



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

THIS IS THE BEGINNING OF MUR # 2487
DATE FILMED 12/3/87 CAMERA NO. 3
CAMERAMAN AS

87040365290

PUBLIC RECORD INDEX MUR 2487

1. Memo, 22 May 87, John D. Gibson (Reports Analysis Division) to Lawrence H. Noble (Acting General Counsel) subj: Referral of the I Love America Committee, w/atch (RAD Referral Package)
2. First General Counsel's Report, 10 Jun 87'
3. Certification of Commission Action, 16 Jun 87
4. Ltr, 29 Jun 87, Scott E. Thomas (Chairman, FEC) to Granville Graham (Treas., I LOVE AMERICA COMMITTEE), w/atch (Factual and Legal Analysis)
5. Ltr, 8 Jul 87, C. Michael Deese (Counsel to Respondents) to FEC, w/atch (Statement of Designation of Counsel)
6. General Counsel's Report, 28 Jul 87
7. Certification of Commission Action, 31 Jul 87
8. Ltr, 4 Aug 87 L.M. Noble to C. Michael Deese
9. General Counsel's Report, 7 Sep 87
10. Certification of Commission Action, 11 Sep 87
11. Ltr, 16 Sep 87, L.M. Noble to C. Michael Deese, w/atch (executed conciliation agreement).

-END-

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.

8704065291



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 22, 1987

MEMORANDUM

TO: LAWRENCE M. NOBLE
ACTING GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

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

SUBJECT: QUARTERLY FILERS (UNAUTHORIZED COMMITTEES) WHICH
FAILED TO FILE THE 1986 12 DAY PRE-GENERAL REPORT
BY ELECTION DAY

The attached list of unauthorized committees consists of forty-nine (49) quarterly filers which failed to file a 1986 12 Day Pre-General Report by Election Day, November 4, 1986. In accordance with Standard 3 of the RAD Review and Referral Procedures, further examination is required by your office.

Unlike the mandatory reporting requirement placed upon monthly filers, 2 U.S.C. §434(a)(4)(A)(ii) requires quarterly filers to submit 12 Day Pre-General Reports only if the committees make contributions to or expenditures on behalf of federal candidates involved in the general election. All unauthorized committees were sent prior notification regarding the pre- and post-general filing requirements on September 29, 1986 (Attachment 50).

The Party/Non-Party Branch conducted a thorough examination to identify quarterly filers disclosing contributions or expenditures between October 1 and October 15, 1986. The research revealed committees that submitted:

- a) 12 Day Pre-General Reports in an untimely manner;
- b) 30 Day Post-General Reports indicating that 12 Day Pre-General Reports should have been filed; and
- c) Year End Reports indicating that 12 Day Pre-General Reports should have been filed.

ATTACHMENT 1

3704065292

For your information, the pertinent supporting documentation on each committee has been arranged in alphabetical order. Statistics on all C indices only reflect activity through December 31, 1986. Any reports disclosing activity in 1987 have not been reviewed.

The following committees were previously referred either to your office or to the Audit Division for a possible 2 U.S.C. §438(b) audit.

(1)

(2) I Love America Committee

(a) #86MF-17: MUR 2264, closed on March 5, 1987.

(3)

(4)

(5)

(6)

If you have any questions, please contact Lisa J. Stolaruk at 376-2480.

Attachments

3704065293

C00160494

I Love America Committee

87HF-106

87040565294

1

I LOVE AMERICA COMMITTEE
(Attachments 21a - 21e)

8704065295

/

8 7 0 4 0 6 6 5 2 9 6

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-86)

DATE 19MAY87
PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
I LOVE AMERICA COMMITTEE						
CONNECTED ORGANIZATION:	NONE					
1985	APRIL QUARTERLY	44,636	43,775	1JAN85 -31MAR85	10	85FEC/372/4347
	MID-YEAR REPORT	89,695	89,962	1JAN85 -30JUN85	13	85FEC/384/1479
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN85 -30JUN85	2	86FEC/404/1657
	REQUEST FOR ADDITIONAL INFORMATION			1JAN85 -30JUN85	2	86FEC/397/3481
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN85 -30JUN85	3	86FEC/403/1824
	YEAR-END	49,862	47,112	1JUL85 -31DEC85	15	86FEC/402/1740
	YEAR-END - AMENDMENT	-	-	1JUL85 -31DEC85	1	86FEC/430/3554
	YEAR-END - AMENDMENT	49,862	47,112	1JUL85 -31DEC85	9	86FEC/432/3613
	YEAR-END - AMENDMENT	51,906	49,156	1JUL85 -31DEC85	5	87FEC/466/3011
	YEAR-END - AMENDMENT	-	-	1JUL85 -31DEC85	2	87FEC/466/3697
	REQUEST FOR ADDITIONAL INFORMATION			1JUL85 -31DEC85	1	86FEC/405/8324
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL85 -31DEC85	2	86FEC/408/1630
	1ST LETTER INFORMATIONAL NOTICE			1JUL85 -31DEC85	1	86FEC/431/4092
	REQUEST FOR ADDITIONAL INFORMATION			1JUL85 -31DEC85	1	87FEC/463/5245
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL85 -31DEC85	3	87FEC/465/2437
1986	MISCELLANEOUS NOTICE FROM FEC			20JUN86	1	86FEC/417/4443
	APRIL QUARTERLY	20,328	4,241	1JAN86 -31MAR86	9	86FEC/414/4822
	APRIL QUARTERLY - AMENDMENT	20,328	4,241	1JAN86 -31MAR86	3	86FEC/419/1908
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN86 -31MAR86	4	87FEC/466/3007
	NOTICE OF FAILURE TO FILE			1JAN86 -31MAR86	1	86FEC/413/3044
	REQUEST FOR ADDITIONAL INFORMATION			1JAN86 -31MAR86	1	86FEC/417/1092
	REQUEST FOR ADDITIONAL INFORMATION			1JAN86 -31MAR86	1	87FEC/463/5243
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN86 -31MAR86	1	87FEC/465/2440
	JULY QUARTERLY	24,004	44,864	1APR86 -30JUN86	10	86FEC/426/3023
	NOTICE OF FAILURE TO FILE			1APR86 -30JUN86	1	86FEC/426/3496
	OCTOBER QUARTERLY	13,507	9,287	1JUL86 -30SEP86	10	86FEC/438/2001
	POST-GENERAL	2,744	3,177	1OCT86 -24NOV86	10	86FEC/445/4752
	YEAR-END	1,239	3,702	25NOV86 -31DEC86	8	87FEC/459/4140
	YEAR-END - AMENDMENT	1,239	3,702	25NOV86 -31DEC86	6	87FEC/463/5274
	REQUEST FOR ADDITIONAL INFORMATION			25NOV86 -31DEC86	1	87FEC/463/1272
	REQUEST FOR ADDITIONAL INFORMATION			25NOV86 -31DEC86	1	87FEC/463/5247
TOTAL		248,059	0 248,164	0	139	TOTAL PAGES

All reports have been reviewed except the amended 1985 Year End and amended 1986 April Quarterly Reports
(received in April 1987).
Ending cash-on-hand as of 12/31/86: \$6,160
Outstanding debts owed by the committee as of 12/31/86: \$74,108

UNITED STATES OF AMERICA
For a Political Committee Other Than an Authorized Committee

RECEIVED AT THE FEC

(Mandatory Page)

08DEC 1 11:21

1. Name of Committee On File

I Love America Committee

Address (Number and Street)

P.O. Box 1776

City, State and ZIP Code

Lynchburg, VA 24503

☐ Check here if address is different than previously reported.

2. FEC Identification Number

C0016848

3. ☐ This committee qualified as a candidate 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-Station 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 Nov. 4 in the State of Virginia

☐ Termination Report

(b) Is this Report an Amendment?

☐ YES ☒ NO

SUMMARY

5. Covering Period Oct. 1, 1986 through Nov. 24, 1986

6. (a) Cash on hand January 1, 1986

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 10)

(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 20)

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)

WARNING: If this committee has received the report due to the date of any delinquency and it is not true, correct and complete.

COLUMN A
This PeriodCOLUMN B
Calendar Year-to-Date

\$ 9,608.01

\$ 9,056.38

\$ 2,744.50

\$ 60,585.53

\$ 11,800.88

\$ 70,193.54

\$ 3,177.12

\$ 61,569.78

\$ 8,623.76

\$ 8,623.76

\$ -0-

\$ 73,462.22

For further information contact:

Federal Election Commission
 435 E Street, N.W.
 Washington, D.C. 20543
 Toll Free 800-424-6520
 Local 202-376-3120

Stanville Y. Graham

(Type or Print Name of Treasurer)

Stanville Y. Graham
 Treasurer of the Committee
 11/24/86

NOTE: Submission of false, fraudulent, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 4311.

All previous versions of FES FORM 8 and FES FORM 9 are obsolete and should no longer be used.

FEC FORM 3X (3-80)

2000-2001 CAMPAIGN FORM
For Political Committees and Candidates
Form 1, FEBRUARY 2000

Name of Committee or Candidate

I Love America Committee

Reporting Period

From: **10-1-86**To: **11-24-86**COLUMN A
Total This PeriodCOLUMN B
Calendar Year-To-Date**I. RECEIPTS****11. CONTRIBUTIONS (other than loans) FROM:**

(a) Individuals/Persons Other Than Political Committees

(Name Entry Unavailable) **2,469.50**

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))

12. TRANSFERS FROM AFFILIATES/OTHER PARTY COMMITTEES**13. ALL LOANS RECEIVED****14. LOAN REPAYMENTS RECEIVED****15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)****16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES****17. OTHER RECEIPTS (Donations, Interest, etc.)****18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)****II. DISBURSEMENTS****19. OPERATING EXPENDITURES****20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES****21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES****22. INDEPENDENT EXPENDITURES (see Schedule E)****23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES**

(2 U.S.C. 6441 (d)) (Use Schedule F)

24. LOAN REPAYMENTS MADE**25. LOANS MADE****26. REFUNDS OF CONTRIBUTIONS TO**

(a) Individuals/Persons Other Than Political Committees

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))

27. OTHER DISBURSEMENTS**28. TOTAL DISBURSEMENTS (Add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)****III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES****29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)****30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)****31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)****32. TOTAL OPERATING EXPENDITURES from Line 19****33. OFFSETS TO OPERATING EXPENDITURES from Line 15****34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)**

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	2,469.50	54,997.17	11(a)
(b) Political Party Committees			11(b)
(c) Other Political Committees			11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	2,469.50	54,997.17	11(d)
12. TRANSFERS FROM AFFILIATES/OTHER PARTY COMMITTEES			12
13. ALL LOANS RECEIVED			13
14. LOAN REPAYMENTS RECEIVED			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	275.00	5,588.36	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
17. OTHER RECEIPTS (Donations, Interest, etc.)			17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	2,744.50	60,585.53	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	1,202.10	31,458.26	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	1,095.02	30,111.52	21
22. INDEPENDENT EXPENDITURES (see Schedule E)			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES			23
(2 U.S.C. 6441 (d)) (Use Schedule F)			
24. LOAN REPAYMENTS MADE			24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees	-0-	-0-	26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))	-0-	-0-	26(d)
27. OTHER DISBURSEMENTS			27
28. TOTAL DISBURSEMENTS (Add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	3,277.12	61,569.78	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	2,469.50	54,997.17	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)	-0-	-0-	30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	2,469.50	54,997.17	31
32. TOTAL OPERATING EXPENDITURES from Line 19	1,202.10	31,458.26	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	275.00	5,588.36	33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	1,007.10	25,869.90	34

SCHEDULE C

ITEMIZED DISBURSEMENTS

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

PAGE 1 OF 1
FOR LINE NUMBER 21

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

NAME OF COMMITTEE (in Full)

I Love America Committee

A. Full Name, Mailing Address and ZIP Code Wylie For Congress Committee Russ Leach Treasurer P.O. Box 15681 Columbus, OH 43215	Purpose of Disbursement OH-15 Contribution Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 10-7-86	Amount of Each Disbursement This Period 250.00
B. Full Name, Mailing Address and ZIP Code Dick Arney For Congress P.O. Box 2730 Denton, TX 76202	Purpose of Disbursement TX Contribution Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 10-6-86	Amount of Each Disbursement This Period 250.00
C. Full Name, Mailing Address and ZIP Code Cobey For Congress Committee 624 W. Chatham Street Apex, NC 27502	Purpose of Disbursement NC Contribution Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 10-7-86	Amount of Each Disbursement This Period 250.00
D. Full Name, Mailing Address and ZIP Code Holtzman For Congress	Purpose of Disbursement Contribution Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 10-28-86	Amount of Each Disbursement This Period 275.90 In-Kind
E. Full Name, Mailing Address and ZIP Code Flo Traywick Dan Snyder	Purpose of Disbursement VA-6 Contribution Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 10-16-86	Amount of Each Disbursement This Period 500.00 In-Kind
F. Full Name, Mailing Address and ZIP Code Flo Traywick Rent-A-Wreck	Purpose of Disbursement VA-6 Contribution Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 11-11-86	Amount of Each Disbursement This Period 94.12 In-Kind
G. Full Name, Mailing Address and ZIP Code Flo Traywick Use of Typewriters	Purpose of Disbursement VA-6 Contribution Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 11-24-86	Amount of Each Disbursement This Period 275.00 In-Kind
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (add line)

TOTAL This Period (add page this line number only)

1,895.02

I LOVE AMERICA COMMITTEE

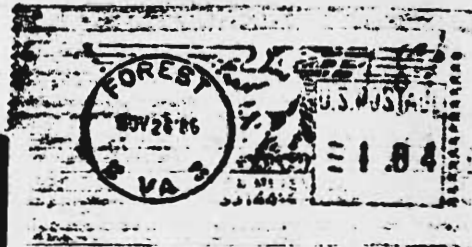
P.O. BOX 1776 • LYNCHBURG, VIRGINIA 24505

CERTIFIED

P 754 587 942

MAIL

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



86DEC 1 P1:91

87040565300

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

FIRST GENERAL COUNSEL'S REPORT

RAD REFERRALS: 87NF-562134
STAFF MEMBER: George F. Rishel

SOURCE OF MUR:

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

RESPONDENTS:

87040665301

**I Love America Committee and Granville Graham,
as treasurer**

RELEVANT STATUTE: 2 U.S.C. § 434(a)(4)(A)(ii)

INTERNAL REPORTS
CHECKED: Referral Materials

FEDERAL AGENCIES
CHECKED: None

I. GENERATION OF MATTER

The Report Analysis Division ("RAD") referred the above-listed 49 committees to the Office of the General Counsel on May 22, 1987. The basis of the attached referrals is their failure to either file a 12-day Pre-Election Report or file such report in a timely fashion.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that for unauthorized committees filing quarterly, such committees shall file a Pre-Election Report before any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election. Such report shall be filed no later than the 12th day before (or posted by registered or certified mail no later than the 15th day before) such election and shall be complete as of the 20th day before the election. 2 U.S.C. § 434(a)(4)(A)(ii).

The 1986 Pre-Election Report for the 1986 General Election was due on October 23, 1986, complete as of October 15, 1986. Quarterly

filers were notified on September 29, 1986, of the requirement for filing the Pre-Election Report.

The following committees filed a 12-Day Pre-Election Report, but did not file it in a timely fashion:

<u>Committee</u>	<u>Date Filed</u>	<u>Pre-Election Activity</u>
------------------	-------------------	------------------------------

87040465303

The following committees filed a 1986 Post-General Report that disclosed activity indicating a 12-Day Pre-Election Report should have been filed:

<u>Committee</u>	<u>Date Filed</u> ^{1/}	<u>Pre-Election Activity</u>
------------------	---------------------------------	------------------------------

87040665304

^{1/} The date filed is that on which the Post-General Election Report was filed. The number of days late is that for the filing of the 12-Day Pre-Election Report. In some cases, the Post-General Election Report was filed after December 4, 1986. The late filings of such reports, however, were not included as a basis for these referrals. Therefore, no recommendations have been made with respect to the late filing of any Post-General Election Report.

2704065305

**I Love America
Committee**

**11-26-86
(34 days late)**

**\$750 in contributions
to three candidates**

R 7 0 4 0 6 5 3 0 6

The following committees filed a Year End Report disclosing activity indicating that 12-Day Pre-Election Report should have been filed:

Accordingly, with regard to 48 of these 49 committees, the Office of the General Counsel recommends that the Commission open Matter Under Review and find reason to believe these committees

III. RECOMMENDATIONS

1. Open Matters Under Review with respect to the following committees and find reason to believe the following committees and their treasurers violated 2 U.S.C. § 434(a)(4)(A)(ii):

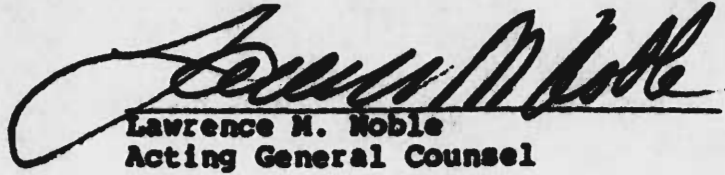
87040465307

I Love America Committee and Granville Graham, as treasurer

2. Approve and send the attached letters and factual and legal analyses to the respective committees listed in recommendation 1.

3.

6/10/57
Date


Lawrence M. Noble
Acting General Counsel

Attachments

1. Referral Materials
2. Letters and Factual and Legal Analyses (48)

87040665308

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

**RAD Ref.'s
87NF-86
THROUGH
87NF-134**

87040365309

**I Love America Committee and Granville Graham,
as treasurer**

(continued)

**Federal Election Commission
Certification for RAD Ref.'s 87NF-86
through 87NF-134
June 15, 1987**

Page 2

87040565310

(continued)

Federal Election Commission
Certification for RAD Ref.'s 87NF-86
through 87NF-134
June 15, 1987

Page 3

CERTIFICATION

I. Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 15, 1987, the Commission decided by a vote of 6-0 to take the following actions in RAD Ref.'s 87NF-86 through 87NF-134:

1. Open Matters Under Review with respect to the following committees and find reason to believe the following committees and their treasurers violated 2 U.S.C. § 434(a)(4)(A)(ii):

(continued)

Federal Election Commission
Certification for RAD Ref.'s 87NF-86
through 87NF-134
June 15, 1987

Page 4

87040665312

I Love America Committee and Granville Graham, as treasurer

(continued)

3

Federal Election Commission
Certification for RAD Ref.'s 87NF-86
through 87NF-134
June 15, 1987

Page 5

87040665313

Federal Election Commission
Certification for RAD Ref.'s 87NF-86
through 87NF-134
June 15, 1987

Page 6

2. Approve and send the letters and factual and legal analyses to the respective committees listed in recommendation 1.

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

Attest:

6-16-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary: Thurs., 6-11-87, 12:34
Circulated on 48 hour tally basis: Thurs., 6-11-87, 4:00
Deadline for vote: Mon., 6-15-87, 4:00

8704065314



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 29, 1987

Granville Graham, Treasurer
I Love America Committee
P. O. BOX 1776
Lynchburg, VA 24505

RE: MUR 2487
I Love America Committee and
Granville Graham, as treasurer

Dear Mr. Graham:

On June 15, 1987, the Federal Election Commission found that there is reason to believe I Love America Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office, within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

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

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 the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have

been mailed to the respondent.

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 will not ordinarily give extensions beyond 20 days.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

The investigation now being conducted will be 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 Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,



Scott E. Thomas
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form

4

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: I Love America Committee and
Granville Graham,
as treasurer

MUR: 2487

8 7 0 4 0 5 6 5 3 1 7

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that for unauthorized committees filing quarterly, such committees shall file a Pre-Election Report before any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election. Such report shall be filed no later than the 12th day before (or posted by registered or certified mail no later than the 15th day before) such election and which shall be complete as of the 20th day before the election. 2 U.S.C. § 434(a)(4)(A)(ii).

The 1986 Pre-Election Report for the 1986 General Election was due on October 23, 1986, and complete as of October 15, 1986. Quarterly filers were notified on September 29, 1986, of the requirement for filing the Pre-Election Report. The committee filed a 1986 Post-General Election Report that disclosed \$750 in contributions to three candidates between October 1, 1986, and October 15, 1986. Thus, the committee was required to file a 12-Day Pre-Election Report by October 23, 1986, and complete as of October 15, 1986. The Committee did not file a report disclosing this activity until it filed its 1986 Post-General Election Report on November 26, 1986. Accordingly, the committee and its treasurer have violated 2 U.S.C. § 434(a)(4)(A)(ii).

—

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LAW OFFICES
WEBSTER, CHAMBERLAIN & BEAN
1747 PENNSYLVANIA AVENUE, N. W.
WASHINGTON, D. C. 20006
(202) 785-9500

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87 JUL 10 AM: 52

GEORGE D. WEBSTER
CHARLES E. CHAMBERLAIN
J. COLEMAN BEAN
JAMES D. McKEVITT
ARTHUR L. HEROLD
ALAN P. DYE
BURRETT VAN KIRK
C. MICHAEL DEESE
FRANK M. NORTHAM
GERARD P. PANARO
JOHN W. HAZARD, JR.
CHARLES M. WATKINS
ROBERT M. SKELTON
HUGH K. WEBSTER

July 8, 1987

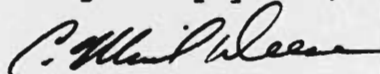
Patty Reilly, Esq.
Office of the General Counsel
Federal Election Commission
Sixth Floor
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2487

Dear Ms. Reilly:

Pursuant to our telephone conversation, I am enclosing a Statement of Designation of Counsel in the above-referenced MUR. Please be advised that respondents desire to pursue pre-probable cause conciliation in this matter.

Very truly yours,



C. Michael Deese

CMD/st

Enclosure

87 JUL 10 P 2: 39

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

8704065318

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STATEMENT OF DESIGNATION OF COUNSEL

MUR 2487

NAME OF COUNSEL: C. Michael Deese

ADDRESS: Webster, Chamberlain, Bean & McKeivitt
Suite 1000, 1747 Pennsylvania Ave., N.W.
Washington, D.C. 20006

TELEPHONE: (202) 785-9500

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.

7/8/87
Date


Signature

RESPONDENT'S NAME: The I Love America Committee, Granville Graham

ADDRESS: P.O. Box 1776
Lynchburg, VA 24505

HOME PHONE: (804) 237-0790

BUSINESS PHONE: (804) 528-5000

87040565319

SENSITIVE

07 JUL 87 10:27

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
I Love America Committee) **MUR 2487**
and Granville Graham,)
as treasurer)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On June 15, 1987, the Commission found reason to believe the I Love America Committee and Granville Graham, as treasurer, ("the Committee") violated 2 U.S.C. § 434(a)(4)(A)(ii) by failing to file their 1986 Pre-General Election Report in a timely manner. Responding to the Commission's reason to believe determination, Respondents request pre-probable cause conciliation. As developed below, this Office recommends that the Commission grant this request.

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III. RECOMMENDATIONS

1. Enter into conciliation prior to a finding of probable cause to believe with the I Love America Committee and Granville Graham, as treasurer.
2. Approve the attached letter and conciliation agreement.

Date

7/28/87

Lawrence M. Noble 6/24
Lawrence M. Noble
Acting General Counsel

Attachments

1. Conciliation Request
2. Proposed letter and conciliation agreement

*/ The Committee filed a combined Pre-General Election and Post-General Election Report on November 26, 1986, encompassing October 1 through November 24, a total of 55 days. Because the Pre-General Report should have covered the first 15 days of this 55 day period, we use a ratio of 15 to 55 in order to reach an approximation of the Committee's unitemized receipts.

87040465322

Attachments to General
Counsel's Report

have been removed from this position in the Public Record File either because they duplicate documents located elsewhere in this file, or because they reflect exempt information.

For Attachment	<u>1</u>	see	<u>5</u>
	<u>2</u>		<u>8</u>
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	—		—
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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

I Love America Committee)
and Granville Graham,)
as treasurer)

MUR 2487

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 31, 1987, the Commission decided by a vote of 5-0 to take the following actions in MUR 2487:

1. Enter into conciliation prior to a finding of probable cause to believe with the I Love America Committee and Granville Graham, as treasurer, as recommended in the General Counsel's Report signed July 28, 1987.
2. Approve the letter and conciliation agreement, as recommended in the General Counsel's Report signed July 28, 1987.

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

Attest:

7-31-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Wed., 7-29-87, 9:27
Circulated on 48 hour tally basis: Wed., 7-29-87, 4:00
Deadline for vote: Fri., 7-31-87, 4:00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 4, 1987

C. Michael Deese, Esquire
Webster, Chamberlain, Bean & McKeivitt
1747 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

RE: MUR 2487
I Love America Committee
and Granville Graham,
as treasurer

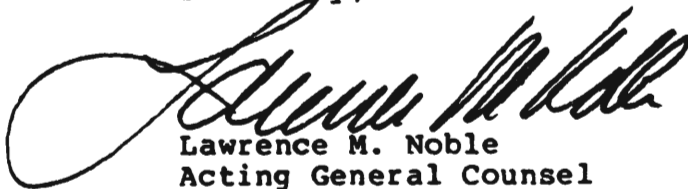
Dear Mr. Deese:

On June 15, 1987, the Federal Election Commission found reason to believe that the I Love America Committee and Granville Graham, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii). At your request, on July 31, 1987, the Commission determined 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 your clients 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 Patty Reilly, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Lawrence M. Noble
Acting General Counsel

Enclosure
Conciliation Agreement

97040565324

plm

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

87 SEP -4 PM 4:09

RECEIVED
FEDERAL ELECTION COMMISSION
SEP 17 1987

In the Matter of)

I Love America Committee and)
Granville Graham, as treasurer)

MUR 2487

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached for Commission approval is a conciliation agreement signed by C. Michael Deese, Esquire, on behalf of his clients, the I Love America Committee and Granville Graham, as treasurer.

Accordingly, the Office

of the General Counsel recommends that the Commission accept this proposed agreement and close the file in this matter.

II. RECOMMENDATIONS

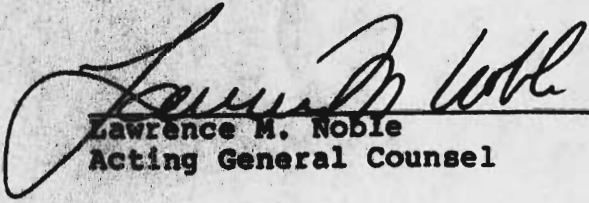
1. Accept the proposed conciliation agreement of the I Love America Committee and Granville Graham, as treasurer.
2. Approve the attached letter.

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3. Close the file in this matter.

Date

9/7/57


Lawrence M. Noble
Acting General Counsel

Attachments

1. Response
2. Proposed Conciliation Agreement
3. Proposed Letter

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Attachments to General
Counsel's Report

have been removed from this position in the Public Record File either because they duplicate documents located elsewhere in this file, or because they reflect exempt information.

For Attachment 1 see -
2 -
3 11

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

I Love America Committee and)
Granville Graham, as treasurer)

MUR 2487

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 10, 1987, the Commission decided by a vote of 5-0 to take the following actions in MUR 2487:

1. Accept the proposed conciliation agreement of the I Love America Committee and Granville Graham, as treasurer, as recommended in the General Counsel's report signed September 7, 1987.
2. Approve the letter, as recommended in the General Counsel's report signed September 7, 1987.
3. Close the file in this matter.

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

Attest:

9-11-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Fri., 9-4-87, 4:09
Circulated on 48 hour tally basis: Tues., 9-8-87, 11:00
Deadline for vote: Thurs., 9-10-87 11:00



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 16, 1987

C. Michael Deese, Esquire
Webster, Chamberlain, Bean & McDevitt
1747 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

RE: MUR 2487
I Love America Committee
and Granville Graham, as
treasurer

Dear Mr. Deese:

On September 10, 1987, the Federal Election Commission accepted the signed conciliation agreement submitted on behalf of the I Love America Committee and Granville Graham, as treasurer, in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(ii), 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. Please note your civil penalty is due thirty days from the date the Commission signed this agreement. If you have any questions, please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-8200.

Sincerely

Lawrence M. Noble
Acting General Counsel

Enclosure
Conciliation Agreement

M

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
I Love America Committee and) MUR 2487
Granville Graham, as)
treasurer)

CONCILIATION AGREEMENT

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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 I Love America Committee and Granville Graham, as treasurer ("Respondents") violated 2 U.S.C. § 434(a)(4)(A)(ii) by failing to file their 1986 Pre-General Election Report in a timely manner.

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 into pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

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

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

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

1. Respondent, the I Love America Committee, is a political committee within the meaning of 2 U.S.C. § 431(4).
2. Respondent, Granville Graham, is the treasurer of the I Love America Committee.
3. Pursuant to 2 U.S.C. § 434(a)(4)(A)(ii), Respondents were required to file their 1986 Pre-General Election Report no later than October 23, 1986. Respondents failed to file this report until November 26, 1986.

V. Respondents failed to file their 1986 Pre-General Election Report in a timely manner in violation of 2 U.S.C. § 434(a)(4)(A)(ii). Respondents contend that said 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), 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.

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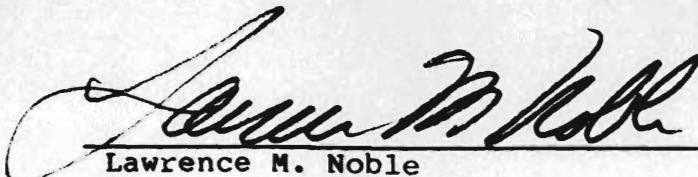
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VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondents shall have no more than thirty (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 valid.

FOR THE COMMISSION:


Lawrence M. Noble
Acting General Counsel

8/13/87
Date

FOR THE RESPONDENTS:


C. Michael Deese
Counsel for Respondents

August 7, 1987
Date



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

THIS IS THE END OF MUR # 2487 I

DATE FILMED 12/3/87 CAMERA NO. 3

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FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

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THE FOLLOWING MATERIAL IS BEING ADDED TO THE
PUBLIC FILE OF CLOSED MUR 2457 .

88040712695

GC# 4552

LAW OFFICES
WEBSTER, CHAMBERLAIN, BEAN & McKEVITT
1747 PENNSYLVANIA AVENUE, N. W.
WASHINGTON, D. C. 20006
(202) 785-9500

GEORGE D. WEBSTER
CHARLES E. CHAMBERLAIN
J. COLEMAN BEAN
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FRANK M. NORTHAM
GERARD P. PANARO
JOHN W. HAZARD, JR.
CHARLES M. WATKINS
ROBERT M. SKELTON
HUGH K. WEBSTER

October 13, 1987

BY HAND DELIVERY

Patty Reilly, Esq.
Office of the General Counsel
Federal Election Commission
Sixth Floor
999 E Street, N.W.
Washington, D.C. 20463

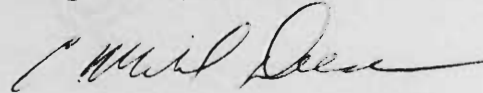
Re: MUR 2487

Dear Ms. Reilly:

Pursuant to the terms of the Conciliation Agreement accepted by the Commission on September 10 and signed by the Acting General Counsel on September 15, 1987, enclosed please find the respondents' civil penalty in the amount of Three Hundred and Fifty Dollars (\$ 350.00).

Thank you for your assistance in this matter.

Very truly yours,



C. Michael Deese

Enclosure

CMD:tlc

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
87 OCT 14 AM 10:31

Sub 40 OGC 10-13-87