



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3817

DATE FILMED 11-25-84 CAMERA NO. 4

CAMERAMAN JM11

24043591223

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSELDATE: July 28, 1993

ANALYST: Jennifer Henry

I. COMMITTEE: Committee to Re-elect Congressman William D. Ford
(C00002063)
Theodore Monolidis, Treasurer
645 Griswald Penobscot Bldg., #1656
Detroit, MI 48226

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 Committee to Re-elect Congressman William D. Ford ("the Committee") has failed to file 23 of 55 or 42% of the required Forty-Eight Hour Notifications ("48-Hour Notices") for contributions totalling \$41,750 received prior to the 1992 General Election.

The candidate was involved in the 1992 General Election held on November 3, 1992. Prior Notice was sent to the Committee on September 28, 1992 (Attachment 2). The Notice includes a section titled "48 Hour Notices on Contributions". This section reads "Notices are required if the committee receives contributions (including contributions and loans from the candidate's personal funds; and endorsements or guarantees of bank loans) of \$1,000 or more, during the period of October 15 through October 31. The notices must reach the appropriate federal and state filing offices within 48 hours of the committee's receipt of the contribution(s)."

Schedule A of the 1992 30 Day Post-General Report indicates that the Committee failed to file twenty-four (24) 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:

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COMMITTEE TO RE-ELECT
 CONGRESSMAN WILIAM D. FORD
 REPORTS ANALYSIS OGC REFERRAL
 PAGE 2

<u>Contributor Name</u>	<u>Date</u>	<u>Amount</u>
Beth Hardwick Jolly	10/30/92	\$1,000
James A. Rogers	10/30/92	\$1,000
Leon Shapiro	10/30/92	\$1,000
Nancy Hanson	10/30/92	\$1,000
Gerald Carrier	10/30/92	\$1,000
Burton Farbman ^{1/}	10/29/92	\$1,000
Evelyn Dubrow	10/22/92	\$1,000
Levin for Congress	10/30/92	\$1,000
Fazio for Congress	10/30/92	\$1,000
D.C. Friends of "Bill" Clay	10/30/92	\$1,000
16th Congressional Democratic District	10/30/92	\$5,000
DSG Campaign Fund	10/30/92	\$5,000
Bell South Telecommunications Federal-PAC	10/30/92	\$5,000
International Assoc. of Fire Fighters	10/30/92	\$2,500
CWA Cope PCC	10/30/92	\$2,000
KMS Fusion Inc.-PAC	10/25/92	\$1,250
Effective Government Committee	10/30/92	\$1,000
Great Lakes Victory-PAC	10/30/92	\$1,000
Bricklayers & Allied Craftsmen-PAC	10/30/92	\$1,000
SEIU Cope Fund PCC	10/30/92	\$1,000
National Committee to Preserve Social Security and Medicare-PAC	10/30/92	\$1,000
NARFE-PAC	10/30/92	\$3,000
Career College Association PAC	10/30/92	\$2,000
Laborers Political League	10/23/92	\$2,000

On January 13, 1993, 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.

^{1/} The Committee filed an amended 1992 30 Day Post-General Report on May 18, 1993, changing the amount of the contribution from Burton Farbman from \$1,000 to \$250. This contribution is not included in the total referable amount of missing 48 Hour Notices.

24043591225

FEDERAL ELECTION COMMISSION
1991-1992
CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

DATE 27JUL93

PAGE 1

CANDIDATE/COMMITTEE/DOCUMENT	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
	OFFICE SOUGHT/ PARTY	PRIMARY GENERAL	PRIMARY GENERAL	GENERAL			
FORD, WILLIAM D	HOUSE 13 DEMOCRATIC PARTY				1992 ELECTION	ID# H6M115036	
1. STATEMENT OF CANDIDATE							
1991 DISAVOWAL NOTICE					15OCT91	1	91FEC/713/3140
STATEMENT OF CANDIDATE					1NOV91	1	91HSE/435/0342
1992 STATEMENT OF CANDIDATE - AMENDMENT					8MAY92	1	92HSE/450/5103
2. PRINCIPAL CAMPAIGN COMMITTEE							
COMMITTEE TO RE-ELECT CONGRESSMAN WILLIAM D. FORD					ID #C00002063	HOUSE	
1991 MID-YEAR REPORT		138,231	67,436		1JAN91 -30JUN91	29	91HSE/430/3406
YEAR-END		59,447	64,121		1JUL91 -31DEC91	22	92HSE/437/4007
1992 48 HOUR CONTRIBUTION NOTICE					3AUG92	1	92HSE/463/2012
48 HOUR CONTRIBUTION NOTICE					4AUG92	1	92HSE/463/2799
48 HOUR CONTRIBUTION NOTICE					10AUG92	1	92HSE/463/3894
48 HOUR CONTRIBUTION NOTICE					30OCT92	2	92HSE/482/0035
48 HOUR CONTRIBUTION NOTICE					4NOV92	2	92HSE/482/2898
48 HOUR CONTRIBUTION NOTICE					6NOV92	1	92HSE/482/3378
APRIL QUARTERLY		63,975	23,135		1JAN92 -31MAR92	15	92HSE/445/4202
APRIL QUARTERLY - AMENDMENT		63,975	23,135		1JAN92 -31MAR92	4	92HSE/450/3099
APRIL QUARTERLY - AMENDMENT		63,975	23,135		1JAN92 -31MAR92	10	92HSE/453/5033
APRIL QUARTERLY - AMENDMENT		63,975	23,135		1JAN92 -31MAR92	9	92HSE/455/4997
REQUEST FOR ADDITIONAL INFORMATION					1JAN92 -31MAR92	1	92FEC/754/2612
REQUEST FOR ADDITIONAL INFORMATION 2ND					1JAN92 -31MAR92	2	92FEC/757/5251
JULY QUARTERLY		97,929	83,718		1APR92 -30JUN92	23	92HSE/456/0610
JULY QUARTERLY - AMENDMENT		97,929	83,718		1APR92 -30JUN92	23	92HSE/462/2310
JULY QUARTERLY - AMENDMENT		92,929	83,718		1APR92 -30JUN92	9	92HSE/493/0600
JULY QUARTERLY - AMENDMENT		92,929	83,718		1APR92 -30JUN92	9	92HSE/497/2056
REQUEST FOR ADDITIONAL INFORMATION					1APR92 -30JUN92	2	92FEC/783/3128
REQUEST FOR ADDITIONAL INFORMATION 2ND					1APR92 -30JUN92	3	92FEC/800/2472
REQUEST FOR ADDITIONAL INFORMATION					1APR92 -30JUN92	1	93FEC/819/4422
REQUEST FOR ADDITIONAL INFORMATION 2ND					1APR92 -30JUN92	2	93FEC/827/2664
PRE-PRIMARY		6,359	29,726		1JUL92 -15JUL92	7	92HSE/462/2372
PRE-PRIMARY - AMENDMENT		6,359	29,726		1JUL92 -15JUL92	2	92HSE/493/0813
PRE-PRIMARY - AMENDMENT		6,359	29,726		1JUL92 -15JUL92	2	92HSE/497/2065
REQUEST FOR ADDITIONAL INFORMATION					1JUL92 -15JUL92	1	92FEC/783/3126
REQUEST FOR ADDITIONAL INFORMATION 2ND					1JUL92 -15JUL92	2	92FEC/800/2470
OCTOBER QUARTERLY			66,926	185,458	16JUL92 -30SEP92	26	92HSE/469/0790
1 ST LETTER INFORMATIONAL NOTICE					16JUL92 -30SEP92	1	92FEC/802/1395
REQUEST FOR ADDITIONAL INFORMATION					16JUL92 -30SEP92	1	93FEC/819/4421
REQUEST FOR ADDITIONAL INFORMATION 2ND					16JUL92 -30SEP92	2	93FEC/827/2662
PRE-GENERAL		70,192		91,899	1OCT92 -14OCT92	18	92HSE/478/4820
PRE-GENERAL - AMENDMENT		66,926		185,458	16JUL92 -30SEP92	26	92HSE/497/2030
PRE-GENERAL - AMENDMENT		69,192		91,899	1OCT92 -14OCT92	2	92HSE/493/0598
PRE-GENERAL - AMENDMENT		69,192		91,899	1OCT92 -14OCT92	19	92HSE/497/2011
REQUEST FOR ADDITIONAL INFORMATION					1OCT92 -14OCT92	1	93FEC/819/4476
REQUEST FOR ADDITIONAL INFORMATION 2ND					1OCT92 -14OCT92	1	93FEC/827/2782
POST-GENERAL		155,086		279,629	15OCT92 -23NOV92	38	92HSE/488/0668

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FEDERAL ELECTION COMMISSION
1991-1992
CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

DATE 27JUL93

PAGE 2

CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/ PARTY	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
POST-GENERAL	- AMENDMENT		155,086	298,179	150CT92	-23NOV92	46	93HSE/493/0615
POST-GENERAL	- AMENDMENT		155,086	298,179	150CT92	-23NOV92	9	93HSE/497/1969
POST-GENERAL	- AMENDMENT				-15NOV92	-23NOV92	33	93HSE/497/1978
REQUEST FOR ADDITIONAL INFORMATION					150CT92	-23NOV92	2	93FEC/819/4473
REQUEST FOR ADDITIONAL INFORMATION 2ND					150CT92	-23NOV92	1	93FEC/827/2784
YEAR-END			29,836	28,677	24NOV92	-31DEC92	16	93HSE/492/3521
YEAR-END	- AMENDMENT		29,836	28,677	24NOV92	-31DEC92	16	93HSE/497/1953
REQUEST FOR ADDITIONAL INFORMATION					24NOV92	-31DEC92	1	93FEC/833/1358
REQUEST FOR ADDITIONAL INFORMATION 2ND					24NOV92	-31DEC92	2	93FEC/837/5427
TOTAL			360,941	321,040	268,136	604,213	447	TOTAL PAGES

3. AUTHORIZED COMMITTEES

4. JOINT FUNDRAISING COMMITTEES AUTHORIZED BY THE CAMPAIGN

All reports have been reviewed.
Cash-n-hand as of 12/31/92: \$6,768
Debts and obligations owed as of 12/31/92: \$55,889

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REPORT NOTICE

FEDERAL ELECTION COMMISSION

CONGRESSIONAL

September 28, 1992

1992 GENERAL ELECTION CANDIDATE COMMITTEES

REPORT	REPORTING PERIOD*	REG./CERT.	
		MAILING DATE**	FILING DATE
Pre-General	10/01/92 - 10/14/92	10/19/92	10/22/92
Post-General	10/15/92 - 11/23/92	12/03/92	12/03/92

WHO MUST FILE

All 1992 general election principal campaign committees of congressional candidates (including unopposed candidates) who seek election in the November 3, 1992 General Election must file the Pre- and Post-General Election Reports.

WHO NEED NOT FILE

Principal campaign committees of candidates not active in the 1992 elections (i.e., committees active in past or future elections) and 1992 campaign committees not participating in the general election do not file the Pre- and Post-General Reports.

48 HOUR NOTICES ON CONTRIBUTIONS

Notices are required if the committee receives contributions (including contributions and loans from the candidate's personal funds; and endorsements or guarantees of bank loans) of \$1,000 or more, during the period of October 15 through October 31. The notices must reach the appropriate federal and state filing offices within 48 hours of the committee's receipt of the contribution(s).

LABEL

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

COMPLIANCE

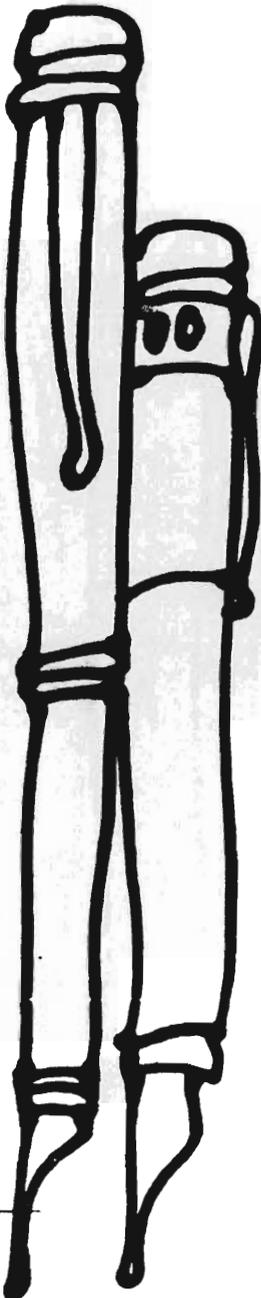
TREASURERS OF POLITICAL COMMITTEES ARE RESPONSIBLE FOR FILING ALL REPORTS ON TIME. FAILURE TO DO SO IS SUBJECT TO ENFORCEMENT ACTION. COMMITTEES FILING ILLEGIBLE REPORTS OR USING NON-FEC FORMS WILL BE REQUIRED TO REFILE.

*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.

**Reports sent by registered or certified mail must be post-marked by the mailing date; otherwise, they must be received by the filing date.

FOR INFORMATION, Call: 800/424-9530 or 202/219-3420

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SCHEDULE A ITEMIZED RECEIPTS

Use separate schedules for each category of the Detailed Summary Page

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 campaign purposes other than using the name and address of any political committee to solicit contributions from such committee.

Committee to Re-Elect Congressman William P. Ford

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Beth Har-Jack Jolly 7008 Blyden Road Bethesda MD 20817	Occupation Housewife	10/30/92	1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):			
James A. Rogers 310 Pennsylvania Ave., S.E., Ste. 304 Washington, D.C. 20003	UPS Occupation Attorney	10/30	1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Leon Shapiro 7351 Woodmont Court Boca Raton, FL 33434-3210	Occupation	10/30	1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):			
D. Suzanne Shaw 1908 Whitmore Villanti, MI 48197	Occupation	11/01	500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):			
E. Penelope S. Farthing .503 35th Street, N.W. Washington, D.C. 20007	Occupation	10/30	500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):			
F. Nancy Jean Barbour 7856 Widdley Lane Alexandria, VA 22306	Occupation	10/30	250.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):			
G. Dawson Mathis 1900 L Street, N.W., Ste. 300 Washington, D.C. 20036	Occupation	10/30	500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):			

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TOTAL of Receipts This Page (optional):

TOTAL This Period (last page this line number only)

SCHEDULE A ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page

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NAME OF COMMITTEE (in full)

Committee to Re-Elect Congressman William D. Ford

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Nancy Hanson 8017 Mulholland Drive Menasha, VA 22111	Occupation Housewife	10/30/92 1,000.00	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	1,000.00
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Dr. Robert Ross 300 East 75th Street New York, NY 10021	Occupation	10/29 500.00	500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date - \$	500.00	500.00
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Gerald Carrier 2-110 Research Drive Farmington Hills, MI 48204	Occupation	10/30 1,000.00	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	1,000.00
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Burton Farberman 820 Kirts, Ste. 100 Troy, MI 48064	Occupation	10/29 1,000.00	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	1,000.00
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Mrs. James G. O'Hare 2115 White Oaks Drive Alexandria, VA 22306	Occupation Housewife	10/30 500.00	500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date - \$	500.00	500.00
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Dennis Stockman 1873 Fort Lincoln Park, MI	Dorsey Business Schools Occupation Owner	10/30 350.00	350.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date - \$	350.00	350.00
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Peter Silver 67020 Denton Road Belleville, MI 48111	Occupation	10/30 250.00	250.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date - \$	250.00	250.00

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Total Receipts This Page (bottom)

Total This Period (last page this line number or 1)

SECTION A ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page

All 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.

NAME OF COMMITTEE (in full)
Committee to Re-Elect Congressman William D. Ford

24043591231

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt in this Period
Dr. Seth Border P.O. Box 1506 Ann Arbor, MI 48106			
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	10/16/92	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt in this Period
Timothy May 3878 52nd St., N.W. Washington, D.C. 20016			
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	10/30	500.00
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt in this Period
Evelyn Dubrow 215 16th Street, N.W. Washington, D.C. 20006			
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	10/22	1,000.00
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt in this Period
Gerald Robert Gereau 144 Constitution Ave., N.E. Washington, D.C. 20002			
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Gereau & Associates Occupation President	11/02	250.00
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt in this Period
Bertley W. O'Hara 3401 McKinley St., N.W. Washington, D.C. 20015			
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	11/02	500.00
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt in this Period
B. Scott Pastrick 5212 Portsmouth Rd Bethesda, MD 20816			
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Black, Maynor, and Stone & Settler Occupation Lobbyist	10/25	500.00
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt in this Period
Peter S. Flathe 75 S. Huron Street Ann Arbor, MI 48106			
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	10/30	500.00

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Total of Receipts this Page (optional)

Total for this Period (set page this to the number on page 1)

ITEMIZED RECEIPTS

Use separate sheets for each receipt. Date on Summary Page.

All information reported on each Receipt and Statement may not be sold or used by any person for the purpose of influencing the outcome of any election for purposes other than using the name and address of any political committee.

Receipt for **Re-elect Congressman William P. Ford**

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Levin for Congress 1630 West 8th Street Southfield, MI 48075 Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Political Organization Occupation Name	10/31/92 1,000.00	1,000.00
Fazio for Congress 300 Capitol Mall, Ste 350 Sacramento, CA 95814 Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer P.O. Occupation Name	10/30 1,000.00	1,000.00
Wineta for Congress Committee 1245 Winchester Blvd., No 314 P.O. Box 28866 San Jose, CA 95159 8866 Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer P.O. Occupation Name	10/31 500.00	500.00
Michigan Democratic Party-Federal Account 606 Townsend Street Lansing, MI 48933 Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer P.O. Occupation Name	11/02 5,000.00	5,000.00
Biagle for Senate Committee P.O. Box 2434 Washington, D.C. 20013-2431 Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer P.O. Occupation Name	11/02 1,000.00	1,000.00
D.C. Friends of Bill Clay P.O. Box 1030 Washington, D.C. 20013 Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer P.O. Occupation Name	10/30 1,200.00	1,200.00
G. Full Name, Mailing Address and ZIP Code Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Name	Date (month, day, year) Aggregate Year-to-Date > \$	Amount of Each Receipt this Period

Subtotal of Receipts This Page (optional) \$0.00

TOTAL This Period (last page this line number only) \$0.00

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SCHEDULE A ITEMIZED RECEIPTS

Use separate schedule for each category of the Detailed Summary Page

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NAME OF COMMITTEE (in Full)

Committee to Re-Elect Congressman William D. Ford

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
General Electric Company - PAC 3135 Easton Turnpike Fairfield, CT 06431	Political Organization Occupation None	10/26/92	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	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Parcel Shippers Association - PAC 1211 Connecticut Ave., NW, Ste. 406 Washington, DC 20036	P.O. Occupation None	10/22/92	200.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$	450.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Treasury Employees Political Action Committee 901 E. Street, N.W., Ste. 600 Washington, DC 20004	P.O. Occupation None	10/22/92	200.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$	200.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
CIA Cape PCC 501 Third Street, N.W. Washington, DC 20001	P.O. Occupation None	10/14/92	1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$	5,000.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
16th Congressional Democratic District 950 Moran Lincoln Park, WI 48146	P.O. Occupation None	10/19/92	5,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$	5,000.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Bowling Proprietors' Association of America Political Action Committee 615 Six Flags Drive Arlington, TX 76011	P.O. Occupation None	10/19/92	225.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$	1,225.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
AARP PAC 1100 17th Street, N.W., 10th Floor Washington, DC 20036	P.O. Occupation None		

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TOTAL of Receipts This Page (last one)

This Period (last page this line number on 1)

MODULE A ITEMIZED RECEIPTS

Use separate schedule for each category of the Detailed Summary Page

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NAME OF COMMITTEE (in Full)

Committee to Re-Elect Congressman William D. Ford

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Committee on Political Education, AFL-CIO 815 16th Street, N.W. Washington, DC 20006	Political Organization Occupation Same	10/30/92	1,500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date = \$	3,500.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
MAPLE PAC 1535 New Hampshire Ave., N.W. Washington, DC 20036	P.O. Occupation Same	10/21/92	2,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date = \$	5,000.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
DSC Campaign Fund	P.O. Occupation Same	10/30/92	2,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date = \$	5,000.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Bell South Telecommunications Federal - PAC	P.O. Occupation Same	10/30/92	2,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date = \$	5,000.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
International Assoc. of Fire Fighters	P.O. Occupation Same	10/30/92	2,500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date = \$	2,500.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
CWA Cape MCC 501 Third Street, N.W. Washington, DC 20001	P.O. Occupation Same	10/30/92	2,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	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
ERS Fusion, Inc. - PAC P.O. Box 1567 Ann Arbor, MI 48106	P.O. Occupation Same	10/25/92	1,250.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date = \$	1,250.00	

Number of Receipts This Page (optional)

For this Period (last page this line number only)

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JLH
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SCHEDULE A ITEMIZED RECEIPTS

Use separate schedule for each category of the Detailed Summary Page

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of raising 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)

Committee to Re-Elect Congressman William D. Ford

A. Full Name, Mailing Address, and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Effective Government Committee 80 F Street, N.W., 8th Floor Washington, DC 20001	Political Organization Occupation None	10/30/92	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	1,000.00
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Great Lakes Victory - PAC	P.O. Occupation None	10/30/92	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	1,000.00
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Bricklayers & Allied Craftmen - PAC 815 Fifteenth Street, N.W. Washington, DC 20005	P.O. Occupation None	10/30/92	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	1,000.00
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
BBU Cape Fund PCC 1313 L Street, N.W. Washington, DC 20005	P.O. Occupation None	10/30/92	2,500.00 (P) 3,500.00 (G)
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$	6,000.00	1,000.00
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Specialized Periodical Action Committee 1350 New York Ave., N.W., Ste. 1100 Washington, DC 20005-4709	P.O. Occupation None	10/30/92	750.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$	1,500.00	1,500.00
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
I.L.G.U. Cap. - on Committee 1710 Broadway New York, NY 10019	P.O. Occupation None	10/30/92	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	1,500.00
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Parcel Shippers Association - PAC 1211 Connecticut Ave., N.W., Ste. 400 Washington, DC 20036	P.O. Occupation None	10/30/92	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	1,500.00

SUBTOTAL of Receipts This Page (copy on 1)

TOTAL This Period (last page this line number on 1)

24
34
24
24

SECTION A ITEMIZED RECEIPTS

Use separate schedule for each category of the Detailed Summary Page

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

Committee to Re-Elect Congressman William P. Ford

A. Full Name, Mailing Address and ZIP Code

National Committee to Preserve Social Security & Medicare - PAC
2000 K Street, N.W., Ste. 800
Washington, DC 20006

Name of Employer

Political Organization

Date (month, day, year)

10/30/92

Receipt For: Primary General
 Other (specify):

Occupation

Same

Aggregate Year-to-Date > \$

1,000.00

1,000.00

B. Full Name, Mailing Address and ZIP Code

WARFE - PAC
1533 New Hampshire Ave., NW
Washington, DC 20036

Name of Employer

P.O.

Date (month, day, year)

10/30

Receipt For: Primary General
 Other (specify):

Occupation

Same

Aggregate Year-to-Date > \$

5,000.00

3,000.00

C. Full Name, Mailing Address and ZIP Code

United Mine Workers of America
Intl. Union Cospec Voluntary Fund
900 Fifteenth Street, NW
Washington, DC 20005

Name of Employer

P.O.

Date (month, day, year)

11/02

Receipt For: Primary General
 Other (specify):

Occupation

Same

Aggregate Year-to-Date > \$

4,500.00

500.00

D. Full Name, Mailing Address and ZIP Code

Operating Engineers Local 324 - PAC
37450 Schoolcraft, Ste. 110
Livonia, MI 48150

Name of Employer

P.O.

Date (month, day, year)

11/02

Receipt For: Primary General
 Other (specify):

Occupation

Same

Aggregate Year-to-Date > \$

1,000.00

1,000.00

E. Full Name, Mailing Address and ZIP Code

Engineers Political Education Committee
1125 Seventeenth Street, N.W.
Washington, DC 20036

Name of Employer

P.O.

Date (month, day, year)

10/30

Receipt For: Primary General
 Other (specify):

Occupation

Same

Aggregate Year-to-Date > \$

1,000.00

500.00

F. Full Name, Mailing Address and ZIP Code

Career College Association - PAC
750 First Street, NE, Ste. 900
Washington, D.C. 20001

Name of Employer

P.O.

Date (month, day, year)

10/30

Receipt For: Primary General
 Other (specify):

Occupation

Same

Aggregate Year-to-Date > \$

6,000.00

2,000.00

G. Full Name, Mailing Address and ZIP Code

American Radio Association AFL-CIO Cope PCC
26 Journal Square, Ste. 1501
New Jersey, NJ 07306

Name of Employer

P.O.

Date (month, day, year)

11/01

Receipt For: Primary General
 Other (specify):

Occupation

Same

Aggregate Year-to-Date > \$

2,000.00

2,000.00

TOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

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Vertical handwritten numbers on the left margin: 2 4 0 4 3 5 9 1 2 3 6

SCHEDULE A

ITEMIZED RECEIPTS

Use separate sheets for each category. Detailed Summary Page

All information copied from such reports and statements may not be sold or used by any person for the purpose of influencing 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)

Committee to Re-Elect Congressman William B. Ford

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Citizens for an Independent Press Detroit, MI Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Political Organization Occupation Same Aggregate Year-to-Date > \$ 200.00	11/02/92	
United States Super Corp. Employee Stock Ownership Plan PAC, Inc. P.O. Drawer 1207 Clearwater, FL 33440 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer P.O. Occupation Same Aggregate Year-to-Date > \$ 1,000.00	11/02 1,000.00	1,000.00
Dickstein, Shapiro & Morin - PAC 2101 L Street, NW Washington, DC 20037 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer P.O. Occupation Same Aggregate Year-to-Date > \$ 200.00	11/02 200.00	200.00
Mitchell - PAC 444 Michigan Avenue Detroit, MI 48226 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer P.O. Occupation Same Aggregate Year-to-Date > \$ 500.00	10/30 500.00	500.00
Brotherhood of Locomotive Engineers 1370 Ontario Street Cleveland, OH 44113 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer P.O. Occupation Same Aggregate Year-to-Date > \$ 500.00	11/02 500.00	500.00
Ford Nat. Lampery Civic Action Fund The American Road Beerborn, MI 48121 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer P.O. Occupation Same Aggregate Year-to-Date > \$ 1,000.00	11/06 1,000.00	1,000.00
Laborers' Political League 905 Sixteenth Street, NW Washington, DC 20006 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer P.O. Occupation Same Aggregate Year-to-Date > \$ 2,000.00	10/23 2,000.00	3,000.00 4,000.00 2,000.00

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number on v)

22



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20541

RO-2

Theodore Monolidis, Treasurer
Committee to Re-elect Congressman
William D. Ford
645 Griswald Penobscot Building
01656
Detroit, MI 48226

JAN 13 1993

Identification Number: C00002063

Reference: 30 Day Post-General Report (10/15/92-11/23/92)

Dear Mr. Monolidis:

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 itemisation follows:

-Schedule A of this report discloses activity outside the coverage dates. This report should include only activity that occurred from 10/15 through 11/23. Please amend this report and any previous reports so that all activity is disclosed in the report covering the period in which the activity occurred.

-Schedule D of your report itemises debts with outstanding beginning balances; however, these debts were not included on your previous report. Please refer to Section 104.11(b) of the FEC Regulations and amend your report(s).

-You must provide the occupation and name of employer for each contributor required to be itemised 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

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information is required by law. See 11 CFR §104.3(a)(4)(i) and 11 CFR §104.7.

-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))

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) 219-3580.

Sincerely,



Todd Gerlough
Reports Analyst
Reports Analysis Division

2494359-1239
3338 24474

COMMITTEE TO RE-ELECT
 CONGRESSMAN WILLIAM D. FORD
 REPORTS ANALYSIS CJC REFERRAL
 PAGE 2

<u>Contributor Name</u>	<u>Date</u>	<u>Amount</u>
Beth Hardwick Jolly	10/30/92	\$1,000
James A. Rogers	10/30/92	\$1,000
Leon Shapiro	10/30/92	\$1,000
Nancy Hanson	10/30/92	\$1,000
Gerald Carrier	10/30/92	\$1,000
Burton Farbman ^{1/}	10/29/92	\$1,000
Evelyn Debrow	10/22/92	\$1,000
Levin for Congress	10/30/92	\$1,000
Fazio for Congress	10/30/92	\$1,000
D.C. Friends of "Bill" Clay	10/30/92	\$1,000
16th Congressional Democratic District	10/30/92	\$5,000
DSG Campaign Fund	10/30/92	\$5,000
Bell South Telecommunications Federal-PAC	10/30/92	\$5,000
International Assoc. of Fire Fighters	10/30/92	\$2,500
CWA Cope PCC	10/30/92	\$2,000
KMS Fusion Inc.-PAC	10/25/92	\$1,250
Effective Government Committee	10/30/92	\$1,000
Great Lakes Victory-PAC	10/30/92	\$1,000
Bricklayers & Allied Craftsmen-PAC	10/30/92	\$1,000
SEIU Cope Fund PCC	10/30/92	\$1,000
National Committee to Preserve Social Security and Medicare-PAC	10/30/92	\$1,000
NARFE-PAC	10/30/92	\$3,000
Career College Association PAC	10/30/92	\$2,000
Laborers Political League	10/23/92	\$2,000

On January 13, 1993, 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.

^{1/} The Committee filed an amended 1992 30 Day Post-General Report on May 18, 1993, changing the amount of the contribution from Burton Farbman from \$1,000 to \$250. This contribution is not included in the total amount of missing 48 Hour Notices.

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD Referral #93L-51
STAFF MEMBER: Mark Allen

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

RESPONDENTS: Committee to Re-elect Congressman William D. Ford
and Theodore Monolidis, as treasurer

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

I. GENERATION OF MATTER

The Office of the General Counsel received a referral from the Reports Analysis Division ("RAD") on July 28, 1993.

Attachment 1. The basis for the attached referral is the failure of the Committee to Re-elect Congressman William D. Ford and Theodore Monolidis, as treasurer, ("Respondents") to file twenty-three 48 Hour notifications ("48 Hour Notices") for contributions totaling \$41,750. William D. Ford won the 1992 General Election in the 13th Congressional District in the State of Michigan with 53 percent of the vote.

II. FACTUAL AND LEGAL ANALYSIS

Based on the Factual and Legal Analysis, see Attachment 2, this Office recommends that the Commission find reason to believe the Respondents violated 2 U.S.C. § 434(a)(6)(A).

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

The Office of the General Counsel recommends that the Commission find reason to believe that the Respondents violated 2 U.S.C. § 434(a)(6)(A). In addition, this Office recommends

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

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IV. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that the Committee to Re-elect Congressman William D. Ford and Theodore Monolidis, as treasurer, violated 2 U.S.C. § 434(a)(6)(A), and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the attached Factual and Legal Analysis, proposed conciliation agreement, and the appropriate letter.

Lawrence M. Noble
General Counsel

9/16/93
Date

BY: Lois G. Lerner (SAS)
Lois G. 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

Committee to Re-elect Congressman
William D. Ford and Theodore Monolidis,
as treasurer.

)
)
) RAD Referral #93L-51
) MUR 3817
)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 22, 1993, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral #93L-51:

1. Open a MUR.
2. Find reason to believe that the Committee to Re-elect Congressman William D. Ford and Theodore Monolidis, as treasurer, violated 2 U.S.C. § 434(a)(6)(A), and enter into conciliation prior to a finding of probable cause to believe.

(continued)

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3. Approve the Factual and Legal Analysis, proposed conciliation agreement, and the appropriate letter, as recommended in the General Counsel's report dated September 16, 1993.

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

Attest:

9-23-93
Date

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

Received in the Secretariat:	September 17, 1993	12:15 P.M.
Circulated to the Commission:	September 17, 1993	2:00 P.M.
Deadline for vote:	September 22, 1993	4:00 P.M.

dh

24043591244



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

SEPTEMBER 28, 1993

Committee to Re-elect Congressman
William D. Ford
Theodore Monolidis, Treasurer
645 Griswald Penobscot Bldg, #1656
Detroit, Michigan 48226

RE: MUR 3817
Committee to Re-elect
Congressman William D. Ford

Dear Mr. Monolidis:

On September 23, 1993, the Federal Election Commission found that there is reason to believe the Committee to Re-elect Congressman William D. Ford ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(6)(A), 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.

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 additional information, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

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

If you are interested in expediting the resolution of this matter by pursuing preprobable cause conciliation and if you agree with the provisions of the enclosed agreement, please sign and return the agreement, along with the civil penalty, to the 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.

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Theodore Monolidis
Page 2

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 Mark Allen, the attorney assigned to this matter, at (202) 219-3400.

Sincerely,



Scott E. Thomas
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Conciliation Agreement

24043591246

**FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS**

RESPONDENTS: Committee to Re-elect Congressman MUR 3817
William D. Ford and Theodore Monolidis,
as treasurer

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).

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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 General Election in the state of Michigan was held on November 3, 1992. Pursuant to the Act, the Respondents were required to notify the Commission, in writing, of all

contributions of \$1,000 or more received from October 15 to October 31, 1992, within 48 hours of their receipt. A review of the Committee's 1992 Post General Report identified 23 contributions received between October 22 and October 30, 1992, of \$1,000 or more totaling \$41,750 (see attached list). The Committee did not submit 48 Hour Notices for these contributions.

Therefore, there is reason to believe that the Committee to Re-elect Congressman William D. Ford and Theodore Monolidis, as treasurer, violated 2 U.S.C. § 434(a)(6)(A) by failing to report campaign contributions of \$1,000 or more, 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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<u>CONTRIBUTOR NAME</u>	<u>DATE</u>	<u>AMOUNT</u>
Evelyn Dubrow	10/22/92	\$1,000
Laborers Political League	10/23/92	\$2,000
RMS Fusion Inc.-PAC	10/25/92	\$1,250
Gerald Carrier	10/30/92	\$1,000
Nancy Hanson	10/30/92	\$1,000
Beth Hardwick Jolly	10/30/92	\$1,000
James A. Rogers	10/30/92	\$1,000
Leon Shapiro	10/30/92	\$1,000
Bell South Telecommunications Federal-PAC	10/30/92	\$5,000
Bricklayers & Allied Craftsmen PAC	10/30/92	\$1,000
Career College Association PAC	10/30/92	\$2,000
CWA Cope PCC	10/30/92	\$2,000
D.C. Friends of "Bill" Clay	10/30/92	\$1,000
DSG Campaign Fund	10/30/92	\$5,000
Effective Government Committee	10/30/92	\$1,000
Fazio for Congress	10/30/92	\$1,000
Great Lakes Victory-PAC	10/30/92	\$1,000
International Assoc. of Fire Fighters	10/30/92	\$2,500
Levin for Congress	10/30/92	\$1,000
NARFE-PAC	10/30/92	\$3,000
National Committee to Preserve Social Security & Medicare-PAC	10/30/92	\$1,000
SEIU Cope Fund PCC	10/30/92	\$1,000
16th Congressional Democratic District	10/30/92	\$5,000

24043591249



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

RECEIVED
F.E.C.
SECRET

94 FEB -4 AM 9:55

SENSITIVE

February 4, 1994

MEMORANDUM

To: The Commission
From: Lois G. Lerner *LL*
Associate General Counsel
Subject: MUR 3817

Recommended Actions in Light of FEC v. NRA Political Victory Fund, 6 F.3d 821 (D.C. Cir. 1993), petition for cert. filed, (U.S. No. 93-1151, Jan. 18, 1994).

I. BACKGROUND

On November 5, 1993, the Office of the General Counsel forwarded to the Commission a memorandum regarding the recent appellate decision in FEC v. NRA Political Victory Fund, 6 F.3d 821 (D.C. Cir. 1993), petition for cert. filed, (U.S. No. 93-1151, Jan. 18, 1994) and advised the Commission on the effects and implications of that decision on the pending enforcement caseload. This Office has again reviewed the Commission's pending enforcement docket and now makes recommendations with respect to MURs in which the Commission found reason to believe, entered into pre-probable cause to believe conciliation, and mailed a proposed conciliation agreement to the respondents prior to the court's decision in NRA.

In one of the MURs discussed herein the respondents have not responded to either the Commission's finding or the proposed conciliation agreement (MUR 3817).

The recommendations put forth as to each of these matters are consistent with the Commission's November 9, 1993, decisions concerning compliance with the NRA opinion.

24043591250

II. RECOMMENDED ACTIONS IN LIGHT OF FEC v. NRA

24043591251

24043591252

MUR 3817 (formerly 93L-51)

This Office recommends that the Commission, consistent with its November 9, 1993, decisions concerning compliance with the NRA opinion, and based on the original referral from the Reports Analysis Division, revoke to: open a Matter Under Review; find reason to believe that the Committee to Re-elect Congressman William D. Ford and Theodore Monolidis, as treasurer, violated 2 U.S.C. § 434(a)(6)(A); and, enter into conciliation prior to a finding of probable cause to believe. This Office also recommends that the Commission revoke to approve the Factual and Legal Analysis and proposed conciliation agreement that were attached to the General Counsel's Report dated September 16, 1993. A copy of the certification reflecting the Commission's previous vote is attached (Attachment 5).

24043591253

2 4 0 4 3 5 9 1 2 5 4

III. RECOMMENDATIONS

24043591255

MUR 3817 (formerly 93L-51)

- a. Open a Matter Under Review.
- b. Find reason to believe that the Committee to Re-elect Congressman William D. Ford and Theodore Monolidis, as treasurer, violated 2 U.S.C. § 434(a)(6)(A), and enter into conciliation prior to a finding of probable cause to believe.

- c. Approve the Factual and Legal Analysis and proposed conciliation agreement attached to the General Counsel's Report dated September 16, 1993.
- d. Approve the appropriate letter.

24043591256

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Committee to Re-elect Congressman) MUR 3817
William D. Ford and Theodore) (Formerly RAD
Monolidis, as treasurer.) Referral #93L-51)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 9, 1994, the Commission decided by a vote of 5-0 to take the following actions in MUR 3817:

1. Open a Matter Under Review.
2. Find reason to believe that the Committee to Re-elect Congressman William D. Ford and Theodore Monolidis, as treasurer, violated 2 U.S.C. § 434(a)(6)(A), and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the Factual and Legal Analysis and proposed conciliation agreement attached to the General Counsel's Report dated September 16, 1993.

(continued)

24043591257

4. Approve the appropriate letter, as recommended in the General Counsel's Memorandum dated February 4, 1994.

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

Attest:

2-9-94
Date

Delores Hardy
for Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat:	Fri., Feb. 4, 1994	9:55 a.m.
Circulated to the Commission:	Fri., Feb. 4, 1994	12:00 p.m.
Deadline for vote:	Wed., Feb. 9, 1994	4:00 p.m.

bjr

24043591258



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

FEBRUARY 14, 1994

Committee to Re-elect Congressman
William D. Ford
Theodore Monolidis, Treasurer
645 Griswald Penobscot Bldg, #1656
Detroit, MI 48226

RE: MUR 3817

Dear Mr. Monolidis:

On September 23, 1993, the Federal Election Commission found reason to believe that the Committee to Re-elect Congressman William D. Ford and you, as treasurer, violated 2 U.S.C. § 434(a)(6)(A), and entered into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. A proposed conciliation agreement was mailed to you.

As you may be aware, on October 22, 1993, the D.C. Circuit declared the Commission unconstitutional on separation of powers grounds due to the presence of the Clerk of the House of Representatives and the Secretary of the Senate or their designees as members of the Commission. FEC v. NRA Political Victory Fund, 6 F.3d 821 (D.C. Cir. 1993), petition for cert. filed, (U.S. No. 93-1151, Jan. 18, 1994). Since the decision was handed down, the Commission has taken several actions to comply with the court's decision. While the Commission petitions the Supreme Court for a writ of certiorari, the Commission, consistent with that opinion, has remedied any possible constitutional defect identified by the Court of Appeals by reconstituting itself as a six member body without the Clerk of the House and the Secretary of the Senate or their designees. In addition, the Commission has adopted specific procedures for revoting or ratifying decisions pertaining to open enforcement matters.

In this matter, on February 9, 1994, the Commission revoted to find reason to believe that the Committee to Re-elect Congressman William D. Ford and you, as treasurer, violated 2 U.S.C. § 434(a)(6)(A), and to approve the Factual and Legal Analysis previously mailed to you. You should refer to that document for the basis of the Commission's decision. If you need an additional copy, one will be provided upon request.

24043591259

Theodore Monolidis, Treasurer
Page 2

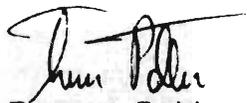
In addition, the Commission also revoted to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe, and revoted to approve the enclosed proposed conciliation agreement previously mailed to you.

If you agree with the provisions of the enclosed agreement, please sign and return it to the Commission within ten days. Please make the check for the civil penalty payable to the Federal Election Commission.

Given the unique circumstances engendered by the NRA decision, conciliation negotiations, prior to a finding of probable cause to believe, will be limited to a maximum of 30 days.

If you have any questions, please contact Mark Allen, the attorney assigned to this matter, at (202) 219-3400.

For the Commission,


Trevor Potter
Chairman

Enclosure
Conciliation Agreement

cc: Congressman William Ford

24043591260

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

OGC 350



THEODORE MONOLIDIS
TREASURER

(313) 961-8870
FAX: (313) 961-9028

March 2, 1994

Federal Election Commission
ATTN: Mark Allen, Esq.
999 E Street, NW
Washington, DC 20463

94 MAR -3 PM 3:22

RECEIVED
FEDERAL ELECTION COMMISSION

Re: MUR 3817

Dear Mr. Allen:

I apologize for the delay in my response to the initial notice of September 23, 1993. As you are well aware, our schedules conflicted due to both of our absences from the office at alternate times.

In accordance with the letter dated February 14th, from your office, here are the events surrounding the 23 contributions which are the subject of the Federal Election Commission's Conciliation Agreement.

The Commission has determined that the checks were received on the dates the checks were written - between October 22, 1992 and October 30, 1992. However, Congressman Ford's authorized committee (hereinafter Committee) did not receive these 23 checks until November 3, 1992, the date of the election.

Although the regulations only require notice of checks received more than 48 hours before any election, the Committee no longer has in its possession proof of receipt. However, it is hoped that the Commission will recognize the fact that the Committee gave the required notice of checks received on October 27, 1992, October 30, 1992 and November 2, 1992, and that the Committee would in no way intend to circumvent the FEC regulations by failing to report the 23 checks which are the subject of the FEC's attention.

Congressman Ford will not be seeking reelection in 1994. Because there was no intentional violation of the FEC's regulations, the Committee would appreciate an opportunity to discuss the amount of penalty with you. Please contact either Mr. Steven Hart or Ms. Barbara Wixon at Williams & Jensen, P.C. (202) 659-8201, if you wish to discuss this matter further.

Very truly yours,

THEODORE MONOLIDIS
Treasurer

TM:rt
Enc.

24043591261

**COMMITTEE TO RE-ELECT
CONGRESSMAN
WILLIAM D. FORD**

**THEODORE MONOLIDIS
TREASURER**

October 27, 1992

**Clerk of the House
Office of Records & Registration
1036 Longworth, House Office Bldg.
Washington, D.C. 20515**

Re: I. D. No. 003450

Dear Sir or Madam:

Please be advised that this committee has received the following contributions to date:

Amalgamated Transit Union Cope Account-Voluntary Fund 5025 Wisconsin Ave., N.W. Washington, D.C. 20016	\$1,000.00
Ironworkers Political Action League 1750 New York Ave., N.W. Washington, D.C. 20006	\$5,000.00
Committee for Thorough Agriculture Political Education of Associated Milk Producers, Inc. P.O. Box 790287 San Antonio, TX 78279-0287	\$1,000.00
Firefighters Interested in Registration and Education PAC 1750 New York Ave., N.W. Washington, D.C. 20006	\$1,000.00
Chrysler Support Committee P.O. Box 1919 Detroit, MI 48231	\$1,000.00
NRLCA Political Action Committee 1630 Duke St., 4th Floor Alexandria, VA 22314-3465	\$1,000.00
EDS-PAC 1331 Pennsylvania Ave., N.W. Suite 1300 North Washington, D.C. 20004	\$1,000.00

1656 PENOBSCOT BUILDING • DETROIT, MICHIGAN 48226 • (313) 961-5570

24043591262

24043591263

Laborers Political League 905 16th Street, N.W. Washington, D.C. 20004	\$3,000.00
American Nurses Assn.-PAC 600 Maryland Ave., S.W., Suite 100 West Washington, D.C. 20024-2571	\$1,000.00
NARAL-PAC 1101 14th St., N.W., 5th Floor Washington, D.C. 20005	\$3,000.00
SEIU Cope Fund PCC 1313 L St., N.W. Washington, D.C. 20005	\$2,500.00
Seafarers Political Activity 5201 Auth Way Camp Springs, MD 20746	\$1,000.00
Sheet Metal Workers International Association-Political Action League 1750 New York Ave., N.W. Washington, D.C. 20006	\$1,500.00
Mortgage Bankers Political Action Committee (MORPAC) 1125 15th St., N.W., Ste. 700 Washington, D.C. 20005	\$1,000.00
Committee on Political Education, AFL-CIO 815 16th St., N.W. Washington, D.C. 20006	\$2,000.00
United Food and Commercial Workers International Union-AFL-CIO/CLC 1775 K Street, N.W. Washington, D.C. 20006-1598	\$2,000.00

Very truly yours,



THEODORE MONOLIDIS

Treasurer

TM:tk

Page Two
Clerk of the House
October 30, 1992

AMERIPAC
601 13th Street, NW, Ste. 710N
Washington, D.C. 20005 \$1,000.00

UPSPAC
Greenwich Office Park
No. 5, Room 240
Greenwich, CT 06830 \$2,000.00

Machinists Non-Partisan
Political League
1300 Connecticut Ave., NW
Washington, D.C. 20036 \$5,000.00

American Bankers Assn.
1120 Connecticut Ave., NW
Washington, D.C. 20036 \$1,000.00

Very truly yours,

THEODORE MONOLIDIS
Treasurer

24043591264

t

COPY

COMMITTEE TO RE-ELECT
CONGRESSMAN
WILLIAM D. FORD

THEODORE MONOLIDIS
TREASURER

November 2, 1992

Clerk of the House
Office Records & Registration
1036 Longworth, House Office Bldg.
Washington, D.C. 20515

Re: I.D. No. 003450

Dear Sir or Madam:

Please be advised that this committee has received the following contributions to date:

CWA COPE PCC 501 3rd Street, N.W. Washington, DC 20001	\$1,000.00
Peter B. Fletcher 25 S. Huron Street Ypsilanti, MI 48197	\$1,000.00
General Electric PAC 1331 Pennsylvania Ave., N.W. Washington, DC 20004	\$1,000.00
AAMFT PAC 1100 17th St., N.W., 10th Floor Washington, DC 20036	\$1,000.00
Committee on Political Education, AFL-CIO 815 16th Street, N.W. Washington, DC 20006	\$1,500.00
NARFE - PAC 1533 New Hampshire Ave., N.W. Washington, DC 20036	\$2,000.00

Very truly yours,

THEODORE MONOLIDIS
←Treasurer

24043591265

COMMITTEE TO RE-ELECT
CONGRESSMAN
WILLIAM D. FORD

THEODORE MONOLIDIS
TREASURER

October 30, 1992

Clerk of the House
Office Records & Registration
1036 Longworth, House Office Bldg.
Washington, D.C. 20515

Re: I.D. No. 003450

Dear Sir or Madam:

Please be advised that this committee has received the following contributions to date:

Transportation Political Education League 14600 Detroit Avenue Cleveland, OH 44107	\$4,000.00
AICPA 1455 Pennsylvania Ave., NW Washington, DC 20004-1007	\$4,000.00
JEG Good Government Committee 251 South Lake Avenue Pasadena, CA 91101	\$1,000.00
Upjohn Employees PAC 7000 Portage Road Kalamazoo, MI 49001	\$1,000.00
Oral and Maxillofacial Surgery PAC 9700 W. Bryn Mawr Avenue Rosemont, IL 60018	\$2,000.00
Civic Involvement Program/GM 3044 West Grand Blvd. Detroit, MI 48202	\$1,000.00



24043591266

COPY

COMMITTEE TO RE-ELECT
CONGRESSMAN
WILLIAM D. FORD

THEODORE MONOLIDIS
TREASURER

November 2, 1992

Clerk of the House
Office Records & Registration
1036 Longworth, House Office Bldg.
Washington, D.C. 20515

Re: I.D. No. 003450

Dear Sir or Madam:

Please be advised that this committee has received the following contributions to date:

CWA COPE PCC 501 3rd Street, N.W. Washington, DC 20001	\$1,000.00
Peter B. Fletcher 25 S. Huron Street Ypsilanti, MI 48197	\$1,000.00
General Electric PAC 1331 Pennsylvania Ave., N.W. Washington, DC 20004	\$1,000.00
AAMFT PAC 1100 17th St., N.W., 10th Floor Washington, DC 20036	\$1,000.00
Committee on Political Education, AFL-CIO 815 16th Street, N.W. Washington, DC 20006	\$1,500.00
NARFE - PAC 1533 New Hampshire Ave., N.W. Washington, DC 20036	\$2,000.00

Very truly yours,

THEODORE MONOLIDIS
←Treasurer

24043591267

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P. 02



THEODORE MONOLIDIS
TREASURER

TEL: 313-961-8979
FAX: 313-961-8988

April 1, 1994

Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: NUR 3817

Dear Sir or Madam:

Please be advised that Robert F. Bauer, Esquire, of the law firm of Perkins & Coie, 607 14th Street, NW, Washington, DC 20005, is retained to represent this committee on matters now pending before your commission.

Very truly yours,

THEODORE MONOLIDIS
Treasurer

TM:rt

24043591268

APR 1 1994

STATEMENT OF DESIGNATION OF COUNSEL

NUR 3817

NAME OF COUNSEL: J. Steven Hart; Barbara E. Nixon
Williams & Jensen, P.C.

ADDRESS: 1155 21st Street, N.W.
Suite 300
Washington, D.C. 20036

TELEPHONE: (202) 659-8201

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.

03-04-94
Date

Shedone Monolidis
Signature

RESPONDENT'S NAME: Committee to Re-elect Congressman William D. Ford
Theodore Monolidis, Treasurer

ADDRESS: 645 Griswold Penobscot Bldg., #1656 17th
Detroit, Michigan 48226

TELEPHONE: HOME

BUSINESS (313) 961-5870

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NARFE

National Association of Retired Federal Employees

1533 New Hampshire Avenue NW
Washington, DC 20036-1279
(202) 234-0832 FAX: 797-9698

94 APR - 7 PM 1:50

RECEIVED

MUR 3817

LEGISLATION FAX COVER SHEET

DATE 4/7/94

TIME 1¹¹

TO: MS DEBRA RICE

FEC GENERAL COUNSEL

FAX NUMBER: 219-3923

TOTAL PAGES: 3

FROM: LEGISLATIVE DEPARTMENT
FAX NUMBER: (202) 797-9697

JULY PARK

BOB NORMANDIE

SHELLEY WALKER

CHRIS FARRELL

DAN ADCOCK

PETE FORGIONE

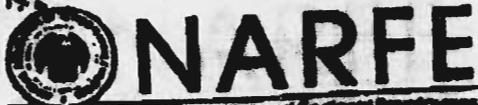
COMMENTS:

ALL I KNOW FOR SURE ABOUT
OUR CONTRIBUTION TO BILL FORD
IS ON THE ATTACHED FORM
USED BY OUR OFFICERS.

I EXPECT THE CHECK WAS SENT
BY USPS.

THANKS

74043591210



National Association of Retired Federal Employees

1533 New Hampshire Avenue NW
Washington, DC 20036-1279
(202) 234-0832 FAX: 797-9698

NARFE-PAC No. 30
October 30, 1992

MEMORANDUM

TO: Hal Price, President
NARFE-PAC

FROM: Judy Park, Legislative Director

Purpose

Amount

FRIENDS OF JOHN CONYERS
669 Federal Building
231 West Layayette
Detroit, MI 48226
Rep. John Conyers (D-MI)

\$1,500 1992
House General

ENGLISH FOR CONGRESS COMMITTEE
P.O. Box 1143
Oklahoma City, OK 73101
Rep. Glenn English (D-OK)

\$3,000 1992
House General

COMMITTEE TO RE-ELECT W.D. FORD
1656 Penobscot Building
Detroit, MI 48226
Rep. William D. Ford (D-MI)

\$3,000 1992
House General

FRIENDS OF PATTI GARAMENDI
3255 W. Hammer Lane, #9B
Stockton, CA 95209
Cand. Patt Garamendi (D-CA)

\$2,000 1992
House General

HOAGLAND FOR CONGRESS COMMITTEE
8601 West Dodge Road
Suite 14
Omaha, NE 68114
Rep. Peter Hoagland (D-NE)

\$2,000 1992
House General

240435912/1



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 15, 1994

BY FACSIMILE AND FIRST CLASS MAIL

Robert F. Bauer, Esq.
Perkins Coie
607 Fourteenth Street, N.W.
Washington, D.C. 20005-2011

RE: MUR 3817
Committee to Re-elect Congressman
William D. Ford and Theodore
Monolidis, as treasurer

Dear Mr. Bauer:

On February 9, 1994, the Commission revoted to find reason to believe that the Committee to Re-elect Congressman William D. Ford and Theodore Monolidis, as treasurer, ("the Committee") violated 2 U.S.C. § 434(a)(6)(A). In addition, the Commission revoted to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe, and revoted to approve a proposed conciliation agreement.

The Commission stated in its letter to the Committee dated February 14, 1994 that conciliation negotiations, prior to a finding of probable cause to believe, would be limited to a maximum of 30 days. Original counsel in this matter represented to this Office that the Committee would provide a signed conciliation agreement. Such agreement was never forwarded to this Office. Instead, we received your designation of counsel on April 4, 1994, and have not heard from you since that time. Because the period for pre-probable cause conciliation has run, unless we receive a signed agreement from you by the close of business Tuesday, April 19, this Office may have to consider the pre-probable cause conciliation negotiation period closed and proceed to the next stage of the enforcement process.

In addition, I note that the Committee, in its response dated March 2, 1994, stated that it received the checks for the contributions at issue on November 3, 1992 rather than on the dates which the Committee disclosed on its 1992 Post General Election Report. Please note that if true, the Committee would appear instead to have violated 2 U.S.C. § 434(b)(3)(A) and (B) by misreporting contribution receipt dates.

240435912/3

Robert F. Bauer, Esq.
Page 2

If you have any questions, please contact me at
(202) 219-3400.

Sincerely,

Mark Allen

Mark Allen
Attorney

340435912/4

0604-1054

PERKINS COIE

A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
607 FOURTEENTH STREET, N.W. • WASHINGTON, D.C. 20005-2011
(202) 628-6600 • FACSIMILE (202) 434-1690

April 20, 1994

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
APR 20 5 11 PM '94

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

Re: MUR 3817

Dear Mr. Allen:

This letter responds to your own telefax of April 15, 1994, received by me on Monday, April 18. The letter notes the interrupted communication between the Friends of Bill Ford and the Commission. In addition, you ask for a response, which apparently you have been waiting for, by the close of business today.

Allow me to briefly clarify the chain of events. As you recall, you placed phone calls to the "original counsel" who is no longer handling this case. Shortly thereafter, I called to inform you that a change of counsel had taken place and that I was prepared to speak with you, but understood that the Commission first required a designation of counsel on file naming this firm as counsel. I advised you that I would arrange for such a designation and I did so, filing it by fax on April 4, 1994. It then developed that I was awaiting your call while you were awaiting mine.

This was the first confusion and your letter indicates still another. You state that original counsel had pledged the return of a "signed conciliation agreement." Apparently you have in mind the conciliation agreement proposed by the Commission on February 14, 1994. No such commitment is known to me.

* The original arrived this morning.

[12877-0001/DA941090.018]

240435912/5

Mark Allen
April 20, 1994
Page 2

Moreover, I have a copy of the letter dated March 2, 1994, forwarded to you by Theodore Monilidis, Committee Treasurer, briefly reviewing the facts and stating that "because there was no intentional violation of the FEC's regulations, the Committee would appreciate an opportunity to discuss the amount of penalty with you."

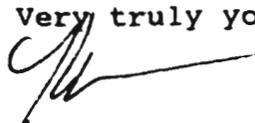
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I can assure you of our intention to proceed to a quick resolution of this matter. As you know, Congressman Ford has announced that he will not seek re-election, and he would like

Mark Allen
April 20, 1994
Page 3

to act with dispatch to wind up the legal affairs of his
Committee.

Very truly yours,



Robert F. Bauer
Counsel to Respondents

cc: Cong. William Ford

24043591277



FEDERAL ELECTION COMMISSION

WASHINGTON DC 20463

April 29, 1994

Robert F. Bauer, Esq.
Perkins Coie
607 Fourteenth Street, N.W.
Washington, D.C. 20005-2011

RE: MUR 3817
Committee to Re-elect Congressman
William D. Ford and Theodore
Monolidis, as treasurer

Dear Mr. Bauer:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission found reason to believe that the Committee to Re-elect Congressman William D. Ford and Theodore Monolidis, as treasurer, ("Committee") violated 2 U.S.C. § 434(a)(6)(A). The Commission also offered to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that violations of 2 U.S.C. §§ 434(a)(6)(A), 434(b)(3)(A), and 434(b)(3)(B) have occurred.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

240435912/8

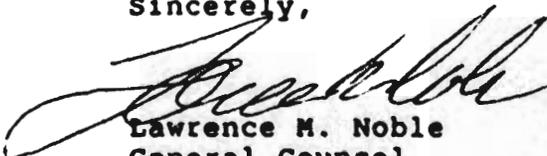
Robert F. Bauer, Esq.
Page 2

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Mark Allen, the attorney assigned to this matter, at (202) 219-3400.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

24043591279

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Committee to Re-elect Congressman William) MUR 3817
D. Ford and Theodore Monolidis,)
as treasurer)

GENERAL COUNSEL'S BRIEF

I. BACKGROUND

The Committee to Re-elect Congressman William D. Ford and Theodore Monolidis, as treasurer, ("the Committee") failed to file twenty-three 48 Hour notifications for contributions totaling \$41,750 received shortly before the 1992 general election. On February 9, 1994, the Commission revoted to find reason to believe that the Committee violated 2 U.S.C. § 434(a)(6)(A) and to enter into pre-probable cause conciliation. On March 28, 1994, counsel represented to this Office that the Committee would provide a signed conciliation agreement. Such agreement was never forwarded to this Office. Instead, on April 4, 1994, after the expiration of the pre-probable cause conciliation period, this Office received a new designation of counsel. New counsel did not further contact this Office, and on April 15, 1994 this Office sent by facsimile a letter to counsel stating that because the period for pre-probable cause conciliation had run, unless counsel provided a signed agreement by the close of business on April 19, 1994, this Office might proceed to the next stage of the enforcement process. Counsel did not provide an agreement on that day, but instead, a day after the due date

24043591280

II. ANALYSIS

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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 Act also requires committees to disclose the date of contributions received from contributors whose aggregate contributions exceed \$200 in a calendar year together with the amount of such contribution and identification of the contributor. 2 U.S.C. § 434(b)(3)(A) and (B).

The General Election in the state of Michigan was held on November 3, 1992. Pursuant to section 434(a)(6)(A), the Committee was required to notify the Commission, in writing, of all contributions of \$1,000 or more received from October 15 to October 31, 1992, within 48 hours of their receipt. A review of the Committee's 1992 Post General Report identified

23 contributions received between October 22 and October 30, 1992, of \$1,000 or more totaling \$41,750 for which the Committee did not submit 48 Hour Notices. On this basis the Commission found reason to believe the Committee violated 2 U.S.C. § 434(a)(6)(A).

2 4 0 4 3 5 9 1 2 3 2

The Committee responded to the reason to believe finding on March 2, 1994 that the contributions were actually received on November 3, 1992, the day of the election. Counsel stated to staff of this Office that the Committee reported the check dates as the receipt dates. No evidence, however, was provided to support this claim. If the Committee did receive the contributions on November 3, 1992, the Committee would appear instead to have violated 2 U.S.C. § 434(b)(3)(A) and (B) by misreporting contribution receipt dates. In contrast to this claim, new counsel, by letter dated April 20, 1994, described the Committee's receipt of the contribution checks in terms of "supporters" who received the checks but did not promptly forward them to the treasurer. This version of events lends itself toward the original evaluation of this case as a 48 Hour reporting violation.

Therefore, this Office recommends that the Commission find probable cause to believe that the Committee violated 2 U.S.C. § 434(a)(6)(A). In the alternative, if the Committee's earlier claim is correct, that the contributions were received on November 3, 1992, then a different reporting violation arises. Therefore, this Office also recommends that the Commission find probable cause to believe that the Committee violated 2 U.S.C. § 434(b)(3)(A) and (B).

III. GENERAL COUNSEL'S RECOMMENDATION

Find probable cause to believe that the Committee to Re-elect Congressman William D. Ford and Theodore Monolidis, as treasurer, violated 2 U.S.C. §§ 434(a)(6)(A), 434(b)(3)(A) and 434(b)(3)(B).

4/29/94
Date



Lawrence M. Noble
General Counsel

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JUN 30 3 00 PM '94

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Committee to Re-elect Congressman William)
D. Ford and Theodore Monolidis,)
as treasurer)

SENSITIVE

MUR 3817

GENERAL COUNSEL'S REPORT

I. BACKGROUND

The Committee to Re-elect Congressman William D. Ford and Theodore Monolidis, as treasurer, ("the Committee") failed to file twenty-three 48 Hour notifications for contributions totaling \$41,750 received shortly before the 1992 general election. On February 9, 1994, the Commission revoted to find reason to believe that the Committee violated 2 U.S.C. § 434(a)(6)(A) and entered into pre-probable cause conciliation.

The

Committee's responses do not address the underlying violations, but rather focus on the procedural history of this matter. This Office now recommends that the Commission find probable cause to believe that the Committee violated 2 U.S.C. § 434(a)(6)(A).

II. ANALYSIS

In the General Counsel's Report dated April 22, 1994, this Office set out the procedural history of this matter including communications with the Committee and two successive counsels.

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This Office notified the Committee of the Commission's original reason to believe finding and the offer of pre-probable cause conciliation on September 28, 1993. The Committee did not respond prior to the October 22, 1993 NRA decision or thereafter. FEC v. NRA Political Victory Fund, et al., 6 F.3d 821 (D.C. Cir. 1993). On February 14, 1994, this Office notified the Committee of the Commission's reason to believe revote, and the letter stated that in light of the unique circumstances engendered by the NRA decision, pre-probable cause conciliation negotiations would be limited to a maximum of 30 days. The Committee responded to the reason to believe finding on March 2, 1994, stating that it received the checks for the contributions at issue on November 3, 1992, the day of the election, rather than on the dates which the Committee disclosed on its 1992 Post General Election Report. On March 4, 1994, this Office received a designation of counsel from first counsel, who stated to staff of this Office that the Committee reported the check dates as the receipt dates. No evidence, however, was provided to support this claim. This Office notes that if the Committee did receive the contributions on November 3, 1992, the Committee would appear instead to have violated 2 U.S.C. § 434(b)(3)(A) and (B) by misreporting

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contribution receipt dates. On this basis, the General Counsel's Brief recommended these alternative findings in addition to a section 434(a)(6)(A) violation.

on April 4, 1994, after the expiration of the pre-probable cause conciliation period, this Office received a new designation of counsel from second counsel. Second counsel did not further contact this Office, and on April 15, 1994 this Office sent by facsimile a letter to counsel stating that because the period for pre-probable cause conciliation had run, unless counsel provided a signed agreement by the close of business on April 19, 1994, this Office might proceed to the next stage of the enforcement process.

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As noted above, this Office received a designation of counsel from first counsel on March 4, 1994, and so did not respond directly to the Committee. Instead, on March 8, 1994, staff of this Office spoke with first counsel.

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Along with the section 434(a)(6)(A) finding, the General Counsel's Brief recommended additional, alternative findings that the Committee violated 2 U.S.C. § 434(b)(3)(A) and (B) by misreporting contribution receipt dates. As noted in the brief, these recommendations were based upon the Committee's representation that the contributions at issue were actually received on the day of the election and so did not require 48 hour notices. First counsel stated to staff of this Office that the Committee reported the check dates as the receipt dates. Second counsel, however, described the Committee's receipt of the contribution checks in terms of "supporters" who received the checks but did not promptly forward them to the treasurer (see Attachment 4 to the General Counsel's Report dated April 22, 1994).

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III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

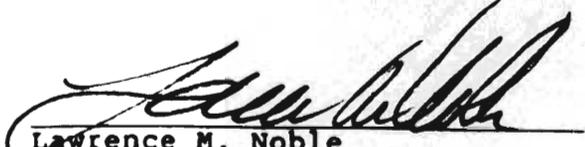
This Office recommends that the Commission approve the attached conciliation agreement that recites the probable cause finding

IV. RECOMMENDATIONS

1. Find probable cause to believe that the Committee to Re-elect Congressman William D. Ford and Theodore Monolidis, as treasurer, violated 2 U.S.C. § 434(a)(6)(A).
2. Approve the attached conciliation agreement and the appropriate letter.

Date

6/30/84


Lawrence M. Noble
General Counsel

Attachments:

1. Committee responses
2. Conciliation agreement

Staff assigned: Mark Allen

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Committee to Re-elect Congressman) MUR 3817
William D. Ford and)
Theodore Monolidis, as treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 6, 1994, the Commission decided by a vote of 6-0 to take the following actions in MUR 3817:

1. Find probable cause to believe that the Committee to Re-elect Congressman William D. Ford and Theodore Monolidis, as treasurer, violated 2 U.S.C. § 434(a)(6)(A).
2. Approve the conciliation agreement and the appropriate letter, as recommended in the General Counsel's Report dated June 30, 1994.

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

Attest:

7-6-94
Date

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

Received in the Secretariat: Thur., June 30, 1994 3:08 P.M.
Circulated to the Commission: Thur., June 30, 1994 4:00 P.M.
Deadline for vote: Wed., July 06, 1994 4:00 P.M.

mck

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JULY 20, 1994

Robert P. Bauer, Esq.
Perkins Coie
607 Fourteenth Street, N.W.,
Washington, D.C. 20005-2011

RE: MUR 3817
Committee to Re-elect Congressman
William D. Ford and Theodore
Monolidis, as treasurer

Dear Mr. Bauer:

On July 6, 1994, the Federal Election Commission found that there is probable cause to believe your clients, the Committee to Re-elect Congressman William D. Ford and Theodore Monolidis, as treasurer, ("Committee") violated 2 U.S.C. § 434(a)(6)(A), a provision of the Federal Election Campaign Act of 1971, as amended, in connection with the failure to file 48 Hour Notices before the 1992 general election.

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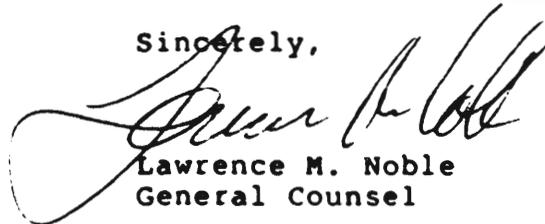
Robert F. Bauer, Esq.
Page 2

In connection with the finding of probable cause to believe, the Commission has a duty to attempt to correct the violations for a period of 30 to 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement during that period, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission within ten days. I will then recommend that the Commission accept the agreement. Please make your check for the civil penalty payable to the Federal Election Commission.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Mark Allen, the attorney assigned to this matter, at (202) 219-3400.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

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RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

BEFORE THE FEDERAL ELECTION COMMISSION

SEP 26 11 37 AM '94

In the Matter of)

Committee to Re-elect Congressman William)
D. Ford and Theodore Monolidis,)
as treasurer)

MUR 3817

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

By letter dated July 20, 1994, respondents were notified of the Commission's finding of probable cause to believe that the Committee to Re-elect Congressman William D. Ford and Theodore Monolidis, as treasurer, ("the Committee") violated 2 U.S.C. § 434(a)(6)(A).

II. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

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III. RECOMMENDATIONS

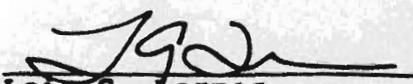
1. Accept the conciliation agreement with the Committee to Re-elect Congressman William D. Ford and Theodore Monolidis, as treasurer in settlement of this matter.
2. Close the file.
3. Send the appropriate letter.

Lawrence M. Noble
General Counsel

Date

9/24/92

BY:


Lois G. Lerner
Associate General Counsel

Staff assigned: Mark Allen
Jonathan Bernstein

24043591294

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Committee to Re-elect Congressman) MUR 3817
William D. Ford and Theodore)
Monolidis, as treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 29, 1994, the Commission decided by a vote of 6-0 to take the following actions in MUR 3817:

1. Accept the conciliation agreement with the Committee to Re-elect Congressman William D. Ford and Theodore Monolidis, as treasurer, in settlement of this matter, as recommended in the General Counsel's Report dated September 24, 1994.
2. Close the file.
3. Send the appropriate letter, as recommended in the General Counsel's Report dated September 24, 1994.

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

Attest:

9-29-94
Date

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

Received in the Secretariat: Mon., Sept. 26, 1994 11:37 p.m.
Circulated to the Commission: Mon., Sept. 26, 1994 4:00 p.m.
Deadline for vote: Thurs., Sept. 29, 1994 4:00 p.m.

bjr

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 5, 1994

Robert F. Bauer, Esq.
Perkins Coie
607 Fourteenth Street, N.W.
Washington, D.C. 20005-2011

RE: MUR 3817
Committee to Re-elect Congressman
William D. Ford and Theodore
Monolidis, as treasurer

Dear Mr. Bauer:

On September 29, 1994, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your clients' behalf in settlement of a violation of 2 U.S.C. § 434(a)(6)(A), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

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 me at (202) 219-3400.

Sincerely,

Mark Allen

Mark Allen
Attorney

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 3817
Committee to Re-elect Congressman William D.)
Ford and Theodore Monolidis, as treasurer)

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RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

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 probable cause to believe that the Committee to Re-elect Congressman William D. Ford and Theodore Monolidis, as treasurer, ("Respondents"), violated 2 U.S.C. § 434(a)(6)(A).

NOW, THEREFORE, the Commission and the Respondents, having duly entered into conciliation pursuant to 2 U.S.C. § 437g(a)(4)(A)(i), do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding.

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

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

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

1. The Committee to Re-elect Congressman William D. Ford is a political committee within the meaning of 2 U.S.C. § 431(4), and is the authorized principal campaign committee for William D. Ford's 1992 congressional campaign.

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2. Theodore Monolidis is the treasurer of the Committee to Re-elect Congressman William D. Ford.

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. Among the contributions that the Respondents received between October 22, 1992, and October 30, 1992, were 23 contributions of \$1,000 or more totaling \$41,750. The Respondents did not submit 48 Hour Notices for these contributions.

v. The Respondents failed to report campaign contributions of \$1,000 or more received after the 20th day, but more than 48 hours before the general election, within 48 hours of receipt of the contributions, in violation of 2 U.S.C. § 434(a)(6)(A).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Five Thousand dollars (\$5,000), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

October 5, 1994
Date

FOR THE RESPONDENTS:

Robert F. Bauer
Robert F. Bauer
Counsel to
Committee to Re-Elect
Congressman William D. Ford
and Theodore Monolidis, Treasurer

9-8-94
Date

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THIS IS THE END OF MUR # 3817

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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DATE FILMED 11-25-94 CAMERA NO. 4

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