



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2509

DATE FILMED 4/1/88 CAMERA NO. 4

CAMERAMAN GPC

88040591062



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

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

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)

(3)

(4)

(5)

(6)

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

Attachments

3 3 0 4 0 6 9 1 0 6 4

38040571063

C00064212

Republican Party of Alaska - Federal
Account

87HF-129

83040671065

REPUBLICAN PARTY OF ALASKA - FEDERAL ACCOUNT

(Attachments 44a - 44e)

8 3 0 4 0 5 9 1 0 5 7
FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-86)

DATE 28APR87
PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
REPUBLICAN PARTY OF ALASKA - FEDERAL ACCOUNT CONNECTED ORGANIZATION: ALASKA'S SALUTE TO THE VICE PRESIDENT				PARTY QUALIFIED		ID 0C00064212
1985	STATEMENT OF ORGANIZATION - AMENDMENT			11OCT85	2	85FEC/389/0790
	STATEMENT OF ORGANIZATION - AMENDMENT			15OCT85	2	85FEC/389/1633
	MID-YEAR REPORT	3,405	1,707	1JAN85 -30JUN85	5	85FEC/382/0797
	MID-YEAR REPORT - AMENDMENT	13,315	9,134	1JAN85 -30JUN85	8	86FEC/399/2829
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN85 -30JUN85	20	86FEC/411/0008
	1'ST LETTER INFORMATIONAL NOTICE			1JAN85 -30JUN85	2	86FEC/395/2016
	REQUEST FOR ADDITIONAL INFORMATION			1JAN85 -30JUN85	1	86FEC/406/2504
	YEAR-END	50,737	33,834	1JUL85 -31DEC85	19	86FEC/399/2837
	YEAR-END - AMENDMENT	50,997	33,834	1JUL85 -31DEC85	4	86FEC/402/3902
	YEAR-END - AMENDMENT	-	-	1JUL85 -31DEC85	1	86FEC/411/3184
	REQUEST FOR ADDITIONAL INFORMATION			1JUL85 -31DEC85	2	86FEC/406/2614
1986	STATEMENT OF ORGANIZATION - AMENDMENT			14JUL86	2	86FEC/420/4431
	APRIL QUARTERLY	44,181	44,974	1JAN86 -31MAR86	11	86FEC/411/4075
	APRIL QUARTERLY - AMENDMENT	44,181	44,974	1JAN86 -31MAR86	4	86FEC/422/2960
	REQUEST FOR ADDITIONAL INFORMATION			1JAN86 -31MAR86	2	86FEC/415/4484
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN86 -31MAR86	3	86FEC/417/2208
	JULY QUARTERLY	5,414	9,207	1APR86 -30JUN86	6	86FEC/422/2964
	OCTOBER QUARTERLY	5,000	16,009	1JUL86 -30SEP86	7	86FEC/438/4401
	OCTOBER QUARTERLY - AMENDMENT	5,000	16,009	1JUL86 -30SEP86	7	86FEC/451/5294
	REQUEST FOR ADDITIONAL INFORMATION			1JUL86 -30SEP86	1	86FEC/446/3867
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL86 -30SEP86	2	86FEC/452/0643
	PRE-GENERAL	4,587	5,000	1OCT86 -15OCT86	7	86FEC/450/2427
	PRE-GENERAL - AMENDMENT	-	-	1OCT86 -15OCT86	6	87FEC/458/1801
	1'ST LETTER INFORMATIONAL NOTICE			1OCT86 -15OCT86	3	87FEC/452/4926
	POST-GENERAL	4,872	4,000	16OCT86 -24NOV86	6	86FEC/450/2421
	YEAR-END	0	122	25NOV86 -31DEC86	4	87FEC/460/1934
1987	APRIL QUARTERLY	-	6,420	1JAN87 -31MAR87	5	87FEC/465/4679
	TOTAL	128,366	0 128,700	0	142	TOTAL PAGES

Total receipts in 1985-1986: \$128,366
Total disbursements in 1985-1986: \$122,280

All 1985-1986 reports have been reviewed.
Ending cash-on-hand as of 12/31/86: \$7,693
Outstanding debts owed by the committee as of 12/31/86: \$0

Attachment 44a

RECEIVED AT THE FEC

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

86 DEC 8 PM 47

(Summary Page)

1. Name of Committee (in Full) REPUBLICAN PARTY OF ALASKA Address (Nur bar and Street) 750 E. FIREWEED LANE City, State and ZIP Code ANCHORAGE, AK 99503 ☐ Check here if address is different than previously reported. 2. FEC Identification Number 000064212 3. ☒ This committee qualified as a multicandidate committee during this Reporting Period on 1976	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 GENERAL (Type of Election) election on 11-4-86 in the State of ALASKA ☐ Thirtieth day report following the General Election on _____ in the State of _____ ☐ Termination Report (b) Is this Report an Amendment? ☐ YES ☒ NO
---	--

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period 10-1-86 through 10-15-86			
6. (a) Cash on hand January 1, 19 86			\$ 22,950.75
(b) Cash on Hand at Beginning of Reporting Period		\$ 7356.50	
(c) Total Receipts (from Line 18)		\$ 4587.00	\$ 59,163.59
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 11,943.50	\$ 82,134.34
7. Total Disbursements (from Line 28)		\$ 5000.00	\$ 75,190.84
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 6943.50	\$ 6943.50
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.

TIM McKEEVER
Type or Print Name of Treasurer

CAWICK
SIGNATURE OF TREASURER

12/1/86
Date

For further information contact:

Federal Election Commission
888 E Street, N.W.
Washington, D.C. 20543
Toll Free 800-424-9530
Local 202 376 3120

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

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

--	--	--	--

FEC FORM 7X (3-86)

95104372427

**DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3X)**

Name of Committee or Fund

REPUBLICAN PARTY OF ALASKA

Report Covering the Period

From: 10-1-86 to 10-15-86

	COLUMN A Total This Period	COLUMN B Calendar Year To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	4587.00	45361.81	11(a)
(b) Political Party Committees		4471.78	11(b)
(c) Other Political Committees		400.00	11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	4587.00	50233.59	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES			12
13. ALL LOANS RECEIVED			13
14. LOAN REPAYMENTS RECEIVED			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		350.00	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
17. OTHER RECEIPTS (Dividends, Interest, etc.)			17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	4587.00	50983.59	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES		57407.00	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	5000.00	7809.56	21
22. INDEPENDENT EXPENDITURES (see Schedule E)			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 old) (Use Schedule F)			23
24. LOAN REPAYMENTS MADE			24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees		500.50	26(b)
(c) Other Political Committees			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))			26(d)
27. OTHER DISBURSEMENTS		4471.78	27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	5000.00	75190.84	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	4587.00	50233.59	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)			30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	4587.00	50233.59	31
32. TOTAL OPERATING EXPENDITURES from Line 19		57407.00	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15		350.00	33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)		57057.00	34

93040621062
000157433

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category of the
Detailed Summary PagePAGE 1 OF 1
FOR LINE NUMBER 21

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

NAME OF COMMITTEE (in Full)

REPUBLICAN PARTY OF ALASKA

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
ALASKANS FOR DON YOUNG	CONTRIBUTION Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	10-15-86	\$500.00
B. 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
C. 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
D. 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
E. 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
F. 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
G. 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
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 (optional)

TOTAL This Period (last page this line number only)

\$500.00

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

FIRST GENERAL COUNSEL'S REPORT

RAD REFERRALS: 87NF-86-134
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

38040691071

27 NOV 11 11:12

36 DEC 8 P5:47

US

PROPERTY OF THE U.S. GOVERNMENT

NO. 300

10/11/11

10/11/11

10/11/11

10/11/11

10/11/11

10/11/11

10/11/11

10/11/11

10/11/11

10/11/11

10/11/11

10/11/11

10/11/11

10/11/11

10/11/11

10/11/11

Frederick, Suite 102
Village, Alaska 99503

P 468 211 301

10/11/11

10/11/11

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

3 9 7 4 0 6 9 1 0 7 3

23040691074

Republican Party of Alaska - Federal Account and
Tim McKeever, as treasurer

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>
------------------	-------------------	------------------------------

83040591075

Republican Party 12-4-86
of Alaska-Federal (42 days late)
Account

\$5,000 in contributions
to one candidate

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

Committee

Date Filed1/

Pre-Election Activity

98040621070

83040521077

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

<u>COMMITTEE</u>	<u>Date Filed⁴/</u>	<u>Pre-Election Activity</u>
------------------	--------------------------------	------------------------------

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):

33040691078

83040591079

Republican Party of Alaska - Federal Account and Tim McKeever,
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)

33040691080

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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

83040671081

(continued)

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

Page 2

83040671082

(continued)

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

Page 3

Republican Party of Alaska - Federal Account and
Tim McKeever, as treasurer

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

28040691084

(continued)

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

Page 5

88040591085

Republican Party of Alaska - Federal Account and Tim
McKeever, as treasurer

(continued)

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.

3

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

98040521086



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 29, 1987

Tim McKeever, Treasurer
Republican Party of Alaska-Federal Account
750 East Fireweed Lane, Suite 102
Anchorage, AK 99503

RE: MUR 2509
Republican Party of Alaska-
Federal Account and Tim
McKeever, as treasurer

Dear Mr. McKeever:

On June 15, 1987, the Federal Election Commission found that there is reason to believe Republican Party of Alaska-Federal Account ("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 Sandra Dunham, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,



Scott E. Thomas
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form

33040571088

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Republican Party of Alaska-
 Federal Account and
 Tim McKeever, as treasurer

MUR: 2509

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 12-Day Pre-Election Report on December 4, 1986, (which was 42 days late). Accordingly, the committee and its treasurer failed to file the 12-Day Pre-Election Report in a timely fashion in violation of 2 U.S.C. § 434(a)(4)(A)(ii).

93040571089

CC# 4042

LAW OFFICES OF
FAULKNER, BANFIELD, DOOGAN & HOLMES
A PROFESSIONAL CORPORATION

RECEIVED
JUL 28 1987
GENERAL

MICHAEL M. HOLMES**
RANDALL J. WEDDLE
WILLIAM B. ROZELL
CHARLES N. DRENNAN
ANTHONY M. SHOLTY
JAMES R. WEBB
MICHAEL A. BARCOTT**
RICHARD B. BROWN
TIMOTHY A. MCKEEVER
JOHN F. CLOUGH, III
LEON T. VANCE
DIANE L. DALEY**

JAMES E. HUTCHINS
JULIE E. BRYANT
JOHN E. CASPERSON**
ANN GIFFORD VANCE
ERIC A. KUEFFNER
JOYCE E. BAMBERGER
JEROME M. JUDAY
ALLAN E. TESCHE
SUSAN L. RANDALL
ROBERT J. McLAUGHLIN
DEBORAH E. BEHR
MARY A. GILSON

DENALI TOWERS NORTH
2550 DENALI STREET, SUITE 700
ANCHORAGE, ALASKA 99503-2774
(907) 274-0666

37 JUL 28

JUNEAU OFFICE
308 GOLD STREET
JUNEAU, ALASKA 99801
(907) 246-2210

SEATTLE OFFICE
FIFTH AVENUE PLAZA
800 FIFTH AVENUE, SUITE 3740
SEATTLE, WASHINGTON 98104
(206) 292-8008

OF COUNSEL

NORMAN C. BANFIELD
LAWRENCE T. FEENEY
LEE S. GLASS, M.D.**

July 24, 1987

HERBERT L. FAULKNER (1882 - 1972)
FRANK M. DOOGAN (1923 - 1977)

**ADMITTED IN WASHINGTON & ALASKA
OTHERS NOT ADMITTED IN WASHINGTON

Scott E. Thomas, Chairman
Federal Election Commission
Washington, D.C. 20463

RE: MUR 2509
Republican Party of Alaska-Federal Account
and Tim McKeever as treasurer
Our File No.: 1101-3204

Dear Mr. Thomas:

I have your letter of June 19, 1987 which was received by my office on July 8, 1987.

Upon review of the party's files concerning this matter, I find that my investigation of the allegations raised by the Commission is hampered by the fact that we do not have a copy of the signed report sent to the Federal Election Commission.

Therefore, I would appreciate it if you could provide me with a copy of that signed report. Once I have the report, I will respond in detail.

My tentative investigation has revealed that even assuming the Commission's allegations concerning the late filing of the report are correct, only five contributions above the \$200 amount were received during this period and the only contribution made by the party during this period was a contribution to Alaskans for Don Young. The contribution, I believe, should have been reported on either Alaskans' for Don Young's 12 day pre-election report or under the telegraphic notification provisions of the statute.

Therefore, to the extent the underlying purpose of the Commission's regulations and statute is to ensure public disclosure of the funds utilized to influence federal elections, it appears that objective was not hampered by the late filing of this report.

37 JUL 28
10:44

Scott E. Thomas, Chairman
File No.: 1101-3204
July 24, 1987
Page 2

Again, without conceding in any way the accuracy of the representations made in your allegation, we would be interested in pursuing pre-probable cause conciliation.

Please arrange for all subsequent correspondence concerning this matter to come to my business address rather than to the party office. This will facilitate my responding more quickly.

Best wishes,



Timothy A. McKeever

TAM/aks

83040621021

GCC # 4276
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

87 AUG 22 AM 11:21
4801

LAW OFFICES OF
FAULKNER, BANFIELD, DOOGAN & HOLMES
A PROFESSIONAL CORPORATION

DENALI TOWERS NORTH
2550 DENALI STREET, SUITE 700
ANCHORAGE, ALASKA 99503-2774
(907) 274-0666
TELECOPIER: (907) 277-4657

MICHAEL M. HOLMES**
RANDALL J. WEDDLE
WILLIAM S. ROZELL
CHARLES N. ORENNAN
ANTHONY M. SHOLTY
JAMES R. WEBB
MICHAEL A. BARCOTT**
RICHARD S. BROWN
TIMOTHY A. MCKEEVER
JOHN F. CLOUGH III
LEON T. VANCE
DIANE L. DALEY**

JAMES E. HUTCHINS
JULIE E. BRYANT
JOHN E. CASPERSON**
ANN G. VANCE
ERICA A. KUEFFNER
JOYCE E. SAMBERGER
JEROME H. JUDAY
ALLAN E. TESCHE
SUSAN L. RANDALL
ROBERT J. McLAUGHLIN
DEBORAH E. BEHR

JUNEAU OFFICE
302 GOLD STREET
JUNEAU, ALASKA 99801
(907) 586-2210

SEATTLE OFFICE
FIFTH AVENUE PLAZA
800 FIFTH AVENUE, SUITE 3740
SEATTLE, WASHINGTON 98104
(206) 292-8008

OF COUNSEL
NORMAN C. BANFIELD
LAWRENCE T. FEENEY
LEE S. GLASS, M.D.**

HERBERT L. FAULKNER (1982-1972)
FRANK M. DOOGAN (1923-1977)

**ADMITTED IN WASHINGTON & ALASKA
OTHERS NOT ADMITTED IN WASHINGTON

August 26, 1987

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

RE: MUR 2509
Republican Party of Alaska-Federal
Account and Tim McKeever as Treasurer
Our Fike No.: 1101-3204

Dear Mr. Thomas:

On July 24, 1987 I sent the enclosed letter concerning this matter. I have not yet had a response to that letter and simply wanted to remind the Commission that the requests of that letter are still outstanding.

Best wishes,


Timothy A. McKeever

TAM/aks
Enclosure
cc: Sandy Dunham

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

87 AUG 31 PM 4:20
-Sept 1

76016706108

LAW OFFICES OF
FAULKNER, BANFIELD, DOOGAN & HOLMES
A PROFESSIONAL CORPORATION

MICHAEL M. HOLMES**
RANDALL J. WEDDLE
WILLIAM B. ROZELL
CHARLES N. DRENNAN
ANTHONY M. SHOLTY
JAMES R. WESS
MICHAEL A. BARCOTT**
RICHARD B. BROWN
TIMOTHY A. MCKEEVER
JOHN F. CLOUGH, III
LEON T. VANCE
DIANE L. DALEY**

JAMES E. HUTCHINS
JULIE E. BRYANT
JOHN E. CASPERSON**
ANN GIFFORD VANCE
ERIC A. KUEFFNER
JOYCE E. RAMBERGER
JEROME H. JUDAY
ALLAN E. TESCHE
SUSAN L. RANDALL
ROBERT J. McLAUGHLIN
DEBORAH E. BEHR
MARY A. GILSON

DENALI TOWERS NORTH
2550 DENALI STREET, SUITE 700
ANCHORAGE, ALASKA 99503-2774
(907) 274-0666

JUNEAU OFFICE
308 GOLD STREET
JUNEAU, ALASKA 99801
(907) 888-2210

SEATTLE OFFICE
FIFTH AVENUE PLAZA
800 FIFTH AVENUE, SUITE 3740
SEATTLE, WASHINGTON 98104
(206) 292-8008

OF COUNSEL

NORMAN C. BANFIELD
LAWRENCE T. FEENEY
LEE S. GLASS, M.D.**

HERBERT L. FAULKNER (1982 - 1972)
FRANK M. DOOGAN (1923 - 1977)

**ADMITTED IN WASHINGTON & ALASKA
OTHERS NOT ADMITTED IN WASHINGTON

July 24, 1987

Scott E. Thomas, Chairman
Federal Election Commission
Washington, D.C. 20463

RE: MUR 2509
Republican Party of Alaska-Federal Account
and Tim McKeever as treasurer
Our File No.: 1101-3204

Dear Mr. Thomas:

I have your letter of June 19, 1987 which was received by my office on July 8, 1987.

Upon review of the party's files concerning this matter, I find that my investigation of the allegations raised by the Commission is hampered by the fact that we do not have a copy of the signed report sent to the Federal Election Commission.

Therefore, I would appreciate it if you could provide me with a copy of that signed report. Once I have the report, I will respond in detail.

My tentative investigation has revealed that even assuming the Commission's allegations concerning the late filing of the report are correct, only five contributions above the \$200 amount were received during this period and the only contribution made by the party during this period was a contribution to Alaskans for Don Young. The contribution, I believe, should have been reported on either Alaskans' for Don Young's 12 day pre-election report or under the telegraphic notification provisions of the statute.

Therefore, to the extent the underlying purpose of the Commission's regulations and statute is to ensure public disclosure of the funds utilized to influence federal elections, it appears that objective was not hampered by the late filing of this report.

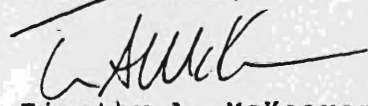
3
9
1
0
9
3
3
8
0
4
0
5
9
1
0
9
3

Scott E. Thomas, Chairman
File No.: 1101-3204
July 24, 1987
Page 2

Again, without conceding in any way the accuracy of the representations made in your allegation, we would be interested in pursuing pre-probable cause conciliation.

Please arrange for all subsequent correspondence concerning this matter to come to my business address rather than to the party office. This will facilitate my responding more quickly.

Best wishes,



Timothy A. McKeever

TAM/aks

89040591094

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Republican Party of Alaska-Federal)
Account and Tim McKeever, as treasurer)

MUR 2509

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On June 15, 1978, the Commission found reason to believe that the Republican Party of Alaska-Federal Account and Tim McKeever, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii) by failing to file the 1986 Pre-Election Report in a timely manner. By letter dated July 24, 1978, respondents requested to settle this matter prior to a finding of probable cause to believe (Attachment 1).

II. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

SENSITIVE

87 SEP 17 PM 4:41

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

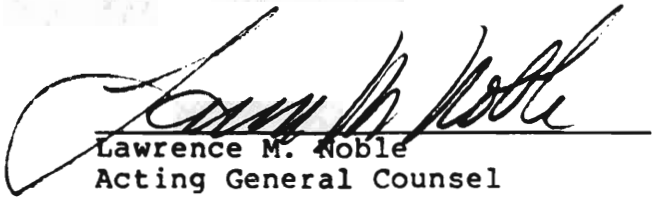
33040691095

83040591096
III. RECOMMENDATIONS

1. Enter into conciliation with the Republican Party of Alaska-Federal Account and Tim McKeever, as treasurer, prior to a finding of probable cause to believe.
2. Approve the attached proposed conciliation agreement and letter.

Date

9/17/87


Lawrence M. Noble
Acting General Counsel

Attachments

1. Request for conciliation
2. Proposed agreement and letter

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Republican Party of Alaska-Federal
Account and Tim McKeever, as treasurer

)
)
) MUR 2509
)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal
Election Commission, do hereby certify that on September 22,
1987, the Commission decided by a vote of 6-0 to take
the following actions in MUR 2509:

1. Enter into conciliation with the Republican
Party of Alaska-Federal Account and Tim
McKeever, 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 September 17, 1987.

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

Attest:

9-23-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Thurs., 9-17-87, 4:41
Circulated on 48 hour tally basis: Fri., 9-18-87, 12:00
Deadline for vote: Tues., 9-22-87, 4:00

33040591097



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

25 September 1987

Tim McKeever, Treasurer
Republican Party of Alaska-
Federal Account
c/o Faulkner, Banfield,
Doogan & Holmes
Denali Towers North
2550 Denali Street, Suite 700
Anchorage, Alaska 99503-2774

RE: MUR 2509
Republican Party of
Alaska-Federal Account
and Tim McKeever, as
treasurer

Dear Mr. McKeever:

On June 15, 1987, the Federal Election Commission found reason to believe that the Republican Party of Alaska-Federal Account and you as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii). At your request, on September 22, 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.

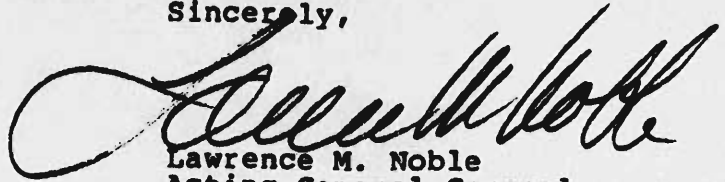
Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

Also enclosed, pursuant to your request, is a copy of the 1986 Pre-Election Report of the Republican Party of Alaska-Federal Account.

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 Sandra Dunham, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
Acting General Counsel

Enclosure
Conciliation Agreement

98040591099



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

21 October 1987

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Tim McKeever, Treasurer
Republican Party of Alaska--
Federal Account
c/o Faulkner, Banfield, Doogan
& Holmes
Denali Towers North
2550 Denali Street, Suite 700
Anchorage, Alaska 99503-2774

RE: MUR 2509
Republican Party of
Alaska--Federal Account
and Tim McKeever, as
treasurer

Dear Mr. McKeever:

On September 25, 1987, you were notified that at your request the Federal Election Commission determined to enter into negotiations directed toward reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. On that same date, you were sent a conciliation agreement offered by the Commission in settlement of this matter.

Please note that conciliation negotiations entered into prior to a finding of probable cause to believe are limited to a maximum of 30 days. To date, you have not responded to the proposed agreement. The 30-day period for negotiations will soon expire. Unless we receive a response from you within 5 days, this Office will consider these negotiations terminated and will proceed to the next stage of the enforcement process.

Should you have any questions, please contact Sandra Dunham, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

By: Lois C. Lerner
Associate General Counsel

38040691100

600 # 4662
RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

LAW OFFICES OF
FAULKNER, BANFIELD, DOOGAN & HOLMES
A PROFESSIONAL CORPORATION

87 OCT 30 AM 9:16

MICHAEL M. HOLMES**
RANDALL J. WEDDLE
WILLIAM B. ROZELL
CHARLES N. DRENNAN
ANTHONY M. SHOLTY
JAMES R. WEBB
MICHAEL A. BARCOTT**
RICHARD S. BROWN
TIMOTHY A. MCKEEVER
JOHN F. CLOUGH III
LEON T. VANCE
DIANE L. DALEY**

JAMES E. HUTCHINS
JULIE E. BRYANT
JOHN E. CASPERSON**
ANN G. VANCE
ERIC A. KUEFFNER
JOYCE E. SAMBERGER
JEROME H. JUDAY
ALLAN E. TESCHE
SUSAN RANDALL POLLARD
ROBERT J. MCLAUGHLIN
DEBORAH E. BEHR
CHERYL M. JONES

DENALI TOWERS NORTH
2850 DENALI STREET, SUITE 700
ANCHORAGE, ALASKA 99503-2774
(907) 274-0666
TELECOPIER: (907) 277-4657

JUNEAU OFFICE
302 GOLD STREET
JUNEAU, ALASKA 99801
(907) 586-2210

SEATTLE OFFICE
FIFTH AVENUE PLAZA
800 FIFTH AVENUE, SUITE 3740
SEATTLE, WASHINGTON 98104
(206) 292-8008

OF COUNSEL
NORMAN C. BANFIELD
LAWRENCE T. FEENEY
LEE S. GLASS, M.D.**

October 28, 1987

HERBERT L. FAULKNER (1982-1972)
FRANK M. DOOGAN (1923-1977)

**ADMITTED IN WASHINGTON & ALASKA
OTHERS NOT ADMITTED IN WASHINGTON

EXPRESS MAIL

Sandra Dunham
Federal Election Commission
Washington, D.C. 20463

RE: MUR 2509
Republican Party of Alaska
Our File No.: 1101-3204

Dear Ms. Dunham:

As we discussed on October 27, the Commission's September 25 letter indicating a willingness to participate in pre-probable cause conciliation negotiations was not received by me until September 29, 1987.

Your October 21 letter advising us that the deadline for responding was rapidly elapsing was not received until October 26, 1987.

On behalf of the Republican Party of Alaska and myself, I hereby request that the Commission grant us an additional thirty (30) days to respond to the pre-probable cause conciliation proposal.

Unfortunately, the Party has been unable to consider the matter during the first thirty days. I do expect a decision in the very near future and it is unlikely that the entire thirty days will be required but nonetheless would request the additional thirty days.

Thank you in advance for your consideration.

Best wishes,

TAMcKeever

Timothy A. McKeever

TAM/aks

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
87 OCT 30 AM 11:48

1011690408

BEFORE THE FEDERAL ELECTION COMMISSION

67 NOV -2 PM 4: 50

In the Matter of)
)
Republican Party of Alaska -) MUR 2509
Federal Account and Tim)
McKeever, as treasurer)

SENSITIVE

GENERAL COUNSEL'S REPORT

On September 22, 1987, the Commission decided to enter into pre-probable cause conciliation with the Republican Party of Alaska-Federal Account and Tim McKeever, as treasurer. The Commission mailed the notification letter and proposed conciliation agreement to Respondents on September 25, 1987. Respondents allege that they did not receive the notification until September 30, 1987.

The Office of General Counsel and Respondents have engaged in several discussions in an effort to agree on a conciliation agreement. At this time, it appears likely that we will be able to resolve this matter at this stage of the compliance process. Therefore, this Office believes it is worthwhile to continue the pre-probable cause conciliation negotiations for an additional thirty (30) days.

Lawrence M. Noble
General Counsel

10/30/87

Date

By:



Lois G. Lerner
Associate General Counsel

88040591102

6004 6112
RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

88 JAN 27 AM 9:11

LAW OFFICES OF
FAULKNER, BANFIELD, DOOGAN & HOLMES
A PROFESSIONAL CORPORATION

DENALI TOWERS NORTH
2550 DENALI STREET, SUITE 700
ANCHORAGE, ALASKA 99503-2774
(907) 274-0666
TELECOPIER: (907) 277-4657

JUNEAU OFFICE
302 GOLD STREET
JUNEAU, ALASKA 99801
(907) 586-2210

SEATTLE OFFICE
FIFTH AVENUE PLAZA
800 FIFTH AVENUE, SUITE 3740
SEATTLE, WASHINGTON 98104
(206) 292-8008

MICHAEL M. HOLMES**
RANDALL J. WEDDLE
WILLIAM B. ROSELL
CHARLES N. ORENHAN
ANTHONY M. SHOLTY
JAMES R. WEBB
MICHAEL A. BARCOTT**
RICHARD B. BROWN
TIMOTHY A. McKEEVER
JOHN F. CLOUGH III
LEON T. VANCE
DIANE L. DALEY**
JAMES E. HUTCHINS
JULIE E. BRYANT
JOHN E. CASPERSON**
ANN G. VANCE
ERIC A. RUEFFNER
JOYCE E. SAMBERGER
ALLAN E. TESCHE
SUSAN RANDALL POLLARD
ROBERT J. McLAUGHLIN
CHERYL M. JONES

OF COUNSEL
NORMAN C. BANFIELD
LAWRENCE T. FEENEY
LEE S. GLASS, M.D.**

HERBERT L. FAULKNER (1922-1972)
FRANK M. DOOGAN (1923-1977)

**ADMITTED IN WASHINGTON & ALASKA
OTHERS NOT ADMITTED IN WASHINGTON

January 21, 1988

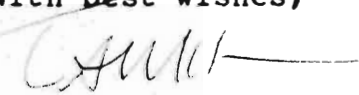
Lawrence M. Noble
General Counsel
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Noble:

I have your letter of January 6, 1988. I have reviewed the conciliation agreement attached to that letter, have signed it and am enclosing the signed copy for you. Please make sure that we receive a copy signed by a representative of the commission.

It is my understanding of this agreement that we have thirty days in which to pay the \$350.00 assessment. We will be forwarding the commission a check in that amount in the near future.

With best wishes,


Timothy A. McKeever

TAM/amh
Enclosure

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
88 JAN 27 AM 10:20

60116506088

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

88 FEB -3 AM 10:39

In the Matter of)

Republican Party of Alaska-Federal)
Account and Tim McKeever, as)
treasurer)

MUR 2509

CONFIDENTIAL

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Tim McKeever, the treasurer of the Republican Party of Alaska-Federal Account.

The attached agreement contains no changes from the agreement approved by the Commission on December 31, 1987. A check for the civil penalty has not been received.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Republican Party of Alaska - Federal Account.
2. Close the file.
3. Approve the attached letter.

Lawrence N. Noble
General Counsel

Date

2/2/88

By:

Lois G. Lerner
Lois G. Lerner
Associate General Counsel

Attachments

1. Conciliation Agreement
2. Letter to Respondent

Staff Person: Sandra Dunham

93040691104

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Republican Party of Alaska-Federal
Account and Tim McKeever, as
treasurer

)
)
)
)
)
)
MUR 2509

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal
Election Commission, do hereby certify that on February 5,
1988, the Commission decided by a vote of 6-0 to take
the following actions in MUR 2509:

1. Accept the conciliation agreement with Republican
Party of Alaska - Federal Account, as recommended
in the General Counsel's report signed February 2,
1988.
2. Close the file.
3. Approve the letter, as recommended in the General
Counsel's report signed February 2, 1988.

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

Attest:

2-5-88

Date

Mary H. Done
for

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Wed., 2-3-88, 10:39
Circulated on 48 hour tally basis: Wed., 2-3-88, 4:00
Deadline for vote: Fri., 2-5-88, 4:00



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 10, 1988

Tim McKeever, Treasurer
Republican Party of Alaska-
Federal Account
c/o Faulkner, Banfield,
Doogan & Holmes
Denali Towers North
2550 Denali Street, Suite 700
Anchorage, Alaska 99503-2774

RE: MUR 2509
Republican Party of
Alaska-Federal Account
and Tim McKeever, as
treasurer

Dear Mr. McKeever:

On February 5, 1988, the Federal Election Commission accepted the signed conciliation agreement submitted on your behalf 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.

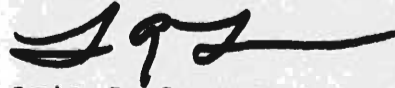
33040591106

Letter to Tim McKeever, Treasurer
Page 2

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

Sincerely,

Lawrence M. Noble
General Counsel



By: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

83040691107

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Republican Party of Alaska-Federal) MUR 2509
Account and Tim McKeever, as)
as treasurer)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Republican Party of Alaska-Federal Account and Tim McKeever, as treasurer ("Respondents") violated 2 U.S.C. § 434(a)(4)(A)(ii).

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. Respondent, Republican Party of Alaska-Federal Account, is a political committee within the meaning of 2 U.S.C. § 431(4).

83040671108

2. Respondent, Tim McKeever, is the treasurer of the Republican Party of Alaska-Federal Account.

3. Respondents were required to file their 1986 Pre-Election Report by October 23, 1986. This report was filed on December 4, 1986, 42 days late.

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

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 that all parties hereto have executed same and the Commission has approved the entire agreement.

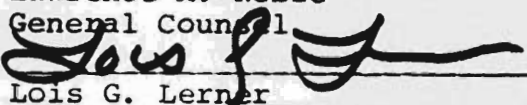
IX. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

83040571109

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.

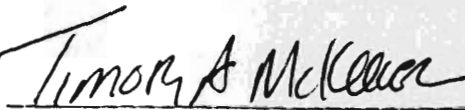
FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

By: 
Lois G. Lerner
Associate General Counsel

2/9/88
Date

FOR THE RESPONDENTS:


Tim McKeever
Treasurer

1/20/88
Date

Staff person: Sandra Dunham

93040591110



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2509

DATE FILMED 4/1/88 CAMERA NO. 4

CAMERAMAN GPC

38040691111



FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

/N 8.25.88

THE FOLLOWING MATERIAL IS BEING ADDED TO THE
PUBLIC FILE OF CLOSED MUR 2509 .

88040712688

000# 6444

FEDERAL ELECTION COMMISSION
MAIL ROOM

88 FEB 16 AM 11:53
JUNEAU OFFICE

302 GOLD STREET
JUNEAU, ALASKA 99801
(907) 588-2210

SEATTLE OFFICE
FIFTH AVENUE PLAZA
800 FIFTH AVENUE, SUITE 3740
SEATTLE, WASHINGTON 98104
(206) 522-8008

LAW OFFICES OF
FAULKNER, BANFIELD, DOOGAN & HOLMES
A PROFESSIONAL CORPORATION

DENALI TOWERS NORTH
2550 DENALI STREET, SUITE 700
ANCHORAGE, ALASKA 99503-2774
(907) 274-0666
TELECOPIER: (907) 277-4887

MICHAEL M. HOLMES** DIANE L. BAILEY**
RANDALL J. WEDDLE JAMES E. MUTHINS
WILLIAM B. ROSELL JULIE E. BRYANT
CHARLES N. BRENNAN JOHN E. CASPERSON**
ANTHONY M. SHOLTY ANN G. VANCE
JAMES W. WEBB ERIC A. RUEFFNER
MICHAEL A. BARCOTT** JOYCE E. SAMBERGER
RICHARD S. BROWN ALLAN E. TESCHE
TIMOTHY A. MCKEEVER SUSAN RANDALL POLLARD
JOHN F. CLOUGH III ROBERT J. McLAUGHLIN
LEON T. VANCE CHERYL M. JONES

OF COUNSEL
NORMAN C. BANFIELD
LAWRENCE T. FEENEY
LEE S. GLASS, M.D.**

HERBERT L. FAULKNER (1982-1972)
FRANK M. DOOGAN (1982-1977)

**ADMITTED IN WASHINGTON & ALASKA
OTHERS NOT ADMITTED IN WASHINGTON

February 2, 1988

Ms. Sandra Dunham
General Counsel's Office
Federal Elections Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2509

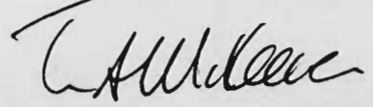
Dear Ms. Dunham:

Enclosed please find a check from the Republican Party of Alaska in the amount of \$350.00. This check is in payment of the civil penalty in MUR 2509.

I believe with this check we have complied with all the requirements of this agreement.

If you believe that the Republican Party of Alaska must do anything else to be in compliance with the Conciliation Agreement, please let me know.

With best wishes,



Timothy A. McKeever

TAM/amh
Enclosure

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
88 FEB 17 PM 2:11

33040712689