



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

THIS IS THE END OF MUR # 2341

DATE FILMED 8/14/87 CAMERA NO. 2

CAMERAMAN GPC

87040553889

PUBLIC RECORD INDEX - MUR 2341

1. Memo, 15 Dec 86, John D. Gibson (Reports Analysis Div) to Charles N. Steele, (General Counsel), Subject: Referral of the Jefferson County (KY) Republic Executive Cmte, w/encl (RAD Referral Pkg).
2. First General Counsel's Report, 21 Jan 87.
3. Memo, 21 Jan 87, Office of General Counsel (OGC) to Office of the Commission Secretary (OCS), Subject: RAF Ref 87NF40: First General Counsel's Report.
4. Memo, 27 Jan 87, OCS to OGC, Subject: Objection to First General Counsel's Report, RAD Ref 87NF 40.
5. Certification of Commission action, 4 Feb 87.
6. Ltr, 11 Feb 87, Scott E. Thomas, (Chmn, FEC) to John H. Yost (Treas, Jefferson County Republican Executive Committee).
7. Ltr, 16 Feb 87, Mary Maple (Accountant, Republican Headquarters) to FEC.
8. Ltr, 20 Feb 87, Mary Maple to FEC.
9. Ltr, 28 Feb 87, Mary Maple to FEC.
10. General Counsel's Report, dtd 20 March 87.
11. Memo, 20 March 87, OGC to OCS, Subject: General Counsel's Report.
12. Certification of Commission action, 26 March 87.
13. Ltr, 27 March 87, L.M. Noble to J.H. Yost.
14. Ltr, 28 April 87, Carolyn Davis (Exec Dir Republican Party of Jefferson County) to FEC.
- 14a. Ltr, 21 May 87, W.T. Warner to FEC.
- 14b. Ltr, 3 June 87, W.T. Warner to FEC.
15. General Counsel's Report, 12 June 87.
16. Memo, 12 June 87, OGC to OCS, Subject: General Counsel's Report.
17. Certification of Commission action, 17 June 87.

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18. Closing ltr, 19 June 87, L.M. Noble to W.T. Warner, w/encl
(Executed Conciliation Agrmt).

NOTE: In preparing its file for the public record, O.G.C.
routinely removes those documents in which it perceives
little or no public interest, and those documents, or
portions thereof, which are exempt from disclosure
under the Freedom of Information Act.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

15 December 1986

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: REFERRAL OF THE JEFFERSON COUNTY REPUBLICAN
EXECUTIVE COMMITTEE

This is a referral of the Jefferson County Republican Executive Committee ("the Committee"). The Committee failed to file the 1986 October Quarterly Report of Receipts and Disbursements by Election Day, November 4, 1986. According to the RAD Review and Referral Procedures for Unauthorized Committees (Standard 3), further examination is required by your office.

In addition, please note that a Chronic Late Filer Notice was sent to the Committee on November 19, 1986 for failure to file the 1986 April and October Quarterly Reports in a timely fashion. Should the Committee file one additional report in an untimely manner during the election cycle, the Committee will be referred to your office as a Chronic Late Filer.

If you have any questions on this matter, please contact Anthony Raymond at 376-2480.

Attachment

87040553892

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 15 December 1986

ANALYST: Anthony Raymond

I. COMMITTEE:

Jefferson County Republican Executive
Committee (C00015594)
John H. Yost, Treasurer^{1/}
300 W. Chestnut
Louisville, KY 40202

II. RELEVANT STATUTE:

2 U.S.C. 434(a)(4)(A)(i)
11 CFR 104.5(c)(1)(i)(A)

III. BACKGROUND:

Failure To File the 1986 October Quarterly Report by
Election Day

The Jefferson County Republican Executive Committee
("the Committee") failed to file the 1986 October Quarterly
Report of Receipts and Disbursements by Election Day,
November 4, 1986. The Committee was notified on September
19, 1986 that the report was due on October 15, 1984
(Attachment 2).

^{1/} Margot Rowe resigned as treasurer of the Committee on June 20,
1984; however, the Commission was not notified of a new treasurer
until May 27, 1986. The November 4, 1986 Non-Filer Notice was
inadvertently sent to the previous treasurer at the Committee's
current address.

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JEFFERSON COUNTY REPUBLICAN
EXECUTIVE COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

On November 4, 1986, a Non-Filer Notice was sent to the Committee for its failure to file the 1986 October Quarterly Report (Attachment 3).

On November 28, 1986, the Committee filed the 1986 October Quarterly Report. A letter accompanying the report explained that the Committee called the Commission during the first week of October to inquire as to whether a quarterly report had to be submitted and was told that "... since we had no activity and no candidate for office, we did not have to file a report until December 5, 1986" (Attachment 4).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

87040353894

87040653895

MISSION

DATE 5DEC86
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (83-84)

FEDERAL ELECTION COMM

PAGE 1

PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
REPUBLICAN EXECUTIVE COMMITTEE OF JEFFERSON COUNTY				PARTY NON-QUALIFIED	ID #C00015594	
1983	STATEMENT OF ORGANIZATION - AMENDMENT			11APR83	2	83FEC/269/2597
	MID-YEAR REPORT	44,401	39,970	1JAN83 -30JUN83	15	83FEC/279/2241
	REQUEST FOR ADDITIONAL INFORMATION			1JAN83 -30JUN83	2	84FEC/306/3051
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN83 -30JUN83	5	84FEC/311/2882
	YEAR-END	31,860	42,797	1JUL83 -31DEC83	17	84FEC/295/5252
	YEAR-END - AMENDMENT	36,760	42,797	1JUL83 -31DEC83	16	84FEC/318/4520
	REQUEST FOR ADDITIONAL INFORMATION			1JUL83 -31DEC83	2	84FEC/306/3054
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL83 -31DEC83	1	84FEC/312/0126
1984	STATEMENT OF ORGANIZATION - AMENDMENT			16APR84	2	84FEC/310/2330
	STATEMENT OF ORGANIZATION - AMENDMENT			23APR84	2	84FEC/312/0113
	MISCELLANEOUS REPORT			14DEC84 TO FEB	2	84FEC/356/4238
	APRIL QUARTERLY	44,795	33,666	1JAN84 -31MAR84	13	84FEC/309/1973
	APRIL QUARTERLY - AMENDMENT	44,795	33,666	1JAN84 -31MAR84	13	84FEC/317/1734
	APRIL QUARTERLY - AMENDMENT	39,895	33,666	1JAN84 -31MAR84	7	84FEC/318/4536
	REQUEST FOR ADDITIONAL INFORMATION			1JAN84 -31MAR84	3	84FEC/313/4803
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN84 -31MAR84	4	84FEC/316/0841
	JULY QUARTERLY	31,199	28,819	1APR84 -30JUN84	18	84FEC/321/2488
	JULY QUARTERLY - AMENDMENT	-	-	1APR84 -30JUN84	2	84FEC/327/1755
	JULY QUARTERLY - AMENDMENT	15,289	28,819	1APR84 -30JUN84	21	84FEC/348/0581
	REQUEST FOR ADDITIONAL INFORMATION			1APR84 -30JUN84	1	84FEC/326/3173
	OCTOBER QUARTERLY	24,274	21,076	1JUL84 -30SEP84	18	84FEC/343/3976
	OCTOBER QUARTERLY - AMENDMENT	21,267	27,743	1JUL84 -30SEP84	18	84FEC/348/0602
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL84 -30SEP84	2	84FEC/356/2866
	REQUEST FOR ADDITIONAL INFORMATION			1JUL84 -30SEP84	3	84FEC/348/3268
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL84 -30SEP84	1	84FEC/350/0169
	PRE-GENERAL	5,116	3,969	1OCT84 -17OCT84	8	84FEC/348/0573
	PRE-GENERAL - AMENDMENT	5,116	3,969	1OCT84 -17OCT84	11	85FEC/367/4548
	REQUEST FOR ADDITIONAL INFORMATION			1OCT84 -17OCT84	1	85FEC/361/1138
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT84 -17OCT84	2	85FEC/366/1037
	POST-GENERAL	8,849	8,620	18NOV84 -26NOV84	11	84FEC/357/1749
	POST-GENERAL - AMENDMENT	8,849	8,620	18OCT84 -26NOV84	13	85FEC/367/0467
	1'ST LETTER INFORMATIONAL NOTICE			18OCT84 -26NOV84	4	85FEC/360/2568
	YEAR-END	2,866	4,614	27NOV84 -31DEC84	9	85FEC/364/2952
	TOTAL	174,443	0 190,198	0	249	TOTAL PAGES

All reports have been reviewed
Cash on hand as of 12/31/84 : \$5,881

Debts and obligations owed to
the committee as of 12/31/1984: \$-0-
Debts and obligations owed by
the committee as of 12/31/84: \$3,699

Attachment 1
(Page 1 of 2)

8 7 0 4 0 5 3 8 9 6
FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-86)

DATE 5DEC86
PAGE 1

PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
JEFFERSON COUNTY REPUBLICAN EXECUTIVE COMMITTEE				PARTY NON-QUALIFIED		ID #C00018594
1985	MID-YEAR REPORT	0	5,881	1JAN85 -30JUN85	3	85FEC/383/3584
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN85 -30JUN85	3	86FEC/397/1866
	REQUEST FOR ADDITIONAL INFORMATION			1JAN85 -30JUN85	1	86FEC/394/2303
	YEAR-END	50	0	1JUL85 -31DEC85	3	86FEC/397/1858
1986	MISCELLANEOUS NOTICE FROM FEC			19NOV86	1	86FEC/444/3491
	APRIL QUARTERLY	0	0	1JAN86 -31MAR86	3	86FEC/415/4457
	NOTICE OF FAILURE TO FILE			1JAN86 -31MAR86	1	86FEC/413/301
	JULY QUARTERLY	0	0	1JAN86 -31MAY86	2	86FEC/420/2326
	OCTOBER QUARTERLY	0	0	1JUN86 -30SEP86	4	86FEC/445/3708
	NOTICE OF FAILURE TO FILE			30SEP86	1	86FEC/443/3951
TOTAL		50	0 5,881	0	22	TOTAL PAGES

All reports have been reviewed
Cash on hand as of 9/30/86: \$50

Debts and obligations owed to
the committee as of 9/30/86: \$-0-
Debts and obligations owed by
the committee as of 9/30/86: \$-0-

QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

September 19, 1986

WHO MUST FILE

ALL Party Committees, Nonconnected Committees and Separate Segregated Funds, except those that file monthly (see below), must file a quarterly report by October 15, 1986.

WHAT MUST BE REPORTED

The report must disclose all financial activity that occurred from the close of books for the last report filed through September 30, 1986. Political committees that have not previously filed a financial disclosure report should report all financial activity through September 30, 1986.* For more detailed instructions, consult your campaign guide.

WHEN TO FILE

Reports sent by registered or certified mail must be postmarked no later than midnight October 15, 1986. Reports hand delivered or mailed first class must be received no later than close of business October 15, 1986.

WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed FEC Form 3X for details.

MONTHLY FILERS

Committees that file on a monthly schedule must file their next report by October 20, 1986, and disclose all financial activity from September 1 through September 30, 1986. (See Monthly Filers on the reverse side.)

COMPLIANCE

Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is also a serious violation. Offending committees are subject to enforcement action. Committees must also submit legible reports which can be clearly reproduced. Illegible reports and reports submitted on non-FEC forms will not be accepted, and committees filing such documents will be required to refile.

*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received or disbursed during the current reporting period. See 11 CFR 104.3(a) and (b).

REMINDERS

QUARTERLY FILERS

Committees that make contributions or expenditures (including independent expenditures) in connection with an election, and coordinated party expenditures in connection with a general election, must file a pre-election report if this activity has not been previously disclosed. See the January 1986 issue of the Federal Election Commission Record for primary and general election filing requirements.

MONTHLY FILERS

Committees that are filing monthly must file a pre-general election report due on October 23, a post-general election report due on December 24, and a year-end report due January 31, 1987, instead of monthly reports on November 20, December 20 and January 20, 1987. See the schedule below.

<u>REPORT</u>	<u>PERIOD COVERED</u>	<u>REG./CENT. MAILING DATE</u>	<u>FILING DATE</u>
Pre-general	10/01 - 10/15	10/20/86	10/23/86
Post-general	10/16 - 11/24	12/24/86	12/24/86
Year-end	11/25 - 12/31	01/31/87	01/31/87

*See General
Election Notice*

INDEPENDENT EXPENDITURES

Any independent expenditure aggregating \$1,000 or more and made between 2 and 20 days before an election must be reported within 24 hours after the expenditure is made. See 11 CFR 104.4(c)(2) and (3) for information concerning where to file.

A notice explaining general election filing requirements will be sent to you before the general election.

FOR INFORMATION CALL: Information Services Division
800/424-9530 or 202/376-3120

8704053893



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

EQ-7

November 4, 1986

Margot Rowe, Treasurer
Jefferson County Republican
Executive Committee
300 W. Chestnut
Louisville, KY 40202

Identification Number: C00015594

Reference: October Quarterly Report (through 9/30/86)

Dear Ms. Rowe:

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 notified previously of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or the relevant portions should also be filed with the Secretary of State or equivalent State officer. See 2 U.S.C. §439.

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 Anthony D. Raymond on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

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

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

RECEIVED BY THE FEC

(Summary Page)

86 NOV 28 P 1:33

1. Name of Committee (in Full)

Republican Executive Committee of
Jefferson County, Kentucky

Address (Number and Street)

300 W. Chestnut Street
Louisville, Kentucky 40202

City, State and ZIP Code

Louisville, Kentucky 40202

☐ Check here if address is different than previously reported.

2. FEC Identification Number

00015594

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (Check appropriate boxes)

- (a) ☐ April 15 Quarterly Report ☒ October 15 Quarterly Report
☐ July 15 Quarterly Report ☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-Election Year Only)
☐ Monthly Report for _____
☐ 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 _____
☐ Termination Report

(b) Is this Report an Amendment?

☐ YES ☒ NO

SUMMARY

5. Covering Period June 1, 1986 through September 30, 1986

6. (a) Cash on hand January 1, 19 _____

(b) Cash on Hand at Beginning of Reporting Period _____

(c) Total Receipts (from Line 18) _____

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and
Lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 28) _____

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) _____

9. Debts and Obligations Owed TO The Committee
(Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee
(Itemize all on Schedule C 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.

Jack Yost
Print Name of Treasurer

Jack Yost (cd)
Signature of Treasurer

11-25-86
Date

For further information contact:

Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463
Tel. (202) 435-6800
Local 228-3763/29

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 437e.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

FEC FORM 3X (3/80)

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Republican Executive Committee of Jefferson County, Kentucky
300 W. Chestnut Street
Louisville, Kentucky 40202

Attachment 4 (Page 2 of 2)

11/19/86

Federal Election Commission
Washington, D.C.

Re: 00015594

Dear Sir,

This letter concerns the quarterly report that was due on October 15, 1986. The first week of October I called the Federal Election Commission inquiring if we had to submit a quarterly report since we had no activity for that quarter. A male that I talked to told me that since we had no activity and no candidate for office, we did not have to file a report until December 5, 1986.

Enclosed is the copy of the letter we received from you stating that the report was due on October 15, 1986. Also enclosed is a report for the period abovementioned.

If I can be of any further assistance in this matter, please do not hesitate to contact me.

Yours very truly,

Mary Maple

Mary Maple

MLM/mm

Enclosures

87-0240

SENSITIVE

RAD REFERRAL 86NF-40
STAFF MEMBER Caroline Lewis

FEDERAL AGENCIES CHECKED: None

On September 19, 1986, a Prior Notice was sent informing the Committee that the 1986 October Quarterly Report was due on October 15, 1986. On November 4, 1986, a Non-Filer Notice was sent to the Committee for its failure to file the 1986 October Quarterly Report. On November 28, 1986, the Committee filed the

1986 October Quarterly Report. A letter attached to the report stated that the Committee contacted the Commission during the first week of October to determine whether a quarterly report had to be filed. The Committee stated that it was informed that ". . . since we had no activity and no candidate for office, we did not have to file a report until December 5, 1986." The Reports Analysis Division has no record of this telephone call.

(B) The Law

Pursuant to 2 U.S.C. § 434(a)(4)(A)(i) and 11 CFR § 104.5(c)(1)(i)(A), all political committees other than authorized committees are required to file a quarterly report no later than the 15th day after the last day of each calendar quarter, and shall be complete as of the last day of each calendar quarter.

(C) Application of the Law to the Facts

The record in this matter reveals that the Committee was required to file a 1986 October Quarterly Report by October 15, 1986. However, the Committee did not file the 1986 October Quarterly Report until November 28, 1986 or 44 days late. Although the Committee states that it was informed through a telephone call to the Commission that it was not necessary to file the 1986 October Quarterly Report, the Prior Notice sent to the Committee on September 19, 1986, indicated that all party committees, except those filing monthly, were required to file the 1986 October Quarterly Report.

87040553903

In view of the Committee's failure to file the 1986 October Quarterly Report by the required filing date, it is the recommendation of this Office that the Commission open a Matter Under Review and find reason to believe that the Committee and John H. Yost, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i).

RECOMMENDATIONS

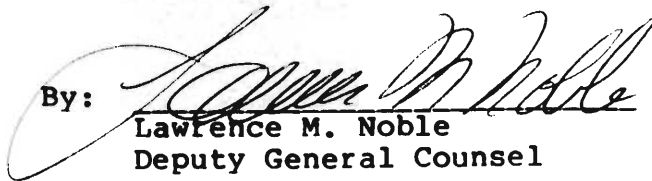
1. Open a Matter Under Review.
2. Find reason to believe that the Jefferson County Republican Executive Committee and John H. Yost, as treasurer, violated 2 U.S.C. § 434(a)(4)(a)(i).
3. Approve the attached letter and factual and legal analysis.

Charles N. Steele
General Counsel

Date

1/21/87

By:


Lawrence M. Noble
Deputy General Counsel

Attachments

1. Referral
2. Letter and Factual and Legal Analysis



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *CCM*
DATE: January 21, 1987
SUBJECT: RAD Ref. 86NF-40 - First General Counsel's Report

The attached is submitted as an Agenda document
for the Commission Meeting of _____
Open Session _____
Closed Session _____

CIRCULATIONS

48 Hour Tally Vote	☒
Sensitive	☒
Non-Sensitive	☐
24 Hour No Objection	☐
Sensitive	☐
Non-Sensitive	☐
Information	☐
Sensitive	☐
Non-Sensitive	☐
Other	☐

DISTRIBUTION

Compliance	☒
Audit Matters	☐
Litigation	☐
Closed MUR Letters	☐
Status Sheets	☐
Advisory Opinions	☐
Other (see distribution below)	☐

87040553905



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO:

CHARLES N. STEELE
GENERAL COUNSEL

FROM:

MJE MARJORIE W. EMMONS/ JOSHUA MCFADDEN *JM*

DATE:

JANUARY 27, 1987

SUBJECT:

OBJECTION TO RAD Ref. 86NF-40 - 1ST G.C. REPORT
SIGNED JANUARY 21, 1987

The above-captioned document was circulated to the
Commission on Friday, January 23, 1987 at 2:00 P.M.

Objections have been received from the Commissioners
as indicated by the name(s) checked:

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner Josefiak	_____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Thomas	_____ X _____

This matter will be placed on the Executive Session
agenda for Tuesday, February 3, 1987.

8704053906

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Jefferson County Republican)
Executive Committee)
John H. Yost, as treasurer)

RAD Referral 86NF-40

(MUR 2341)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of February 3, 1987, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions with respect to the above-captioned referral:

1. Open a Matter Under Review.
2. Find reason to believe that the Jefferson County Republican Executive Committee and John H. Yost, as treasurer, violated 2 U.S.C. § 434(a)(4)(a)(i).
3. Approve the letter and factual and legal analysis attached to the General Counsel's report dated January 21, 1987.

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

Attest:

2/4/87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

87040553907



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 11, 1987

John H. Yost, Treasurer
Jefferson County Republican
Executive Committee
300 W. Chestnut
Louisville, KY 40202

RE: MUR 2341
Jefferson County Republican
Executive Committee;
John H. Yost, as treasurer

Dear Mr. Yost:

On February 3, 1987, the Federal Election Commission determined that there is reason to believe the Jefferson County Republican Executive Committee and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within fifteen days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you **should** so request **in writing**. **See** 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the **Commission** either

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Jefferson County Republican
Executive Committee; John H.
Yost, as treasurer

MUR _____

SUMMARY OF ALLEGATIONS

The Jefferson County Republican Executive Committee ("Committee") and John H. Yost, as treasurer, failed to file the 1986 October Quarterly Report in a timely manner.

FACTUAL AND LEGAL ANALYSIS

(A) The Facts

On September 19, 1986, a Prior Notice was sent informing the Committee that the 1986 October Quarterly Report was due on October 15, 1986. On November 4, 1986, a Non-Filer Notice was sent to the Committee for its failure to file the 1986 October Quarterly Report. On November 28, 1986, the Committee filed the 1986 October Quarterly Report. A letter attached to the report stated that the Committee contacted the Commission during the first week of October to determine whether a quarterly report had to be filed. The Committee stated that it was informed that ". . . since we had no activity and no candidate for office, we did not have to file a report until December 5, 1986." The Reports Analysis Division has no record of this telephone call.

(B) The Law

Pursuant to 2 U.S.C. § 434(a)(4)(A)(i) and 11 CFR § 104.5(c)(1)(i)(A), all political committees other than authorized committees are required to file a quarterly report no later than the 15th day after the last day of each calendar quarter, and shall be complete as of the last day of each calendar quarter.

8704053909

(C) Application of the Law to the Facts

The record in this matter reveals that the Committee was required to file a 1986 October Quarterly Report by October 15, 1986. However, the Committee did not file the 1986 October Quarterly Report until November 28, 1986 or 44 days late. Although the Committee states that it was informed through a telephone call to the Commission that it was not necessary to file the 1986 October Quarterly Report, the Prior Notice sent to the Committee on September 19, 1986, indicated that all party committees, except those filing monthly, were required to file the 1986 October Quarterly Report.

In view of the Committee's failure to file the 1986 October Quarterly Report by the required filing date, it is the recommendation of this Office that the Commission open a Matter Under Review and find reason to believe that the Committee and John H. Yost, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i).

87040553910

RECEIVED
Republican Headquarters
300 W. Chestnut St.
OFFICE OF Louisville, Kentucky 40202
GENERAL COUNSEL

RECEIVED AT THE FEC

87 FEB 24 10:20

87 FEB 24 3:38 February 16, 1987

Federal Election Commission
ATTN: Caroline Lewis
Scott Thomas
Report Analysis Division
Washington, D.C. 20463

Re: MUR 2341

Dear Ms. Lewis and Mr. Thomas,

In response to your letter dated February 11, 1987, it is with deep regret that the October 15, 1986 report was not filed timely.

As this account has no activity and has had no activity since June 30, 1985, it was simply a process of filing a report with no activity on it containing a \$50.00 balance.

I should have prepared the October report according to the instructions received in the mail instead of instructions received in a telephone conversation.

There was no intent to be in violation of the Federal Election Commission's reporting laws, and it is possible that I confused the state of Kentucky reporting requirements with the federal reporting requirements.

As you can see, the post election report (11/1-11/24/86) and the year end report (11/25-12/31/86) was timely filed and extreme caution shall be taken in the future to prevent any further delays in the reporting process.

It is hoped this is sufficient information to resolve this investigation.

If I can be of any further assistance in this matter, please do not hesitate to contact me.

Mary Maple
Mary Maple
Accountant

Republican Headquarters
300 W. Chestnut Street
Louisville, Kentucky 40202

RECEIVED AT THE FEC
GCC#2770
87 FEB 25 19:04

February 20, 1987

Federal Election Commission
Caroline Lewis and Scott Thomas
Report Analysis Division
Washington, D.C. 20463

Re: MUR 2341

Dear Ms. Lewis and Mr. Thomas,

This letter will serve as an addition to the explanation received from me, dated February 16, 1987.

Enclosed please find a copy of my personal telephone bill showing a call to the Federal Election Commission on October 20, 1986. This call was made to inquire about the filing requirements for Republican Headquarters which had no candidate or any activity for the reporting period concerned. As I stated earlier, I was told the report was not due until December by a male employee, who apparently did not make note of my call to him.

If I can be of any further assistance in this matter, please do not hesitate to contact me.

Sincerely,

Mary Maple

Mary Maple
Accountant

MAM/mm
Enclosures

RECEIVED
OFFICE OF THE
GENERAL COUNSEL
87 FEB 25 10:26



South Central Bell

** AT&T COMMUNICATIONS **

CURRENT CHARGES

CL 502-423-0111-115

NOV 10, 1986

13996

LSVL R PAGE

1 ATX

ITEM

CODES AMOUNT

1. INTER STATE AND CANADA DIRECTORY ASSISTANCE USAGE

2 CALL ALLOWANCE

6 BILLABLE CALLS AT \$.60 PER CALL . . .

3.60

2.	OCT 12	730PM TO SEYMOUR	IN 812 522-4838	4 MIN	AE	.67
3.	OCT 12	940PM TO NO VERNON	IN 812 346-3707	1 MIN	AE	.24
4.	OCT 12	941PM TO NO VERNON	IN 812 346-5648	16 MIN	AE	2.40
5.	OCT 13	1024AM TO SEYMOUR	IN 812 522-4838	4 MIN	AD	1.13
6.	OCT 20	842AM TO SANJACINTO	IN 812 873-6511	1 MIN	AD	.41
7.	OCT 20	959AM TO WASHINGTON DC	202 376-3140	1 MIN	AD	.47
8.	OCT 20	855PM TO BEAVERCREK OH	513 426-7198	27 MIN	AE	4.94
9.	OCT 22	117PM TO MITCHELL	IN 812 849-4081	1 MIN	AD	.41
10.	OCT 22	817PM TO COLUMBUS	IN 812 372-1267	1 MIN	AE	.25
11.	OCT 24	920AM TO SEYMOUR	IN 812 522-4838	3 MIN	AD	.89
12.	OCT 24	743PM TO NO VERNON	IN 812 346-4265	3 MIN	AE	.53
13.	OCT 26	928PM TO COLUMBUS	IN 812 372-1267	9 MIN	AE	1.60
14.	OCT 28	757PM TO SANJACINTO	IN 812 873-6511	2 MIN	AE	.39
15.	OCT 31	418PM TO SANJACINTO	IN 812 873-6511	1 MIN	AD	.41

CONTINUED

8 7 0 4 0 6 5 3 9 1 3

Republican Headquarters,
300 W. Chestnut St.
Louisville, Kentucky 40202

BCC 2814
RECEIVED AT THE FEC

87 MAR 2 12:37

February 28, 1987

ATTN: Caroline Lewis
Federal Election Commission
Office of the General Counsel
Washington, D.C. 20463

Re: MUR 2341

Dear Ms. Lewis,

The Committee and the Treasurer of the Louisville and Jefferson County Republican Finance Committee is interested in the Preprobable Cause Conciliation procedure.

If I can be of any further assistance in this matter, please do not hesitate to contact me.

Sincerely,

Mary Maple

Mary Maple
Accountant

Mam/mm

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

87 MAR 2 12:38

87040553914

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Jefferson County Republican)
Executive Committee;)
John H. Yost, as treasurer)

MUR 2341

07 MAR 23 10:52

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On February 3, 1987, the Commission found reason to believe that the Jefferson County Republican Executive Committee and John H. Yost, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) by failing to file the 1986 October Quarterly Report in a timely manner. By letter dated February 28, 1987, the Jefferson County Republican Executive Committee and John H. Yost requested to settle this matter prior to a finding of probable cause to believe (Attachment 1, page 4).

II. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

87040353915

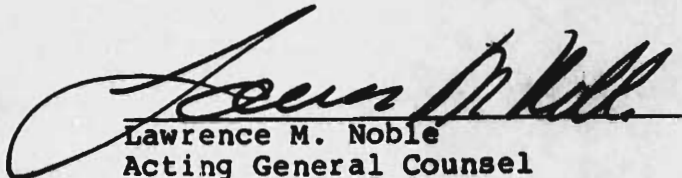
87040553916

III. RECOMMENDATIONS

1. Enter into conciliation with the Jefferson County Republican Executive Committee and John H. Yost, as treasurer, prior to a finding of probable cause to believe.
2. Approve the attached proposed conciliation agreement and letter.

Date

3/20/87


Lawrence M. Noble
Acting General Counsel

Attachments

1. Letter from respondents
2. Proposed agreement and letter

87040553917

87040553918

Attachment(s) 1, 2
to General Counsel's Report
have been removed from this
position in Public Record File.
See Index Item(s) 9, 13



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel
DATE: March 20, 1987
SUBJECT: MUR 2341 - General Counsel's Report

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote ☒
Sensitive ☒
Non-Sensitive ☐

24 Hour No Objection ☐
Sensitive ☐
Non-Sensitive ☐

Information ☐
Sensitive ☐
Non-Sensitive ☐

Other ☐

DISTRIBUTION

Compliance ☒
Audit Matters ☐

Litigation ☐
Closed MUR Letters ☐

Status Sheets ☐
Advisory Opinions ☐

Other (see distribution
below) ☐

87040553919

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Jefferson County Republican) MUR 2341
Executive Committee;)
John H. Yost, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 25, 1987, the Commission decided by a vote of 6-0 to take the following actions in MUR 2341:

1. Enter into conciliation with the Jefferson County Republican Executive Committee and John H. Yost, as treasurer, prior to a finding of probable cause to believe.
2. Approve the proposed conciliation agreement and letter, as recommended in the General Counsel's Report signed March 20, 1987.

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

Attest:

3-26-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Mon., 3-23-87, 8:52
Circulated on 48 hour tally basis: Mon., 3-23-87, 4:00
Deadline for vote: Wed., 3-25-87, 4:00



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 27, 1987

John H. Yost, Treasurer
Jefferson County Republican
Executive Committee
300 W. Chestnut
Louisville, KY 40202

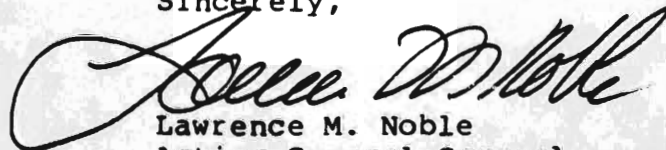
RE: MUR 2341
Jefferson County Republican
Executive Committee
John H. Yost, as treasurer

Dear Mr. Yost:

On February 3, 1987, the Commission found reason to believe that Jefferson County Republican Executive Committee and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i). At your request, the Commission determined on March 25, 1987 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 in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. 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. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Caroline Lewis, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,


Lawrence M. Noble
Acting General Counsel

Enclosures

R 7 0 4 0 5 5 3 9 2 1



Republican Party Of Jefferson County

300 W. Chestnut • Louisville, Kentucky 40202 • 502 • 584-7111

April 28, 1987

Federal Election Commission
999 E. Street N.W.
Washington, D.C. 20467

Gentlemen:

Please be advised that the Jefferson County Republican Executive Committee held their annual election of officers on April 7, 1987.

Mr. William D. Tafel was elected Treasurer of the Jefferson County Republican Party replacing Mr. John H. Yost. All appropriate correspondence should be mailed to Mr. Tafel at 300 West Chestnut, Louisville, Kentucky 40202.

Sincerely,

Carolyn Davis

Carolyn Davis
Executive Director

cc: Mr. John G. Heyburn II Chairman
Mr. William Warner, Legal Counsel

87040553922

6cc 3443
RECEIVED AT THE FEC

LAW OFFICES

CONLIFFE, SANDMANN, GORMAN & SULLIVAN

621 W. MAIN STREET
LOUISVILLE, KENTUCKY 40202
(502) 687-7711

J. D. RAINE, SR.
EDWIN J. LOWRY, SR.
I. G. SPENCER, JR.
KARL N. VICTOR, JR.
CHARLES I. SANDMANN
MICHAEL E. CONLIFFE
WILLIAM T. WARNER
RICHARD M. SULLIVAN
F. CHRIS GORMAN
SAM DEEB
STUART L. ADAMS, JR.
JACK R. UNDERWOOD, JR.
J. D. RAINE, JR.
JOSEPH W. O'REILLY
N. SCOTT LILLY
EDWIN J. LOWRY, JR.
ALLEN K. GRUNER
KENNETH A. BOHNERT
JAMES T. MITCHELL
R. ALLEN MCCARTNEY
EDWARD F. BUSCH

ALLEN P. DODD, III
OF COUNSEL

JAMES S. MURPHY
(1945-1986)

*ALSO ADMITTED IN MASSACHUSETTS
*ALSO ADMITTED IN INDIANA

May 21, 1987

87 MAY 26 P 3:20

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

Ms. Caroline Lewis
Federal Election Commission
999 E. Street, NW
Washington, DC 20463

RE: MUR ²³⁴¹~~2314~~; Jefferson County Republican Executive
Committee and James H. Yost, Treasurer, Respondents

Dear Ms. Lewis:

In connection with your recommendation and that of Mr. Whitehead at our May 4 Conference, I am enclosing duplicate originals of a Conciliation Agreement, executed on behalf of the Respondents by William D. Tafel who was elected Treasurer of the Respondent Committee April 7, 1987.

The executed Conciliation Agreement contains the changes and modifications we discussed at the meeting.

I also enclose the Respondent Committee's check in the amount of \$350.00 payable to the Federal Election Commission, also as discussed and recommended at the May 4 Conference.

In checking through the Committee's documentation on file with the Commission, in order to verify whether or not the Commission had been properly notified of the election of Mr. Tafel, we have been advised that the Committee's original Registration Statement is not in the computer files, and apparently not available from any other Commission file. Therefore, at this point, we are proceeding with the drafting of a "amended original" Registration Statement which we will have adopted by the local Committee, properly executed, and submitted at the earliest possible date.

14a

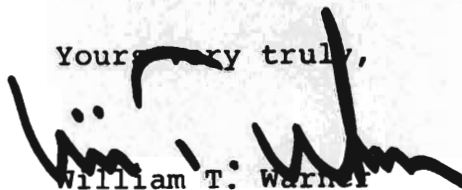
Ms. Caroline Lewis
Federal Election Commission
May 21, 1987
Page Two

In the meantime, I did verify that the Commission was notified by letter dated April 28, 1987 of the election of Mr. Tafel. That letter appears in the Committee's file at the Commission, and I am enclosing a copy for your information and reference.

We would appreciate being advised as to whether or not the Commission accepts and approves the Conciliation Agreement, including the agreed civil penalty, and we would like to have back a signed copy of the Agreement. We would also like to have a copy of the press release concerning the Agreement when it is released, if that is possible.

Again, for myself and on behalf of the Respondents, I want to express our very sincere appreciation for the many courtesies extended by you, and the General Counsel's Office, in connection with the resolution of this matter.

Yours very truly,



William T. Warner

WTW/drb
enclosures
cc: Ms. Carolyn Davis
Mr. William D. Tafel
Mr. John Heyburn

14a

GCC 3533

RECEIVED AT THE FEC

HAND DELIVERED

87 JUN 4 AIO: 33

/ MUR 2341

LAW OFFICES

CONLIFFE, SANDMANN, GORMAN & SULLIVAN

881 W. MAIN STREET
LOUISVILLE, KENTUCKY 40202
(606) 587-7711ALLEN P. DODD, III
OF COUNSELJAMES S. MURPHY
(1942-1986)* ALSO ADMITTED IN MASSACHUSETTS
* ALSO ADMITTED IN INDIANAJ. D. RAINE, SR.
EDWIN J. LOWRY, SR.
I. G. SPENCER, JR.
KARL N. VICTOR, JR.
CHARLES I. SANDMANN
MICHAEL E. CONLIFFE
WILLIAM T. WARNER
RICHARD M. SULLIVAN
F. CHRIS GORMAN
SAM DEES
STUART L. ADAMS, JR.*
JACK R. UNDERWOOD, JR.
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JAMES T. MITCHELL
R. ALLEN MCCARTNEY+
EDWARD F. BUSCH

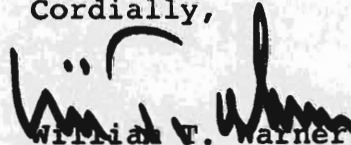
June 3, 1987

VIA FEDERAL EXPRESSMs. Caroline Lewis
Federal Election Commission
999 E. Street, NW
Washington, DC 20463RE: MUR 2314; Jefferson County Republican Executive
Committee and James H. Yost, Treasurer, Respondents

Dear Ms. Lewis:

Enclosed are two copies of the redrafted Conciliation Agreement, incorporating the changes you suggested during our telephone conversation Wednesday morning, June 3, and executed by Mr. Tafel on behalf of the Respondents.

Cordially,



William T. Warner

WTW/drb

enclosures

cc: Mr. William D. Tafel
Mrs. Carolyn Davis
Mr. John Heyburn

87 JUN 4 AIO: 34

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

146

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Jefferson County Republican)
Executive Committee;)
John H. Yost, as treasurer)

MUR 2341

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by William D. Tafel, the current treasurer of the Jefferson County Republican Executive Committee, for the Committee and the former treasurer, John H. Yost (Attachment 1).

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The Committee was notified by letter dated September 19, 1986, that it was to file a quarterly report due on October 15, 1986. Yet, the Committee has stated that it contacted the Commission in October to determine whether or not it had to file a quarterly report. The Committee stated that it was informed that because it had no activity and no candidate for office, it did not have to file until December 3, 1986 (Attachment 2). The Reports Analysis Division has no record of this telephone call, but the Committee did supply a copy of a telephone bill indicating a call to the Commission's Public Disclosure Office on October 20, 1986 ^{1/} (Attachment 3). Thus, the Committee has maintained that the quarterly report notice and the Committee's succeeding phone call to the Commission concerning the filing produced confusion over whether or not the October quarterly filing was necessary.

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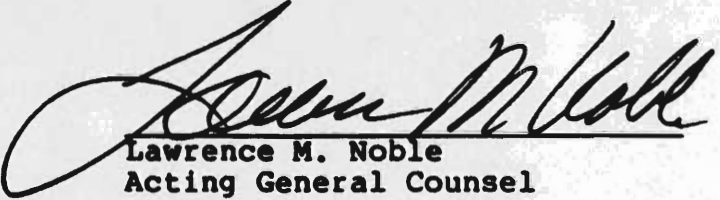
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III. RECOMMENDATIONS

1. Accept the conciliation agreement with the Jefferson County Republican Executive Committee and John H. Yost, as Treasurer.
2. Close the file.
3. Approve the attached proposed conciliation agreement and letter.

Date

6/12/87


Lawrence M. Noble
Acting General Counsel

Attachments

1. Conciliation Agreement and photocopy of civil penalty check
2. Letter from Committee dated November 19, 1986
3. Letter from Committee dated February 20, 1987
4. Proposed letter

87040653929

Attachment(s) 1, 3, 4
to General Counsel's Report
have been removed from this
position in Public Record File.
See Index Item(s) 18, 8, 18



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Cof.*
DATE: June 12, 1987
SUBJECT: MUR 2341 - General Counsel's Report

The attached is submitted as an Agenda document
for the Commission Meeting of _____
Open Session _____
Closed Session _____

CIRCULATIONS

48 Hour Tally Vote	☒
Sensitive	☒
Non-Sensitive	☐
24 Hour No Objection	☐
Sensitive	☐
Non-Sensitive	☐
Information	☐
Sensitive	☐
Non-Sensitive	☐
Other	☐

DISTRIBUTION

Compliance	☒
Audit Matters	☐
Litigation	☐
Closed MUR Letters	☐
Status Sheets	☐
Advisory Opinions	☐
Other (see distribution below)	☐

87040553930

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Jefferson County Republican) MUR 2341
Executive Committee;)
John H. Yost, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 17, 1987, the Commission decided by a vote of 6-0 to take the following actions in MUR 2341:

1. Accept the conciliation agreement with the Jefferson County Republican Executive Committee and John H. Yost, as Treasurer, as recommended in the General Counsel's Report signed June 12, 1987.
2. Close the file.
3. Approve the proposed conciliation agreement and letter, as recommended in the General Counsel's Report signed June 12, 1987.

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

Attest:

6-17-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Fri., 6-12-87, 2:24
Circulated on 48 hour tally basis: Mon., 6-15-87, 11:00
Deadline for vote: Wed., 6-17-87, 11:00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 19, 1987

William T. Warner, Esquire
Conliffe, Sandmann, Gorman & Sullivan
621 West Main Street
Louisville, KY 40202

RE: MUR 2341
Jefferson County Republican
Executive Committee
John H. Yost, as treasurer

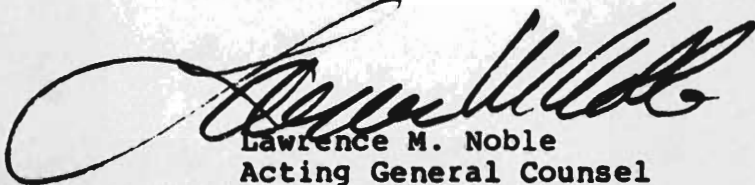
Dear Mr. Warner:

On June 17, 1987, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your client's behalf in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(i), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter. This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Caroline Lewis, the staff member assigned to this matter at (202) 376-8200.

Sincerely,



Lawrence M. Noble
Acting General Counsel

Enclosure
Conciliation Agreement

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Jefferson County Republican) MUR 2341
Executive Committee;)
John H. Yost, as treasurer)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Jefferson County Republican Executive Committee, and John H. Yost, as treasurer (hereinafter "the Respondents"), violated 2 U.S.C. §434(a)(4)(A)(i).

NOW, THEREFORE, the Commission and 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:

87040553934

1. Jefferson County Republican Executive Committee is a political committee registered with the Commission.

2. At all material times herein, John H. Yost was the treasurer of the Jefferson County Republican Executive Committee.

3. William D. Tafel is presently the Treasurer of the Jefferson County Republican Executive Committee.

4. Pursuant to 2 U.S.C. §434(a)(4)(A)(i), the Respondents were required to file the 1986 October Quarterly by October 15, 1986. The report was filed November 28, 1986, 44 days late.

V. Respondents violated 2 U.S.C. §434(a)(4)(A)(i) by failing to file timely the 1986 October Quarterly report. Respondents contend that the violation was not knowing and willful.

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Three Hundred Fifty Dollars (\$350.00), pursuant to 2 U.S.C. §437g(a)(5)(A).

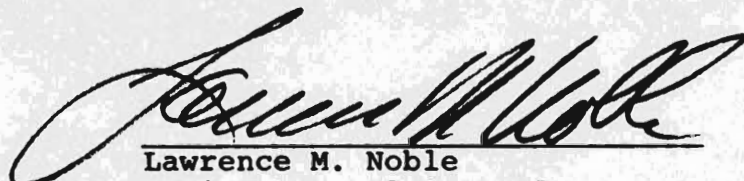
VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. §437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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

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

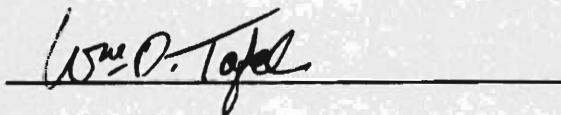
X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement, shall be valid.

FOR THE COMMISSION:


Lawrence M. Noble
Acting General Counsel

6/19/87
Date

FOR THE RESPONDENTS:



June 3, 1987
Date

87040553935



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2341
DATE FILMED 8/14/87 CAMERA NO. 2
CAMERAMAN GPC

87040553936