/90	\$ 500.00
		10/25/90	\$ 1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 2,500.00		
C. Full Name, Mailing Address and ZIP Code Kostmayer 1990 Campaign P O Box 1351 Doylestown, PA 18901	Name of Employer	Date (month, day, year)	Amount of Each Receipt (the Period)
	Occupation	11/03/90	\$ 1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 1,000.00		KRS
D. Full Name, Mailing Address and ZIP Code Larry Smith for Congress P O Box 6174 Hollywood, FL 33081	Name of Employer	Date (month, day, year)	Amount of Each Receipt (the Period)
	Occupation	10/29/90	\$ 500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 500.00		
E. Full Name, Mailing Address and ZIP Code League of Conservation Voters PAC 1150 Connecticut Ave #201 Washington, DC 20036	Name of Employer	Date (month, day, year)	Amount of Each Receipt (the Period)
	Occupation (IN-KIND)	10/22/90	\$ 500.00
		11/01/90	\$ 78.78
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 578.78		
F. Full Name, Mailing Address and ZIP Code Letter Carriers Political Ed Comm 100 Indiana Ave NW Washington, DC 20001	Name of Employer	Date (month, day, year)	Amount of Each Receipt (the Period)
	Occupation	10/23/90	\$ 4,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 7,000.00		
G. Full Name, Mailing Address and ZIP Code Life Underwriters Natl Assoc PAC 1922 F Street NW Washington, DC 20006	Name of Employer	Date (month, day, year)	Amount of Each Receipt (the Period)
	Occupation	10/22/90	\$ 500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 500.00		

SUBTOTAL of Receipts This Page (optional) \$ 10,578.78

TOTAL This Period (for page this line number only)

9973493A67A6

SCHEDULE A

**ITEMIZED RECEIPTS
(PACS)**

Use separate schedules for each category of the Detailed Summary Page
 PAGE 11 OF 14
 FOR LINE NUMBER 11(c)

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NAME OF COMMITTEE (in Full)
WOLPE FOR CONGRESS (076490)

A. Full Name, Mailing Address and ZIP Code Northwest Airlines PAC 900 17th St NW Ste 526 Washington, DC 20036	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation	10/22/90	\$ 500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date	> \$ 500.00	

B. Full Name, Mailing Address and ZIP Code Oakland Democratic Campaign Comm , MI	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation	11/03/90	\$ 4,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date	> \$ 4,000.00	

C. Full Name, Mailing Address and ZIP Code Operating Engineers Pol Ed Comm 1125 17th St NW Washington, DC 20036	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation	11/05/90	\$ 1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date	> \$ 2,000.00	

D. Full Name, Mailing Address and ZIP Code Optometric Assoc of Amer PAC 1505 Prince St #300 Alexandria, VA 22314	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation	10/22/90	\$ 1,500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date	> \$ 1,500.00	

E. Full Name, Mailing Address and ZIP Code Philip Hart Democratic Club 37922 Terra Mar Mt Clemens, MI 48043	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation	10/31/90	\$ 100.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date	> \$ 100.00	

F. Full Name, Mailing Address and ZIP Code Pork PAC 501 School St SW Ste 400 Washington, DC 20024	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation	10/26/90	\$ 250.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date	> \$ 250.00	

G. Full Name, Mailing Address and ZIP Code Re-elect Cong Chuck Schumer	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation	10/22/90	\$ 500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date	> \$ 500.00	

SUBTOTAL of Receipts This Page (optional) \$ 7,850.00
TOTAL This Period (last page the line number only)

977-42077
 077-42077

SCHEDULE A

ITEMIZED RECEIPTS (PACS)

Use separate schedules for each category of the Detailed Summary Page

PAGE 12 of 14 FOR LINE NUMBER 11 (C)

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NAME OF COMMITTEE IN FULL

WOLPE FOR CONGRESS (076490)

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Realtors PAC 430 N Michigan Ave Chicago, IL 60611		10/22/90	\$ 4,500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$7,150.00	
B. Full Name, Mailing Address and ZIP Code Retired Federal Employees Natl ASSOC PAC 1533 New Hampshire Ave NW Washington, DC 20036		11/02/90	\$ 5,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$7,500.00	
C. Full Name, Mailing Address and ZIP Code Roundtable PAC 125 East 23rd St #300 New York, NY 10010		11/05/90	\$ 1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$1,000.00	
D. Full Name, Mailing Address and ZIP Code San Franciscans for Good Govt 8 Via Capistrano Tiburon, CA 94920		11/03/90	\$ 3,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$3,000.00	KRS
E. Full Name, Mailing Address and ZIP Code Seafarers Pol Activity Donation 5201 Auth Way Camp Springs, MD 20746		10/22/90	\$ 5,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$8,500.00	
F. Full Name, Mailing Address and ZIP Code Service Employees Intl Union COPE 1313 L St NW Washington, DC 20005		11/03/90	\$ 1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$3,000.00	KRS
G. Full Name, Mailing Address and ZIP Code Service Station Dealers Assoc of MI PAC 200 N Capitol #330 Lansing, MI 48933		11/01/90	\$ 500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$500.00	

SUBTOTAL of Receipts This Page (optional) \$ 20,000.00
TOTAL This Period (last page this line number only)

8
4
7
9
3
2
2
3
4
0
7
0



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20543

NO-2

DEC 24 1990

Marilyn S. Graber, Treasurer
Wolpe for Congress P.O. Box 781
Kalamazoo, MI 49005

Identification Number: C00091462

Reference: 30 Day Post-General Report (10/18/90-11/26/90)

Dear Ms. Graber:

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:

-The aggregate year-to-date totals for certain entries on your report indicate there were additional contributions that should have been itemized. Each contribution from a political committee must be itemized regardless of the amount. Please amend your report to correct the discrepancy for the aggregate totals for: AFL-CIO COPE and Airline Pilots Association PAC.

-You must provide the occupation and name of employer for each contributor required to be itemized on Schedule A. Please amend your report by supplying the omitted information.

With respect to the occupation and name of employer of the contributor, your committee may demonstrate "best efforts" to obtain the required information. This demonstration must describe your committee's procedures for requesting the information. You may also supply a copy of the solicitation. Under 11 CFR §104.7(b), the solicitation shall consist of a clear request for the required information (i.e., name, mailing address, occupation, and name of employer). The request should also inform the contributor that the reporting of such information is required by law. See 11 CFR §104.3(a)(4)(i) and 11 CFR §104.7.

-Schedule A of your report (pertinent portion attached) discloses a contribution(s) which appears to exceed the limit set forth in the Act. A qualified multicandidate committee may not make a contribution to a candidate for federal office in excess of \$5,000 per election. (2 U.S.C. §441a(a) and (f); 11 CFR §110.2(b))

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original

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report with the clarifying information. If the contribution(s) you received exceeds the limit, you should refund to the donor the amount in excess of \$5,000 or get the donor to redesignate the contribution in writing. Refunds and redesignations must be made within sixty days of the treasurer's receipt of the contribution. Copies of refund checks and copies of letters redesignating the contributions in question may be used to respond to this letter. Refunds are reported on Line 20 of the Detailed Summary Page and on Schedule B of the report covering the period in which they are made. Redesignations are reported as memo entries on Schedule A of the report covering the period in which the authorization for the redesignation is received. (11 CFR §104.8(d)(2) and (4))

Although the Commission may take further legal steps, prompt action by you to refund or seek redesignation of the excessive amount(s) will be taken into consideration.

-Schedule A of your report indicates that your committee may have failed to file one or more of the required 48 hour notices regarding "last minute" contributions received by your committee after the close of books for the 12 Day Pre-General report. A principal campaign committee must notify the Commission, in writing, within 48 hours of any contribution of \$1,000 or more received between two and twenty days before an election. These contributions are then reported on the next report required to be filed by the committee. To ensure that the Commission is notified of last minute contributions of \$1,000 or more to your campaign, it is recommended that you review your procedures for checking contributions received during the aforementioned time period. Although the Commission may take legal action, any response you wish to make concerning this matter will be taken into consideration. (11 CFR §104.5(f))

KRS

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515 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,

Kevin R. Salley

Kevin R. Salley
Reports Analyst
Reports Analysis Division

97036791531

REGULAR MAIL

Wolpe

JAN - 9 1991

Working for us.

DATE: January 7, 1991

TO: Office of Records and Registration
Office of the Clerk of the House
US House of Representatives
1036 Longworth House Office Bldg
Washington, DC 20515

FROM: Wolpe for Congress (076490)
ID Number C00091462

RE: 30 Day Post-General Report (10/18/90 to 11/26/90)
Reply to Letter Dated Dec 24 1990

AGGREGATE YEAR-TO-DATE TOTALS - Schedule A Page 1 of 14 line 11(c) -
Entry B - The aggregate year-to-date for AFL-CIO is incorrect
due to a typographical error. The correct amount is \$6,750.00.

Entry D - An internal audit has disclosed that a contribution of
\$1500 made 10-10-90 was inadvertently omitted from the previous
reporting period. This amount was included in the aggregate
year-to-date of \$6500, which is correct as reported. The
omitted contribution has been added with notation. Revisions
to subtotal, total, and summary page have been made.

OCCUPATIONS/EMPLOYERS -

Effort has been made to obtain information from individual donors
by request and proclamation on contribution reply cards included
in direct mail solicitations and thru follow-up mail. Enclosed
are samples of cards that are included in mailings. As information
is received on the individuals in this report, it will be forwarded
with copies of amended pages. All information received by filing
deadline was reported.

SCHEDULE A - Page 8 of 14 line 11(c) -

Entry F - The contributions and designation received from Letter
Carriers PEC for the 1990 campaign cycle are as follows:

6-13-89	\$1000	Primary
11-1-89	\$1000	"
11-17-89	\$1000	"
4-2-90	\$2000	"

		Primary Total \$5000.
5-7-90	\$1000	General
10-23-90	\$4000	"

		General Total \$5000

1989 Aggregate	\$3000	
1990 Aggregate	\$7000	Total Contributions \$10,000

WOLPE FOR CONGRESS P.O. Box 791 Alexandria, VA 22304-0791 (703) 345-1970

Paid for by Wolpe for Congress, Martin Gruber, Treasurer.

Contributions or gifts to Wolpe for Congress are not deductible.

JAN 10 1991

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JAN 10 AM 7:56

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PRE-GENERAL LAST MINUTE REPORTING -

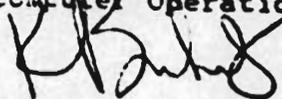
Apparently the count for 2 to 20 days reporting was erroneously determined to be up to 11-3-90 instead of thru 11-3-90. Regretfully, \$1000 contributions received on 11-3-90 were not included in the last minute reporting process. Steps have been taken to prevent this error from reoccurring. It was not our intention to disregard FEC rules in reporting last minute contributions.

We will be happy to provide any documentation of the pertinent contributions needed, or file the last minute reports now if appropriate.

Enclosed are copies of revised documents. If you have any questions, or if I may be of further assistance in the above matters, please feel free to contact me.

Sincerely,

Kay Bernhart
Computer Operations


Enclosures

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD Referral #91L-23
STAFF MEMBER: Jeffrey Long

SOURCE: INTERNALLY GENERATED

**RESPONDENTS: Wolpe for Congress and
Marilyn S. Graber, as treasurer**

**RELEVANT STATUTES: 2 U.S.C. § 434(a)(6)
11 C.F.R. § 104.5(f)**

I. GENERATION OF MATTER

The Office of the General Counsel received a referral from the Reports Analysis Division ("RAD") on February 25, 1991. Attachment 1. The basis for the attached referral is the failure of Wolpe for Congress and Marilyn S. Graber, as treasurer, ("Committee") to file seven forty-eight hour notifications ("48 Hour Notices") for contributions totaling \$15,500.00. Howard E. Wolpe won the 1990 General Election in the Third Congressional District in Michigan with 58 percent of the vote.

II. FACTUAL AND LEGAL ANALYSIS

See Attachment 2.

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

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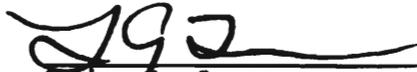
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IV. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that Wolpe for Congress and Marilyn S. Graber, as treasurer, violated 2 U.S.C. § 434(a)(6), and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the appropriate letter, Factual and Legal Analysis, and proposed conciliation agreement.

Lawrence M. Noble
General Counsel

Date 3/8/91

BY: 
Lois S. Lerner
Associate General Counsel

Attachments:

1. Referral Materials
2. Factual and Legal Analysis
3. Proposed Conciliation Agreement

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Wolpe for Congress and) RAD Referral 91L-23
)
Marilyn S. Graber, as)
)
treasurer.)

(MUR
3236)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 13, 1991, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 91L-23:

1. Open a MUR.
2. Find reason to believe that Wolpe for Congress and Marilyn S. Graber, as treasurer, violated 2 U.S.C. § 434(a)(6), and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the appropriate letter, Factual and Legal Analysis, and proposed conciliation agreement, as recommended in the General Counsel's Report dated March 8, 1991.

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

Attest:

3-13-91
Date

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

Received in the Secretariat: Fri., March 8, 1991 4:33 p.m.
Circulated to the Commission: Mon., March 11, 1991 11:00 a.m.
Deadline for vote: Wed., March 13, 1991 11:00 a.m.

dr

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 21, 1991

Marilyn S. Graber, Treasurer
Wolpe for Congress
P.O. Box 751
Kalamazoo, Michigan 49005

RE: MUR 3236
Wolpe for Congress and
Marilyn S. Graber, as
treasurer

Dear Ms. Graber:

On March 13, 1991, the Federal Election Commission found that there is reason to believe Wolpe for Congress ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(6), 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.

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Marilyn S. Graber, Treasurer

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.

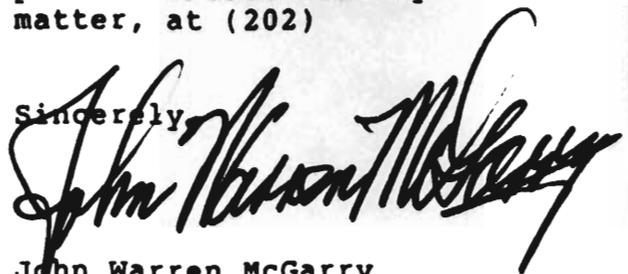
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,



John Warren McGarry
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Conciliation Agreement

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FEDERAL ELECTION COMMISSION
FACTUAL & LEGAL ANALYSIS

RESPONDENTS: Wolpe for Congress and
Marilyn S. Graber, as treasurer

MUR 3236

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2).

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires principal campaign committees of candidates for federal office to notify in writing either the Secretary of the Senate, the Clerk of the U.S. House of Representatives or the Commission, as appropriate, and the Secretary of State, of each contribution totaling \$1,000 or more, received by any authorized committee of the candidate after the 20th day but more than 48 hours before any election. 2 U.S.C. § 434(a)(6)(A). The Act further requires notification to be made within 48 hours after the receipt of the contribution and to include the name of the candidate and office sought, the date of receipt, the amount of the contribution, and the identification of the contributor. Id. The notification of these contributions shall be in addition to all other reporting requirements. 2 U.S.C. § 434(a)(6)(B). The 1990 General Election in the State of Michigan was held on November 6, 1990. Pursuant to the Act, the Committee was

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required to notify the Commission, in writing, of all contributions of \$1,000 or more received from October 18 to November 3, 1990, within 48 hours of their receipt.

A review of the Committee's 1990 30 Day Post-General Report identified seven contributions received on November 3, 1990, of one thousand dollars or more, totaling \$15,500.00. The Committee did not file 48 Hour Notices for these contributions.

Therefore, there is reason to believe that Wolpe for Congress and Marilyn S. Graber, as treasurer, violated 2 U.S.C. § 434(a)(6) by failing to report campaign contributions in excess of \$1,000 received after the 20th day, but more than 48 hours before the general election, within 48 hours of receipt of the contributions.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 23, 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Marilyn S. Graber, Treasurer
Wolpe for Congress
P.O. Box 751
Kalamazoo, Michigan 49005

RE: MUR 3236
Wolpe for Congress and
Marilyn S. Graber, as
treasurer

Dear Ms. Graber:

On March 21, 1991, you were notified that the Federal Election Commission determined to enter into negotiations directed toward reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. On that same date you were sent a conciliation agreement offered by the Commission in settlement of this matter.

Please note that conciliation negotiations entered into prior to a finding of probable cause to believe are limited to a maximum of 30 days. To date, you have not responded to the proposed agreement. The 30 day period for negotiations will soon expire. Unless we receive a response from you within five days, this Office will consider these negotiations terminated and will proceed to the next stage of the enforcement process.

Should you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: George F. Rishel
Assistant General Counsel

cc: The Honorable Howard Wolpe

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91 APR 26 PM 12:07

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Wolpe for Congress and
Marilyn S. Graber, as treasurer

)
) MUR 3236
)
)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Marilyn S. Graber, the treasurer of Wolpe for Congress.

The attached agreement contains no changes from the agreement approved by the Commission on March 13, 1991. A check for the civil penalty has been received.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Wolpe for Congress and Marilyn S. Graber, as treasurer.
2. Close the file.
3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

Date 4/25/91

BY: 
Lois G. Lerner
Associate General Counsel

Attachments

1. Conciliation Agreement
2. Photocopy of civil penalty check

Staff Assigned: Jeffrey Long

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 3236
Wolpe for Congress and)
Marilyn S. Graber, as treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 1, 1991, the Commission decided by a vote of 6-0 to take the following actions in MUR 3236:

1. Accept the conciliation agreement with Wolpe for Congress and Marilyn S. Graber, as treasurer, as recommended in the General Counsel's Report dated April 25, 1991.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's Report dated April 25, 1991.

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

Attest:

5-1-91
Date

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

Received in the Secretariat: Friday, April 26, 1991 12:07 p.m.
Circulated to the Commission: Monday, April 29, 1991 11:00 a.m.
Deadline for vote: Wednesday, May 1, 1991 11:00 a.m.

dh

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CLOSED

May 7, 1991

Marilyn S. Graber, Treasurer
Wolpe for Congress
P.O. Box 751
Kalamazoo, Michigan 49005

RE: MUR 3236
Wolpe for Congress and
Marilyn S. Graber, as
treasurer

Dear Ms. Graber:

On May 1, 1991, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on you in settlement of a violation of 2 U.S.C. § 434(a)(6), 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 Jeffrey Long, the staff member 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
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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Wolpe for Congress and
Marilyn S. Graber, as treasurer

)
) MUR 3236
)

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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 Wolpe for Congress and Marilyn S. Graber, as treasurer, ("Respondents") violated 2 U.S.C. § 434(a)(6).

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. Wolpe for Congress is a political committee within the

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meaning of 2 U.S.C. § 431(4), and is the authorized principal campaign committee for Mr. Wolpe's 1990 congressional campaign.

2. Marilyn S. Graber is the treasurer of Wolpe for Congress.

3. The Federal Election Campaign Act of 1971, as amended ("the Act"), requires principal campaign committees of candidates for federal office to notify in writing either the Secretary of the Senate, the Clerk of the U.S. House of Representatives or the Commission, as appropriate, and the Secretary of State, of each contribution totaling \$1,000 or more, received by any authorized committee of the candidate after the 20th day but more than 48 hours before any election. 2 U.S.C. § 434(a)(6)(A). The Act further requires notification to be made within 48 hours after the receipt of the contribution and to include the name of the candidate and office sought, the date of receipt, the amount of the contribution, and the identification of the contributor. Id. The notification of these contributions shall be in addition to all other reporting requirements. 2 U.S.C. § 434(a)(6)(B).

4. The Respondents received on November 3, 1990, seven contributions of \$1,000 or more totaling \$15,500.00.

5. The Respondents did not submit 48 Hour Notices for these two contributions.

V. The Respondents failed to report campaign contributions in excess of \$1,000 received after the 20th day, but more than 48

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hours before the general election, within 48 hours of receipt of the contributions, in violation of 2 U.S.C. § 434(a)(6).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of one thousand six hundred fifty dollars (\$1,650.00), 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.

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,

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

Date 5/7/91

FOR THE RESPONDENTS:

Marilyn A. Graku
(Name)
(Position) *Treasurer*

Date 4/15/91

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

THIS IS THE END OF MUR # 3236

DATE FILMED 5/10/91 CAMERA NO. 4

CAMERAMAN AS

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