FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3273

DATE FILMED 4/22/91 CAMERA NO. 2

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REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 26 March 1991

ANALYST: TODD GERLOUGH

I. COMMITTEE: Reed for Congress
(C00238907)
Elizabeth R. Young, Treasurer
53 Boxwood Avenue
Cranston, RI 02910

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 Reed for Congress committee ("the Committee") has failed to file the required Forty-Eight (48) Hour Notifications ("48-Hour Notices") for six (6) contributions/ loans received prior to the 1990 Primary and 1990 General Elections.

The candidate was involved in the 1990 Primary and General Elections held on September 11 and November 6, 1990, respectively. Prior Notice for the Primary Election was sent on August 6, 1990 (Attachment 2). The Notice includes a section titled "Last-Minute Contributions". This section reads "Committees must also file special notices on contributions of $1,000 or more, received during the period August 23 through September 8, 1990. The notice must reach the appropriate federal and state offices within 48 hours of the committee's receipt." Prior Notice for the General Election was sent on October 1, 1990 (Attachment 3). It 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 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."

Schedules A and C of the 1990 October Quarterly Report indicate that the Committee failed to file four (4) 48-Hour

Notices for contributions received during the period of August 23 through September 8, 1990 (Attachment 4). Schedules A and C of the 1990 30 Day Post-General Report indicate that the Committee failed to file two (2) 48-Hour Notices for contributions/loans received during the period of October 18 through November 3, 1990 (Attachment 5). The following is a list of the contributions for which no 48-Hour Notices were filed:

Contributor Name	Date	Amount
John F. Reed (Guarantor of $100,000 line of credit)	08/27/90	$15,910
John F. Reed (Guarantor of $100,000 line of credit)	08/30/90	$17,000
Massachusetts Laborers' District Council Laborers' Political League Fund	08/30/90	$ 2,000
John F. Reed (Guarantor of $100,000 line of credit)	09/04/90	$14,215
John F. Reed (Guarantor of $130,000 line of credit)[1/]	10/29/90	$46,205
Thomas S. Foley	11/02/90	$ 1,000

On November 20, 1990 and January 22, 1991, Requests for Additional Information ("RFAIs") were sent to the Committee for the October Quarterly and 30 Day Post-General Reports, respectively (Attachment 6). The RFAIs note 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 notices request the Committee to review their procedures for checking contributions received during the aforementioned time periods. In addition, the notices state that although the Commission may take legal steps, any response would be taken into consideration.

On December 5, 1990, a Reports Analysis Division ("RAD") analyst contacted Melinda, a committee representative, about the missing 48-Hour notices for three (3) candidate loans itemized on Schedule C of the Committee's 1990 October Quarterly Report. Melinda promised to inform the treasurer, Elizabeth Young, of the analyst's query. Later that day, the treasurer called and stated that she was not aware that loans were considered "last minute contributions" (Attachment 7).

1/ Original $100,000 line of credit was increased by $30,000.

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The treasurer called on December 26, 1990 to inform the analyst that the loans in question were actually from a $100,000 line of credit "opened by the candidate" (Attachment 8).

On December 27, 1990, a written response was received from the Committee. The letter stated that the Committee was unaware that loans had to be included in 48-Hour Reports (Attachment 9).

On January 29, 1991, a one page letter regarding the line of credit was received (Attachment 10). The letter explains that although the bank commitment letter was issued on August 22, 1990, Mr. Reed did not sign for the line until August 27, 1990. The letter also explained that the line was increased to $130,000 on October 29, 1990 (Attachment 10).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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FEDERAL ELECTION COMMISSION
1989-1990
CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

DATE 27FEB91

PAGE 1

CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/	PARTY	RECEIPTS PRIMARY	RECEIPTS GENERAL	DISBURSEMENTS PRIMARY	DISBURSEMENTS GENERAL	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
							TYPE OF FILER		
REED, JOHN F	HOUSE 02	DEMOCRATIC PARTY				RHODE ISLAND	1990 ELECTION	ID#	H0RI02071
1. STATEMENT OF CANDIDATE									
1989 STATEMENT OF CANDIDATE							29SEP89	1	89HSE/385/8721
2. PRINCIPAL CAMPAIGN COMMITTEE									
REED FOR CONGRESS							ID C00230307 HOUSE		
1989 STATEMENT OF ORGANIZATION							6OCT89	1	89HSE/385/8895
YEAR-END			183,235		32,264		6OCT89 -31DEC89	12	90HSE/393/2545
YEAR-END	- AMENDMENT		183,235		32,264		6OCT89 -31DEC89	13	90HSE/393/8736
REQUEST FOR ADDITIONAL INFORMATION							6OCT89 -31DEC89	2	90FEC/630/3558
1990 48 HOUR CONTRIBUTION NOTICE							6SEP90	1	90HSE/487/3836
48 HOUR CONTRIBUTION NOTICE							7SEP90	1	90HSE/487/3838
48 HOUR CONTRIBUTION NOTICE							11SEP90	1	90HSE/487/3862
48 HOUR CONTRIBUTION NOTICE							26OCT90	3	90HSE/416/2334
48 HOUR CONTRIBUTION NOTICE							2NOV90	1	90HSE/417/1454
48 HOUR CONTRIBUTION NOTICE							5NOV90	2	90HSE/417/1701
48 HOUR CONTRIBUTION NOTICE							5NOV90	2	90HSE/417/1688
48 HOUR CONTRIBUTION NOTICE							8NOV90	2	90HSE/417/2946
APRIL QUARTERLY			75,888		41,939		1JAN90 -31MAR90	17	90HSE/395/3365
APRIL QUARTERLY	- AMENDMENT		75,248		41,939		1JAN90 -31MAR90	17	90HSE/400/1940
REQUEST FOR ADDITIONAL INFORMATION							1JAN90 -31MAR90	2	90FEC/644/8592
JULY QUARTERLY			89,587		188,437		1APR90 -30JUN90	48	90HSE/481/4374
1'ST LETTER INFORMATIONAL NOTICE							1APR90 -30JUN90	2	90FEC/651/4733
PRE-PRIMARY			53,987		123,733		1JUL90 -22AUG90	30	90HSE/487/8684
OCTOBER QUARTERLY				173,249		123,868	23AUG90 -30SEP90	35	90HSE/413/2411
OCTOBER QUARTERLY	- AMENDMENT			173,249		123,868	23AUG90 -30SEP90	4	90HSE/422/2227
OCTOBER QUARTERLY	- AMENDMENT			173,249		138,286	23AUG90 -30SEP90	5	91HSE/425/5872
REQUEST FOR ADDITIONAL INFORMATION							23AUG90 -30SEP90	4	90FEC/671/1164
REQUEST FOR ADDITIONAL INFORMATION 2ND							23AUG90 -30SEP90	3	90FEC/678/3154
PRE-GENERAL				128,982		151,184	1OCT90 -17OCT90	28	90HSE/416/8388
PRE-GENERAL	- AMENDMENT			128,982		151,184	1OCT90 -17OCT90	11	90HSE/422/2216
PRE-GENERAL	- AMENDMENT			128,982		161,184	1OCT90 -17OCT90	5	91HSE/425/5891
REQUEST FOR ADDITIONAL INFORMATION							1OCT90 -17OCT90	2	90FEC/671/1161
REQUEST FOR ADDITIONAL INFORMATION 2ND							1OCT90 -17OCT90	5	90FEC/678/3157
POST-GENERAL				228,427		246,138	18OCT90 -26NOV90	63	90HSE/421/4823
POST-GENERAL	- AMENDMENT			-			-18OCT90 -26NOV90	2	91HSE/424/1156
POST-GENERAL	- AMENDMENT			228,427		254,358	18OCT90 -26NOV90	14	91HSE/425/5877
REQUEST FOR ADDITIONAL INFORMATION							18OCT90 -26NOV90	4	91FEC/682/2366
REQUEST FOR ADDITIONAL INFORMATION 2ND							18OCT90 -26NOV90	1	91FEC/687/4565
YEAR-END				58,242		53,177	27NOV90 -31DEC90	17	91HSE/424/3643
1991 STATEMENT OF ORGANIZATION - AMENDMENT							14JAN91	1	91HSE/423/2188
TOTAL			321,977	588,988	238,377	598,847		361	TOTAL PAGES

3. AUTHORIZED COMMITTEES
4. JOINT FUNDRAISING COMMITTEES AUTHORIZED BY THE CANDIDATE

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All reports except the 1990 Year-end report have been reviewed.
Cash-on-hand as of 12/31/90; $6,152
Debts and obligations as of 12/31/90; $219,277

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PRIMARY ELECTION

REPORT NOTICE

FEDERAL ELECTION COMMISSION

RHODE ISLAND August 6, 1990

REPORT	REPORTING PERIOD1/	REG./CERT. MAILING DATE2/	FILING DATE
PRE-PRIMARY	07/01/90 - 08/22/90	08/27/90	08/30/90
OCTOBER QUARTERLY	08/23/90 - 09/30/90	10/15/90	10/15/90

WHO MUST FILE
PRINCIPAL CAMPAIGN COMMITTEES OF CONGRESSIONAL "CANDIDATES" who seek nomination in the September 11, 1990, Rhode Island Primary.

WHAT MUST BE REPORTED
All financial activity that occurred during the reporting period (or before, if not previously reported).

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 3Z.

WHERE TO FILE
Consult the instructions on the back of the Form 3 Summary Page. Note state filing requirements also.

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

LAST-MINUTE CONTRIBUTIONS
Committees must also file special notices on contributions of $1,000 or more, received during the period August 23 through September 8, 1990. The notice must reach the appropriate federal and state offices within 48 hours of the committee's receipt. TG

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.

1/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.
2/Reports sent by registered or certified mail must be postmarked by the mailing date. Otherwise, they must be received by the filing date.

FOR INFORMATION, Call: 800/424-9530 or 202/376-3120

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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 3Z.

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. TB

*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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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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FOR INFORMATION, Call: 202/376-3120 or 800/424-9530

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule for each category of the Detailed Summary Page

PAGE 7

FOR LINE NUMBER

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

NAME OF COMMITTEE (In Full)

FEED FOR [illegible]

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Machinists Non-Partisan Political League - General Fund, 1300 Connecticut Avenue, NW, Washington, D.C. 20036	PAC / Multi	9/28/90	$5,000.00
Receipt For: Primary [ ] General [X] Other (specify)	Aggregate Year-to-Date > $ 10,000.00		
Massachusetts Laborers' Dist. Council, Laborers Political League Fund, 7 Laborers' Way, Hopkinton, Massachusetts 01748	PAC / PAC	8/30/90	$2,000.00
Receipt For: Primary [X] General [ ] Other (specify)	Aggregate Year-to-Date > $ 2,000.00		
National Education Association Political Action Committee, 1201 16th Street, NW, Washington, D.C. 20036	PAC / PAC	9/26/90	$5,000.00
Receipt For: Primary [ ] General [X] Other (specify)	Aggregate Year-to-Date > $ 10,000.00		
National Committee to Preserve Social Security and Medicare PAC, 2000 K Street, NW Suite 800, Washington, D.C. 20006	Multi PAC / PAC	9/5/90	$1,500.00
Receipt For: Primary [X] General [ ] Other (specify)	Aggregate Year-to-Date > $ 4,000.00		
National Committee to Preserve Social Security and Medicare PAC, 2000 K Street, NW Suite 800, Washington, D.C. 20006	Multi PAC / PAC	9/28/90	$2,500.00
Receipt For: Primary [X] General [ ] Other (specify)	Aggregate Year-to-Date > $ 4,000.00		
National Emergency Medicine Political Action Committee, 1125 Executive Circle, Irving, Texas 75038	PAC / Multi PAC	9/11/90	$1,000.00
Receipt For: Primary [X] General [ ] Other (specify)	Aggregate Year-to-Date > $ 1,000.00		
National beer workers Association NBWA Political Action Committee, 5205 Leesbury Pike #1600, Falls Church, Virginia 22041	PAC / PAC	9/28/90	$500.00
Receipt For: Primary [ ] General [X] Other (specify)	Aggregate Year-to-Date > $ 500.00		

SUBTOTAL of Receipts This Page (optional) . . . . . .

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

SCHEDULE C
(Revised 2/90)

LOANS

Page 3 of 3 for
Line Number
(Use separate schedule for each numbered line)

Name of Committee (in Full)
REED FOR CONGRESS

A. Full Name, Mailing Address and ZIP Code of Lender Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
John F. Reed - personal funds lent 11 Bradford Rd. Cranston, RI 02910 Election: ☐ Primary ☐ General ☐ Other (specify):	38,000.00	-0-	38,000.00

Terms: Date Incurred 3/10/90 Date Due ____ Interest Rate 12 % ☐ Secured

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

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

B. Full Name, Mailing Address and ZIP Code of Lender Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
John F. Reed 11 Bradford Rd. Cranston, RI 02910 Election: ☑ Primary ☐ General ☐ Other (specify):	15,910.00	-0-	15,910.00

Terms: Date Incurred 8/27/90 Date Due ____ Interest Rate 11.15 % ☐ Secured

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

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

SUBTOTALS This Period This Page (optional) .....

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

TG

90 0 4 0 8 3 8 2 0 4 7 4 1 2 3

SCHEDULE C
(Revised 3/90)

LOANS

Page 4 of 5 for
LINE NUMBER
(Use separate schedule for each numbered line)

Name of Committee (in Full): REED FOR CONGRESS

A. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
John F. Reed 11 Bradford Rd. CRanston, RI 02910 Election: ☑ Primary ☐ General ☐ Other (specify):	17,000.00	-0-	17,000.00

Terms: Date Incurred 8/30/90 Date Due — Interest Rate [illegible] ☐ Secured

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

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

B. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
John F. Reed 11 Bradford Rd. Cranston, RI 02910 Election: ☑ Primary ☐ General ☐ Other (specify):	14,215.00	-0-	14,215.00

Terms: Date Incurred 9/4/90 Date Due — Interest Rate 11.15% (APR) ☐ Secured

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

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

SUBTOTALS This Period This Page (optional) . . . . . .

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

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

2649488-0374134

Attach[redacted]5
Page 1 of 2
1990 30 Day Post-General

SCHEDULE A — ITEMIZED RECEIPTS

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

NAME OF COMMITTEE (In Full)

REED FOR CONGRESS

Full Name, Mailing Address and ZIP Code	Receipt For:	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
ANDREA L. FINKEL 16 Alton Road Providence, Rhode Island 02906	☐ Primary ☒ General ☐ Other (specify):	Fleet National Bank Banker	10/25/90	250.00
		Aggregate Year-to-Date > $250.00		
ROLAND J. FIORE P. O. Box 3714 Pascoedale, Rhode Island 02883	☐ Primary ☒ General ☐ Other (specify):	South County Sand and Gravel Company President	10/24/90	100.00
		Aggregate Year-to-Date > $275.00		
EDWARD FOGARTY 488 Lloyd Avenue Providence, Rhode Island 02906	☐ Primary ☒ General ☐ Other (specify):	State of Rhode Island Attorney	10/29/90	125.00
		Aggregate Year-to-Date > $250.00		
THOMAS S. FOLEY US House of Representatives The Capitol Washington, D.C. 20515	☐ Primary ☒ General ☐ Other (specify):	US Senate Speaker	11/07/90	1,000.00
		Aggregate Year-to-Date > $1,000.00		
JAMES C. FORTE 54 Taylor Drive East Providence, Rhode Island 02914	☐ Primary ☒ General ☐ Other (specify):	Forte, Inc. President		[illegible]
		Aggregate Year-to-Date > $600.00		
MARCOS FOUNTAIN ARTS 192 Wentworth Avenue Cranston, Rhode Island 02905	☐ Primary ☒ General ☐ Other (specify):	None None	10/29/90	[illegible]
		Aggregate Year-to-Date > $150.00		
ROBERT GAMBINO 38 South Angell Street Providence, Rhode Island 02906	Receipt For: ☐ Primary ☐ General	Shields & Company Real Estate		

SUBTOTAL

TOTAL

9113448837

(Revised 3/80) LOANS Attach Page 2 of 2 30 Day Post General (for each numbered line)

Name of Committee (in Full)
REED FOR CONGRESS

A. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
John F. Reed BORROWED * 11 Bradford Rd. Cranston, RI 02910	$5,555.00	-0-	$5,555.00

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

Terms: Date Incurred 10/5/90 Date Due n/a Interest Rate 11.1% (Fixed) ☐ Secured

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

1. Full Name, Mailing Address and ZIP Code	Name of Employer	Occupation	Amount Guaranteed Outstanding $
*BORROWED FROM: Fleet National Bank 111 Westminster St. Providence, RI 02903			
2. Full Name, Mailing Address and ZIP Code	Name of Employer	Occupation	Amount Guaranteed Outstanding $
3. Full Name, Mailing Address and ZIP Code	Name of Employer	Occupation	Amount Guaranteed Outstanding $

B. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
John F. Reed BORROWED* 11 Bradford Rd. Cranston, RI 02910	46,205.00	46,000.00	205.00

Election: ☐ Primary ☐ General ☐ Other (specify)

Terms: Date Incurred 10/29/90 Date Due n/a Interest Rate 11.1% (Fixed) ☐ Secured

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

1. Full Name, Mailing Address and ZIP Code	Name of Employer	Occupation	Amount Guaranteed Outstanding $
*BORROWED FROM: Fleet National Bank 111 Westminster St. Providence, RI 02903			
2. Full Name, Mailing Address and ZIP Code	Name of Employer	Occupation	Amount Guaranteed Outstanding $
3. Full Name, Mailing Address and ZIP Code	Name of Employer	Occupation	Amount Guaranteed Outstanding $

SUBTOTALS This Period This Page (optional)	
TOTALS This Period (last page in this line only)	197,885.00

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

9 7 1 4 2 1 4 3 9 2

FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

RQ-2

NOV 20 1990

Elizabeth R. Young, Treasurer
Reed for Congress
922 Reservoir Avenue
Cranston, RI 02910

Identification Number: C00238907

Reference: October Quarterly Report (8/23/90-9/30/90)

Dear Ms. Young:

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

-Schedule A of your report (pertinent portion attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. An individual or a political committee other than a qualified multicandidate committee may not make a contribution to a candidate for federal office in excess of $1,000 per election. The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. (2 U.S.C. §441a(a) and (f); 11 CFR §110.1(b), (e) and (k))

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution(s) you received exceeds the limits, you should either refund to the donor the amount in excess of $1,000 or get the donor to redesignate and/or reattribute the contribution in writing. All refunds, redesignations, and reattributions must be made within sixty days of the treasurer's receipt of the contribution. Copies of refund checks and copies of letters reattributing or 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 and reattributions are reported as memo entries on Schedule A of the report covering the period in which the authorization for the redesignation and/or reattribution is received. (11 CFR §104.8(d)(2), (3) and (4))

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Although the Commission may take further legal steps, prompt action by you to refund or seek redesignation and/or reattribution of the excessive amount 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-Primary 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)) TG

-When a committee reports receiving a loan from the candidate, it is necessary to clarify whether or not the candidate used his/her personal funds or borrowed the money from a lending institution or any other source. If the candidate borrowed funds from a lending institution, or any other source, please provide the name of the lending institution and the complete terms of the loan. If the loan(s) was from personal funds, please acknowledge that fact in an amendment to this report. It is important to note that "personal funds" is strictly defined by Commission Regulations and may be found in 11 CFR §110.10. (11 CFR §§100.7(a)(1) and 104.3(d))

-Column B, Line 6(b) of the Summary Page should equal Column B, Line 20(d) of the Detailed Summary Page.

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,

R. Todd Gerlough
Reports Analyst
Reports Analysis Division

9 0 0 3 6 7 1 1 1 5 5

FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

RQ-8

JUN 22 1991

Elizabeth R. Young, Treasurer
Reed for Congress
53 Boxwood Avenue
Cranston, R.I. 02910

Identification Number: C00238987

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

Dear Ms. Young:

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

-Schedule A of your report (pertinent portion attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. An individual or a political committee other than a qualified multicandidate committee may not make a contribution to a candidate for federal office in excess of $1,000 per election. The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. (2 U.S.C. §441a(a) and (f); 11 CFR §110.1(b), (e) and (k))

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution(s) you received exceeds the limits, you should either refund to the donor the amount in excess of $1,000 or get the donor to redesignate and/or reattribute the contribution in writing. All refunds, redesignations, and reattributions must be made within sixty days of the treasurer's receipt of the contribution. Copies of refund checks and copies of letters reattributing or 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 and reattributions are reported as memo entries on Schedule A of the report covering the period in which the authorization for the redesignation and/or reattribution is received. (11 CFR §104.8(d)(2), (3) and (4))

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

-Line 11(a)(i), Column A, of the Detailed Summary Page discloses $53,915 in receipts. Schedule A supporting Line 11(a)(i) itemizes $53,695 in receipts. These figures should be the same. Please amend your report to explain the difference. (11 CFR §104.3(a))

-Line 11(c), Column A, of the Detailed Summary Page discloses $98,009.74 in receipts. Schedule A supporting Line 11(c) itemizes $99,254.24 in receipts. These amounts should be the same. Please explain the discrepancy and amend your report(s). (11 CFR §104.3(a))

-Line 17, Column A, of the Detailed Summary Page discloses $199,630.71 in operating expenditures. The total on the last page of Schedule B supporting this Line equals $255,630.71; the sum of all entries itemized equals $251,567.02. Please explain this discrepancy and amend your report(s).

-Your calculations for the debt schedule (Schedule D) appear to be incorrect. Our calculations disclose an apparent discrepancy of $230.31 in the debt owed to Narragansett Electric Co. ($0 + $903.83 - $230.31 = $673.52). Please provide the correct total for this debt on Schedule D.

-Line 10 of the Summary Page of your report discloses $306,091.97 in outstanding loans/debts. The sum of Schedule C loans and Schedule D debts indicates $321,717.28 in outstanding obligations. Please explain the discrepancy and amend your report. (11 CFR §104.3(d))

-Column B figures for the Summary and Detailed Summary Pages should equal the sum of the Column B figures on your previous report and the Column A figures on this report. Please amend your report to correct the Column B discrepancies for Line(s) 16, 17 and 22 and any subsequent report(s) which may be affected by this correction. Note that Column B should reflect only the year-to-date totals for calendar year 1990.

-Line 16, Column B, of the Detailed Summary Page does not equal the sum of Lines 11(e), 12, 13(c), 14 and 15. Please amend your report to clarify this discrepancy.

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-The beginning cash balance of this report does not equal the ending balance of your 12 Day Pre-General report. Please clarify this discrepancy and amend any subsequent report(s) which may be affected by this correction.

-Please provide a Schedule B to support the amount reported on Line 19(a), Column A, of the Detailed Summary Page. Each loan repayment made by the committee must be itemized on a supporting Schedule B, regardless of the amount of the repayment. (11 CFR §104.3(b)(4)(iii) and (iv)

-The contribution from United Steelworkers PAC is reported as $2,000 on this report. Yet, the 48 hour notice shows $1,000. Further, the $1,000 contribution from Joan Moran is disclosed as $2,000 on the 48 hour notice. Please examine these discrepancies and if necessary, amend your report.

-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))

RTG

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,

R. Todd Gerlough
Reports Analyst
Reports Analysis Division

91036922368

Attach

DATE 12/5/90

MEMORANDUM TO FILES

TELECON X
VISIT ____

NAME OF COMMITTEE: Reed for Congress (RI)

SUBJECT: Missing 48 hour notices

FEC REP: Todd Gerlough

COMMITTEE REP: Melinda followed by Elizabeth Young (treasurer)

I called to ask if the committee had any reaction to the identification of missing 48 hour notices. The committee rep. said she would check with the treasurer.

The treasurer responded by saying that she was not aware that loans needed to be reported as last minute contributions.

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Attach

MEMORANDUM TO FILES: **DATE** 12/26/91

TELECON X
VISIT ___

NAME OF COMMITTEE: Reed for Congress (R.I.)

SUBJECT: Committee response to RFAI

FEC REP: Todd Gerlough

COMMITTEE REP: Elizabeth Young

The treasurer called to inform me of a forthcoming response. She stated that a number of the loans were actually bank loans, and were now reported as such. She later mentioned that the loans were actually from a line of credit opened by the candidate for committee media buys. I stated that a line of credit needed to be reported in a particular way. I later informed her of the correct way to report a line of credit after first examining her written response.

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REED FOR CONGRESS
11 Bradford Rd.
Cranston, RI 02910

December 27, 1990

R. Todd Gerlough
Reports Analyst
Reports Analyst Division
Federal Election Commission
999 E St., NW
Washington, DC 20463

Dear Todd:

Regarding your letter of November 20 (Oct. Quarterly 8/23/90-9/30/90) I have enclosed amended pages of Schedule A reflecting the correct election allocations of contributions made by Arnold Chace.

Also, the 48 hour reports submitted to you only showed contributions made by individuals in excess of $1,000. It was my incomplete knowledge of procedure which caused me not to report loans made to the committee on the 48 hour reports. All such loans have been subsequently reported. It was an inadvertant omission on my part in not reporting one PAC contribution on a 48 hour report. It too has been subsequently reported.

Regarding your letter of November 20 (12 Day Pre-General 10/1/90-10/17/90) I submit to you an amended abbreviated report which is enclosed with this letter. Per our conversation, I have enclosed only the pertinent pages.

If you have further questions, please call me at 401 274-7475. Thanks for all your help and understanding.

Happy New Year.

Very truly yours,

Elizabeth R. Young
Treasurer, Reed for Congress

ERY:ehr
enc.
FAX 202 376-5280
cc: RI Secretary of State

Attachment

REED FOR CONGRESS
53 Boswood Ave.
Cranston, RI 02910

January 29, 1991

R. Todd Gerlough
Reports Analyst
Reports Analyst Division
Federal Election Commission
999 E. St., NW
Washington, DC 20463

Dear Todd:

In talking with Robert Mancini at Fleet National Bank this morning regarding Jack Reed's Line of Credit, he informs me that the bank commitment letter was issued on August 22, 1990. This line gave Jack the capability of borrowing up to $100,000.00. Jack signed for the Line on August 27, 1990 and drew $15,910 on the Line that day. On October 29, 1990 the Line of Credit was extended giving Jack the capability of drawing an additional $30,000. By November 6, 1990 the Line was reduced again to the original sum of $100,000.00. Each of the draws and repayments against the Line have been reported on the appropriate reports. As of December 31, 1990 the balance owing on this Line is $98,885.00.

If you need any additional information, please call me at (401) 274-7475. Thank you for all your help.

Very truly yours,

Elizabeth R. Young
Treasurer

ERY:ehr

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RECEIVED
FEDERAL ELECTION COMMISSION

91 MAY -8 AM 11:53

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD Referral: #91L-34
Staff Member: Tamara Kapper

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

RESPONDENTS: Reed for Congress and Elizabeth R. Young, as treasurer

RELEVANT STATUTE: 2 U.S.C. § 434(a)(6)

INTERNAL REPORTS CHECKED: Referral Material
Disclosure Reports

FEDERAL AGENCIES CHECKED: None

I. **GENERATION OF MATTER**

The Office of the General Counsel received a referral from the Reports Analysis Division on March 26, 1991. Attachment 1. The basis of the attached referral is the failure of Reed for Congress and Elizabeth R. Young, as treasurer ("the Committee"), to timely file forty-eight hour notifications ("48 Hour Notices") for six (6) contributions received prior to the Primary and General Elections. The six contributions were made up of four (4) contributions in the form of loans guaranteed by the candidate which totaled $93,330 and two (2) contributions by an individual and a political action committee which totaled $3,000. Specifically, prior to the 1990 Primary Election, the Committee received a $2,000 contribution and three (3) contributions in the form of loans which totaled $47,125, for a grand total of $49,125. In addition, prior to the 1990 General

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Election the Committee received a $1,000 contribution and a $46,205 contribution in the form of a loan, for a grand total of $47,205. The candidate, John F. Reed, won the September 11, 1990 Primary election for the U.S House of Representatives from the state of Rhode Island with forty-nine (49%) of the vote and also won the November 6, 1990 General Election with fifty-nine (59%) of the vote.

II. FACTUAL AND LEGAL ANALYSIS

For the Factual and Legal Analysis, see Attachment 2.

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

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IV. RECOMMENDATIONS

1. Open a MUR.

2. Find reason to believe that Reed for Congress and Elizabeth R. Young, 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 attached Factual and Legal Analysis and conciliation agreement, and the appropriate letter.

Lawrence M. Noble
General Counsel

5/7/91
Date

BY: LGL
Lois G. Lerner
Associate General Counsel

Attachments
1. Referral Materials
2. Factual and Legal Analysis
3. Proposed agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

(MUR 3273)

In the Matter of	)	
	)	
Reed for Congress and Elizabeth R. Young, as treasurer.	)	RAD Refferal #91L-34
	)	
	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 10, 1991, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral #91L-34:

1. Open a MUR.

2. Find reason to believe that Reed for Congress and Elizabeth R. Young, 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 Factual and Legal Analysis and conciliation agreement, and the appropriate letter, as recommended in the General Counsel's Report dated May 7, 1991.

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

Attest:

5-13-91
Date

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

Received in the Secretariat: Wed., May 8, 1991 11:53 a.m.
Circulated to the Commission: Wed., May 8, 1991 4:00 p.m.
Deadline for vote: Fri., May 10, 1991 4:00 p.m.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 17, 1991

Elizabeth R. Young, Treasurer
Reed for Congress
53 Boxwood Avenue
Cranston, RI 02910

RE: MUR 3273
Reed for Congress and
Elizabeth R. Young, as
treasurer

Dear Ms. Young:

On May 10, 1991, the Federal Election Commission found that there is reason to believe Reed for Congress (the "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.

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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If you are interested in expediting the resolution of this matter by pursuing preprobable cause conciliation and if you agree with the provision 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 Tamara Kapper, 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 AND LEGAL ANALYSIS

RESPONDENTS: Reed for Congress and Elizabeth R. Young, as treasurer MUR: 3273

SUMMARY OF ALLEGATIONS

It is alleged that Reed for Congress and Elizabeth R. Young, as treasurer (the "Committee"), failed to timely file forty-eight hour notifications ("48 Hour Notices") for six (6) contributions totaling $96,330.

FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended (the "Act"), requires principal campaign committees of candidates for federal office to notify 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, in writing, 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 this notification to be made within 48 hours after the receipt of the contribution and to include the name of the candidate and the office sought by the candidate, identification of the contributor, the date of receipt and the amount of the contribution. Id. The notification of these contributions shall be in addition to all other reporting requirements. 2 U.S.C. § 434(a)(6)(B). Pursuant to 2 U.S.C. § 431(8)(A)(i) a contribution is defined as any gift,

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subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any Federal election.

Congressman Reed was a candidate for the U.S. House of Representatives from the state of Rhode Island in the September 11, 1990 Primary Election and the November 6, 1990 General Election. According to its Statement of Organization filed with the Commission, Reed for Congress is the authorized principal campaign committee of John F. Reed. Elizabeth R. Young is the treasurer of Reed for Congress.

The Primary Election was held on September 11, 1990. Pursuant to 2 U.S.C. § 434(a)(6)(A), the Committee was required to notify the Commission, in writing, of all contributions of $1,000 or more received from August 23, 1990 to September 8, 1990 within 48 hours of their receipt.

On August 6, 1990 the Committee was reminded by the Commission, in writing, that the receipt of contributions of $1,000 or more must be reported within 48 hours if received during the period of August 23, 1990 through September 8, 1990. The notice further stated that these notifications must reach the appropriate federal and state offices within 48 hours of the committee's receipt.

The General Election was held on November 6, 1990. Pursuant to 2 U.S.C. § 434(a)(6)(A), the Committee was required to notify the Commission, in writing, of all contributions of

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$1,000 or more received from October 18, 1990 to November 3, 1990 within 48 hours of their receipt.

On October 1, 1990 the Committee was reminded by the Commission, in writing, that the receipt of contributions of $1,000 or more must be reported within 48 hours if received during the period of October 18, 1990 through November 3, 1990. The notice further stated that these notifications must reach the appropriate federal and state offices within 48 hours of the committee's receipt.

The Committee received four (4) contributions during the period prior to the Primary Election that required written notification to the Commission. The Committee also received two (2) contributions during the period prior to the General Election that required written notification to the Commission. The contributions were received as follows:

Name of Contributor	Date	Amount
1. John F. Reed (Advance against $100,000 line of credit guaranteed by candidate)	8/27/90	$15,910
2. John F. Reed (Advance against $100,000 line of credit guaranteed by candidate)	8/30/90	$17,000
3. Massachusetts Laborers' District Council Laborers' Political League Fund	8/30/90	$ 2,000
4. John F. Reed (Advance against $100,000 line of credit guaranteed by candidate)	9/4/90	$14,215
5. John F. Reed (Advance against $100,000 line of credit guaranteed by candidate)[1]	10/29/90	$46,205
6. Thomas S. Foley	11/2/90	$ 1,000
	Total	$96,330

1. The original line of credit was increased by $30,000 on October 29, 1990.

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Contributions 1 through 4 listed above, were not reported to the Commission until the Committee filed its 1990 October Quarterly Report, which was not received by the Commission until October 12, 1990. Contributions 5 and 6 listed above, were not reported to the Commission until the Committee filed its 1990 30 Day Post-General Report, which was not received by the Commission until December 6, 1990.

It thus appears that the Committee may have violated 2 U.S.C. § 434(a)(6) by failing to disclose six (6) contributions of $1,000 or more before a primary and general election within 48 hours of their receipt. Therefore, there is reason to believe that Reed for Congress and Elizabeth R. Young, as treasurer, violated 2 U.S.C. § 434(a)(6).

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PERKINS COIE

A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
607 FOURTEENTH STREET N.W. • WASHINGTON, D.C. 20005-2011 • (202) 628-6600

May 24, 1991

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 MAY 24 AM 11:45

Tamara Kapper
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: MUR 3273 - Reed for Congress and Elizabeth R. Young, as Treasurer

Dear Ms. Kapper:

Please find enclosed a designation of counsel for the above-referenced matter under review.

Respondents received your notice of the reason to believe finding on or about Monday, May 20. A response would be due, therefore, by June 4. Having just been retained as counsel we are concerned, with the intervening Memorial Day holiday, that we will not have adequate time to gather the relevant facts and information and prepare a response by that date. We request an extension of 20 days, to June 24, to file a response in this matter.

If you have any questions or need additional information, please do not hesitate to contact the undersigned.

Very truly yours,

Judith L. Corley
Counsel for Respondents

JLC:smb

Enclosure

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TELEX 44-0277 PCSO UI • FACSIMILE (202) 434-1690
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STATEMENT OF DESIGNATION OF COUNSEL

MUR 3273

NAME OF COUNSEL: Judith Corley

ADDRESS: Perkins, Coie
607 14th St., NW 7th Floor
Washington, DC 20005-2011

TELEPHONE: (202) 628-6600

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

5/22/91
Date

Elizabeth R. Young
Signature

RESPONDENT'S NAME: Reed for Congress
Elizabeth R. Young, Treasurer

ADDRESS: 53 Boxwood Ave.
Cranston, RI 02903

HOME PHONE: (401) 467-3029

BUSINESS PHONE: (401)274-7475

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 29, 1991

Judith Corley, Esquire
Perkins Coie
607 14th Street, N.W., 7th Floor
Washington, D.C. 20005-2011

RE: MUR 3273
Reed for Congress and
Elizabeth R. Young, as
treasurer

Dear Ms. Corley:

This is in response to your letter dated May 24, 1991, which we received on that same date, requesting an extension of 20 days until June 24, 1991 to respond to the Commission's reason to believe finding in MUR 3273. 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 24, 1991.

If you have any questions, please contact Tamara Kapper, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Robert W. Bonham III
Assistant General Counsel

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RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 JUN 24 PM 4:58

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June 24, 1991

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Attn: Tamara Kapper

Re: MUR 3273 - Reed for Congress
and Elizabeth R. Young, as Treasurer

Dear Mr. Noble:

Enclosed is the response of Respondents in the above-referenced MUR.

Please note that we are submitting an unsigned affidavit from the Committee's Treasurer. I have not yet received the executed affidavit from Ms. Young, but she has read it and approved the text. I will submit the signed copy as soon as I have received it.

If you have any questions, please let me know.

Very truly yours,

Judith L. Corley

JLC:smb

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June 24, 1991

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Attn: Tamara Kapper

Re: MUR 3273 - Reed for Congress and Elizabeth R. Young, as Treasurer

Dear Mr. Noble:

This letter constitutes the response of the Reed for Congress Committee (the "Committee") and Elizabeth R. Young, as Treasurer (collectively referred herein as "Respondents") to the Commission's letter dated May 17, 1991. Also submitted is an affidavit from the Treasurer.

The Commission found reason to believe that Respondents had violated the Federal Election Campaign Act of 1971, as amended ("FECA"), to 2 U.S.C. §§ 431 et seq., by failing to disclose on its 48-hour reports certain contributions, including loans from Congressman Reed to the Committee. Specifically, the Commission found that four loans from the candidate had not been disclosed. In addition, two contributions, one from an individual and one from a political committee, were not disclosed. All of the loans and the two contributions, were fully disclosed on the Committee's subsequently filed reports.

Congressman Reed ran for Congress for the first time in 1990. His campaign staff, new to the federal campaign laws, was unfamiliar with the 48-hour reporting requirements. The Committee's treasurer, responsible for filing the reports, had never worked on a federal campaign before. The treasurer, who is neither a lawyer nor an accountant, was an unpaid volunteer who performed her duties as treasurer while running her own business.

Despite the unfamiliarity with the requirements of the law, it is clear that the Committee was extremely

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conscientious in its efforts to comply with the 48-hour report requirements and that it did substantially comply with them. The Committee filed 48-hour reports for 56 contributions totalling close to $100,000.

The candidate loans were not disclosed for a simple reason: the campaign did not realize that such loans were treated as contributions for purposes of the 48-hour reporting requirements. Loans, including those from a candidate, are reported on FEC forms in a location and in a manner different from contributions. While included within a committee's receipts, candidate loans are never referred to as contributions on the face of the forms or in the instructions.

Prior to the 48-hour reporting periods, the Treasurer had repeatedly consulted with the Commission's Reports Analysis Division on questions that arose concerning reporting issues. Some of these consultations included the proper disclosure of loans. The Treasurer's understanding of the reporting of loans, including candidate loans, was formed around the distinction between reporting loans and reporting contributions. Loans do not show up on Line 11 as contributions, but are shown on their own Line 13.

For 48-hour report disclosure purposes, however, the Commission lumps candidate loans together with all other contributions. The Treasurer missed this nuance, and continued to think of loans as a transaction reportable separate from contributions, and, thus, not subject to the 48-hour contribution reporting requirements. This explains the consistency with which the Committee's regularly filed reports properly disclosed all loans, but the loans were omitted from the 48-hour reports. Indeed, the fact that the candidate was making loans to the campaign was clearly documented before the primary on the regular reports filed by the Committee. Moreover, the loans made during the 48-hour reporting period before the primary were disclosed on the quarterly report available to the public before the general election.

In fact, the nondisclosure of candidate loans is consistent with the statutory intent of the 48-hour reporting requirements -- to provide the public with prompt identification of large contributors to a candidate who might thereby obtain undue influence over that candidate. See, e.g., Buckley v. Valeo, 424 U.S. 1, 67 (1976)("the sources of a candidate's financial support . . . alert the voter to the

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interest to which a candidate is mostly likely to be responsive and thus facilitate predictions of future performance in office.").

The 48-hour reports are crucial to disclosing to the public such last minute contributions. These contributions could potentially shed some light on a candidate's views or his or her performance as an officeholder. The lending of a candidate's own money to his campaign is in another category altogether. The disclosure of the loans in the pre-election period would not give voters any information as to undisclosed interest to which candidate might be responsive nor would it assist the voters in predicting future performance as an officeholder.

When the loans are removed from the Commission's analysis, the substantial compliance of the Committee becomes clear. In a hotly contested race where numerous contributions were received, only two contributions were not disclosed on the Committee's 48-hour reports. It is clear that the failure to disclose these contributions was the result of inadvertent omissions rather than any effort to hide the source of the funds. The first contribution, from a labor organization, was received after many other labor contributions had been received <u>and</u> disclosed. The second contribution, from Speaker of the House of Representatives, Thomas S. Foley, was one the Committee clearly would <u>want</u> disclosed since it reflected the Speaker's endorsement of Congressman Reed's campaign.

Both contributions, along with the loans, were promptly and properly disclosed on the subsequent reports filed by the Committee.

In the Committee's view the Commission's reason-to-believe is based at best on a technical violation of the law. The Rhode Island voters were not deprived of vital information that could have changed the outcome of the election. Furthermore, to avoid similar issues in the future, the Committee has taken steps to insure that its system of compliance with the 48-hour reporting requirements is even more stringently followed than it was during the 1990 elections.

The Commission should dismiss this case without further action. In reality, the Committee made only three highly technical errors. The failure to disclose candidate loans

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was, in effect, a single error consistently made and entirely understandable. A review of released 48-hour MURs shows that the misunderstanding of this requirement was commonplace. The Commission has only recently made its guidance in this area clearer. The loans were properly disclosed on the regular reports.

The two other contributions missed were the result of inadvertent administrative error. It appears unlikely the Commission would have pursued an enforcement action against Respondents for these contributions only. Their good faith efforts to comply with all the provisions of the law have been clearly demonstrated.

The FECA recognizes that such good faith efforts are enough. Section 432(i) of Title 2 states:

> When the treasurer of a political Committee shows that best efforts have been used to obtain, maintain and submit the information required this Act for the political committee, any report or any records of such committee shall be considered in compliance with this Act .

<u>See also</u> 11 C.F.R. § 104.7(a). The Explanation and Justification for this regulation notes that to determine whether "best efforts" have been made, the Commission will look principally to "whether the Committee has in place a systematized method for complying with the Act's disclosure requirements." <u>Explanation and Justification for Federal Election Commission Regulations</u> at 129.[1] Respondents' system of compliance fully meets this best efforts standard as demonstrated by its success: In disclosing close to $100,000, the Committee missed only two contributions. There is no reason to take any further action in this matter.

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[1]While the best efforts provision is generally applied to the disclosure of the identification of contributors, it is clear from the legislative history that this was only one of the applications envisioned by the Congress. House Rept. 96-422, 96th Cong. 1st Sess. at 14.

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Should you have any questions, or need additional information, please do not hesitate to contact the undersigned.

Very truly yours,

Judith L. Corley
Counsel to Respondents

JLC:smb

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BEFORE THE FEDERAL ELECTION COMMISSION

MUR 3273

Respondent: Reed for Congress and Elizabeth R. Young, as Treasurer

AFFIDAVIT OF ELIZABETH R. YOUNG

I, ELIZABETH R. YOUNG, hereby state as follows:

1. I have personal knowledge of the facts set forth herein and if called to testify in this matter, I would testify as set forth herein.

2. I am currently the treasurer of the Reed for Congress Committee (the "Committee"), and was treasurer of the Committee at all times relevant to the matters discussed in this affidavit.

3. I served as treasurer as an unpaid volunteer. During the period that I was treasurer of the Committee, I was also running my own business.

4. When I was asked by Congressman Reed to serve as his treasurer, I had never before worked on a federal election campaign.

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5. I was completely unfamiliar with the federal law when I started. In order to educate myself as to the requirements of a treasurer, I reviewed a video produced by the Federal Election Commission ("FEC") entitled "Why Me?" and reviewed the Campaign Guide for Congressional Candidates.

6. During the course of the campaign, when I had questions about the proper reporting of matters, I frequently consulted with FEC employees in the Reports Analysis Division.

7. On several occasions I consulted with the FEC on how to properly report candidate loans.

8. As a result of my reading and my conversations with the FEC, it was my understanding that loans were reported completely differently from contributions on the FEC reports. On all of the reports filed before and after the 48-hour report periods, I disclosed loans to the campaign on a different line and schedule from contributions.

9. From the Campaign Guide I understood that the committee was required to file reports of contributions of $1,000 or more within 48 hours when those contributions were received within 20 days and 48 hours before both the primary and the general elections.

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10. In order to comply with this requirement, I arranged to have filed nine 48-hour reports covering 56 contributions of $1,000 or more. The 56 contributions totalled in value close to $100,000.

11. I never considered loans as contributions for reporting purposes, including for 48-hour reports.

12. Because I did not believe that candidate loans were considered contributions for purposes of 48-hour reporting, I did not arrange to have filed any 48-hour reports for candidate loans in excess of $1,000 during the relevant pre-election periods.

13. I did not realize my understanding was incorrect until the Committee received notification by the Commission after the election. Although we had received a Request for Additional Information related to 48-hour reports, it did not identify the candidate loans as one of the missed reports.

14. Despite the system established by the Committee to report contributions within the 48-hour reporting periods, two contributions were inadvertently left off the reports filed during those periods. The contributions were properly reported on the subsequent reports.

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Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the Laws of the United States of America that the foregoing is true and correct. Executed this 25th day of June, 1991.

Elizabeth R. Young

Elizabeth R. Young

OGC3257

PERKINS COIE

A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
607 FOURTEENTH STREET, N.W. • WASHINGTON, D.C. 20005-2011 • (202) 628-6600

October 25, 1991

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 OCT 25 PM 5:05

Ms. Tamara Kapper
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 3273

Dear Ms. Kapper:

Pursuant to our conversation, please find enclosed an executed conciliation agreement in the above-referenced matter under review.

If you have any questions or need additional information, please let me know.

Very truly yours,

Judith L. Corley
Counsel to Respondents

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[16357-0001/DA912980.028]

TELEX: 44-0277 PCSO UI • FACSIMILE: (202) 434-1690
ANCHORAGE • BELLEVUE • LOS ANGELES • PORTLAND • SEATTLE • SPOKANE

RECEIVED
F.E.C.
SECRETARIAT

BEFORE THE FEDERAL ELECTION COMMISSION

91 OCT 29 AM 10: 04

In the Matter of	)	MUR 3273
	)	
Reed for Congress and	)	
Elizabeth R. Young, as	)	
treasurer	)	

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On May 10, 1991 the Federal Election Commission (the "Commission") found reason to believe that Reed for Congress and Elizabeth R. Young, as treasurer (the "Committee"), violated 2 U.S.C. § 434(a)(6) for the failure to file forty-eight hour notifications ("48 Hour Notices") for six (6) contributions received prior to the Primary and General Elections. The six (6) contributions were comprised of four (4) contributions in the form of loans guaranteed by the candidate which totaled $93,330 and two (2) contributions by an individual and a political action committee which totaled $3,000.

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II. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

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III. **RECOMMENDATIONS**

1. Accept the attached conciliation agreement with Reed for Congress and Elizabeth R. Young, as treasurer.

2. Close the file in this matter.

3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

Date 10/28/91

BY: Lois G. Lerner
Associate General Counsel

Staff Assigned: Tamara Kapper

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Reed for Congress and Elizabeth R. Young, as treasurer.	)	MUR 3273
	)	
	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 31, 1991, the Commission decided by a vote of 5-0 to take the following actions in MUR 3273:

1. Accept the conciliation agreement with Reed for Congress and Elizabeth R. Young, as treasurer, as recommended in the General Counsel's Report dated October 28, 1991.

2. Close the file in this matter.

3. Approve the appropriate letter, as recommended in the General Counsel's Report dated October 28, 1991.

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

Attest:

10-31-91
Date

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

Received in the Secretariat: Tues., Oct. 29, 1991 10:04 a.m.
Circulated to the Commission: Tues., Oct. 29, 1991 4:00 p.m.
Deadline for vote: Thurs., Oct. 31, 1991 4:00 p.m.

dr

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 6, 1991

Judith Corley, Esquire
Perkins, Coie
607 14th Street, N.W.
7th Floor
Washington, D.C. 20005-2011

CLOSED

RE: MUR 3273
Reed for Congress and
Elizabeth R. Young, as
treasurer

Dear Ms. Corley:

On October 31, 1991, the Federal Election Commission accepted the signed conciliation agreement submitted on your clients' behalf 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. I remind you that the civil penalty is due within 30 days of the conciliation

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agreement's effective date. If you have any questions, please contact Tamara Kapper, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of Reed for Congress and Elizabeth R. Young, as treasurer	MUR 3273

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 Reed for Congress and Elizabeth R. Young, 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.

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

1. John F. Reed was a candidate for the U.S. House of Representatives in the September 11, 1990 Primary Election from the 2nd Congressional District of Rhode Island. Mr. Reed was also a candidate in the November 6, 1990 General Election. Reed for Congress is the authorized principal campaign committee for Mr. Reed's 1990 congressional campaign.

2. Elizabeth R. Young is the treasurer of Reed 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 either the Clerk of the House, the Secretary of the U.S. Senate, or the Commission, as appropriate, and the Secretary of State, in writing, of any contribution totalling $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). The Act further requires this notification to be made within 48 hours after the receipt of the contribution and to include the name of the candidate and the office sought by the candidate, identification of the contributor, the date of receipt and the amount of the contribution. Id. The notification of the contribution shall be in addition to all other reporting requirements. 2 U.S.C. § 434(a)(6)(3).

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4. Pursuant to 2 U.S.C. § 431(8)(a), a "contribution" is defined as any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office.

5. The Act defines a "person" as an individual, partnership, committee, association, corporation, labor organization, or any other organization or group of persons. 2 U.S.C. § 431(11).

6. Pursuant to 2 U.S.C. § 431(13), the "identification" of an individual includes disclosing the name, mailing address, and occupation of each individual, as well as the name of their employer; and in case of any other person, the full name and mailing address.

7. Respondents received four (4) contributions in the form of loans from the candidate totalling $93,330 and two (2) contributions totalling $3,000 for a total of $96,330 which were received after the 20th day but more than 48 hours before the primary or before the general election. Respondents were required to file a 48-Hour Notice for each of these loans and these contributions.

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8. The contributions or loans described in subparagraph 7 above were disclosed when Respondents regularly filed their 1990 October Quarterly with regard to the primary or 1990 30-Day Post-General Report, both of which were received after the close of the relevant 48-hour reporting period.

V. Respondents failed to file 48-Hour Notices for the above six (6) contributions in violation of 2 U.S.C. § 434(a)(6).

VI. Respondents contend that the violations in question were the result of a misunderstanding of the requirement to disclose candidate loans on 48-hour reports and, with respect to the two contributions, the result of an inadvertent administrative error.

VII. Respondents will pay a civil penalty to the Federal Election Commission in the amount of two thousand five hundred dollars ($2,500), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VIII. 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.

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

X. 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.

XI. 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.

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FOR THE COMMISSION:

Lawrence M. Noble, Esq.
General Counsel

BY: _____ _____ 11-6-91
Lois G. Lerner, Esq. Date
Associate General Counsel

FOR THE RESPONDENTS:

BY: _____ _____ 10/25/91
Judith L. Corley Date
Counsel for Respondents

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3273

DATE FILMED 11/27/91 CAMERA NO. 2

CAMERAMAN AS

9104088076 2

FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 3273.

12/17/91

9104088405 4

CLOSED

MUR 3429

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

91 NOV 15 AM 10:39

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

91 NOV 18 AM 10:56

HOUSE OF REPRESENTATIVES
WASHINGTON, D. C. 20515

JOHN F. REED
SECOND DISTRICT
RHODE ISLAND

November 12, 1991

Mr. Lawrence Noble
General Counsel
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Noble:

I have been notified that the Federal Election Commission has accepted a signed conciliation agreement from the Reed for Congress Committee. Enclosed herewith please find a check for $2,500.00 as payment of the civil penalty by the Reed for Congress Committee.

Please do not hesitate to contact me at (401) 274-7475 if you have any further questions or concerns.

Sincerely,

Elizabeth R. Young (MKD)

Elizabeth R. Young
Treasurer
Reed for Congress

ERY:mkd
enc:

NOT PRINTED AT GOVERNMENT EXPENSE

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

Nov. 15 1991

TWO WAY MEMORANDUM

TO: Fabrae Brunson
OGC, Docket

FROM: Philomena Brooks PB
Accounting Technician

SUBJECt: Account Determination for Funds Received

We recently received a check from Jack Reed, check number T-001, dated Nov. 12, 1991, and in the amount of $ 2,500.00. Attached is a copy of the check and any correspondence that was forwarded. Please indicate below the account into which it should be deposited, and the MUR number and name.

TO: Philomena Brooks
Accounting Technician

FROM: Fabrae Brunson HDB
OGC, Docket

In reference to the above check in the amount of $ 2,500, the MUR number is 3273 and in the name of Reed for Congress Cmte. The account into which it should be deposited is indicated below:

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

✓ Civil Penalties Account, 95-1099.160

__ Other: _____

Fabrae Brunson
Signature

11/18/91
Date

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M ~~N~~ GP S JR

NAME Jack Reed

ADDRESS 1229 Longworth

ACCT. NO. 99337

T-001

15-7434/2540

Nov. 13 1991

PAY TO THE ORDER OF F.E.C. $ 2,500.00

Two Thousand Five Hundred and no/100 DOLLARS

CONGRESSIONAL FEDERAL CREDIT UNION U.S. HOUSE OF REPRESENTATIVES WASHINGTON D.C. 20515

FOR

Jack Reed

⑆254074350⑈ 009938701⑈ 0051