



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

THIS IS THE BEGINNING OF PUR # 4692

DATE FILMED 5/11/88 CAMERA NO. 1

CAMERA MAN SES

93043900560

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: APR 11 11

ANALYST: Neill Evans

- I. COMMITTEE: Political Club for Growth
(C00182964)
Kelly Forsberg, Treasurer
(6/1/96 - present)
Maggy Laws, Treasurer
(1/31/96 - 5/31/96)
Lisa B. Nelson, Treasurer
(2/27/92 - 1/30/96)
215 East 73rd Street 9E
New York, NY 10021
- II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(A)(i) & (iii)
11 CFR §104.5(c)(1)(i)(A) & (iii)(A)
- III. BACKGROUND:

Chronic Late Filing of Reports

Political Club for Growth ("the Committee") has failed to file four (4) Reports of Receipts and Disbursements in a timely manner for the 1995-1996 election cycle (see Chart on Page 3). The reports were filed between eleven (11) and one-hundred fifty-four (154) calendar days late.

On August 16, 1996, a Chronic Late Filer Notice was sent to the Committee for failing to file the 1996 April Quarterly and July Quarterly Reports in a timely manner (Attachment 8). The Notice advised the Committee that any additional late filing of reports may result in legal enforcement action. Subsequent to the sending of the Chronic Late Filer Notice, the Committee failed

98043080561

**POLITICAL CLUB FOR GROWTH
REPORTS ANALYSIS OGC REFERRAL
PAGE 2**

to file the 1996 October Quarterly and 30 Day Post-General Reports in a timely manner.

On December 3, 1996, the Reports Analysis Division analyst called and left a message for the committee to inform them of their non-filing of the 1996 July Quarterly and October Quarterly Reports. On December 10, 1996, the treasurer returned the call, and stated that she was on maternity leave, and the filing responsibility was given to another person in the Committee. However, she said that the late reports, including the 30 Day Post-General Report, would be filed by December 13, 1996 (Attachment 13). All three reports were received by the Commission on December 16, 1996.

9
3
0
4
3
0
6
0
5
6
2

LATE FILING HISTORY

<u>REPORT TYPE</u>	<u>PRIOR NOTICE</u>	<u>DATE DUE</u>	<u>NON-FILER NOTICE</u>	<u>DATE FILED</u>
1996 April Quarterly (1/1/96-3/31/96)	12/29/95 (Attachment 2) 3/22/96 (Attachment 3)	4/15/96	5/08/96 (Attachment 4)	6/04/96 (Attachment 5)
1996 July Quarterly (4/1/96-6/30/96)	12/29/95 (Attachment 2) 6/21/96 (Attachment 6)	7/15/96	8/12/96 (Attachment 7)	12/16/96 (Attachment 14)
1996 October Quarterly (7/1/96-9/30/96)	12/29/95 (Attachment 2) 9/20/96 (Attachment 9)	10/15/96	11/6/96 (Attachment 11) ²	12/16/96 (Attachment 15)
1996 90 Day Post-General (10/1/96-11/25/96)	12/29/95 (Attachment 2) 9/30/96 (Attachment 10) 11/08/96 (Attachment 12)	12/05/96	None	12/16/96 (Attachment 16)

² The Non-Filer Notice was sent via Mailgram.

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	# OF		MICROFILM
				COVERAGE DATE	PAGE	
				TYPE OF FILER		
POLITICAL CLUB FOR GROWTH				D=001122594 NON-PARTY NON-QUALIFIED		
CONNECTED ORGANIZATION: NONE						
1995	MID-YEAR REPORT	23,100	10,491	12MAY95 - 30JUN95	22	95FEC/508/2566
	MID-YEAR REPORT - AMENDMENT	-	-	12MAY95 - 30JUN95	2	95FEC/0108/3937
	REQUEST FOR ADDITIONAL INFORMATION	-	-	12MAY95 - 30JUN95	3	95FEC/597/0505
	REQUEST FOR ADDITIONAL INFORMATION 2ND	-	-	12MAY95 - 30JUN95	4	95FEC/0105/3554
	YEAR-END	450	18,904	1JUL95 - 31DEC95	6	95FEC/0121/3203
	YEAR-END - AMENDMENT	450	18,904	1JUL95 - 31DEC95	7	95FEC/0133/1646
	YEAR-END - AMENDMENT	450	18,904	1JUL95 - 31DEC95	4	95FEC/172/4566
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1JUL95 - 31DEC95	2	95FEC/0131/2241
1996	STATEMENT OF ORGANIZATION - AMENDMENT	-	-	31JAN96	1	95FEC/0121/3202
	STATEMENT OF ORGANIZATION - AMENDMENT	-	-	9MAY96	2	95FEC/049/3611
	MISCELLANEOUS NOTICE FROM FEC	-	-	56AUG96	2	95FEC/072/3331
	APRIL QUARTERLY	20,550	8,462	31MAY96 - 31MAY96	11	95FEC/055/3086
	APRIL QUARTERLY - AMENDMENT	21,350	8,462	12MAY96 - 31MAY96	4	95FEC/162/0670
	APRIL QUARTERLY - AMENDMENT	20,550	8,462	31MAY96 - 31MAY96	11	95FEC/162/0674
	NOTICE OF FAILURE TO FILE	-	-	12MAY96 - 31MAY96	2	95FEC/049/2632
	REQUEST FOR ADDITIONAL INFORMATION	-	-	12MAY96 - 31MAY96	3	95FEC/071/1397
	REQUEST FOR ADDITIONAL INFORMATION 2ND	-	-	12MAY96 - 31MAY96	4	95FEC/076/4506
	JULY QUARTERLY	7,600	99,799	199606 - 30JUN96	7	95FEC/162/0085
	JULY QUARTERLY - AMENDMENT	7,600	99,799	199606 - 30JUN96	2	95FEC/172/4406
	NOTICE OF FAILURE TO FILE	-	-	199606 - 30JUN96	2	95FEC/071/3007
	OCTOBER QUARTERLY	3,000	66,146	1JUL96 - 30SEP96	5	95FEC/162/0082
	OCTOBER QUARTERLY - AMENDMENT	3,000	66,146	1JUL96 - 30SEP96	2	95FEC/172/4408
	NOTICE OF FAILURE TO FILE	-	-	1JUL96 - 30SEP96	2	95FEC/127/0077
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1JUL96 - 30SEP96	2	95FEC/167/0341
	POST-GENERAL	0	49,706	1OCT96 - 1DEC96	4	95FEC/162/0697
	POST-GENERAL - AMENDMENT	0	49,706	1OCT96 - 1DEC96	2	95FEC/172/4433
	REQUEST FOR ADDITIONAL INFORMATION	-	-	1OCT96 - 1DEC96	2	95FEC/167/0330
	YEAR-END	500	600	1DEC96 - 31DEC96	6	95FEC/172/4427
1997	STATEMENT OF ORGANIZATION - AMENDMENT	-	-	30AUG97	1	95FEC/175/0008
TOTAL		55,200	0 594,066	11	117	TOTAL PAGES

9 8 0 4 3 0 6 9 5 6 4

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	DATE	# OF PAGES	MICROFILM LOCATION
POLITICAL CLUB FOR GROWTH						
CONNECTED ORGANIZATION: NONE						
1997 STATEMENT OF ORGANIZATION - AMENDMENT						
	APRIL QUARTERLY	0	1,811	30 JAN 97	1	97FEC/175/0192
				1 JAN 97 - 31 MAR 97	4	97FEC/193/1305
	TOTAL	0	0		5	TOTAL PAGES

ID BC0102964 NON-PARTY NON-QUALIFIED

All reports except the 1997 April Quarterly Report have been reviewed.

Cash on Hand as of 3/31/97: \$2177.36

Debts and obligations owed to the committee as of 3/31/97: \$0

Debts and obligations owed by the committee as of 3/31/97: \$0

9 0 0 4 0 0 0 0 1 5 6 5

YEAR-END REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 29, 1995

WHO MUST FILE

Party committees and PACs (nonconnected committees and separate segregated funds) must file a Year-End Report on January 31, 1996.

REPORT CONTENT AND DATES

I. Semiannual Filers

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Year-End	07/01/95 - 12/31/95	01/31/96	01/31/96

Semiannual filers must disclose financial activity that occurred from July 1 through December 31, 1995, on their Year-End Report.

II. Monthly Filers

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Year-End	12/01/95 - 12/31/95	01/31/96	01/31/96

Monthly filers must disclose financial activity from December 1 through December 31, 1995, on their Year-End Report.

CHANGE IN FILING FREQUENCY

Committees wishing to change their reporting schedule (for example, from semiannual to monthly) must notify the Commission in writing when they file their next report due under their current reporting schedule. Committees may change their filing frequencies no more than once per calendar year.

LABEL

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

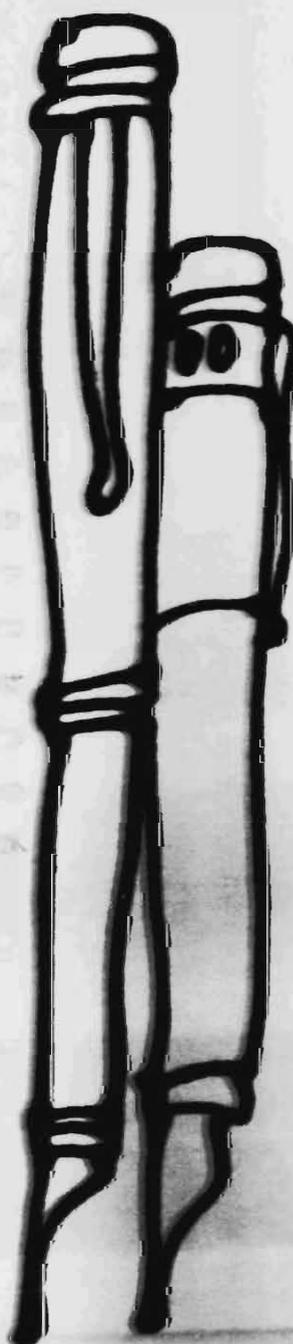
CONFERENCE

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 (except for FEC approved computer generated forms) will be required to refile.

*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

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

(over)



PARTIES AND PACS

YEAR-END

1996 FILING SCHEDULE

I. Quarterly Filers

REPORT	REPORTING PERIOD*	REG./COMT.	
		MAILING	FILING
		REG**	DATE
April	01/01/96 - 03/31/96	04/15/96	04/15/96
July	04/01/96 - 06/30/96	07/15/96	07/15/96
October	07/01/96 - 09/30/96	10/15/96	10/15/96
Pre-General	10/01/96 - 10/16/96	10/21/96	10/24/96
-----24 Hour Reports***-----			
Post-General	10/17/96 - 11/25/96	12/05/96	12/05/96
Year-End	11/26/96 - 12/31/96	01/31/97	01/31/97

II. Monthly Filers

REPORT	REPORTING PERIOD*	REG./COMT.	
		MAILING	FILING
		REG**	DATE
February	01/01/96 - 01/31/96	02/20/96	02/20/96
March	02/01/96 - 02/29/96	03/20/96	03/20/96
April	03/01/96 - 03/31/96	04/20/96	04/20/96
May	04/01/96 - 04/30/96	05/20/96	05/20/96
June	05/01/96 - 05/31/96	06/20/96	06/20/96
July	06/01/96 - 06/30/96	07/20/96	07/20/96
August	07/01/96 - 07/31/96	08/20/96	08/20/96
September	08/01/96 - 08/31/96	09/20/96	09/20/96
October	09/01/96 - 09/30/96	10/20/96	10/20/96
Pre-General	10/01/96 - 10/16/96	10/21/96	10/24/96
-----24 Hour Reports***-----			
Post-General	10/17/96 - 11/25/96	12/05/96	12/05/96
Year-End	11/26/96 - 12/31/96	01/31/97	01/31/97

*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

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

***PACs that make independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours before the election must file 24 Hour Reports. Party committees may not make independent expenditures.

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

9 8 0 4 0 0 0 5 6 7

QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

March 22, 1996

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
April Quarterly	01/01/96 - 03/31/96	04/15/96	04/15/96

WHO MUST FILE

Party committees and PACs (nonconnected committees and separate segregated funds) filing on a quarterly basis must file a Quarterly Report in April.

PRE-ELECTION REPORTING

Committees which make contributions or expenditures (including independent expenditures) in connection with an election must also file a Pre-Election Report, if the activity was not previously reported. See the January 1996 Record.

24 HOUR REPORT ON INDEPENDENT EXPENDITURES

Any PAC that makes independent expenditures in connection with an election may have to file a 24 hour report. This reporting requirement will be triggered if the committee makes independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the election day.

CHANGE IN FILING FREQUENCY

Committees wishing to change their reporting schedule (for example, from quarterly to monthly) must notify the Commission in writing when they file their next report due under their current reporting schedule. Committees may change their filing frequencies no more than once per calendar year.

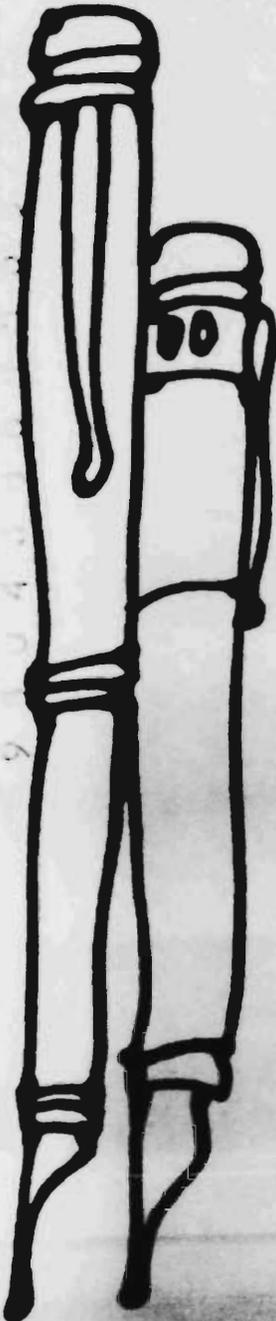
LABEL

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

*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

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

(over)



PARTIES AND PACS

APRIL QUARTERLY

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 (except for FEC approved computer generated forms) will be required to refile.

FOR INFORMATION, CALL: 800/424-9530 or 202/219-3620

90043001569



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20541

BQ-7

May 8, 1996

Margy Laws, Treasurer
Political Club for Growth
1775 Broadway
New York, NY 10019

Identification Number: C00182964

Reference: April Quarterly Report (1/1/96-3/31/96)

Dear Ms. Laws:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may be in violation of 2 U.S.C. §634(a) for failing to file the above referenced Report of Receipts and Disbursements. You were previously notified of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Secretary of the Senate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR §§100.2, 100.3, 100.4).

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

If you have any questions, please contact Wendy Barkley on our toll-free number (800) 424-9530. Our local number is (202) 219-3580.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

For Other Than An Authorized Committee (Summary Page)

USE FPC MAILING LABEL OR PRINT TYPE OR PRINT

1. NAME OF COMMITTEE (in full)
Political Club For Growth

ADDRESS (number and street) Check if different than previously reported
1775 BROADWAY

CITY, STATE and ZIP CODE
Ny. Ny. 10019.

FD-278
Page 1 of 2
JUN 10 11 25 AM '96

2. IDENTIFYING INFORMATION
CO01829

3. IDENTIFYING INFORMATION
 committee (see FPC FORM 100)

4. TYPE OF REPORT

- (a) April 15 Quarterly Report **01**
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year End Report
- July 31 Mid Year Report (Non-election Year Only)
- Termination Report

Monthly Report Due On:

- February 20 January 20 October 20
- March 20 July 20 November 20
- April 20 August 20 December 20
- May 20 September 20 January 01

- Twelfth day report preceding _____ (Type of election) election on _____ in the State of _____
- Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment?

YES NO on the detailed summary page

SUMMARY	COLUMN A Total Period	COLUMN B Calendar Year to Date
5. Covering Period 1-31-96 through 3-31-96		
6. (a) Cash on Hand January 1, 19 96		\$ 11,075.28
(b) Cash on Hand at Beginning of Reporting Period	\$ 1058.04	
(c) Total Receipts from Line 12	\$ 20,550.00	\$ 20,550.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(c) and 6(d) for Column B)	\$ 21,608.04	\$ 21,608.00
7. Total Disbursements from Line 20	\$ 8,462.99	\$ 8,462.77
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 13,145.05	\$ 13,145.23
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ - 0 -	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ - 0 -	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

MAGGY LAWS

Signature of Treasurer

Maggie Laws

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 18 USC 951.

--	--	--	--	--	--	--	--

FPC FORM 278

9906043005053587816

Federal Election Commission
ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS

The Commission has added this page to the end of this filing to indicate how it was received.

Hand Delivered

DATE OF RECEIPT

First Class Mail

POSTMARKED

Registered/Certified Mail

POSTMARKED

6-4-96

No Postmark

Postmark Illegible

Received from the House Office of Records
and Registration

DATE OF RECEIPT

Received from the Senate Office of Public
Records

DATE OF RECEIPT

Other (Specify):

POSTMARKED

and/or DATE OF RECEIPT

ftb
PREPARED

6-10-96
DATE PREPARED

9883853896

QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

REGIONS AND DATES

June 21, 1996

WHO MUST FILE

Party committees and PACs (nonconnected committees and separate segregated funds) filing on a quarterly basis must file a Quarterly Report in July.

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
July Quarterly	04/01/96 - 06/30/96	07/15/96	07/15/96

PRE-ELECTION REPORTING

Committees which make contributions or expenditures (including independent expenditures) in connection with an election must also file a Pre-Election Report, if the activity was not previously reported. See the January 1996 Record.

24 HOUR REPORT ON INDEPENDENT EXPENDITURES

Any PAC that makes independent expenditures in connection with an election may have to file a 24 hour report. This reporting requirement will be triggered if the committee makes independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the election day.

CHANGE IN FILING FREQUENCY

Committees wishing to change their reporting schedule (for example, from quarterly to monthly) must notify the Commission in writing when they file their next report due under their current reporting schedule. Committees may change their filing frequencies no more than once per calendar year.

LABEL

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

*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

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

(over)

PARTIES AND PACS

JULY 2008

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 (except for FEC approved computer generated forms) will be required to refile.

9 8 0 4 3 0 8 0 5 7 4



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-7

August 12, 1996

Kelly Forsberg, Treasurer
Political Club for Growth
150 East 35th Street
New York, NY 10016

Identification Number: C00182964

Reference: July Quarterly Report (4/1/96-6/30/96)

Dear Ms. Forsberg:

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

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

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

If you have any questions, please contact Wendy Barkley on our toll-free number (800) 424-9530. Our local number is (202) 219-3580.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

20040001570



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

MS-L

Sally Forsberg, Treasurer
Political Club for Growth
130 East 35th Street
New York, NY 10016

AUG 16 1996

Identification Number: C00182964

Reference: 1995-1996 Election Cycle Reports

Dear Ms. Forsberg:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may have violated 2 U.S.C. §434(a), by failing to timely file Reports of Receipts and Disbursements. The following is a list of the reports in question.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
April Quarterly (1/1/96-3/31/96)	4/15/96	6/4/96
July Quarterly (4/1/96-6/30/96)	7/15/96	Not Filed

Timely filing is a specific requirement of the Federal Election Campaign Act ("the Act") and is essential to fulfilling the public disclosure concept embodied in that law. The Commission views failure to timely file reports as a serious violation of the Act. This communication is to advise you that, notwithstanding any matters which may be pending before the Commission, any additional report which is not submitted in a timely manner by your committee may result in the Commission instituting legal enforcement or audit action.

You may submit a letter of explanation in response to this notification. If, however, you have any questions, please feel free to contact Wendy Barkley on our toll-free number, (800) 424-9513. My local number is (202) 219-3500.

Sincerely,

Lisa J. Stolaruk
Chief, Party/Non-Party Branch
Reports Analysis Division

QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

September 20, 1996

REPORT	REPORTING PERIOD*	MAILING DATE**	FILING DATE
October Quarterly	07/01/96 - 09/30/96	10/15/96	10/15/96

WHO MUST FILE

Party committees and PACs (nonconnected committees and separate segregated funds) filing on a quarterly basis must file a Quarterly Report in October.

PRE-ELECTION REPORTING

Committees which make contributions or expenditures (including independent expenditures) in connection with an election must also file a Pre-Election Report, if the activity was not previously reported. See the January 1996 Record.

24 HOUR REPORT ON INDEPENDENT EXPENDITURES

Any PAC that makes independent expenditures in connection with an election may have to file a 24 hour report. This reporting requirement will be triggered if the committee makes independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the election day.

CHANGE IN FILING FREQUENCY

Committees wishing to change their reporting schedule (for example, from quarterly to monthly) must notify the Commission in writing when they file their next report of the number their current reporting schedule. Committees may change their filing frequency no more than once per calendar year.

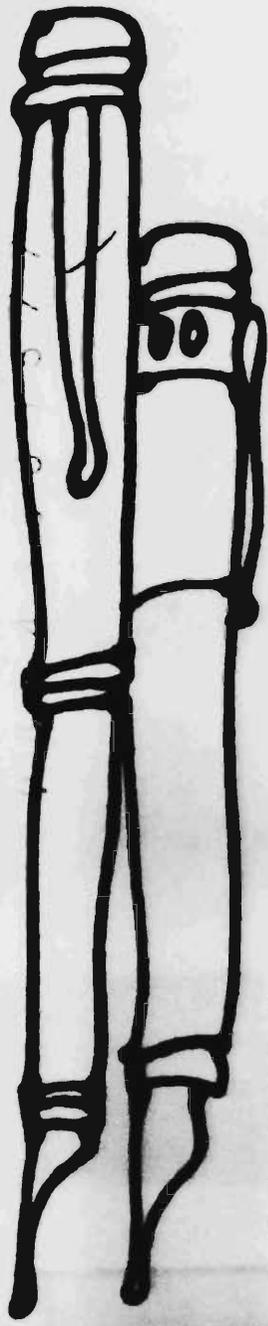
LABEL

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

*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

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

(over)



PARTIES AND PACS

OCTOBER QUARTERLY

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-PEC forms (except for PEC approved computer generated forms) will be required to refile.

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

98043000570

GENERAL ELECTION REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

September 30, 1996

I. ALL MONTHLY FILERS

REPORT	REPORTING PERIOD*	REG./CERT.	
		MAILING DATE**	FILING DATE
Pre-General	10/01/96 - 10/16/96	10/21/96	10/24/96
Post-General	10/17/96 - 11/25/96	12/05/96	12/05/96

II. QUARTERLY FILERS THAT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 16

REPORT	REPORTING PERIOD*	REG./CERT.	
		MAILING DATE**	FILING DATE
Pre-General	10/01/96 - 10/16/96	10/21/96	10/24/96
Post-General	10/17/96 - 11/25/96	12/05/96	12/05/96

III. QUARTERLY FILERS THAT DO NOT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 16***

REPORT	REPORTING PERIOD*	REG./CERT.	
		MAILING DATE**	FILING DATE
Post-General	10/01/96 - 11/25/96	12/05/96	12/05/96

WHO MUST FILE

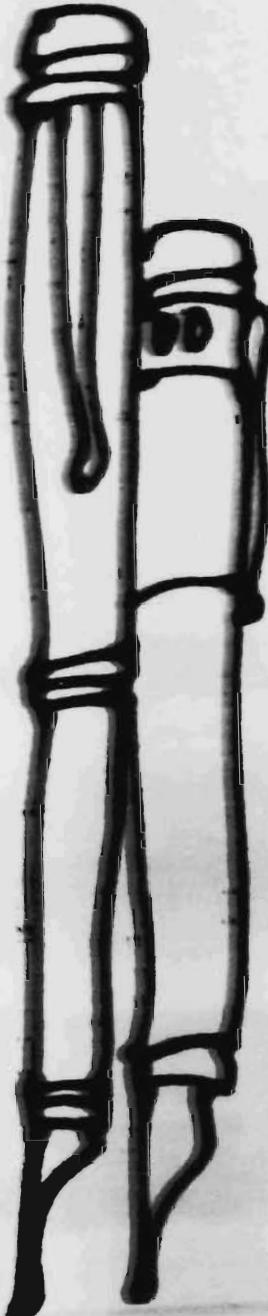
Party committees and PACs must follow the above charts in order to determine whether they must file a report 12 days before the general election on November 5 (the Pre-General Report). All Party committees and PACs, regardless of financial activity, must file a report 30 days after the general election (the Post-General Election Report).

*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

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

***Committees that made general election contributions or expenditures before October 1 and did not previously report then must also follow Chart II reporting requirements.

(over)



PARTIES AND PACS

PRE/POST GENERAL ELECTION

24 HOUR REPORT ON INDEPENDENT EXPENDITURES

Any PAC that makes independent expenditures aggregating \$1,000 or more during the period beginning October 17 and ending November 3 must report them within 24 hours.

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 (except for FEC approved computer generated forms) will be required to refile.

9304300580

RQ-7

(This is a copy of the text of a mailgram sent to the committee listed below on November 6, 1996.)

Kelly Forsberg, Treasurer
Political Club for Growth
150 East 35th Street
New York, NY 10016

Identification Number: C00182964

Reference: OCTOBER QUARTERLY REPORT (7/1/96-9/30/96)

Dear Ms. Forsberg:

9 6 0 3 1 2 7 1 0 7 7
1 5 8 1
It has come to the attention of the Federal Election Commission ("the Commission") that your committee may be in violation of 2 U.S.C. §434(a) for failing to file the above referenced Report of Receipts and Disbursements. You were previously notified of the due date for this report.

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

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

If you have any questions, please contact Neil Evans on our toll-free number (800) 424-9530. Our local number is (202) 219-3580.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

GENERAL ELECTION

REPORT NOTICE

FEDERAL ELECTION COMMISSION



REMINDER

REMINDER

REMINDER

November 8, 1996

All party committees and PACs (nonconnected committees and separate segregated funds) must file a Post-General Election Report. Reports sent by registered or certified mail must be postmarked by the mailing date (December 5, 1996); otherwise, they must be received by the filing date (December 5, 1996). FEC Form 3X is enclosed.

ANALYST:	Neil Evans
COMMITTEE:	Political Club for Growth (COB1829464)
DATE(S):	December 3 and 10, 1996
SUBJECT(S):	Non-Filer

On December 3, 1996, the analyst called and left a message for the committee to inform them of their non-filing of the October Quarterly.

On December 10, 1996, the treasurer returned the call, and stated that she was on maternity leave, and the filing responsibility was given to another person in the committee. However, she said that the late reports, including the 30 Day Post-General Report, would be filed by December 13, 1996.

9 8 0 4 3 0 8 0 5 8 3

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full)
Political Club for Cornich

ADDRESS (number and street) Check if different than previously reported
1775 Broadway, 26th floor

CITY, STATE and ZIP CODE
New York, NY 10019

2. FEC IDENTIFICATION NUMBER
C00182964

3. This committee has qualified as a multi-member committee. (see FEC FORM 114)

4. TYPE OF REPORT

- (a) April 15 Quarterly Report
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year End Report
- July 31 Mid Year Report (Non-election Year Only)
- Termination Report

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

(b) Is this Report an Amendment? YES NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	<i>4-1-96 through 6-30-96</i>		
6. (a) Cash on Hand January 1, 19 <i>96</i>			<i>\$ 1,253.26</i>
(b) Cash on Hand at Beginning of Reporting Period		<i>\$ 14,140.27</i>	
(c) Total Receipts (from Line 10)		<i>\$ 7,600.00</i>	<i>\$ 28,950.00</i>
(d) Subtotal (add Lines 6(b) and (c) for Column A and Lines 6(a) and (c) for Column B)		<i>\$ 21,740.27</i>	<i>\$ 30,203.26</i>
7. Total Disbursements (from Line 10)		<i>\$ 9,749.99</i>	<i>\$ 19,242.98</i>
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		<i>\$ 12,490.28</i>	<i>\$ 11,090.28</i>
9. Debt and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		<i>\$ -0-</i>	
10. Debt and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)		<i>\$ -0-</i>	

For further information contact:
Federal Election Commission
999 E Street, NE
Washington, DC 20002
Tel: 202-451-4910
Local: 202-512-5400

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer
Kelley Forsberg

Signature of Treasurer
Kelley Forsberg

Date
12/13/96

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 4307g.

98043380584

**Federal Election Commission
ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

Hand Delivered

DATE OF RECEIPT

12/16/96

First Class Mail

POSTMARKED

Registered/Certified Mail

POSTMARKED

No Postmark

Postmark Illegible

Received from the House Office of Records
and Registration

DATE OF RECEIPT

Received from the Senate Office of Public
Records

DATE OF RECEIPT

Other (Specify):

POSTMARKED

and/or DATE OF RECEIPT

ES.
PREPARED

12/16/96
DATE PREPARED

9 0 0 4 0 0 0 1 5 0 0

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

ATTACHMENT # 15
Page 1 of 2

USE PREC MARKING LABEL
OR
TYPE ON PRINT

1. NAME OF COMMITTEE (or Club)
Political Club for Growth

ADDRESS (number and street) Check if different than previously reported:
1775 Broadway 26th Floor

CITY, STATE and ZIP CODE
New York, NY 10019

2. REPORT IDENTIFICATION NUMBER
C 000182969

3. This committee has qualified as a multicandidate committee. (see FEC FORM 100)

4. TYPE OF REPORT

- (a) April 15 Quarterly Report
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year End Report
- July 31 Mid Year Report (Non-election Year Only)
- Termination Report

Monthly/Report Due On:

- | | | |
|--------------------------------------|---------------------------------------|--------------------------------------|
| <input type="checkbox"/> February 20 | <input type="checkbox"/> June 20 | <input type="checkbox"/> October 20 |
| <input type="checkbox"/> March 20 | <input type="checkbox"/> July 20 | <input type="checkbox"/> November 20 |
| <input type="checkbox"/> April 20 | <input type="checkbox"/> August 20 | <input type="checkbox"/> December 20 |
| <input type="checkbox"/> May 20 | <input type="checkbox"/> September 20 | <input type="checkbox"/> January 21 |

- The 15th day report, preceding _____ (Type of Election)
- election on _____ in the State of _____
- The 15th day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? YES NO

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
1. Covering Period 7-1-96 through 9-30-96		
2. (a) Cash on Hand January 1, 1996		\$ 1,253.26
(b) Cash on Hand at Beginning of Reporting Period	\$ 11,970.28	
(c) Total Receipts (from Line 10)	\$ 3,000.00	\$ 31,450.00
(d) Subtotal (add Lines (b) and (c)) for Column A and Lines (b) and (c) for Column B	\$ 11,970.28	\$ 33,203.26
3. Total Disbursements (from Line 11)	\$ 6,144.92	\$ 24,359.90
4. Cash on Hand at Close of Reporting Period (add Line 2 from Line (d))	\$ 9,343.36	\$ 9,843.36
5. Debts and Obligations Owed TO the Committee (Report all on Schedule C and/or Schedule D)	\$ -	For full information contact: Federal Election Commission 600 E Street, NW Washington, DC 20543 Tel: 202-456-4000 Local: 202-219-6000
6. Debts and Obligations Owed BY the Committee (Report all on Schedule C and/or Schedule D)	\$ -	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct, and complete.

Type or Print Name of Treasurer
Kelly Frisberg

Signature of Treasurer
Kelly Frisberg

Date
12/13/96

NOTE: Submission of false, erroneous, or incomplete information may subject the preparer signing this Report to the penalties of 2 U.S.C. 1907.

9 8 0 4 3 0 8 0 5 8 6

Federal Election Commission
ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS

The Commission has added this page to the end of this filing to indicate how it was received.

Hand Delivered DATE OF RECEIPT
12/16/96

First Class Mail POSTMARKED

Registered/Certified Mail POSTMARKED

No Postmark

Postmark Illegible

Received from the House Office of Records and Registration DATE OF RECEIPT

Received from the Senate Office of Public Records DATE OF RECEIPT

Other (Specify): POSTMARKED
DATE OF RECEIPT

 12/16/96
PREPARED DATE PREPARED

96031620696

REPORT OF RECEIPTS AND DISBURSEMENTS

File Only (If Not An Authorized Candidate)
(Summary Page)

ATTACHMENT # 16
Page 1 of 2

USE FPC MAILING LABEL
TYPE OR PRINT

11. NAME OF COMMITTEE (FEC)

Political Club For Growth

ADDRESS (number and street) Check if different than previously reported

1775 Broadway 26th floor

CITY, STATE and ZIP CODE

NY NY 10019

2. FEC IDENTIFICATION NUMBER

C00182969

3. This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

4. TYPE OF REPORT

- April 15 Quarterly Report
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year End Report
- July 31 AEC Year Report (Non-election Year Only)
- Termination Report

Monthly Report Due On:

<input type="checkbox"/> February 20	<input type="checkbox"/> June 20	<input type="checkbox"/> October 20
<input type="checkbox"/> March 20	<input type="checkbox"/> July 20	<input type="checkbox"/> November 20
<input type="checkbox"/> April 20	<input type="checkbox"/> August 20	<input type="checkbox"/> December 20
<input type="checkbox"/> May 20	<input type="checkbox"/> September 20	<input type="checkbox"/> January 31

Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____

Thirtieth day report following the General Election on _____ in the State of _____

(9) Is this Report an Amendment? YES NO

6. SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Reporting Period: <i>10-1-96</i> through <i>12-1-96</i>		
6. (a) Cash on Hand January 1, 19 <i>96</i>		\$ <i>1,253.26</i>
(b) Cash on Hand at Beginning of Reporting Period	\$ <i>8,843.36</i>	
(c) Total Receipts (from Line 10)	\$ <i>0</i>	\$ <i>31,950.00</i>
(d) Subtotal (add Lines (b) and (c) for Column A and Lines (a) and (c) for Column B)	\$ <i>8,843.36</i>	\$ <i>33,203.26</i>
7. Total Disbursements (from Line 8)	\$ <i>4,746.45</i>	\$ <i>29,106.35</i>
6. Cash on Hand Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ <i>4,096.91</i>	\$ <i>4,096.91</i>
9. Debts and Obligations Owed TO the Committee (Review all on Schedule C and/or Schedule D)	\$ <i>0</i>	For further information contact: Federal Election Commission 690 E Street, NW Washington, DC 20543 Tel: Poo-696-6828 Local 205-516-6222
10. Debts and Obligations Owed BY the Committee (Review all on Schedule C and/or Schedule D)	\$ <i>0</i>	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Typed Print Name of Treasurer: *Kelly Enberg*

Signature of Treasurer: *Kelly Enberg*

Date: *12-13-96*

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 6437g.

Federal Election Commission
**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

Hand Delivered

DATE OF RECEIPT

12/16/15

First Class Mail

POSTMARKED

Registered/Certified Mail

POSTMARKED

No Postmark

Postmark Illegible

Received from the House Office of Records
and Registration

DATE OF RECEIPT

Received from the Senate Office of Public
Records

DATE OF RECEIPT

Other (Specify):

POSTMARKED

DATE OF RECEIPT

PREPARED

EJ.

DATE OF RECEIPT

m. J. [unclear]

96031620700

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

OCT 24 10 30 AM '97

FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

RAD REFERRAL: 97NF-9
DATE ACTIVATED: 9/12/97

STAFF MEMBER: Ruth Heilizer

SOURCE: INTERNALLY GENERATED

RESPONDENT: Political Club for Growth and Kelly Forsberg, as treasurer

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

INTERNAL REPORTS CHECKED: Disclosure Reports
Referral Material

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Office of General Counsel received a referral from the Reports Analysis Division ("RAD") on April 11, 1997. The basis of the referral is the failure of the Political Club for Growth and Kelly Forsberg, as treasurer, ("Political Club") to file timely four (4) disclosure reports during the 1995-1996 election cycle. Specifically, the Political Club failed to file timely its 1996 April, July and October quarterly reports, and its 1996 30 Day Post-General Report.¹

II. FACTUAL AND LEGAL ANALYSIS

Based on the Factual and Legal Analysis, see Attachment 1, this Office recommends the Commission find reason to believe the respondents violated 2 U.S.C. § 434(a)(4)(A)(i) and (iii).

¹ The Political Club was also the subject of MUR 4221, in which the Commission found reason to believe that the Political Club had failed to file timely six (6) reports and was a chronic late filer of reports in the 1993-1994 election cycle. (At that time, the treasurer was Linn B. Nelson.) The Commission entered into conciliation with the Political Club, which paid a civil penalty of \$3,200.

9804360590

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

7 0 0 4 0 0 0 5 9 1

IV. RECOMMENDATIONS

- 1. Open a MUR.
- 2. Find reason to believe that the Political Club for Growth and Kelly Forberg, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (ii) and enter into conciliation prior to a finding of probable cause to believe.
- 3. Approve the attached Factual and Legal Analysis and Conciliation Agreement.
- 4. Approve the appropriate letter.

~~Lawrence M. Noble~~
~~General Counsel~~

10/23/97
Date

BY: [Signature]
~~Louis G. Lerner~~
~~Associate General Counsel~~

Attachments:

- 1. Factual and Legal Analysis
- 2. Conciliation Agreement

9 3 0 4 3 3 8 0 5 9 2



FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/LISA DAVIS 
COMMISSION SECRETARY

DATE: OCTOBER 28, 1997

SUBJECT: RAD Referral #97NF-09 - First General Counsel's Report

The above-captioned document was circulated to the Commission
on Friday, October 24, 1997.

Objection(s) have been received from the Commissioner(s) as
indicated by the name(s) checked below:

- Commissioner Aikens
- Commissioner Elliott
- Commissioner McDonald
- Commissioner McGarry
- Commissioner Thomas

This matter will be placed on the meeting agenda for
Tuesday, November 04, 1997.

Please notify us who will represent your Division before the Commission on this
matter.

9 0 0 4 3 0 8 0 5 2 3

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Political Club for Growth and) RAD Referral 97NF-9
Kelly Forsberg, as treasurer)

MUR 4692

CERTIFICATION

I, Marjorie W. Remons, recording secretary for the Federal Election Commission executive session on November 4, 1997, do hereby certify that the Commission decided by a vote of 4-1 to take the following actions with respect to RAD Referral 97NF-9:

1. Open a MUR.
2. Find reason to believe that the Political Club for Growth and Kelly Forsberg, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (iii) and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the Factual and Legal Analysis and Conciliation Agreement attached to the General Council's October 23, 1997 report.

(continued)

20043000594

5. Approve the appropriate letter as recommended in the General Counsel's October 23, 1997 report.

Commissioners Elliott, McDonald, McGarry, and Thomas voted affirmatively for the decision; Commissioner Nilsen dissented.

Attest:

11-5-97
Date


Marjorie W. Emmons
Secretary of the Commission

98043680595



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 7, 1997

Kelly Forsberg, Treasurer
Political Club for Growth
1775 Broadway, 26th Floor
New York, NY 10019

RE: MUR 4692

Dear Ms. Forsberg:

On November 4, 1997, the Federal Election Commission found that there is reason to believe the Political Club for Growth and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (iii), provisions 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.

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:

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

9
0
0
4
0
0
0
5
9
0

Kelly Forsberg, Treasurer

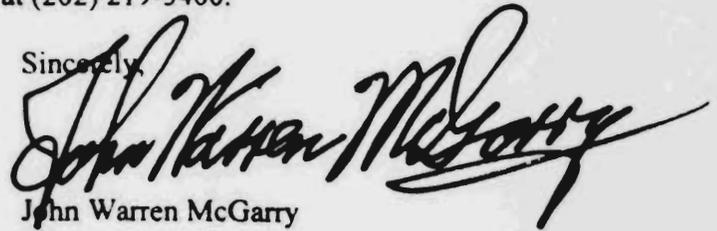
Page 2

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 Ruth Heilizer, the attorney assigned to this matter, at (202) 219-3400.

Sincerely,



John Warren McGarry
Chairman

Enclosures

Factual and Legal Analysis

Procedures

Designation of Counsel Form

Conciliation Agreement

98043660597

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Political Club for Growth and
Kelly Furstberg, as treasurer

MUR 4692

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2). The Federal Election Campaign Act of 1971, as amended ("the Act") requires treasurers of political committees, other than authorized committees of a candidate, to file periodic reports of receipts and disbursements. 2 U.S.C. § 434(a)(4)(A). Such committees may choose to file reports either on a monthly or a quarterly basis. *Id.*

In any calendar year in which a regularly scheduled general election is held, committees that choose to file on a quarterly basis shall file quarterly reports no later than the 15th day after the last day of each calendar quarter. 2 U.S.C. § 434(a)(4)(A)(i). Such committees shall also file post-general election reports, which shall be filed no later than the 30th day after the general election and which shall be complete as of the 20th day after such general election. 2 U.S.C. § 434(a)(4)(A)(iii).

The Political Club for Growth and Kelly Furstberg, as treasurer, ("Political Club") is a political committee not authorized by any candidate, and has elected to file disclosure reports on a quarterly basis.

Pursuant to 2 U.S.C. § 434(a)(4)(A)(i), the due date for the Political Club's 1996 April Quarterly Report was April 15, 1996. The Commission notified the Political Club on

9
8
0
4
3
6
0
5
9
0

December 29, 1995 and on March 22, 1996 that their 1996 April Quarterly Report was due on April 15, 1996. On May 8, 1996, the Commission sent the Political Club a non-filer notice instructing them to file the report immediately, and that the Commission may initiate audit or legal enforcement action. On June 4, 1996 the Political Club filed their 1996 April Quarterly Report, 50 days late, disclosing receipts totaling \$20,550.00 and disbursements totaling \$8,426.99.

Pursuant to 2 U.S.C. § 434(a)(4)(A)(i), the due date for the Political Club's 1996 July Quarterly Report was July 15, 1996. The Commission notified the Political Club on December 29, 1995 and on June 21, 1996 that their 1996 July Quarterly Report was due on July 15, 1996. On August 12, 1996, the Political Club was sent a non-filer notice instructing them to file the report immediately, and that the Commission may initiate audit or legal enforcement action. On December 16, 1996 the Political Club filed their 1996 July Quarterly Report, 150 days late, disclosing receipts totaling \$7,600.00 and disbursements totaling \$9,749.99.

On August 16, 1996, the Commission notified the Political Club regarding the failure to timely file their 1996 April Quarterly Report and their 1996 July Quarterly Report. The notice advised the Political Club that any additional reports filed in an untimely manner could result in the Commission initiating legal enforcement action or audit action.

Pursuant to 2 U.S.C. § 434(a)(4)(A)(i), the due date for the Political Club's 1996 October Quarterly Report was October 15, 1996. The Commission notified the Political Club on December 29, 1995 and on September 20, 1996 that their 1996 October Quarterly was due on October 15, 1996. On November 6, 1996, the Political Club was sent a non-filer notice

9
0
0
4
3
0
0
0
0
5
9
9

instructing them to file the report immediately, and that the Commission may initiate audit or legal enforcement action. On December 16, 1996 the Political Club filed their 1996 October Quarterly Report, 62 days late, disclosing receipts totaling \$3,000.00 and disbursements totaling \$6,146.92.

Pursuant to 2 U.S.C. § 434(a)(4)(A)(iii), the due date for the Political Club's 1996 30 Day Post-General Report was December 5, 1996. The Commission notified the Political Club on December 29, 1995, September 30, 1996, and November 8, 1996 that their 1996 30 Day Post-General Report was due on December 5, 1996. On December 16, 1996 the Political Club filed their 1996 30 Day Post-General Report, 11 days late, disclosing receipts totaling \$0.00 and disbursements totaling \$4,746.45.

Therefore, there is reason to believe that the Political Club for Growth and Kelly Forsberg, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (iii).

9 0 0 4 3 0 0 6 0 0

Facsimile Cover Sheet

MUR 4692

To: Ruth Heitzer, Esq.

Company: FEC

Phone:

Fax: 202 219-3923

From: Kelly Luce Forsberg

Company: Political Club For Growth

Phone: 212/679-7330 ext. 2820

Fax: 212/213-9366

Date: 11/18/97

Pages including this cover page: 2

Comments:

Please see attached

9 6 0 4 2 6 8 0 6 0 1

STATEMENT OF DESIGNATION OF COUNSEL

NO. 4692

Nov 18 1997

NAME OF COUNSEL: LARS Forsberg

ADDRESS: Dickerson + Reilly
780 3rd Avenue, 20th floor

NY NY 10017

TELEPHONE: 212 644-7036

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.

11/18/97
Date

Kelly Forsberg
Signature

RESPONDENT'S NAME: Kelly Forsberg - Treasurer

ADDRESS: Political Club for Grandly

215 East 73rd St

New York, NY 10021

HOME PHONE: 212 472-4642

BUSINESS PHONE: 212 679-1330 ext 2820

93043660602

YEAR-END REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 29, 1995

WHO MUST FILE,
Party committees and PACs (nonconnected committees and separate segregated funds) must file a Year-End Report on January 31, 1996.

REPORT CONTENT AND DATES

I. Semiannual Filers

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Year-End	07/01/95 - 12/31/95	01/31/96	01/31/96

Semiannual filers must disclose financial activity that occurred from July 1 through December 31, 1995, on their Year-End Report.

II. Monthly Filers

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Year-End	12/01/95 - 12/31/95	01/31/96	01/31/96

Monthly filers must disclose financial activity from December 1 through December 31, 1995, on their Year-End Report.

CHANGE IN FILING FREQUENCY

Committees wishing to change their reporting schedule (for example, from semiannual to monthly) must notify the Commission in writing when they file their next report due under their current reporting schedule. Committees may change their filing frequencies no more than once per calendar year.

ENVELOPE

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

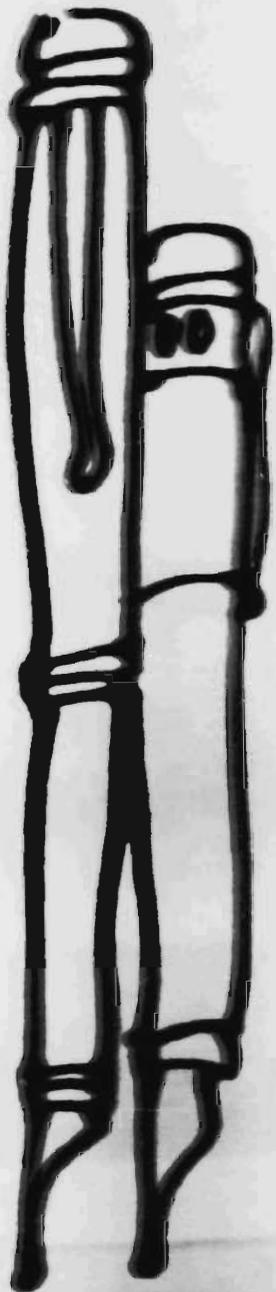
COMPLIANCE

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 (except for FEC approved computer generated forms) will be required to refile.

*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

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

(over)



1996 FILING SCHEDULE

I. Quarterly Filers

REPORT	REPORTING PERIOD*	MAILING DATE	FILING DATE
April	01/01/96 - 03/31/96	04/15/96	04/15/96
July	04/01/96 - 06/30/96	07/15/96	07/15/96
October	07/01/96 - 09/30/96	10/15/96	10/15/96
Pre-General	10/01/96 - 10/16/96	10/21/96	10/24/96
	-----24 Hour Reports-----		
Post-General	10/17/96 - 11/25/96	12/05/96	12/05/96
Year-End	11/26/96 - 12/31/96	01/31/97	01/31/97

II. Monthly Filers

REPORT	REPORTING PERIOD*	MAILING DATE	FILING DATE
February	01/01/96 - 01/31/96	02/20/96	02/20/96
March	02/01/96 - 02/29/96	03/20/96	03/20/96
April	03/01/96 - 03/31/96	04/20/96	04/20/96
May	04/01/96 - 04/30/96	05/20/96	05/20/96
June	05/01/96 - 05/31/96	06/20/96	06/20/96
July	06/01/96 - 06/30/96	07/20/96	07/20/96
August	07/01/96 - 07/31/96	08/20/96	08/20/96
September	08/01/96 - 08/31/96	09/20/96	09/20/96
October	09/01/96 - 09/30/96	10/20/96	10/20/96
Pre-General	10/01/96 - 10/16/96	10/21/96	10/24/96
	-----24 Hour Reports-----		
Post-General	10/17/96 - 11/25/96	12/05/96	12/05/96
Year-End	11/26/96 - 12/31/96	01/31/97	01/31/97

*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

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

***PACs that make independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours before the election must file 24 Hour Reports. Party committees may not make independent expenditures.

FOR INFORMATION, CALL: 800/424-9530 or 202/692-3000

9804300605

QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

March 22, 1996

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
April Quarterly	01/01/96 - 03/31/96	04/15/96	04/15/96

WHO MUST FILE

Party committees and PACs (nonconnected committees and separate segregated funds) filing on a quarterly basis must file a Quarterly Report in April.

PRE-ELECTION REPORTING

Committees which make contributions or expenditures (including independent expenditures) in connection with an election must also file a Pre-Election Report, if the activity was not previously reported. See the January 1996 Record.

24 HOUR REPORT ON INDEPENDENT EXPENDITURES

Any PAC that makes independent expenditures in connection with an election may have to file a 24 hour report. This reporting requirement will be triggered if the committee make independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the election day.

CHANGE IN FILING FREQUENCY

Committees wishing to change their reporting schedule (for example, from quarterly to monthly) must notify the Commission in writing when they file their next report due under their current reporting schedule. Committees may change their filing frequencies no more than once per calendar year.

LABEL

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

*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

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

(over)

NEWS AND FACTS

APRIL QUARTERLY

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 (except for FEC approved computer generated forms) will be required to refile.

7
6
6
0
0
7

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



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20541

EQ-7

May 2, 1996

Maggie Laws, Treasurer
Political Club for Growth
1775 Broadway
New York, NY 10019

Identification Number: C00018228554

Reference: April Quarterly Report (1/1/95-3/31/96)

Dear Ms. Laws:

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

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

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

If you have any questions, please contact Wendy Barkley on our toll-free number (800) 424-9530. Our local number is (202) 219-3580.

Sincerely,

John D. Gibson
John D. Gibson
Assistant Staff Director
Reports Analysis Division

9504368060

QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

June 21, 1996

WHO MUST FILE

Party committees and PACs (nonconnected committees and separate segregated funds) filing on a quarterly basis must file a Quarterly Report in July.

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
July Quarterly	04/01/96 - 06/30/96	07/15/96	07/15/96

PRE-ELECTION REPORTING

Committees which make contributions or expenditures (including independent expenditures) in connection with an election must also file a Pre-Election Report, if the activity was not previously reported. See the January 1996 Record.

24 HOUR REPORT ON INDEPENDENT EXPENDITURES

Any PAC that makes independent expenditures in connection with an election may have to file a 24 hour report. This reporting requirement will be triggered if the committee makes independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the election day.

CHANGE IN FILING FREQUENCY

Committees wishing to change their reporting schedule (for example, from quarterly to monthly) must notify the Commission in writing when they file their next report due under their current reporting schedule. Committees may change their filing frequencies no more than once per calendar year.

LABEL

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

*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

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

(over)



PARTIES AND PACS

JULY QUARTERLY

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 (except for FEC approved computer generated forms) will be required to refile.

90040000610

FOR INFORMATION, Call: 800/424-9530 or 302/219-3420



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

HQ-7

August 12, 1996

Kelly Forsberg, Treasurer
 Political Club for Growth
 150 East 35th Street
 New York, NY 10016

Identification Number: C00182964

Reference: July Quarterly Report ((4/1/96-6/30/96))

Dear Ms. Forsberg:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may be in violation of 2 U.S.C. 5434(a) for failing to file the above referenced Report of Receipts and Disbursements. You were previously notified of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Secretary of the Senate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer ((see 11 CFR 95100.2, 100.3, 100.4)).

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

If you have any questions, please contact Wendy Barkley on our toll-free number (800) 424-9539. Our local number is (202) 219-3500.

Sincerely,

John B. Gilman
 Assistant Staff Director
 Reports Analysis Division

9
3
0
4
3
8
0
6
1
1



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MS-L

AUG 16 1996

Kelly Forsberg, Treasurer
Political Club for Growth
150 East 35th Street
New York, NY 10016

Identification Number: C00182964

Reference: 1995-1996 Election Cycle Reports

Dear Ms. Forsberg:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may have violated 2 U.S.C. §434(a), by failing to timely file Reports of Receipts and Disbursements. The following is a list of the reports in question.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
April Quarterly (1/1/96-3/31/96)	4/15/96	6/4/96
July Quarterly (4/1/96-6/30/96)	7/15/96	Not Filed

Timely filing is a specific requirement of the Federal Election Campaign Act ("the Act") and is essential to fulfilling the public disclosure concept embodied in that law. The Commission views failure to timely file reports as a serious violation of the Act. This communication is to advise you that, notwithstanding any matters which may be pending before the Commission, any additional report which is not submitted in a timely manner by your committee may result in the Commission initiating legal enforcement or audit action.

You may submit a letter of explanation in response to this notification. If, however, you have any questions, please feel free to contact Wendy Barkley on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Lisa J. Stolaruk
Chief, Party/Non-Party Branch
Reports Analysis Division

90043060612

QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

September 20, 1996

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
October Quarterly	07/01/96 - 09/30/96	10/15/96	10/15/96

WHO MUST FILE

Party committees and PACs (nonconnected committees and separate segregated funds) filing on a quarterly basis must file a Quarterly Report in October.

PRE-ELECTION REPORTING

Committees which make contributions or expenditures (including independent expenditures) in connection with an election must also file a Pre-Election Report, if the activity was not previously reported. See the January 1996 Record.

24 HOUR REPORT ON INDEPENDENT EXPENDITURES

Any PAC that makes independent expenditures in connection with an election may have to file a 24 hour report. This reporting requirement will be triggered if the committee makes independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the election day.

CHANGES IN FILING FREQUENCY

Committees wishing to change their reporting schedule (for example, from quarterly to monthly) must notify the Commission in writing when they file their next report due under their current reporting schedule. Committees may change their filing frequencies no more than once per calendar year.

MAIL

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

*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

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

(over)

PARTIES AND PACS

GENERAL INFORMATION

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 (except for FEC approved computer generated forms) will be required to refile.

9 8 0 4 3 8 8 0 6 1 4

FOR INFORMATION, Call: 800/426-9530 or 202/219-3420

GENERAL ELECTION REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

September 30, 1996

I. ALL MONTHLY FILERS

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Pre-General	10/01/96 - 10/16/96	10/21/96	10/24/96
Post-General	10/17/96 - 11/25/96	12/05/96	12/05/96

II. QUARTERLY FILERS THAT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 16

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Pre-General	10/01/96 - 10/16/96	10/21/96	10/24/96
Post-General	10/17/96 - 11/25/96	12/05/96	12/05/96

III. QUARTERLY FILERS THAT DO NOT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 16***

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Post-General	10/01/96 - 11/25/96	12/05/96	12/05/96

WHO MUST FILE

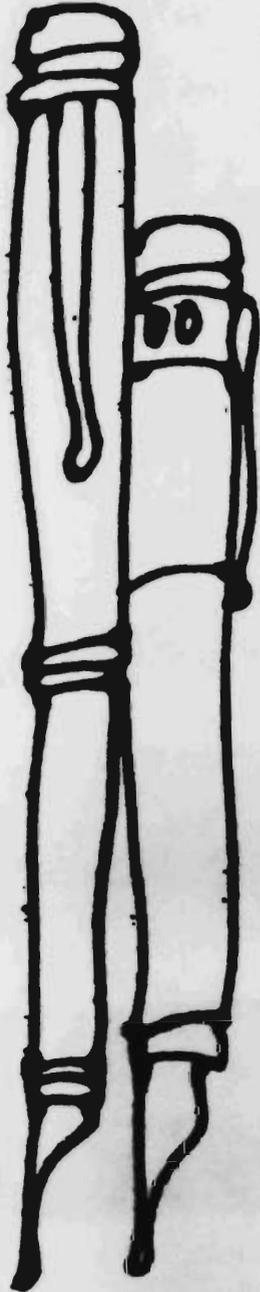
Party committees and PACs must follow the above charts in order to determine whether they must file a report 12 days before the general election on November 5 (the Pre-General Report). All Party committees and PACs, regardless of financial activity, must file a report 30 days after the general election (the Post-General Election Report).

*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

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

***Committees that made general election contributions or expenditures before October 1 and did not previously report them must also follow Chart II reporting requirements.

(over)



93040000610

PARTIES AND PACS

PRE/POST GENERAL ELECTION

24 HOUR REPORT ON INDEPENDENT EXPENDITURES

Any PAC that makes independent expenditures aggregating \$1,000 or more during the period beginning October 17 and ending November 3 must report them within 24 hours.

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 (except for FEC approved computer generated forms) will be required to refile.

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

FD-7

(This is a copy of the text of a maligned sent to the committee listed below on November 6, 1986.)

Kelly Forsberg, Treasurer
Political Club for Growth
150 East 35th Street
New York, NY 10016

Identification Number: C00182964

Reference: OCTOBER QUARTERLY REPORT (7/1/86-9/30/86)

Dear Ms. Forsberg:

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

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Secretary of the State). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR §101.2, 101.3, 101.4).

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

If you have any questions, please contact Neil Evans on our toll-free number (800) 424-9630. Our local number is (202) 219-3580.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

9 0 0 4 0 0 0 6 1 7

GENERAL ELECTION

REPORT NOTICE

FEDERAL ELECTION COMMISSION



REMINDER

REMINDER

REMINDER

November 8, 1996

All party committees and PACs (nonconnected committees and separate segregated funds) must file a Post-General Election Report. Reports sent by registered or certified mail must be postmarked by the mailing date (December 5, 1996); otherwise, they must be received by the filing date (December 5, 1996). FEC Form 3X is enclosed.

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

9 6 0 4 3 0 0 6 1 0

THE FEDERAL ELECTION COMMISSION

Plaintiff,

MUR 4692

vs.

POLITICAL CLUB FOR GROWTH
and KELLY FORSBERG, as Treasurer.

Defendants.

DECLARATION OF KELLY L. FORSBERG

1. The Political Club for Growth has an official business address of 1775 Broadway, New York, NY 10019. The present mailing address is my home at 215 East 73 Street, New York, NY 10021.

2. The Political Club for Growth (the "Club") is a nonpartisan, unincorporated organization existing in the City of New York. The Club does not solicit or make any contributions to candidates or organizations. During its nine meetings a year, the Club introduces to the members speakers comprised of political candidates, grassroots organizers, think tank analysts and academic leaders. The political candidates could be members of any recognized political party and usually are running for or are already elected to local, state or national public offices.

90040000620

3. The Club has approximately eighty dues paying members. The dues are used only for the Club's administrative expenses and are never disbursed to any speaker. (See "Itemized Disbursements" incorporated in FEC Form 3X).

4. I was selected as treasurer for the Club in June of 1996 primarily because of my experience with event planning. My specific duties for the Club are to organize the nine meetings a year; mail announcements; collect dues; coordinate caterers; pay administrative expenses; and file reports.

5. I replaced Maggy Laws who, as a result of illness over the prior five months, was unable to perform many of the duties of the Club. When I assumed the position in June of 1996, I obtained a file which only included 1996 information. (FEC letters dated February 20, 1996 and May 8, 1996, and a copy of the April report)

6. It was not until early July of 1996 that I became aware that Ms. Laws had filed the April 1996 Quarterly report in June of 1996. At the same time I became aware that the April report contained errors and was not complete. I immediately called the Federal Election Commission and requested proper forms for filing the required reports. When I received and reviewed the forms, I realized that I was not in possession of some of the required information. (Exhibit A)

7. In a follow up call to the FEC in early August of 1996, I requested guidance to correct the problems of the previous filing and was instructed to make every effort to supply a completed report. Shortly after my call, I received a letter from Wendy Barkley itemizing the required information. (Exhibit B) Immediately after receipt of that letter, I sent out a mailing to all club members in an effort to obtain the required information. Since the Club does not meet

9 0 0 4 5 0 0 6 2 1

in July or August, and many members were on vacation, it was difficult to track down the required information.

8. In mid August of 1996, I received two letters from the FEC about late filings (Exhibit C). I called the FEC shortly after the receipt of the second letter and advised them that I was attempting to obtain the required information.

9. The July report was not filed in a timely manner because the same information necessary to complete the April filing was not available at that date. In addition, the previous treasurer was not available for advice due to her illness and hospitalization.

10. Adding to the delays in attempting to obtain the required information, my own pregnancy necessitated a very reduced work schedule in September and almost no work in October of 1996. My twin boys were delivered on October 18, 1996 and I returned to my duties for the Club on a part time basis in early November.

11. On November 6th the FEC sent a "MailGram" regarding the late filing of the October Quarterly report. (Exhibit D) Again, I called shortly after the receipt of this correspondence and advised the FEC that I had just returned to work on a limited schedule.

12. After compiling what I believed to be the required information, I made several confirming telephone calls to the FEC in early December of 1996. On December 13, 1996 I submitted Quarterly reports as well as the 30-Day Post-General Election report. (Exhibit E)

13. Each and every time that I received a correspondence from the FEC, I telephoned the individual named at the bottom of the FEC letters to discuss the issues addressed in the correspondence and to keep the FEC informed of my progress. I have always found the FEC representatives to be very helpful and courteous in their responses. I never had the

90040000622

impression after any of my telephone calls that the FEC was contemplating a fine for late filings. At no time did I receive the impression that time was of the essence. To the contrary, my impression was that the emphasis was on supplying complete and correct information.

14. About January 15, 1997 I was notified that additional information was necessary for the reports submitted in December, 1996 and I again immediately called to discuss these additions. The requested information was forwarded to the FEC on January 28, 1997.

15. Before I discussed the Chairman's letter with Attorney Heilizer on November 18, 1997, I was totally unaware that there had been a prior Conciliation Agreement involving a former treasurer of the Club. When I was finally able to locate and communicate with this individual, she advised me that she had recently discarded all prior files and had personally negotiated a settlement of her fine without informing the Club. She did not have a copy of her Conciliation Agreement or have any recollection of the amount that she personally paid in resolution of the matter. As a result of her failure to inform anyone associated with the Club, no one was aware that the Club was already under scrutiny for her prior acts/omissions.

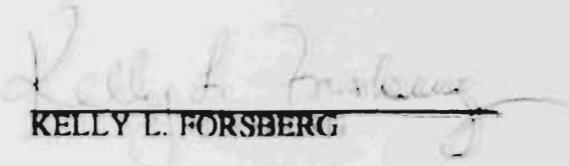
16. Throughout my brief tenure, I believe I have acted in good faith and as quickly as possible to correct any deficiencies in the filings of the prior treasurer, to obtain the correct forms from your office, to obtain correct information for insertion into the reports, and to keep your office informed of the status of the reporting.

9 6 0 4 3 0 6 0 6 2 3

17. I believe that there are mitigating circumstances given the health problems of the former treasurer and my own pregnancy in the summer and fall of 1996.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
December 4, 1997


KELLY L. FORSBERG

(Pursuant Title 28, United States Code, Section 1746)

9
3
0
4
3
6
0
6
2
4

9 3 0 4 3 8 8 0 6 2 5



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

FAX TRANSMITTAL

date: 7/12/96
 to: Kelly Forsberg (Political Club For Growth)
 fax #: (212) 213-9369

from: Debbie Manzano

fax #: (202) 219-3496

phone #: (800) 424-9530
(202) 219-3580

page count: 3
(w/ cover sheet)

9 0 0 4 3 3 0 0 6 2 6



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

07/17/1996

KELLY FORSBERG
150 E. 35TH ST., FOURTH FLOOR
NEW YORK, NY 10016

Dear FEC Constituent:

Enclosed are the materials you ordered from the Federal Election Commission. This shipment contains the following items:

Name of Publication/Form

Form 3X - Report of Receipts and Disbursements 11

We hope you find these materials helpful. If you have any questions, please call the Information Division toll-free (800)424-9530, locally (202)219-3420 or TDD/voice (800)8777-88339.

The Information Division
Federal Election Commission

980435060627

98043080628



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

Helly Forsberg, Treasurer
Political Club For Growth
1380 East 35th Street
New York, NY 10016

AUG - 7 1996

Identification Number: C00182964

Reference: 1996 April Quarterly Report (1/1/96-3/31/96)

Dear Ms. Forsberg:

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

-The beginning cash balance of this report should equal the ending balance of your 1995 Amended Year End Report. Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.

-Please provide the totals for Lines 11(d), 20, 30 and 31, Columns A and B of the Detailed Summary Page. Note that changes in your figures may affect your Column B totals on this report and/or on subsequent reports.

-You must make an attempt to obtain the full name, mailing address, occupation and name of employer for all individuals who contribute more than \$200 in a calendar year. Please amend your report to include the omitted information.

A committee may demonstrate "best efforts" to obtain the required information by providing the Commission with a description of its procedures for requesting the information and may also supply a copy of a solicitation: the committee must request the contributor information in initial solicitations; make follow-up requests (if necessary); report the information; and file amendments to disclose previously unreported information. Each solicitation must include a clear and conspicuous request for the information. If a committee receives a contribution that exceeds the \$200 threshold that lacks contributor information, the committee must, within 30 days, make an additional written or oral request for the information. Please note that a written request may not include an additional solicitation or

material on any other subject, other than thanking the contributor for the donation and must include a pre-addressed return post card or envelope for the contributor's response. An oral request must be documented in writing. Committees must also disclose information that was not provided by the contributor, but is available in any of the committee's records for that current election cycle. Furthermore, if a committee receives contributor information after the contributions have been reported, it must submit, with its next report, an amended memo Schedule A listing all the contributions for which additional information was received or file, on or before the next reporting date, amendments to the previous reports on which the contributions were originally disclosed. See 11 CFR \$104.3(a)(4)(i) and 11 CFR \$104.7.

-On Schedule A supporting Line 11(a)(i) of the Detailed Summary Page, your report disclosed contributions from individuals that omit the Dates of Receipt. Please amend your report by supplying the information. 11 CFR \$104.3(a)(4)(i)

-Line 11(a)(i) of the Detailed Summary Page of your report discloses a total of \$20,550.00 in Itemized Contributions from Individuals. The sum of the entries itemized on Schedule A, however, indicates the total to be \$21,350.00. Please amend your report to clarify the discrepancy.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission 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,



Wendy Barkley
Reports Analyst
Reports Analysis Division

9 0 0 4 3 0 0 1 6 3 0

98043360631



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

RQ-7

August 12, 1996

Kelly Forsberg, Treasurer
Political Club for Growth
150 East 35th Street
New York, NY 10016

Identification Number: C00182964

Reference: July Quarterly Report (4/1/96-6/30/96)

Dear Ms. Forsberg:

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

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

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

If you have any questions, please contact Wendy Barkley on our toll-free number (800) 424-9539. Our local number is (202) 209-3580.

Sincerely,

A handwritten signature in cursive script, appearing to read "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

MS-L

Kelly Forsberg, Treasurer
Political Club for Growth
150 East 35th Street
New York, NY 10016

AUG 11 6 1996

Identification Number: C00182964

Reference: 1995-1996 Election Cycle Reports

Dear Ms. Forsberg:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may have violated 2 U.S.C. §434(a), by failing to timely file Reports of Receipts and Disbursements. The following is a list of the reports in question.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
April Quarterly (1/1/96-3/31/96)	4/15/96	6/4/96
July Quarterly (4/1/96-6/30/96)	7/15/96	Not Filed

Timely filing is a specific requirement of the Federal Election Campaign Act ("the Act") and is essential to fulfilling the public disclosure concept embodied in that law. The Commission views failure to timely file reports as a serious violation of the Act. This communication is to advise you that, notwithstanding any matters which may be pending before the Commission, any additional reports which is not submitted in a timely manner by your committee may result in the Commission initiating legal enforcement or audit action.

You may submit a letter of explanation in response to this notification. If, however, you have any questions, please feel free to contact Wendy Barkley on our toll-free number, (800) 424-9530. My local number is (202) 218-8580.

Sincerely,

Lisa J. Stollanik
Chief, Party/Non-Party Branch
Reports Analysis Division

3
6
3
3
4
3
0
4
3
0
3
9

9 8 0 4 3 8 8 0 6 3 4

98043880636

Political Club for Growth

1775 Broadway
Twenty-eighth floor
New York, NY 10019
212 765-2500

David Grossel
Co-Chairman

Gerard Gold
Co-Chairman

12/13/96

TO FEC

From: Kelly Forsberg
Political Clubs for Growth

Re: Reports -

Attached Reports

Revised 1-1-96 - 3-31-96
4-1-96 - 6-30-96
7-1-96 - 9-30-96
10-1-96 - 12-1-96

delay due to polling of members for more information
and delivery of Policy by treasurer - myself.

Thank you -
Kelly Forsberg

9304306037

DICKERSON & REILLY

LAW OFFICES
780 Third Avenue
New York, NY 10017-2024

(212) 644-6886
Telecopier (212) 486-3032

LARS FORSBERG
DIRECT DIAL (212) 644-7036

December 19, 1997

VIA TELECOPIER N° (202) 219-3923
and Registered Mail

John Warren McGarry, Chairman
Federal Election Commission
Washington, D.C. 20463

Re: **POLITICAL CLUB FOR GROWTH**
Your File N° MUR 4692
Our File N° 1700-01

Dear Sir:

As previously advised, the undersigned represents both the Political Club for Growth and Kelly L. Forsberg, Treasurer. As we understand from both your correspondence and our communications with Ruth Hollier, Esq., the FEC is in the probable cause phase as described in 2 U.S.C. § 437g. Pursuant to your letter, Kelly Forsberg submitted a Declaration with supporting exhibits on December 4, 1997.

Please be advised that the Political Club for Growth ("Club") and Kelly Forsberg would like to resolve this matter but have concerns regarding both your Factual and Legal Analysis and the terms of the proposed Conciliation Agreement. After careful review of 2 U.S.C. § 431(4), (8)(a) and (9)(a), there is question on my clients' part whether the Club in fact falls within the definition of a "political committee." This, in turn, raises the threshold issue whether your organization has jurisdiction over the Club activities. Please note in the Declaration of Kelly L. Forsberg that she states: (Par. 2) "The Club does not solicit or make any contributions to candidates or organizations." After the present matter is resolved, the Political Club for Growth may seek an advisory opinion under 2 U.S.C. § 437f questioning whether they should be required to register with the FEC and report their activities.

2304306030

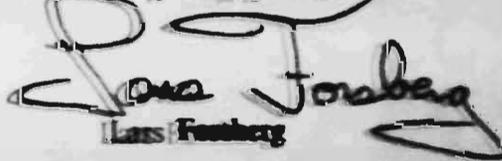
12.19.97

With regard to the Enforcement Priority System of the FEC and given the identified activities of this Club, it is hard to believe that the FEC would place a high priority on the issues raised. In researching other "matters under review" is our understanding that the goal of effective enforcement relies upon the timely pursuit of complaints and referrals to ensure compliance with the law. The matters in your letter of November 7th relate to events commencing in the spring of 1996. In 1997 there has been total compliance by the Club. It would appear from those facts alone that a fine or penalty at this time would not act as a deterrent. It is possible that your offices delay in pursuing the alleged late filing of the April 1996 Quarterly Report has sent out a misleading message regarding the FEC's level of concern. Again, I refer you to the Declaration of Kelly L. Forsberg.

On behalf of my clients, I respectfully request that the Commission exercise its prosecutorial discretion, take no further action and direct closure of this case. This request is made in light of the information on the record, the relative insignificance of this matter and the amount of time that has elapsed. Closing this case would permit the Commission to focus its resources on more important cases presently pending.

Thank you for your consideration.

Very truly yours,


Lars Forsberg

LF/arl

cc: The Political Club for Growth
Kelly L. Forsberg

17000000097419

98043680639

DICKERSON & REILLY

LAW OFFICES

780 THIRD AVENUE
NEW YORK, N.Y. 10017

(212) 644-8008

TELECOPIER (212) 486-3038

RECEIVED
FEDERAL ELECTION
COMMISSION MAIL ROOM

MAR 27 9 16 AM '98

LARS FORSBERG
DIRECT DIAL (212) 644-7036

March 26, 1998

RECEIVED
FEDERAL ELECTION
COMMISSION
ACCOUNTING OFFICE
MAR 27 2 28 PM '98

VIA FEDERAL EXPRESS

Ruth Heilizer, Esq.
999 E Street, N.W.
Federal Election Commission
Washington, D.C. 20463

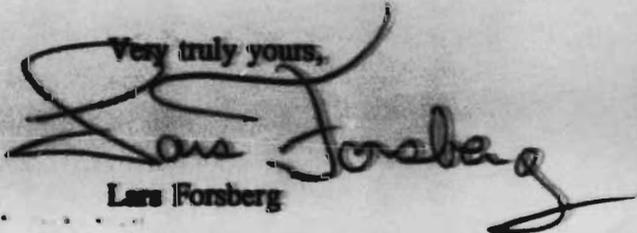
Re: **POLITICAL CLUB FOR GROWTH**
Your File N^o MUR 4692
Our File N^o 1700-01

Dear Ms. Heilizer:

Your assistance has been greatly appreciated in concluding this matter.

Enclosed please find the original conciliation agreement with the penalty payment of \$2,500.00 from the Political Club For Growth. Again, many thanks for your help.

Very truly yours,



Lars Forsberg

LF/arl
Enclosure
170001VHE09L.C26

9 8 0 4 3 8 8 0 6 4 0

THE POLITICAL CLUB FOR GROWTH

1588

3-16

19 98

~~1/18~~

PAY TO THE ORDER OF

Federal Election Commission

\$ 2,500.00

Turbidity Free Blend and 10/4

DOLLARS

CHEMICAL BANK
870 EIGHTH AVENUE, NEW YORK, N.Y. 10019

FOR *Conk Agony +*

Kelly Sabry

⑆001588⑆ ⑆021000128⑆ 008-040311⑆

90043300641



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20543

FEDERAL ELECTION COMMISSION
MAY 1998

Mar 31 2 25 PM '98

March 31, 1998

TWO WAY MEMORANDUM

TO: OGC Docket
FROM: Rosa E. Swinton *RS*
Accounting Technician
SUBJECT: Account Determination for Funds Received

We recently received a check from **The Political Club for Growth**, check number **15000**, dated **March 16, 1998**, for the amount of **\$2500.00**. A copy of the check and any correspondence is being forwarded. Please indicate below which account the funds should be deposited and give the MUR/Case number and name associated with the deposit.

TO: Rosa E. Swinton Leslie D. Brown
Accounting Technician Disturbing Technician
FROM: OGC Docket
SUBJECT: Disposition of Funds Received

In reference to the above check in the amount of \$2500.00, the MUR/Case number is 41092 and in the name of The Political Club for Growth. Place this deposit in the account indicated below:

- Budget Clearing Account (OGC), 95F3875.16
- Civil Penalties Account, 95-1099.160
- Other: _____

[Handwritten Signature]
Signature

4-3-98
Date

9804360642



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 7, 1988

Lars Forsberg, Esq.
Dickerson & Reilly
780 Third Avenue, 20th Floor
New York, NY 10017

RE: MUR 4692
Political Club for Growth

Dear Mr. Forsberg:

Enclosed, for your information, is an FEC Disclosure Form 3X, which the Political Club for Growth should complete if it wishes to terminate. The "type of report" (item 4) should be marked "termination report."

If you have any questions, please contact the Reports Analysis Division at (202) 694-1130.

Sincerely,

Ruth Heilizer
Ruth Heilizer
Attorney

Enclosure
FEC Disclosure Form 3X

9 8 0 4 3 8 8 0 6 4 3

RECEIVED
FEDERAL
COMMISSION
SECRET

APR 10 10 45 AM '98

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Political Club for Growth, and) MUR 4692
)
Kelly Forsberg, as treasurer)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On November 4, 1997, the Federal Election Commission ("Commission") found reason to believe that the Political Club for Growth and Kelly Forsberg, as treasurer ("Political Club"), violated 2 U.S.C. § 434(a)(4)(A)(i) and (iii), and determined to enter into pre-probable cause conciliation.

9804680644

II. RECOMMENDATIONS

1. Accept the conciliation agreement.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Political Club for Growth, and) MUR 4692
Kelly Forsberg, as treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 15, 1998, the Commission decided by a vote of 5-0 to take the following actions in MUR 4692:

1. Accept the conciliation agreement, as recommended in the General Counsel's Report dated April 9, 1998.
2. Close the file.
3. Approve the appropriate letter, as recommended in the General Counsel's Report dated April 9, 1998.

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

Attest:

4-15-98
Date

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

Received in the Secretariat: Fri., April 10, 1998 10:45 a.m.
Circulated to the Commission: Fri., April 10, 1998 12:00 p.m.
Deadline for vote: Wed., April 15, 1998 4:00 p.m.

lrd

9 3 0 4 3 0 6 4 6



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 21, 1998

Lars Forsberg, Esq.
Dickerson & Reilly
780 Third Avenue, 20th Floor
New York, NY 10017

RE: MUR 4692
Political Club for Growth
and Kelly Forsberg, as treasurer

Dear Mr. Forsberg:

On April 15, 1998, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on behalf of the Political Club for Growth and Kelly Forsberg, as treasurer, in settlement of violations of 2 U.S.C. § 434(a)(4)(A)(i) and (iii), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. 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.

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) 694-1650.

Sincerely,


Ruth Heilizer
Attorney

Enclosure:
Conciliation Agreement

98043000647

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 4692
Political Committee for Growth and)
Kelly Forsberg, as treasurer)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities.

The Commission found reason to believe that the Political Committee for Growth and Kelly Forsberg, as treasurer, ("Respondents") violated 2 U.S.C. § 434(a)(4)(A)(i) and (iii).

NOW, THEREFORE, the Commission and the Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

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

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

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

1. The Political Club for Growth is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Kelly Forsberg is the treasurer of the Political Club for Growth.

9 0 0 4 0 0 0 1 0 4 0

3. The Federal Election Campaign Act of 1971, as amended ("the Act") requires treasurers of political committees other than authorized committees of a candidate to file periodic reports of receipts and disbursements. 2 U.S.C. § 434(a)(1)(D).

4. In any calendar year in which a regularly scheduled general election is held, committees that choose to file on a quarterly basis shall file quarterly reports no later than the 15th day after the last day of each calendar quarter. 2 U.S.C. § 434(a)(4)(A)(ii).

5. In addition, political committees shall file post-general election reports, which shall be filed no later than the 30th day after the general election and which shall be complete as of the 20th day after such general election. 2 U.S.C. § 434(a)(4)(A)(iii).

6. The due date for Respondents' 1996 April Quarterly report was April 15, 1996. 2 U.S.C. § 434(a)(4)(A)(i). Respondents filed their 1996 April Quarterly Report on June 4, 1996, 50 days late, disclosing receipts totaling \$20,550.00 and disbursements totaling \$8,426.99.

7. The due date for Respondents' 1996 July Quarterly Report was July 15, 1996. 2 U.S.C. § 434(a)(4)(A)(i). Respondents filed their 1996 July Quarterly Report on December 16, 1996, 150 days late, disclosing receipts totaling \$7,000.00 and disbursements totaling \$9,749.99.

8. The due date for Respondents' 1996 October Quarterly Report was October 15, 1996. 2 U.S.C. § 434(a)(4)(A)(i). Respondents filed their 1996 October Quarterly Report on December 16, 1996, 62 days late, disclosing receipts totaling \$3,000.00 and disbursements totaling \$6,146.92.

98043600649

9. The due date for Respondents' 1996 30 Day Post-General Report was December 5, 1996. 2 U.S.C. § 434(a)(4)(A)(iii). Respondents filed their 30 Day Post-General Report on December 16, 1996, 11 days late, disclosing receipts totaling \$0.00 and disbursements totaling \$4,746.45.

10. On July 31, 1995, Respondents entered into a conciliation agreement for violations of 2 U.S.C. § 434(a)(4)(A)(i), (iii) and (iv) for late-filing the 1993 Mid-Year Report, the 1993 Year End Report, the 1994 April Quarterly Report, the 1994 July Quarterly Report, the 1994 October Quarterly Report, and the 1994 30 Day Post-General Report.

V. Respondents failed to file timely its 1996 April, July and October Quarterly Reports, and its 1996 30 Day Post-General Report, in violation of 2 U.S.C. § 434(a)(4)(A)(i) and (iii)

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Two Thousand Five Hundred dollars (\$2,500), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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.

980430065C

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, 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: [Signature]
Lois G. Lerner
Associate General Counsel

4/21/98
Date

FOR THE RESPONDENTS:

[Signature]
(Name)
(Position) Treasurer

3/10/97
Date

98043080651



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

THIS IS THE END OF MUR # 4692
DATE FILMED 5/14/98 CAMERA NO. 1
CAMERAMAN SES

9
0
4
3
8
0
6
5
2