



FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

THIS IS THE BEGINNING OF MUR # 2831

DATE FILMED 4/12/90 CAMERA NO. 4

CAMERAMAN AS

90040774959

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 4 October 1988

ANALYST: David J. Blakeley

I. COMMITTEE: Colorado Republican Federal Campaign
Committee (C00033134)
Douglas L. Jones, Treasurer
(7/11/88-Present)
Michael V. Spillane, Treasurer
(2/19/88-7/10/88)
Vincent A. Zarlengo, Treasurer
(through 2/18/88)
1275 Tremont Place
Denver, CO 80204

II. RELEVANT STATUTE: 11 CFR 102.5(a)(1)(i)

III. BACKGROUND:

Receipt of Funds from Non-Federal Account

The Colorado Republican Federal Campaign Committee's ("the Committee") 1988 April Quarterly Report disclosed \$5,320.00 in itemized contributions from individuals, \$14,014.00 in unitemized contributions from individuals, and \$15,000.00 in transfers from affiliated/other party committees (Attachment 2). The sum of the entries on Schedule A, supporting Line 11(a)(i), however, disclosed \$5,570.00 in itemized contributions from individuals. An Informational Notice was sent on May 20, 1988 which requested clarification of this discrepancy (Attachment 3).

On May 31, 1988, the Committee filed an amended April Quarterly Report which disclosed \$5,570.00 in itemized contributions from individuals, \$14,014.00 in unitemized contributions from individuals, and \$15,000.00 in transfers from affiliated/other party committees (Attachment 4).

On July 15, 1988, the Committee filed a second amended April Quarterly Report which disclosed \$3,000.00 in itemized contributions from individuals, \$1,334.00 in unitemized contributions from individuals, and \$30,000.00 in transfers from affiliated/other party committee (Attachment 5). Schedule A, supporting Line 12, disclosed a transfer-in of \$15,000.00 received March 25, 1988 from the Committee's non-federal account (Attachment 6).

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COLORADO REPUBLICAN FEDERAL
CAMPAIGN COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

A letter accompanying the second amendment explained that the \$15,000.00 consisted of, "...personal contributions from our affiliated Colorado Republican party account," and that there was, "...a question as to such a transfer being permissible by FECA regulations, although the contributions were exclusively on a personal basis." The letter also states that the Committee's "...second quarter report shows a disbursement [sic] on Line 20 of \$15,000.00 to reverse this contribution since we discovered the possible incompatibility of this contribution with FECA regulations," (Attachment 7).

The Committee's 1988 July Quarterly Report disclosed a \$15,000.00 transfer-out to its non-federal account on May 6, 1988 (Attachment 8).

On August 24, 1988, an Informational Notice was sent to the Committee which noted the transfer-out of impermissible funds and stated that legal action may be initiated by the Commission (Attachment 9).

On September 12, 1988, a response was submitted by the Committee which reiterated their July 15, 1988 explanation of the \$15,000.00 transfer-in (Attachment 10).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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FEDERAL ELECTION COMMISSION
1987-1988
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 20SEP88

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
						TYPE OF FILER
COLORADO REPUBLICAN FEDERAL CAMPAIGN COMMITTEE				ID #C00033134	PARTY NON-QUALIFIED	
CONNECTED ORGANIZATION: 1ST-5TH CONG. DIST. CNTES						
1987	STATEMENT OF ORGANIZATION - AMENDMENT			2APR87	2	87FEC/464/1489
	MID-YEAR REPORT	221,195	237,383	1JAN87 -30JUN87	26	87FEC/480/2055
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN87 -30JUN87	2	87FEC/494/5095
	REQUEST FOR ADDITIONAL INFORMATION			1JAN87 -30JUN87	5	87FEC/492/5116
	YEAR-END	29,960	31,100	1JUL87 -31DEC87	8	88FEC/502/3048
1988	STATEMENT OF ORGANIZATION - AMENDMENT			26FEB88	2	88FEC/510/4820
	STATEMENT OF ORGANIZATION - AMENDMENT			15JUL88	1	88FEC/534/3646
	APRIL QUARTERLY	34,342	30	1JAN88 -31MAR88	7	88FEC/521/1262
	APRIL QUARTERLY - AMENDMENT	34,592	30	1JAN88 -31MAR88	5	88FEC/528/2168
	APRIL QUARTERLY - AMENDMENT	34,342	30	1JAN88 -31MAR88	8	88FEC/534/3637
	1ST LETTER INFORMATIONAL NOTICE			1JAN88 -31MAR88	1	88FEC/526/0974
	1ST LETTER INFORMATIONAL NOTICE			1JAN88 -31MAR88	1	88FEC/540/3398
	JULY QUARTERLY	281,342	99,649	1APR88 -30JUN88	29	88FEC/534/3607
	JULY QUARTERLY - AMENDMENT	-	-	1APR88 -30JUN88	2	88FEC/545/3745
	REQUEST FOR ADDITIONAL INFORMATION			1APR88 -30JUN88	5	88FEC/543/2309
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR88 -30JUN88	2	88FEC/545/5185
	PRE-PRIMARY	26,692	3,907	1JUL88 -20JUL88	6	88FEC/540/1702
	1ST LETTER INFORMATIONAL NOTICE			1JUL88 -20JUL88	1	88FEC/545/0873
TOTAL		593,531	0 372,069 0		113	TOTAL PAGES

All reports have been reviewed.

Cash on hand balance as of 7/20/88 was \$239,463.20.

Debts owed to the committee as of 7/20/88 was \$0.00.

Debts owed by the committee as of 7/20/88 was \$72,146.00.

Name of Committee (in full)		Report Covering the Period From: To:	
		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			
(i) Itemized (use Schedule A)		5,320.00	5,320.00
(ii) Unitemized		14,014.00	14,014.00
(iii) Total of contributions from individuals			
(b) Political Party Committees			
(c) Other Political Committees (such as PACs)		19,824.00	19,824.00
(d) TOTAL CONTRIBUTIONS (add 11(a)(i), (a)(ii), and (c))			
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		15,000.00	15,000.00
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 (Dividends, Interest, etc.)		8.03	8.03
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)		34,342.03	34,342.03
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES		30.00	30.00
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			
22. INDEPENDENT EXPENDITURES (use Schedule E)			
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(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 (such as PACs)			
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))			
27. OTHER DISBURSEMENTS			
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)		30.00	30.00
III. NET CONTRIBUTIONS/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 29)			
32. TOTAL OPERATING EXPENDITURES (from Line 19)			
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)			
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)			

MODULE A

ITEMIZED RECEIPTS

See instructions on each receipt or the Required Summary Page

FOR LINE NUMBER

116A)

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

Colorado Republican Federal Campaign Committee

A. Full Name, Mailing Address and ZIP Code Donald K. Bain 1700 Broadway #1800 Denver, CO 80290 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Holmes, Roberts & Owen Occupation Attorney Aggregate Year-to-Date > \$ 2500.00	Date (month, day, year) 3/19/88	Amount of Each Receipt this Period 2500.00
B. Full Name, Mailing Address and ZIP Code William R. Childs 77 S. Adams St. #1504 Denver, CO 80209 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Melec Industries Inc. Occupation Engineer Aggregate Year-to-Date > \$ 250.00	Date (month, day, year) 3/1/88	Amount of Each Receipt this Period 250.00
C. Full Name, Mailing Address and ZIP Code Lowell A. Hare 8166 South Innton Way Englewood, CO 80111 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer H+L Investment Co. Occupation Real Estate/Investments Aggregate Year-to-Date > \$ 250.00	Date (month, day, year) 3/19/88	Amount of Each Receipt this Period 250.00
D. Full Name, Mailing Address and ZIP Code Erik M. Jensen 401 S. Wilcox Castle Rock, CO 80104 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Irving F. Jensen Co Occupation Owner Aggregate Year-to-Date > \$ 250.00	Date (month, day, year) 3/15/88	Amount of Each Receipt this Period 250.00
E. Full Name, Mailing Address and ZIP Code Charles B. Lutz 1077 Race St. Apt #1001 Denver, CO 80206 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer None Occupation Retired Aggregate Year-to-Date > \$ 250.00	Date (month, day, year) 3/1/88	Amount of Each Receipt this Period 250.00
F. Full Name, Mailing Address and ZIP Code Bob S. Magnus 4725 South Holly Street Englewood, CO 80111 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Tele Communications Occupation COB Aggregate Year-to-Date > \$ 250.00	Date (month, day, year) 3/19/88	Amount of Each Receipt this Period 250.00
G. Full Name, Mailing Address and ZIP Code R. Alan Magnuson 1470 S. Quebec Way, #35 Denver, CO 80231 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Mountain Bell Occupation Sales Aggregate Year-to-Date > \$ 250.00	Date (month, day, year) 3/18/88	Amount of Each Receipt this Period 250.00

SUBTOTAL of Receipts This Page (optional)

7000.00

TOTAL This Period (last page this line number only)

SCHEDULE A

STANDARD RECEIPTS

The amount reported
for each category of the
Standard Summary Page

PAGE

2 1 2

FOR LINE NUMBER

116(11)

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

Colorado Republican Federal Campaign Committee

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Richard J. Miano 4675 S. Yosemite #205 Denver, CO 80237	Thomas & Betts Corp.	3/13/88	250.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation Regional Manager Aggregate Year-to-Date > \$ 250.00		
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Frank L. Musgrave 2715 East Flora Place Denver, CO 80210	Aspen Airways	3/11/88 3/16/88	250.00 20.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation Dir. Engr. Aggregate Year-to-Date > \$ 270.00		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Mabel Musgrave 2715 E. Flora Place Denver, CO 80210	Self	3/1/88	250.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation Housewife Aggregate Year-to-Date > \$ 250.00		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
John Richards 4481 Tule Lake Dr Littleton, CO 80123	Information Requested	3/14/88	300.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation Information Requested Aggregate Year-to-Date > \$ 300.00		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Gloria Roemer 530 S. University Blvd Denver, CO 80209	Self	3/17/88	250.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation Homemaker Aggregate Year-to-Date > \$ 250.00		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Glen G. Saunders 240 South Clermont Denver, CO 80222	None	3/17/88	250.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation Retired Aggregate Year-to-Date > \$ 250.00		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date > \$		

SUBTOTAL of Receipts This Page (last one):

1320.00

TOTAL This Period (last page this line number only):

5320.00

68035211265

SCHEDULE A

STANDARD RECEIPTS

Amounts scheduled
for each category of the
Standard Summary Page

PAGE 4 OF 4
FOR LINE NUMBER 11

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 On File

Colorado Republican Federal Campaign Committee

A. Full Name, Mailing Address and ZIP Code <i>Republican National Committee</i> <i>310 First St. SE</i> <i>Washington, DC 20003</i> Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$ <i>15,000.00</i>	Date (month, day, year) <i>2/27/88</i>	Amount of Each Receipt this Period <i>15,000.00</i>
B. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
C. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional)	<i>15,000.00</i>
TOTAL This Period (last page this line number only)	<i>15,000.00</i>

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FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20541

RG-5

MAR 20 1988

Michael V. Spillane, Treasurer
Colorado Republican Federal Campaign
Committee
1275 Tremont Place
Denver, CO 80204

Identification Number: C00033134

Reference: April Quarterly Report (1/1/88-3/31/88)

Dear Mr. Spillane:

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

-Line 11(a)(i) of the Detailed Summary Page of your report discloses a total of \$5,320 in contributions from individuals. The sum of the entries itemized on Schedule A, however, indicates the total to be \$5,570. Please amend your report to clarify the discrepancy.

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

A handwritten signature in dark ink, appearing to read "Mark F. Eilers".

Mark F. Eilers
Reports Analyst
Reports Analysis Division

88 April Quarterly Report
(1st amendment)

DETAILED SUMMARY PAGE of Receipts and Disbursements Page 2, FEC FORM 323

(page 1 of 2)

Name of Committee (in full)	Report Covering the Period From:	To:	
	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			11(a)(1)
(i) Itemized (use Schedule A)	6,570.00	5,570.00	11(a)(1)
(ii) Unitemized	17,014.00	14,614.00	11(a)(2)
(iii) Total of contributions from individuals			11(a)(3)
(b) Political Party Committees			11(b)
(c) Other Political Committees (such as PACs)			11(c)
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	17,564.00	19,564.00	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	15,000.00	15,000.00	12
13. ALL LOANS RECEIVED			13
14. LOAN REPAYMENTS RECEIVED			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
17. OTHER RECEIPTS (Dividends, Interest, etc.) <i>Interest</i>	8.03	8.03	17
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	34,592.03	34,592.03	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	30.00	30.00	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			21
22. INDEPENDENT EXPENDITURES (use Schedule E)			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (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			26(b)
c. Other Political Committees (such as PACs)			26(c)
d. TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))			26(d)
27. OTHER DISBURSEMENTS			27
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	30.00	30.00	28
III. NET CONTRIBUTIONS OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))			29
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))			30
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)			31
32. TOTAL OPERATING EXPENDITURES (from Line 19)			32
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)			33
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)			34

88 APRIL QUARTERLY REPORT
1998

88 April Quarterly Report
(1st amendment)

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule for each category of the Detailed Summary Page

PAGE 2 OF 2
FOR LINE NUMBER 11(a)(i)

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

Colorado Republican Federal Campaign Committee

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Richard J. Mann 4675 S. Yosemite #205 Denver, CO 80237	Thomas + Betts Corp.	3/23/88	250.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation Regional Manager	Aggregate Year-to-Date > \$ 250.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Frank L. Musgrave 2715 East Flora Place Denver, CO 80210	Aspen Airways	3/11/88 3/18/88	250.00 20.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation Dir. Instr.	Aggregate Year-to-Date > \$ 270.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Mabel Musgrave 2715 E. Flora Place Denver, CO 80210	Self	3/1/88	250.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation Housewife	Aggregate Year-to-Date > \$ 250.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
John Richards 4481 Tule Lake Dr Littleton, CO 80123	Information Requested	3/10/88	300.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation Information Requested	Aggregate Year-to-Date > \$ 300.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Gloria Roemer 530 S University Blvd Denver, CO 80209	Self	3/17/88	250.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation Housewife	Aggregate Year-to-Date > \$ 250.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Glen G. Saunders 240 South Clement Denver, CO 80222	None	3/17/88	250.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation Retired	Aggregate Year-to-Date > \$ 250.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation	Aggregate Year-to-Date > \$	

SUBTOTAL of Receipts To a Page (add lines)

1570.00

TOTAL This Period (add page and line number only)

5570.00

30740714369
33733392171

DETAILED SUMMARY PAGE

of Receipts and Disbursements
(Page 2, FISC FORM 100)

Name of Committee (in full)	Report Covering the Period From: 1/1/88 To: 3/31/88	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			
(i) Itemized (use Schedule A)	3000.00	3000.00	11(a)(i)
(ii) Unitemized	1334.00	1334.00	11(a)(ii)
(iii) Total of contributions from individuals	4334.00	4334.00	11(a)(iii)
(b) Political Party Committees			11(b)
(c) Other Political Committees (such as PACs)			11(c)
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	4334.00	4334.00	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	30,000.00	30,000.00	12
13. ALL LOANS RECEIVED			13
14. LOAN REPAYMENTS RECEIVED			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	8.03	8.03	17
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	34,342.03	34,342.03	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	30.00	30.00	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			21
22. INDEPENDENT EXPENDITURES (use Schedule E)			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (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			26(b)
(c) Other Political Committees (such as PACs)			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))			26(d)
27. OTHER DISBURSEMENTS			27
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	30.00	30.00	28
III. NET CONTRIBUTIONS OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))	4334.00	4334.00	29
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	-0-	-0-	30
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)	4334.00	4334.00	31
32. TOTAL OPERATING EXPENDITURES (from Line 19)	30.00	30.00	32
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)	-0-	-0-	33
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)	30.00	30.00	34

DISBURSEMENTS

FINANCIAL STATEMENTS

PAGE 1 OF 1 for
LINE NUMBER 11a1

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.

Colorado Republican Federal Campaign Committee

DONOR AND ADDRESS	EMPLOYER & OCCUPATION	DATE RECD	AMOUNT
-------------------	-----------------------	-----------	--------

Mr. Donald E. Main 1700 Broadway Ste. #1000 Denver, CO 80202	Holmes Roberts & Owen Attorney	03/29/88	2,500.00
--	-----------------------------------	----------	----------

RECEIPT:	YTD TOTAL	2,500.00	
----------	-----------	----------	--

Mr. Lowell A. Ware 5166 South Ironton Way Englewood, CO 80111	H & L Investment Co. Real Estate/Investments	03/29/88	250.00
---	---	----------	--------

RECEIPT:	YTD TOTAL	250.00	
----------	-----------	--------	--

Mr. Richard J. Miano 4675 S. Yosemite #205 Denver, CO 80237	Thomas & Betts Corp. Regional Manager	03/23/88	250.00
---	--	----------	--------

RECEIPT:	YTD TOTAL	250.00	
----------	-----------	--------	--

SUBTOTAL This Page		3,000.00	
--------------------	--	----------	--

TOTAL THIS PERIOD		3,000.00	
-------------------	--	----------	--

88 April Quarterly Report

SCHEDULE A

(2nd amendment)

This schedule is to be attached to the last page of the financial summary page

Page Line Number

12

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

NAME OF COMMITTEE (in Full)**Colorado Republican Federal Campaign Committee**

A. Full Name, Mailing Address and ZIP Code
 Republican National Committee
 310 First Street S.E.
 Washington DC 20003

Name of Employer

Date (month, day, year)

3/29/88

Amount of Each Receipt this Period

15,000.00

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

Occupation

Aggregate Year-to-Date > \$ 15,000.00

B. Full Name, Mailing Address and ZIP Code
 Colorado Republican Committee
 1275 Tremont Place
 Denver, CO 80204

Name of Employer

Date (month, day, year)

3/25/88

Amount of Each Receipt this Period

15,000.00

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

Occupation

Aggregate Year-to-Date > \$ 15,000.00

C. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt this Period

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

Occupation

Aggregate Year-to-Date > \$

D. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt this Period

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

Occupation

Aggregate Year-to-Date > \$

E. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt this Period

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

Occupation

Aggregate Year-to-Date > \$

F. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt this Period

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

Occupation

Aggregate Year-to-Date > \$

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt this Period

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

Occupation

Aggregate Year-to-Date > \$

SUBTOTAL of Receipts This Page (optional)

\$30,000.00

TOTAL This Period (last page this line number only)

\$30,000.00

039407143643

88 April Quarterly Report
(2nd amendment)

**Colorado Republican Federal Campaign Committee
Quarterly Report, Jan. 1, 1988 - March 31, 1988**

DISCUSSION OF AMENDMENTS TO FIRST QUARTER REPORT

1.) On our original first quarter report (1/1/88 - 1/31/88) dated 4/15/88, the Detailed Summary Page reported:

line 11 (a) (i)	as \$ 5,320.00	(\$250.00 low)
line 11 (a) (ii)	as \$14,014.00	(\$250.00 high) and
line 11 (a) (iii)	as \$19,334.00	
line 12	as \$15,000.00	

2.) Mark F. Eilers' letter dated 5/20/88 noted that the itemized entries on Schedule A (in support of line 11(a)(i)) in fact totaled \$5,570.00 (an addition error on our part).

3.) On our amended First Quarter Report, dated 5/26/88, the Detailed Summary Page reported:

line 11 (a) (i)	as \$ 5,570.00	
line 11 (a) (ii)	as \$14,014.00	(\$250.00 high) and
line 11 (a) (iii)	as \$19,584.00	(\$250.00 high).

All subsequent amended entries based on line 11 (a)(iii) were overstated by \$250.00.

line 12	as \$15,000.00
---------	----------------

4.) The current amended First Quarter Report, dated 7/13/88 the Detailed Summary Page reports:

line 11 (a) (i)	as \$3000.00
line 11 (a) (ii)	as \$1334.00
line 11 (a) (iii)	as \$4334.00

line 12	as \$30,000.00
---------	----------------

These values are correct for this period.

Colorado Republican Federal Campaign Committee
Quarterly Report, Jan 1, 1988 - March 31, 1988

5.) On our amended report dated 7/13/88, line 12 of the Detailed Summary Page reads \$30,000.00. This is an adjustment from our previous report showing in Line 11, \$5,570.00 in itemized receipts and \$14,014.00 in unitemized receipts.

Line 12 consists of \$15,000.00 given to us by the Republican National Committee, and \$15,000 consisting of personal contributions from our affiliated Colorado Republican party account. There is a question as to such a transfer being permissible by FECA regulations, although the contributions were exclusively on a personal basis. We have amended our first quarter report to better identify this contribution of \$15,000.00. Our second quarter report shows a disbursement on Line 20 of \$15,000.00 to reverse this contribution since we discovered the possible incompatibility of this contribution with FECA regulations.

078

98033743641

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category of the
Detailed Summary PagePAGE 68
1 1
FOR LINE NUMBER
20

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)

Colorado Republican Federal Campaign Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Colorado Republican Committee 1275 Tremont Place Denver, CO 80204	overhead allocation	4/1/88	\$ 3,000.00
	Disbursement for: ☐ Primary ☐ General	4/4/88	500.00
	☐ Other (specify)	4/8/88	8,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	" "	4/14/88	9,000.00
	Disbursement for: ☐ Primary ☐ General	4/21/88	16,000.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	" "	4/25/88	10,000.00
	Disbursement for: ☐ Primary ☐ General	6/27/88	30,000.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Reimbursement - 1st Quarter audited report	5/6/88	15,000.00
	Disbursement for: ☐ Primary ☐ General		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Reimbursement for over- payment - contributions	6/20/88	1,000.00
	Disbursement for: ☐ Primary ☐ General	6/29/88	1,100.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General		

SUBTOTAL of Disbursements This Page (optional)

\$93,600.00

TOTAL This Period (last page this line number only)

\$93,600.00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

20-2

AUG 24 1988

Douglas L. Jones, Treasurer
Colorado Republican Federal
Campaign Committee
1275 Fremont Place
Denver, CO 80204

Identification Number: C00033134

Reference: July Quarterly Report (4/1/88-6/30/88)

Dear Mr. Jones:

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

-Your report discloses a contribution(s) which may have been drawn on a corporate account(s) (pertinent portion(s) attached). You are advised that contributions from corporations are prohibited by the Act, unless made from separate segregated funds established by the corporations. (2 U.S.C. §441b) If you have received a contribution(s) from a corporation(s), the Commission recommends that you refund the full amount(s) to the donor(s) in accordance with 11 CFR 103.3(b). Alternatively, if you choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributor(s) in writing and provide the contributor(s) with the option of receiving a refund(s). You may wish to seek a written authorization(s) (either before or after the transfer(s)-out) from the donor(s) for any transfer(s)-out to protect the donor's interests.

Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. In the best interests of the committee, all refunds and transfers-out should be made within thirty days of the treasurer's receipt of the contribution. See 11 CFR 103.3(b). Refunds and transfers-out should be disclosed on a supporting Schedule B for Line 26 or 20 of the report covering the period during which they are made.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information.

8 8 0 3 5 4 3 2 3 0 9

Although the Commission may take further legal steps concerning the acceptance of prohibited contributions, prompt action on your part to refund or transfer-out any such prohibited contributions will be taken into consideration.

-The Commission notes the transfer-out of the funds received from your non-federal account. You are advised that the transfer-in of funds from a non-federal account is prohibited by 11 CFR 102.5(a)(1)(i).

Although the Commission may take further legal steps concerning the acceptance of impermissible funds, the prompt action by your committee will be taken into consideration.

-Please clarify the nature of the transfers-out totalling \$2,110.00 labeled "Reimbursement for overpayment-contributions."

Although the Commission may take further legal steps concerning the acceptance of impermissible funds, the prompt action by your committee will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

David J. Blakeley

David J. Blakeley
Reports Analyst
Reports Analysis Division

88735432310

07B



COLORADO REPUBLICANS

1275 Tremont Place, Denver, Colorado 80204 (303) 883-1776

ATTACHMENT 10
PAGE 1 OF 2
FEDERAL ELECTION COMMISSION

00 SEP 12 AM 11:05

August 30, 1988

Federal Election Commission
Mr. David G. Blakeley
Reports Analysis Division
999 E Street, N.W.
Washington, D.C. 20463

RE: July Quarterly Report (4/1/88 - 6/30/88)
Identification Number C00033134

Dear Mr. Blakeley:

This letter responds to your letter of August 24, 1988, regarding the above captioned report of the Colorado Republican Federal Campaign Committee. Each of the concerns in your letter are addressed below.

-The contributions in question were all drawn on personal checking accounts. The mailing address used in each case is a business address, including the name of the business.

-Schedule B, for Line 20, shows a \$15,000.00 transfer labeled "Reimbursement - 1st Quarter Amended Report". This \$15,000 represents personal contributions received by our affiliated Colorado Republican party account, which was later transferred to the Federal account. After the transfer was made, there arose a question as to such a transfer being permissible by FEC regulations, even though the contributions were exclusively from personal accounts. Upon discovering the possible incompatibility of the transaction, the \$15,000 was returned to the state account.

-Schedule B, for Line 20, shows two disbursements totalling \$2,100.00 (your letter states the amount in question as \$2,110.00 which is incorrect). This money represents various contributions that exceeded the \$5,000 limit per person per year. Each contributor was notified in writing of the transfer to the non-federal account.

Hopefully this letter clarifies the concerns you had with our report. If you need more information, or more detailed answers to your questions, please do not hesitate to contact me.

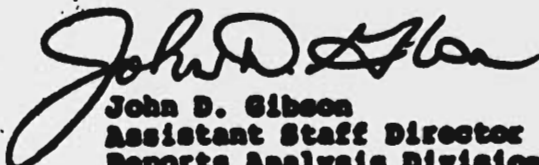
Sincerely,

Doug Jones, Treasurer
Colorado Republican Federal Campaign Committee

078

If you should have any questions related to this matter,
please contact David Stahel on our toll-free number (800) 424-
5330 or our local number (202) 576-2480.

Sincerely,


John D. Gibson
Assistant Staff Director
Reports Analysis Division

98035455186

RECEIVED
FEDERAL ELECTION COMMISSION
FEB 17 AM 10:28

FEDERAL ELECTION COMMISSION

999 E Street, N.W.
Washington, D.C. 20463

SENSITIVE

EXECUTIVE SESSION

FEB 28 1989

FIRST GENERAL COUNSEL'S REPORT

RAD Referral: 88L-25

STAFF MEMBER: Keith Morgan

SOURCE: INTERNALLY GENERATED

**RESPONDENTS: Colorado Republican Federal Campaign Committee
and Douglas L. Jones, as treasurer**

**RELEVANT STATUTES: 2 U.S.C. § 441b(a)
11 C.F.R. § 102.5(a)**

**INTERNAL REPORTS CHECKED: Referral Materials
Disclosure Reports**

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred the Colorado Republican Federal Campaign Committee (the "Committee") and Douglas L. Jones, as treasurer, to the Office of the General Counsel on October 4, 1988. (Attachment 1). The bases for the referral are apparent violations of 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a) by the Committee.

II. FACTUAL AND LEGAL ANALYSIS

1. Factual Background

The Committee maintains two accounts, one to finance political activity in connection with federal elections, and a separate account to finance activity in connection with state and local elections. According to the referral materials, the Committee received and deposited into its Federal account \$15,000 from its non-federal account. Specifically, the Committee disclosed in its Second Amendment to its April Quarterly Report, a transfer-in of \$15,000 from its non-federal account on

March 25, 1988. An accompanying letter explained that the \$15,000 consisted of, "personal contributions from our affiliated Colorado Republican party account, and that there was, a question as to such a transfer being permissible by FECA regulations, although the contributions were exclusively on a personal basis." The letter also stated that the Committee's "second quarter report shows a disbursement on Line 20 of \$15,000 to reverse this contribution since we discovered the possible incompatibility of this contribution with FECA regulations." The Committee's 1988 July Quarterly Report does in fact disclose a \$15,000 transfer-out to the Committee's non-federal account on May 6, 1988.

2. Applicable Law

To ensure that prohibited monies are not used in connection with federal elections, 11 C.F.R. § 102.5 prescribes certain requirements for organizations that intend to finance both federal and non-federal political activity. An organization that is a political committee may, pursuant to 11 C.F.R. § 102.5(a), establish a separate federal account for federal activity and a second account for state and local election activity.

Only funds subject to the prohibitions and limitations of the Act may be deposited into the separate federal account. See also, 2 U.S.C. § 441b(a). Pursuant to 11 C.F.R.

§ 102.5(a)(1)(i), no transfers may be made to the federal account from any other account maintained for the purpose of financing activity in connection with non-federal elections. In addition,

contributions deposited into a federal account must meet the following conditions: (1) contributions must be designated for the federal account, (2) contributions must result from solicitations which expressly state that the contributions will be used in connection with a federal election, and (3) contributions must be from contributors who are informed that all contributions are subject to the prohibitions and limitations of the Act. See 11 C.F.R. § 102.5(a)(2). Moreover, corporations and labor unions are prohibited by the Act from making contributions to the federal account. 2 U.S.C. § 441b(a).

3. Analysis

The transfer from the respondents' non-federal to its federal account appears to be impermissible. The transfer appears to violate 11 C.F.R. § 102.5(a)(1)(i), since that section disallows transfers between federal and non-federal accounts. In addition, under Colorado law, state political committees may receive contributions from corporations and labor unions. The committee claims that the transfer only contained personal contributions. However, this claim needs to be investigated to determine whether the transfer consisted of any corporate or labor union funds. Therefore, this Office recommends that the Commission find reason to believe that the Colorado Republican Federal Campaign Committee and Douglas L. Jones, as treasurer violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a).

Attached are proposed interrogatories to determine the composition of the non-federal account at the time of the transfer.

III. RECOMMENDATIONS

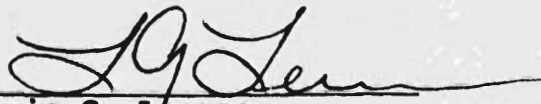
1. Open a MUR.
2. Find reason to believe the Colorado Republican Federal Campaign Committee and Douglas L. Jones, as treasurer violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a).
3. Approve the attached letter, factual and legal analysis and questions.

Lawrence M. Noble
General Counsel

Date

2/16/89

BY:


Lois G. Lerner
Associate General Counsel

Attachments:

1. Referral Materials
2. Proposed Letter and Factual and Legal Analysis
3. Questions

Staff Person: Keith V. Morgan

00040774983



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: *MA* MARJORIE W. EMMONS
COMMISSION SECRETARY

DATE: FEBRUARY 22, 1989

SUBJECT: OBJECTION TO RAD REF 88L-25: First G.C. Report
Signed February 16, 1989

The above-captioned document was circulated to the
Commission on Friday, February 17, 1989 at 2:00 P.M..

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

Commissioner Aikens	<u>XX</u>
Commissioner Elliott	<u>XX</u>
Commissioner Josefiak	<u>XX</u>
Commissioner McDonald	<u> </u>
Commissioner McGarry	<u> </u>
Commissioner Thomas	<u> </u>

This matter will be placed on the meeting agenda
for Tuesday, February 28, 1989.

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

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Colorado Republican Federal
Campaign Committee and
Douglas L. Jones, as treasurer

RAD REFERRAL 88L-25

(MUR)
2831

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the
Federal Election Commission executive session of February 28,
1989, do hereby certify that the Commission decided by a vote
of 6-0 to take the following actions with respect to the
above-captioned referral:

1. Open a Matter Under Review (MUR).
2. Find reason to believe the Colorado Republican
Federal Campaign Committee and Douglas L.
Jones, as treasurer, violated 11 C.F.R.
§ 102.5(a).
3. Approve the letter, factual and legal
analysis and questions as recommended in
the General Counsel's report dated
February 16, 1989.

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

Attest:

3-2-89

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

200407/4985



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 8, 1989

Douglas L. Jones, Treasurer
Colorado Republican Federal
Campaign Committee
1275 Tremont Place
Denver, CO 80204

RE: MUR 2831
Colorado Republican Federal
Campaign Committee

Dear Mr. Jones:

On February 28, 1989, the Federal Election Commission found that there is reason to believe the Colorado Republican Federal Campaign Committee ("Committee") and you, as treasurer, violated 11 C.F.R. § 102.5 of the Commission's regulations. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information. The Commission is also concerned about a possible violation of 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), and has approved the attached questions to determine the sources of the funds in the Committee's non-federal account at the time of the transfer of funds to the federal account.

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 along with answers to the enclosed questions 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.

Colorado Republican Federal Campaign Committee
Page 2

§ 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.

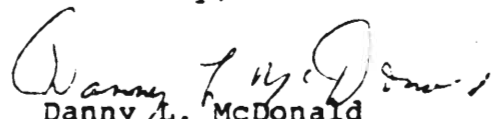
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Keith V. Morgan, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Questions

000407/40037

OGC 2325

RECEIVED
FEDERAL ELECTION COMMISSION

WILEY, REIN & FIELDING

89 MAR 30 PM 2:51

1776 K STREET, N.W.
WASHINGTON, D.C. 20006
(202) 429-7000

JAN W. BARAN
(202) 429-7330

March 30, 1989

TELECOPIER
(202) 429-7049
TELEX 248349 WYRN UR

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Attn: Keith V. Morgan

Re: MUR 2831
Colorado Republican Federal Campaign Committee

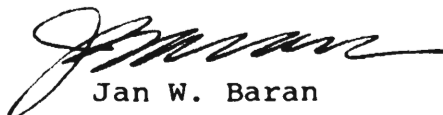
Dear Mr. Noble:

This office represents the Colorado Republican Federal Campaign Committee ("Committee") and Douglas L. Jones, as Treasurer, in the above-referenced matter. Enclosed please find an executed Statement of Designation of Counsel confirming our representation.

I am advised that the Committee received Chairman McDonald's letter of March 8, 1989 on March 15, 1989. The letter was accompanied by Interrogatories and Request for Production of Documents. In light of the fact that counsel was not retained until today, I hereby request an additional twenty days within which to file Responses and produce documents, up to and including April 19, 1989.

Your favorable consideration of this request will be appreciated.

Sincerely,


Jan W. Baran

rpb
Encl.

cc: Mr. Bruce Benson
Mr. Douglas L. Jones
Mr. John Dorrenbacher

0040774008

RECEIVED
FEDERAL ELECTION COMMISSION

89 MAR 30 PM 2:51

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2831

NAME OF COUNSEL: Jan W. Baran, Esq.

ADDRESS: Wiley, Rein & Fielding

1776 K Street, N.W.

Washington, D.C. 20006

TELEPHONE: (202) 429-7330

The above-named individual is hereby designated as my
counsel and is authorized to receive any notification and
other communications from the Commission and to act on my
behalf before the Commission.

3/30/89
Date


Signature

RESPONDENT'S NAME: Douglas L. Jones, as Treasurer

ADDRESS: Colorado Republican Federal

Campaign Committee

1275 Tremont Place

Denver, CO 80204

HQTRS PHONE: (303) 893-1776

BUSINESS PHONE: (303) 572-6477

90040774009



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 4, 1989

Jan W. Baran, Esquire
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

RE: MUR 2831
Colorado Republican Federal
Campaign Committee

Dear Mr. Baran:

This is in response to your letter dated March 30, 1989, which we received on March 31, 1989, requesting an extension of 20 days until April 19, 1989 to respond to the reason to believe finding against your client, and to answer the interrogatories and document requests in this matter. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on April 19, 1989.

If you have any questions, please contact Keith V. Morgan, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

A handwritten signature in black ink, appearing to read "Lisa E. Klein", is written over the typed name.

BY: Lisa E. Klein
Assistant General Counsel

00040772990

06C 2516

WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D. C. 20006
(202) 429-7000

JAN W. BARAN
(202) 429-7330

April 19, 1989

TELECOPIER
(202) 429-7049
TELEX 248349 WYRN

65 APR 19 PM 3:16

Lawrence M. Noble, Esquire
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

ATTN: Keith V. Morgan

RE: MUR 2831
Colorado Republican
Federal Campaign Committee
and Douglas L. Jones, as
treasurer

Dear Mr. Noble:

This letter is written on behalf of the Colorado Republican Federal Campaign Committee ("Committee") and Douglas L. Jones, as treasurer ("Respondents") in the above-captioned matter. The Commission has found reason to believe that Respondents have violated 11 C.F.R. § 102.5 of the Commission's Regulations in connection with a transfer of \$15,000 from the Committee's non-federal account to its federal account, brought to the Commission's attention sua sponte by Respondents.

The Commission's analysis in this matter focuses on three requirements of 11 C.F.R. § 102.5(a)(2):
(1) contributions must be designated for the federal account;
(2) contributions must result from solicitations which expressly state that the contributions will be used in connection with a federal election; and (3) contributions must be from contributors who are informed that all contributions are subject to the prohibitions and limitations of the Act. Further, the Commission's analysis indicates that it is attempting to ascertain whether the monies transferred to the federal account meet these requirements.

The Committee previously indicated its belief that the monies transferred constituted personal contributions to the Committee. See Amended 1988 April Quarterly Report of the

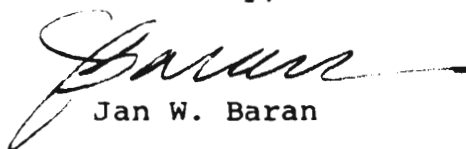
Lawrence M. Noble, Esq.
April 19, 1989
Page 2

Colorado Republican Federal Campaign Committee. Upon receipt of the Commission's notification of this reason to believe finding, the Committee has conducted a further review of its records. Affidavit of John Dorrenbacher in MUR 2831 (hereinafter "Dorrenbacher Aff.") at ¶ 3. This review has revealed that at the time of the transfer, March 25, 1988, personal contributions consisted of more than two-thirds, or \$50,304.42, of all the Party's non-federal monies, with the remaining one-third being comprised of corporate contributions and contributions from state PACs and associations. Id. Thus, "at the time of the transaction . . . the Colorado Republican Party's non-federal monies were composed of sufficient personal contributions to cover the transfer." Id. at ¶ 4.

Further, as stated in Mr. Dorrenbacher's Affidavit "these particular contributions were not specifically designated for the Colorado Republican Campaign Committee Federal Account, nor were they the result of solicitations that state specifically that the money would be used in connection with a federal election. . . . [W]ith few exceptions, contributors had not been informed that contributions are subject to the prohibitions and limitations of the Federal Election Campaign Act of 1971, as amended." Id. at ¶ 5. At the same time, however, "these particular contributions were not specifically designated for non-federal purposes." Id. at ¶ 6.

Since the Committee has previously acknowledged its error and refunded the monies at issue, it respectfully requests that pre-probable cause conciliation be entered into so that this matter may be resolved.

Sincerely,



Jan W. Baran

cc: Bruce Benson
Douglas L. Jones

JWB/CAL:co

90040774993

MUR 2831

AFFIDAVIT OF JOHN DORRENBACHER

JOHN DORRENBACHER, being first duly sworn, deposes and says:

1. I am John Dorrenbacher. I have been the Data Base Administrator for the Colorado Republican Party ("Party") since 1987.

2. I am familiar with the interrogatories issued by the Federal Election Commission ("Commission") pursuant to its reason to believe finding in the above captioned MUR.

3. I have reviewed the Party's financial records as of March 25, 1988 in accordance with the requests from the Commission. As of March 25, 1988, the Party had a total of \$73,961.87 in non-federal monies from hundreds of contributors, attributable as follows:

personal contributions	= \$ 50,304.42	= 68%
corporate contributions	= \$ 18,450.00	= 25%
state PACs and associations	= \$ 5,050.00	= 6.8%
miscellaneous contributions	= \$ 157.45	= .2%
(apparently corporate)		

Total = \$ 73,961.87

4. As seen above, at the time of the transaction which is the subject of this matter, the Colorado Republican

Party's non-federal monies were composed of sufficient personal contributions to cover the transfer.

5. To the best of my knowledge, these particular contributions were not specifically designated for the Colorado Republican Campaign Committee Federal Account, nor were they the result of solicitations that state specifically that the money would be used in connection with a federal election. Further, to my knowledge, with few exceptions, contributors had not been informed that contributions are subject to the prohibitions and limitations of the Federal Election Campaign Act of 1971, as amended.

6. In general, however, contributions are solicited on an either/or basis for the Colorado Republican Federal Campaign Committee and the Colorado Republican Committee. Thus, these particular contributions were not specifically designated for non-federal purposes. In addition, the solicitations do state that they are "Paid for by the Colorado Republican Committee and/or the Colorado Republican Federal Campaign Committee."

John Dorrenbacher
John Dorrenbacher

Signed and sworn to before me
this 18th day of April, 1979.

Mary M. Hunt
Notary Public

My Commission Expires: February 5, 1992

0603071

RECEIVED
FEDERAL ELECTION COMMISSION
ADMINISTRATIVE DIVISION

WILEY, REIN & FIELDING

89 JUN 15 AM 8:27

1776 K STREET, N. W.
WASHINGTON, D. C. 20006
(202) 429-7000

JAN W. BARAN
(202) 429-7330

June 14, 1989

TELECOPIER
(202) 429-7049
TELEX 248349 WYRN UR

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Attn: Keith V. Morgan

Re: MUR 2831
Colorado Republican
Federal Campaign Committee
and Douglas L. Jones, as
treasurer

Dear Mr. Noble:

Enclosed please find an Affidavit executed by John Dorrenbacher, Data Base Administrator for the Colorado Republican Party. This is provided in response to a telephone request from Keith Morgan of your office for additional information in the above captioned MUR.

I trust this information satisfies your needs.

Sincerely,


Jan W. Baran

cc: Bruce Benson
Douglas L. Jones

89 JUN 15 AM 10:10

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

00040774993

BEFORE THE FEDERAL ELECTION COMMISSION

County of Denver)
)
State of Colorado) MUR 2831

AFFIDAVIT OF JOHN DORRENBACHER

JOHN DORRENBACHER, being first duly sworn, deposes and says:

1. I am John Dorrenbacher. I have been the Data Base Administrator for the Colorado Republican Party ("Party") since 1987.

2. I have been informed of the Federal Election Commission's request for the list of contributors which comprised the \$15,000 transferred to the Colorado Republican Federal Campaign Committee which is the subject of this MUR.

3. I have compiled the attached list of contributors, including the date of contribution and amount contributed in response to this request.

4. I also want to confirm that when I made reference to personal contributions in my Affidavit of April 18, 1989, I was referring to contributions from individuals.


John Dorrenbacher

Signed and sworn to before me
this 9th day of June, 1989.


Notary Public

My commission expires Feb. 5, 1992

970407/1330

CONTRIBUTION DATE	FULL.NAME.....	REVENUE.. AMOUNT
03/01/88	Mr. & Mrs. Harold Anderson	5.00
03/01/88	Mrs. Mildred M. Ball	12.00
03/01/88	Mr. & Mrs. Glen Banester	10.00
03/01/88	Mr. Robert D. Binder	15.00
03/01/88	Mrs. Valerie D. Brinkworth	25.00
03/01/88	Mr. Robert Broom	20.00
03/01/88	Mr. & Mrs. Irving Cannon	15.00
03/01/88	Mr. & Mrs. Kenton G. Circle	30.00
03/01/88	Mr. Irvin R. Clapper	25.00
03/01/88	Mr. David C. Cougill	25.00
03/01/88	Mr. & Mrs. Donald Cross	35.00
03/01/88	Mr. Richard L. Davis	25.00
03/01/88	Mr. Al F. Dworak	35.00
03/01/88	Mr. Hugh Funkhouser, Jr.	25.00
03/01/88	Mary G. Gilmartin	15.00
03/01/88	Mr. Klaus P. Hendrix	10.00
03/01/88	Lynn E Hornbrook	36.50
03/01/88	Mr. & Mrs. Dale Keathley	25.00
03/01/88	Mr. William H. Kindel	100.00
03/01/88	Mr. & Mrs. Donald Knight	40.00
03/01/88	Mary C. Lawson	25.00
03/01/88	Dr. & Mrs. Robert Mohling	40.00
03/01/88	Evangeline K. Nelson	10.00
03/01/88	Mr. Howard O'Hanahan	40.00
03/01/88	Arvella O'Hanahan	40.00
03/01/88	Mr. & Mrs. Marvin Olsen	50.00
03/01/88	Mr. Louis A. Otto	20.00
03/01/88	Mr. John C. Preston	30.00
03/01/88	Mr. Dale W. Querfeld	50.00
03/01/88	Ms. Bonnie J. Read	25.00
03/01/88	Mrs. David G. Rice, Jr	15.00
03/01/88	Mr. Stephen D. Tebo	20.00
03/01/88	Dr. John W. Thimmig	50.00
03/01/88	Mr. Victor H. Walker	20.00
03/01/88	Mr. Monte G. Waller	50.00
03/01/88	Mr. William Webster	100.00
03/02/88	Dr. & Mrs. Joel M. Karlin	50.00
03/02/88	Mr. Donald J. McCoy	10.00
03/02/88	Irene Miller	5.00
03/03/88	Mr. Lee Ashley	25.00
03/03/88	Mr. & Mrs. Gary Balzer	25.00
03/03/88	Mr. James V. Barnes	5.00
03/03/88	Mr. Edwin A. Bathke	25.00
03/03/88	Mr. Dan Bell	50.00
03/03/88	Mrs. Arthur B. Church	50.00
03/03/88	Mr. & Mrs. Leo Desrosiers	30.00
03/03/88	Mr. & Mrs. Dallis Esarey	20.00
03/03/88	Ms. Jeanne H. Fligg	5.00
03/03/88	Mr. & Mrs. Quinten Gates	10.00
03/03/88	Mr. Roland N. Hayes, Jr	25.00
03/03/88	Mr. Lorne R. Hinkle	25.00
03/03/88	Mr. Douglas I. Holmes	10.00
03/03/88	Col. James T. Johnson	100.00
03/03/88	Mr. & Mrs. Mark S. Loye	30.00

000407/4007

CONTRIBUTION DATE	FULL.NAME.....	REVENUE.. AMOUNT
03/03/88	Mr. & Mrs. Hugh Martin	25.00
03/03/88	Mr. Larry C. McVey	150.00
03/03/88	Mr. & Mrs. Gordon W. Netzorg	50.00
03/03/88	Mrs. Lauretta R. Nichols	25.00
03/03/88	Mr. & Mrs. David W. Olson	25.00
03/03/88	Mr. & Mrs. John Reid	45.00
03/03/88	Mr. & Mrs. Ralph L. Spellman	100.00
03/03/88	Hon. & Mrs. John R. Ulvang	100.00
03/03/88	Hon. John Vanderhoof	100.00
03/03/88	Dr. & Mrs. Mark M. Wolff	75.00
03/04/88	Geraldine L. Alden	40.00
03/04/88	Mr. & Mrs. Daniel Boyd	25.00
03/04/88	Mr. Bert Chiappini	25.00
03/04/88	Mr. William R. Childs	250.00
03/04/88	Mr. & Mrs. John Davis	40.00
03/04/88	Ms. Anna L. Devlin	40.00
03/04/88	Mr. & Mrs. M. G. Engel	15.00
03/04/88	Mr. William W. Grant	200.00
03/04/88	Mr. Paul Griner	10.00
03/04/88	Mr. & Mrs. Gerald Hadduck	25.00
03/04/88	Dr. Arthur Herzberger	50.00
03/04/88	Mr. & Mrs. Glenn K. Hill	25.00
03/04/88	Mr. William M. Holden	20.00
03/04/88	Mr. & Mrs. Jeffrey Johns	50.00
03/04/88	Miss Kathleen P. Krider	20.00
03/04/88	Robert & Evelyn Kube	25.00
03/04/88	Ms. Norma N. Leiby	5.00
03/04/88	Lois M. Meyers	30.00
03/04/88	Sister Irene Nathan	150.00
03/04/88	Mrs. Laura Nokes	30.00
03/04/88	Ruth A. Nuneville	20.00
03/04/88	Mr. Walton L. Ohler	20.00
03/04/88	Mr. & Mrs. Ralph Phillips	30.00
03/04/88	Mr. Richard Roth	5.00
03/04/88	Mr. Edward J. Schuh	25.00
03/04/88	Mr. & Mrs. Wilbur VanWinkle	25.00
03/04/88	Ms. Ella Vetter	10.00
03/04/88	Dr. Robert J. Weakley	30.00
03/04/88	Mr. & Mrs. Robert Wiegand II	25.00
03/04/88	Dr. William T. Yen	40.00
03/07/88	Mary E. Allmendinger	20.00
03/07/88	Mr. Robert P. Baldwin	15.00
03/07/88	Mr. Emil E. Ballast	25.00
03/07/88	Mr. Donald A. Beggs	10.00
03/07/88	Mr. Herbert W. Berendt	25.00
03/07/88	Mr. And Mrs. Philip Bissell	25.00
03/07/88	Mrs. Elizabeth A. Bloom	10.00
03/07/88	Mr. & Mrs. Robert E. Brady, Jr.	25.00
03/07/88	Mr. & Mrs. Robert L. Brod	25.00
03/07/88	Mr. M. O. Brown	25.00
03/07/88	Mr. Jack Caldwell	10.00
03/07/88	Velma N. Churchill	15.00
03/07/88	Dr. Donald E. Cook	50.00
03/07/88	Mr. A. C. Corder	30.00

030407/4008

CONTRIBUTION DATE	FULL.NAME.....	REVENUE.. AMOUNT
03/07/88	Mary E. Damian	10.00
03/07/88	Mr. & Mrs. Gordon L. Davis	20.00
03/07/88	Mrs. Wilma F. Dunn	15.00
03/07/88	Mr. & Mrs. Joe Eisaguirre	25.00
03/07/88	Ms. Veronica Fetzer	10.00
03/07/88	Mr. Albert E. Gomez	50.00
03/07/88	Mrs. Loren Gould	36.50
03/07/88	Mr. & Mrs. Philip Harrison	36.50
03/07/88	Mrs. Bertha Kidder	30.00
03/07/88	Mr. Vadim A. Litinsky	25.00
03/07/88	Lt Col & Mrs Charles W. Markl	20.00
03/07/88	Emilie D. Migota	5.00
03/07/88	Mr. John C. Mitchell	100.00
03/07/88	LTGEN & Mrs. Thomas Moorman	36.50
03/07/88	Mrs. Gladys Nylund	25.00
03/07/88	Mr. Eugene F. Oliver	36.50
03/07/88	Mr. & Mrs. James Penfold	10.00
03/07/88	Col. & Mrs. F. B. Porter, Jr.	5.00
03/07/88	Mr. R. N. Richey	10.00
03/07/88	Mrs. Katie E. Schertz	150.00
03/07/88	Mr. F. A. St. John	15.00
03/07/88	Mr. Bradley C. Streeter	100.00
03/07/88	Mr. & Mrs. Arley Swart	20.00
03/07/88	Mr. E. Telling	20.00
03/07/88	Col & Mrs. Charles Tennant	25.00
03/07/88	Mr. Arnold Wanak	25.00
03/07/88	Mrs. Nell Yarberry	36.50
03/08/88	Mr. Leo S. Altman	25.00
03/08/88	Bobby L. Andersen	36.50
03/08/88	Mr. Ralph Cole	25.00
03/08/88	Mr. & Mrs. Ira Diggs	10.00
03/08/88	Mrs. Blanche L. Dodd	20.00
03/08/88	Mr. & Mrs. Ivan Dransfeldt	10.00
03/08/88	Mrs. Esther L. Emmons	15.00
03/08/88	Mr. Robert Gray	40.00
03/08/88	Mr. J. M. Hatton	25.00
03/08/88	Mr. Eldon K. Helm	20.00
03/08/88	Mr. & Mrs. W. P. Hinman	20.00
03/08/88	Mr. & Mrs. D. Bert Hougland	30.00
03/08/88	Mr. & Mrs. Arthur H. Johnson	50.00
03/08/88	Mrs. Margaret L. King	10.00
03/08/88	Mr. Nicholas A. Liontas	25.00
03/08/88	Mrs. Kathleen P. Littler	10.00
03/08/88	Mr. Charles B. Lutz	250.00
03/08/88	Mrs. Birnadine D. Mack	20.00
03/08/88	Mr. & Mrs. Merrill J. Mattes	25.00
03/08/88	Mr. Charles Keith Millen	40.00
03/08/88	Mr. Thomas E. Neubauer	36.50
03/08/88	Mrs. Lottie W. Reddert	20.00
03/08/88	Miss Estella Rogers	25.00
03/08/88	Ms. Dora Sanford	50.00
03/08/88	Dr. James E. Shira	30.00
03/08/88	Lois E. Simeral	36.50
03/08/88	Mr. & Mrs. William Sinclair	35.00

200407/8899

CONTRIBUTION DATE	FULL.NAME.....	REVENUE.. AMOUNT
03/08/88	Mr. Emmer A. Stevenson	10.00
03/08/88	Mr. & Mrs. Charles Steward	40.00
03/08/88	Mrs. Renee S. Strank	5.00
03/08/88	Mr. Jerry B. Tamlin	20.00
03/08/88	Col. & Mrs. Robert H. Taylor	40.00
03/08/88	Mrs. Charlotte K. Udd	25.00
03/08/88	Mr. & Mrs. William D. Weller	40.00
03/08/88	Sarah Wolf	5.00
03/08/88	Mr. & Mrs. William S. Worth	50.00
03/08/88	Mr. & Mrs. Carl Zier	10.00
03/09/88	Mr. Norman C. Allen	50.00
03/09/88	Mr. Wayne Biddle	200.00
03/09/88	Dorothy Darrow	40.00
03/09/88	Mr. & Mrs. William E. Deckman	30.00
03/09/88	Mr. & Mrs. Lee D. Engelking	20.00
03/09/88	Mr. & Mrs. Hugh C. Fowler	36.50
03/09/88	Mr. & Mrs. Jack Holler	5.00
03/09/88	Rep. John J. Irwin	50.00
03/09/88	Mr. Ervin L. Lackey	50.00
03/09/88	Suzanne T. Lada	25.00
03/09/88	Lois G. LeBaron	25.00
03/09/88	Elizabeth H. Maloney	50.00
03/09/88	Nellie Z McCaw	10.00
03/09/88	Mr. & Mrs. Robert McGinniss	25.00
03/09/88	Mr. Thomas J. Milburn	15.00
03/09/88	Mr. Wallace M. Parker	50.00
03/09/88	Mr. & Mrs. Herbert G. Pratt, III	25.00
03/09/88	Mr. Darrell G. Reichert	50.00
03/09/88	Miyako Sawai	5.00
03/09/88	Eleanor B. Simoni	20.00
03/09/88	Irene Tanberg	20.00
03/09/88	Mr. & Mrs. Herman Thulin	25.00
03/09/88	Patricia M. Vagneur	50.00
03/10/88	Mr. M. Gene Aldridge	36.50
03/10/88	Mr. V. E. Baker	10.00
03/10/88	Mr. Robert C. Barr	10.00
03/10/88	Mr. Clyde B. Carroll	30.00
03/10/88	Mrs. Louise Child	10.00
03/10/88	Mr. & Mrs. Gordon L. Cox	10.00
03/10/88	Minnie M. Foster	25.00
03/10/88	Mr. Robert Hansen	36.50
03/10/88	Mrs. Stanley Kansgen	25.00
03/10/88	Mr. Robert J. Lynch	50.00
03/10/88	Mr. Loren E. Magnuson	25.00
03/10/88	Mr. Harley M. Perkins	10.00
03/10/88	Mr. & Mrs. David Pfaelzer	50.00
03/10/88	Mrs. Jeanette M. Powell	36.50
03/10/88	Mr. David Roberts	10.00
03/10/88	Mrs. Martha Toot	15.00
03/10/88	Mr. Bryce D. Tracy	36.50
03/10/88	Mr. Purvis C. Vickers	30.00
03/10/88	Mr. & Mrs. Sampson Wade	15.00
03/10/88	Mr. & Mrs. Robert E. White	25.00
03/10/88	Margaret V. Young	20.00

0004075000

CONTRIBUTION DATE	FULL.NAME.....	REVENUE.. AMOUNT
03/11/88	Ingetraud P. Boettcher	20.00
03/11/88	Mr. Patrick M. Brogan	20.00
03/11/88	Mr. & Mrs. Bernard De Cook	25.00
03/11/88	Mr. Donald Wm. Hamil, Jr.	10.00
03/11/88	Mr. & Mrs. R. G. Horner	50.00
03/11/88	Mr. & Mrs. Jon Lounsbury	40.00
03/11/88	Mrs. Rene C. Mauz	20.00
03/11/88	Mrs. Edythe Morrison	25.00
03/11/88	Gertrude M. Pim	15.00
03/11/88	Mr. & Mrs. Everett Sloan	50.00
03/11/88	Mr. & Mrs. Gordon B. Towne	20.00
03/11/88	Mr. Jack Woods	15.00
03/14/88	Mr. Kenneth H. Alderson	25.00
03/14/88	Helen M. Arduser	35.00
03/14/88	Janet Baird	15.00
03/14/88	Lydia J. Barner	10.00
03/14/88	Mr. And Mrs. Edward Bruderlin	40.00
03/14/88	Mr. F. Buck	20.00
03/14/88	Mr. Kenneth L. Campbell	25.00
03/14/88	Mr. Charles P. Casteel	15.00
03/14/88	Dr. Paul M. Chau	50.00
03/14/88	Mr. And Mrs. Jack W. Dickens	20.00
03/14/88	Mary Dilley	50.00
03/14/88	Mr. Harry C. Dowson	100.00
03/14/88	Mr. Aubrey L. Gilder	20.00
03/14/88	Mrs. Irma S. Glidden	5.00
03/14/88	Mr. & Mrs. Dewitt Green	50.00
03/14/88	Ms. Ruth A. Grimes	20.00
03/14/88	Mr. John Hale	40.00
03/14/88	Mildred S. Hansen	10.00
03/14/88	Mr. & Mrs. Richard Hansen	50.00
03/14/88	Kae K. Hatcher	30.00
03/14/88	Mr. John E. Herberger	50.00
03/14/88	Ms. Katherine Herndon	25.00
03/14/88	Beverly H. Hoffmaster	25.00
03/14/88	Mr. Albert Linger	36.50
03/14/88	Helen J. Lovelace	35.00
03/14/88	Mr. Bob J. Magness	250.00
03/14/88	Mr. & Mrs. Joe H. Martin	20.00
03/14/88	Mr. Arthur W. Palm	25.00
03/14/88	Pearl Paper	10.00
03/14/88	Joyce Powell	10.00
03/14/88	Mr. & Mrs. W. H. Richards	10.00
03/14/88	Mr. & Mrs. John Richards	300.00
03/14/88	Mr. & Mrs. David Riley	25.00
03/14/88	Mr. Leon C. Rittenhouse	15.00
03/14/88	Mr. & Mrs. Ben Robison	30.00
03/14/88	Mr. & Mrs. Billy Sheats	100.00
03/14/88	Mrs. Hubert Stock	30.00
03/14/88	Mr. Irvin E. Troudt	36.50
03/14/88	Mr. & Mrs. Donald Tyner	25.00
03/14/88	Mr. & Mrs. John Wells	25.00
03/15/88	Ruth L. Allrich	10.00
03/15/88	Marilyn I. Borgsteadt	15.00

CONTRIBUTION DATE	FULL.NAME.....	REVENUE.. AMOUNT
03/15/88	Mrs. Florence Decker	30.00
03/15/88	Euphemia M. Demmin	10.00
03/15/88	Mr. & Mrs. David E. Flatt	100.00
03/15/88	Sharon Gresko	10.00
03/15/88	Mr. Erik M. Jensen	250.00
03/15/88	Dr. Gloria Komppa	36.50
03/15/88	Mr. James H. Phillips	25.00
03/15/88	Ms. Diane Reynolds	10.00
03/15/88	Mr. Gary Wright	10.00
03/16/88	Mr. & Mrs. Herbert L. Bacon	100.00
03/16/88	Shirley M. Bergman	10.00
03/16/88	Mr. W. Crafts Black	20.00
03/16/88	Mrs. E. W. Borland	20.00
03/16/88	Mr. Norman Burris	10.00
03/16/88	Mr. & Mrs. Roland Cavanah	10.00
03/16/88	Mrs. Berton Coffin	20.00
03/16/88	Mr. & Mrs. Wilton Cogswell	30.00
03/16/88	Mr. Robert Glenn	36.50
03/16/88	Mr. & Mrs. William P. Grace	10.00
03/16/88	Mr. J. G. Heiney	25.00
03/16/88	Marian E. Howell	25.00
03/16/88	Mr. & Mrs. G. W. Hunsinger	25.00
03/16/88	Mr. Doyle W. James	36.50
03/16/88	Mr. Alan A. Jones	36.50
03/16/88	Edith L. Jones	25.00
03/16/88	Mary F. Kennedy	15.00
03/16/88	Mr. Pat Leonard	36.50
03/16/88	Rosemary T. Lucey	25.00
03/16/88	Mr. & Mrs. Ernie Martin	25.00
03/16/88	Mr. & Mrs. John McKown	100.00
03/16/88	Mrs. Bertha Mortensen	15.00
03/16/88	Prudie V. Osteen	5.00
03/16/88	Mr. Bryce F. Payne	25.00
03/16/88	Mr. Russel J. Phillips	20.00
03/16/88	Mr. & Mrs. L. Gerald Solt	15.00
03/16/88	Mrs. Louise B. Stark	20.00
03/16/88	Mrs. Ramona Sweeney	25.00
03/16/88	Mr. & Mrs. Richard C. Ten Eyck	20.00
03/17/88	Mr. & Mrs. Richard Christiansen	10.00
03/17/88	Mr. Dale Cockayne	15.00
03/17/88	Mr. & Mrs. Hugh S. Hatcher	50.00
03/17/88	Mr. David G. Hill	100.00
03/17/88	Mr. George Hopfenbeck	100.00
03/17/88	Mr. & Mrs. Don W. Jones	15.00
03/17/88	Mr. & Mrs. Frank E. Loterzo	15.00
03/17/88	Mr. H. E. McKenna	20.00
03/17/88	Mr. & Mrs. Donald J. Morgan	20.00
03/17/88	Mr. Frank L. Musgrave	250.00
03/17/88	Mrs. Mabel Musgrave	250.00
03/17/88	Mr. Thomas J. Nance	25.00
03/17/88	Mrs. Barbara Parsons	10.00
03/17/88	Mr. & Mrs. Ray L. Patterson	10.00
03/17/88	Mr. William G. Phebus	5.00
03/17/88	Mr. & Mrs. Karl L. Rathgeber	10.00

000407/5002

CONTRIBUTION DATE	FULL.NAME.....	REVENUE.. AMOUNT
03/17/88	Mrs. Lamar B. Roemer	250.00
03/17/88	Mr. Glenn G. Saunders	250.00
03/17/88	Lucille Slocum	1.00
03/17/88	Dr. Richard L. Speck	40.00
03/17/88	Mr. & Mrs. Paul Tillotson	25.00
03/17/88	Mr. & Mrs. Garland L. Truitt	25.00
03/17/88	C. Jane VanDyke	25.00
03/17/88	Col & Mrs. Carl T. Weaver, Jr	25.00
03/17/88	Dr. & Mrs. Theodore Wills	40.00
03/18/88	Mr. Victor V. Alcazar	50.00
03/18/88	Mr. Bernard E. Bump	25.00
03/18/88	Mr. & Mrs. Arnold Condron	25.00
03/18/88	Evelyn Edmonson	25.00
03/18/88	Mr. & Mrs. Wesley L. Folsom	50.00
03/18/88	Mr. Harley G. Hamilton	36.50
03/18/88	Col. Stuart E. Hays	25.00
03/18/88	Mr. Bartholemew V. Hegarty	25.00
03/18/88	Mr. R. Alan Magnuson	250.00
03/18/88	Joan Morgan	10.00
03/18/88	Connie Shovea	36.50
03/18/88	Mr. Russell A. Ward	10.00
03/18/88	Mr. Russell A. Ward	20.00
03/18/88	Mrs. Suzanne T. Williams	35.00
03/21/88	Mr. W. P. Allen, Jr.	50.00
03/21/88	Cecile C. Barrett	20.00
03/21/88	Mr. Robert B. Bizal	50.00
03/21/88	Mrs. Virginia M. Blackford	20.00
03/21/88	Mrs. Donald N. Brown	10.00
03/21/88	Mr. & Mrs. Robert Burright	20.00
03/21/88	Mr. & Mrs. Richard R. Ficca	36.00
03/21/88	Marjorie Fitzgerald	10.00
03/21/88	Mr. Les Fowler	20.00
03/21/88	Mr. Kevin Greiman	36.50
03/21/88	Mr. John Hefty	36.50
03/21/88	Mr. Jim Horton	36.50
03/21/88	Mr. & Mrs. Alfred Koester	10.00
03/21/88	Mrs. Diane L. Kolesar	50.00
03/21/88	Col. Henry A. Kortemeyer	40.00
03/21/88	Mr. Leland Larson	5.00
03/21/88	Mr. Donald Lawson	36.50
03/21/88	Gen. & Mrs. Robert M. Lee	50.00
03/21/88	Mr. J. W. Looney	25.00
03/21/88	Mrs. Dorothy Malone	5.00
03/21/88	Mr. Francis McGregor	25.00
03/21/88	Mrs. Sylvia L. Miles	20.00
03/21/88	Mr. & Mrs. Donald J. Miller	50.00
03/21/88	Mr. Frederick L. Peal	25.00
03/21/88	Mr. Donald C. Peterson	100.00
03/21/88	Mr. & Mrs. Lynn R. Pierce	50.00
03/21/88	Mrs. Margaret S. Reef	10.00
03/21/88	Mr. & Mrs. John F. Richardson	25.00
03/21/88	Mr. Franklin C. Stewart	36.50
03/21/88	Mr. Matt Strehle	20.00
03/21/88	Mrs. Dorle W. Thornton	30.00

000407/5003

CONTRIBUTION DATE	FULL.NAME.....	REVENUE.. AMOUNT
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03/21/88	Stanley & Donna Versaw	20.00
03/21/88	Mr. & Mrs. Carl Waldeck	10.00
03/21/88	Mr. Frederick H. Weeks	15.00
03/21/88	Mr. Dennis E. Williams	10.00
03/21/88	Jeannine Zimmerman	20.00
03/22/88	Mr. Christopher A. Scott	10.00
03/22/88	Mr. John P. Sheehy	36.50
03/22/88	Mrs. Grace Torkelson	10.00
03/23/88	Mr. & Mrs. William Albe	20.00
03/23/88	Mrs. Samuel Butler, Jr.	150.00
03/23/88	Ruth H. Drinkwater	36.50
03/23/88	Mrs. Robert Dunn	30.00
03/23/88	Mrs. Carol Farr	36.50
03/23/88	Mr. & Mrs. F. C. Gideon	20.00
03/23/88	Mr. R. A. Grimes	10.00
03/23/88	Mr. Arthur W. Hiner	5.00
03/23/88	Mr. Jerry E. Johnson	15.00
03/23/88	Mrs. Lila Karcher	50.00
03/23/88	Mrs. M. Robin Laignelot	20.00
03/23/88	Mr. & Mrs. Cornelius F. Loehr	30.00
03/23/88	Mrs. Beulah K. McConaughy	20.00
03/23/88	Mr. Cecil E. Munson	10.00
03/23/88	Mr. James H. Petersen	10.00
03/23/88	Mr. Richard F. Peterson	20.00
03/23/88	Mrs. Ceora G. Shumaker	25.00
03/23/88	Joseph & Judith Smith	10.00
03/23/88	Mrs. Darle C. Sprigg	5.00
03/23/88	Ms. Audna Taylor	10.00
03/23/88	Mrs. Edmund W. Uhlig	15.00
03/23/88	Mrs. Henry Wehr	20.00
03/23/88	Mr. Robert E. Wilson	15.00
03/23/88	Mr. Leslie C. Zeger	50.00
03/24/88	Hildredth E. Abrahamsen	20.00
03/24/88	Mr. Charles E. Bates	15.00
03/24/88	Mr. & Mrs. James W. Bruskotter	25.00
03/24/88	Mr. & Mrs. Samuel Colburn	10.00
03/24/88	Mr. & Mrs. Henry M. Denton	25.00
03/24/88	Mrs. Henrietta A. Gardner	10.00
03/24/88	Stephanie Nelson	36.50
03/24/88	Jean Nolan	20.00
03/24/88	R. Marilyn Olson	36.50
03/24/88	Mr. & Mrs. Homer Patrick	25.00
03/24/88	Mr. & Mrs. Michael Sellers	20.00
03/24/88	Mr. & Mrs. Ronald D. Weddle	25.00
03/25/88	Mr. Martin Bucek	36.50
03/25/88	Mr. & Mrs. William S Garnsey	50.00

15000.00

424 ITEMS LISTED.

89 OCT 17 PM 4:09

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)

Colorado Republican Federal)

Campaign Committee and)

Douglas L. Jones, as treasurer)

MUR 2831

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On February 28, 1989, the Federal Election Commission determined that there is reason to believe that the Colorado Republican Federal Campaign Committee ("Committee") and Douglas L. Jones, as treasurer, violated 11 C.F.R. § 102.5(a) because of a \$15,000 transfer from the Committee's non-federal account to its federal account. At that time the Commission also approved the sending of questions and requests for the production of documents to the Committee. The Commission's questions and document requests explored the issue of whether there were prohibited funds in the non-federal account at the time of the transfer. The Committee, on April 19, 1989, responded to the questions and requested to enter into conciliation in this matter prior to a determination of probable cause.

II. ANALYSIS

The Committee's submission of April 19, 1989, does not dispute the Commission's finding of a violation of 11 C.F.R. § 102.5(a)(1)(i). The Committee, in fact, concedes that the funds in its non-federal account did not meet the requirements of 11 C.F.R. §§ 102.5(a)(2). In response to the Commission's questions, the Committee produced an affidavit from the

personal contributions	= \$50,304.42	= 68%
corporate contributions	= \$18,450.00	= 25%
state PACs and associations	= \$ 5,050.00	= 6.8%
miscellaneous contributions (apparently corporate)	= \$ 157.45	= .2%

The Committee did not produce any documents to support this breakdown, nor did it provide contributor name, amount or date of such contributions as requested by the Commission's questions and document requests. Instead, the Committee claims that there were sufficient personal contributions in the non-federal account on March 25, 1989 to cover the transfer.

On June 14, 1989, the Committee submitted a supplement to its previous response. This response included another affidavit from Mr. Dorrenbacher, in which he reiterated his claim that the transfer only contained individual contributions (Attachment 2). Attached to his affidavit is a list of individual contributors whom he contends contributed the \$15,000 contained in the transfer.

Section 441b(a) of the Act prohibits political committees from knowingly accepting corporate contributions. Despite the Committee's claim that the \$15,000 transfer consisted of only personal contributions, its response indicates that at the time of the transfer, the non-federal account's balance included corporate moneys. Therefore, this Office recommends that the Commission find reason to believe that the Colorado Republican Federal

Campaign Committee and Douglas L. Jones, as treasurer violated 2 U.S.C. § 441b(a).

III. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

IV. RECOMMENDATIONS

1. Find reason to believe the Colorado Republican Federal Campaign Committee and Douglas L. Jones, as treasurer violated 2 U.S.C. § 441b(a) and enter into conciliation prior to a finding of probable cause to believe.
2. Approve the attached proposed Conciliation Agreement and letter.

Lawrence M. Noble
General Counsel

Date

10-16-89

BY:


Lois G. Lerner
Associate General Counsel

Attachments

1. Committee's Response and Request for preprobable cause conciliation
2. Committee's supplemental Response
3. Proposed Conciliation Agreement and letter

Staff Assigned: Keith V. Morgan



FEDERAL ELECTION COMMISSION
WASHINGTON D C 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/DELORES R. HARRIS
COMMISSION SECRETARY

DATE: OCTOBER 19, 1989

SUBJECT: MUR 2831 - GENERAL COUNSEL'S REPORT
DATED OCTOBER 16, 1989

ORH

The above-captioned document was circulated to the
Commission on Wednesday, October 18, 1989 at 11:00 a.m.

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

Commissioner Aikens	<u>XXXX</u>
Commissioner Elliott	<u></u>
Commissioner Josefiak	<u>XXXX</u>
Commissioner McDonald	<u></u>
Commissioner McGarry	<u></u>
Commissioner Thomas	<u></u>

This matter will be placed on the meeting agenda
for Tuesday, October 24, 1989 at 10:00 a.m.

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

00040715008

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Colorado Republican Federal) MUR 2831
Campaign Committee and)
Douglas L. Jones, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary of the Federal Election Commission executive session of October 24, 1989, do hereby certify that the Commission decided by a vote of 4-1 to take the following actions in MUR 2831:

1. Find reason to believe the Colorado Republican Federal Campaign Committee and Douglas L. Jones, as treasurer, violated 2 U.S.C. § 441b(a) and enter into conciliation prior to a finding of probable cause to believe.
2. Approve the proposed Conciliation Agreement and letter attached to the General Counsel's report dated October 16, 1989.

Commissioners Aikens, Josefiak, McGarry, and Thomas voted affirmatively for the decision; Commissioner Elliott dissented; Commissioner McDonald was not present.

Attest:

October 26, 1989

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



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 31, 1989

Jan Baran, Esquire
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

RE: MUR 2831
Colorado Republican Federal
Campaign Committee

Dear Mr. Baran:

On February 28, 1989, the Federal Election Commission found reason to believe that your clients violated 11 C.F.R. § 102.5. After reviewing your responses to the Commission's reason to believe finding and discovery requests, on October 24, 1989, the Commission also found reason to believe the Colorado Republican Federal Campaign Committee violated 2 U.S.C. § 441(b)(a). The factual and legal analysis which found the basis for finding is attached for your information. At your request, on October 24, 1989, the Commission also 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 Keith V. Morgan, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Factual and Legal Analysis
Conciliation Agreement

000040710

RECEIVED
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20542

89 DEC 13 PM 5:05

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of	)	
	)	
Colorado Republican Federal	)	MUR 2831
Campaign Committee and	)	
Douglas L. Jones, as treasurer	)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Jan W. Baran, Counsel for the Colorado Republican Federal Campaign Committee and Douglas L. Jones, as treasurer ("Respondents").

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II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Colorado Republican Federal Campaign Committee and Douglas L. Jones, as treasurer.
2. Close the file.
3. Approve the attached letter.

Lawrence M. Noble
General Counsel

12-12-88 BY: 
Date Lois G. Lerner
Associate General Counsel

Attachments

1. Conciliation Agreement
2. Respondents' letter and civil penalty check
2. Letter to Counsel for Respondents

Staff Assigned: Colleen Miller

000407/5012

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2831
Colorado Republican Federal)
Campaign Committee and)
Douglas L. Jones, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on December 18, 1989, the Commission decided by a vote of 5-0 to take the following actions in MUR 2831:

1. Accept the conciliation agreement with Colorado Republican Federal Campaign Committee and Douglas L. Jones, as treasurer, as recommended in the General Counsel's Report dated December 12, 1989.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's Report dated December 12, 1989.

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

Attest:

12/18/89

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat:	Wed.,	Dec. 13, 1989	5:05 p.m.
Circulated to the Commission:	Thurs.,	Dec. 14, 1989	11:00 a.m.
Deadline for vote:	Mon.,	Dec. 18, 1989	11:00 a.m.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 3, 1990

Jan W. Baran
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

RE: MUR 2831
Colorado Republican Federal
Campaign Committee and
Douglas L. Jones, as treasurer

Dear Mr. Baran:

On December 18, 1989, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your client's behalf in settlement of a violation of 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a), provisions of the Federal Election Campaign Act of 1971, as amended, and Commission regulations. Accordingly, the file has been closed in this matter. This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

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

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

000407/5014

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Colorado Republican Federal) MUR 2831
Campaign Committee and)
Douglas L. Jones, as treasurer)

CONCILIATION AGREEMENT

200049775015
This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Colorado Republican Federal Campaign Committee and Douglas L. Jones, as treasurer, ("Respondents") violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a).

NOW, THEREFORE, the Commission and the Respondent(s), 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. Colorado Republican Federal Campaign Committee is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Douglas L. Jones is the current treasurer of the Committee. At the time of the transaction which is the subject of this matter Mr. Jones was not the treasurer.

3. Pursuant to 2 U.S.C. § 441b(a) contributions or expenditures by national banks, corporations and labor organizations in connection with federal elections are prohibited.

4. 11 C.F.R § 102.5(a) permits organizations that intend to finance activity in connection with both federal and non-federal elections to set up a separate federal account.

5. Pursuant to 11 C.F.R. § 102.5(a)(1)(i) only funds subject to the prohibitions and limitations of the Act may be deposited into the separate federal account, and transfers are not allowed to be made to the federal account from any other account maintained for activity in connection with non-federal elections.

6. The Committee received a \$15,000 transfer from its non-federal account on March 25, 1988. The funds were transferred back out to the Committee's non-federal account

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on May 6, 1988, after the Committee discovered that the contribution may have violated Commission regulations.

7. The Committee's non-federal account contained corporate contributions at the time of the transfer.

V. Respondents accepted a transfer from their non-federal account which contained corporate funds in violation of 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of two thousand three hundred and fifty dollars (\$2,350), 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.

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

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

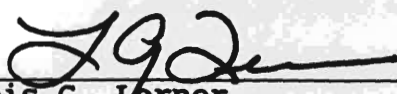
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X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not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

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

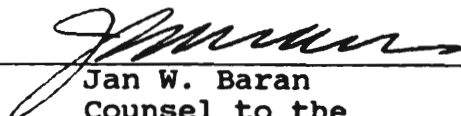
BY:


Lois G. Lerner
Associate General Counsel

Date

1/2/90

FOR THE RESPONDENTS:


Jan W. Baran
Counsel to the
Colorado Republican Federal
Campaign Committee, and
Douglas L. Jones,
as Treasurer

11/20/89

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2831

DATE FILMED 1/17/90 CAMERA NO. 4

CAMERAMAN AS

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