



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2876

DATE FILMED 2/24/89 CAMERA NO. 4

CAMERAMAN AS

89040755408

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 28 March 1989

ANALYST: Robert B. DiNardo

I. COMMITTEE: Republican Party of Arkansas
(C00084954)
J. Richey McCullough, CPA, Treasurer
Twin City Bank Suite 715
North Little Rock, AR 72114

II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(A)
11 CFR 104.5(c)(1)(i), (ii), and (iii)
11 CFR 104.5(c)(2)(i)(B)

III. BACKGROUND:

Chronic Late Filing of Reports and Failure to File the 1988
12 Day Pre-General Report by Election Day

The Republican Party of Arkansas (the "Committee") failed to file four (4) Reports of Receipts and Disbursements in a timely manner during the 1987-1988 election cycle (see Late Filing History Chart). The reports were filed between eight (8) and ninety-eight (98) calendar days late. In addition, one of the late filings, the 1988 12 Day Pre-General Report, was not filed by Election Day, November 8, 1988.

On October 3, 1988, the Committee was notified that all committees that have made contributions or expenditures in connection with the general election during the period ending October 19, 1988, must file a pre-election report by October 27, 1988, if such activity has not previously been reported (Attachment 5).

On November 10, 1988, a Chronic Late Filer Notice was sent to the Committee for failing to file the 1987 Year End and 1988 October Quarterly Reports in a timely manner (Attachment 7). The Notice advised the Committee that any additional late filing of reports may result in legal enforcement action. Subsequent to the sending of the Chronic Late Filer Notice, the Committee failed to file the 30 Day Post-General Report in a timely manner.

On February 2, 1989, the Reports Analysis Division ("RAD") analyst called the Committee to try to obtain a response to the 30 Day Post-General Report Non-Filer Notice.

89040755409

REPUBLICAN PARTY OF ARKANSAS
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

The Committee treasurer, Mr. J. Richey McCullough, told the RAD analyst that the report was mailed on January 30, 1989 (Attachment 9).

On February 2, 1989, the Committee filed the 30 Day Post-General Report (Attachment 10). The report disclosed two (2) contributions totalling \$10,000 made to two (2) different federal candidates on October 3, 1988 indicating the Committee's failure to timely file the 1988 12 Day Pre-General Report due on October 27, 1988.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

89040755410

8 9 0 4 0 7 5 5 4 1 1

LATE FILING HISTORY

REPORT TYPE	PRIOR NOTICE	DATE DUE	NON-FILER NOTICE	DATE FILED
1987 Year End (7/1/87-12/31/87)	12/18/87 (Attachment 2)	1/31/88	N/A	2/8/88 (Attachment 3)
1988 October Quarterly (7/1/88-9/30/88)	9/21/88 (Attachment 4)	10/15/88	N/A	10/28/88 (Attachment 6)
1988 12 Day Pre-General* (10/1/88-10/19/88)	10/3/88 (Attachment 5)	10/27/88	N/A	2/2/89 (Attachment 10)
1988 30 Day Post-General (10/1/88-11/30/88)	10/3/88 (Attachment 5)	12/8/88	1/6/89 (Attachment 8)	2/2/89 (Attachment 10)

*/ The 1988 30 Day Post-General Report filed on 2/2/89 contains the 12 Day Pre-General activity. No separate 12 Day Pre-General Report was filed.

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

Attachment 1

DATE 10FEB89

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
						TYPE OF FILER
REPUBLICAN PARTY OF ARKANSAS						
CONNECTED ORGANIZATION: REPUBLICAN PARTY OF ARKANSAS						
1987 STATEMENT OF ORGANIZATION - AMENDMENT				30JUL87	2	87FEC/479/5338
MID-YEAR REPORT	89,977	74,148		1JAN87 -30JUN87	20	87FEC/479/5340
MID-YEAR REPORT - AMENDMENT	90,627	69,148		1JAN87 -30JUN87	22	88FEC/510/2582
REQUEST FOR ADDITIONAL INFORMATION				1JAN87 -30JUN87	5	88FEC/498/2276
REQUEST FOR ADDITIONAL INFORMATION 2ND				1JAN87 -30JUN87	6	88FEC/507/3419
YEAR-END	58,286	79,497		1JUL87 -31DEC87	17	88FEC/508/1947
YEAR-END - AMENDMENT	58,286	79,497		1JUL87 -31DEC87	20	88FEC/518/5046
REQUEST FOR ADDITIONAL INFORMATION				1JUL87 -31DEC87	5	88FEC/513/1190
REQUEST FOR ADDITIONAL INFORMATION 2ND				1JUL87 -31DEC87	6	88FEC/516/0932
1988 STATEMENT OF ORGANIZATION - AMENDMENT				22FEB88	4	88FEC/510/2604
MISCELLANEOUS NOTICE FROM FEC				10NOV88	1	88FEC/565/1121
MISCELLANEOUS REPORT TO FEC				5DEC88	2	88FEC/566/4549
APRIL QUARTERLY	43,892	46,802		1JAN88 -31MAR88	12	88FEC/519/1529
APRIL QUARTERLY - AMENDMENT	43,892	46,802		1JAN88 -31MAR88	13	88FEC/528/3915
APRIL QUARTERLY - AMENDMENT	59,907	42,100		1JAN88 -31MAR88	12	88FEC/564/0349
REQUEST FOR ADDITIONAL INFORMATION				1JAN88 -31MAR88	1	88FEC/528/0186
REQUEST FOR ADDITIONAL INFORMATION				1JAN88 -31MAR88	1	88FEC/565/4155
JULY QUARTERLY	23,114	37,000		1APR88 -30JUN88	8	88FEC/536/4843
JULY QUARTERLY - AMENDMENT	23,055	37,000		1APR88 -30JUN88	7	88FEC/564/0361
REQUEST FOR ADDITIONAL INFORMATION				1APR88 -30JUN88	3	88FEC/545/1867
REQUEST FOR ADDITIONAL INFORMATION 2ND				1APR88 -30JUN88	4	88FEC/549/1711
OCTOBER QUARTERLY	29,006	18,374		1JUL88 -30SEP88	5	88FEC/563/2989
POST-GENERAL	-	-		1OCT88 -30NOV88	9	89FEC/583/0546
NOTICE OF FAILURE TO FILE				28NOV88	1	89FEC/576/1995
YEAR-END	11,685	27,000		1OCT88 -31DEC88	9	89FEC/583/0555
TOTAL	272,566	0	273,119	0	195	TOTAL PAGES

All reports referenced above, except for
the 1988 30-Day Post-General and Year End
Reports have been reviewed.

Debts owed to the Committee as of 12/31/88 - \$0

Debts owed by the Committee as of 12/31/88 - \$0

Cash on hand as of 12/31/88 - \$14,035

89040755412

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 18, 1987

WHO MUST FILE

ALL PARTY COMMITTEES and PACs (NON-CONNECTED COMMITTEES AND SEPARATE SEGREGATED FUNDS) must file a Year End Report in January.

REPORTING DATES

Semiannual. The Year End Report is due January 31, 1988, and must disclose financial activity that occurred from July 1 through December 31, 1987. Committees which have previously filed 1987 reports should only report activity from the closing date of the last report filed.

Monthly. Committees that choose to file on a monthly basis must file the Year End Report due January 31, 1988. The report must disclose financial activity from December 1 through December 31, 1987. All other monthly reports are due by the 20th of each month and cover all financial activity of the previous month.

WHAT MUST BE REPORTED

A report must disclose all receipts and disbursements that occurred during the reporting period. A newly registered political committee filing its first report should also include all amounts received and expended before the committee registered. See 11 CFR 104.3. For more detailed information on reporting instructions, consult your Campaign Guide.

WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed FEC Form 3X for details. Affix the peel-off label from the envelope to line 1 of the report. Any corrections in the information should be made directly on the label.

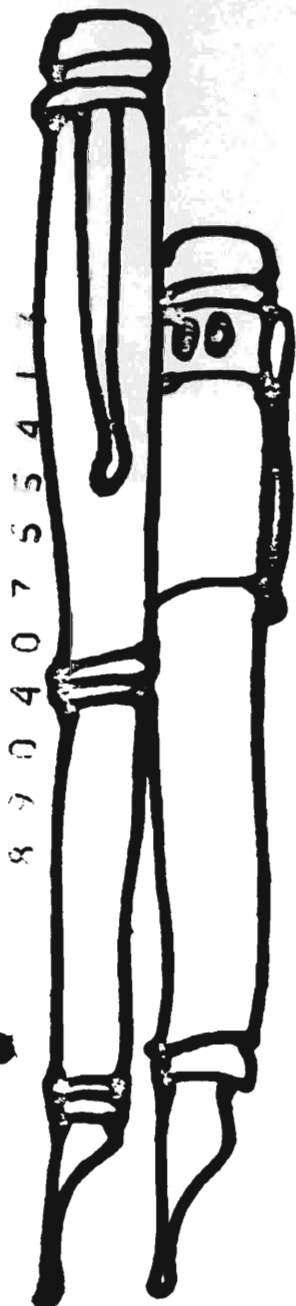
CHANGE IN FILING FREQUENCY

Committees that wish to change their reporting schedule (for example, from semiannual to monthly) must notify the Commission by sending a letter with the next report due under their current reporting schedule. Committees may change their filing frequency only once a year.

COMPLIANCE

Political committees are responsible for filing all reports required under the Act in a timely fashion. Committees and treasurers who file late reports, or fail to file reports, are subject to enforcement action. Illegible reports and reports submitted on non-FEC forms will not be accepted; committees filing such documents will be required to refile.

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



total price of financial aid policy of the government
for Other Than An Authorized Committee
(Summary Page)

FEDERAL ELECTION COMMISSION

88 FEB -3 AM 9:54

USE FEC MAILING LABEL

OR PRINT

1. NAME OF COMMITTEE (in full)		2. FEC IDENTIFICATION NUMBER C 00084954
REPUBLICAN PARTY OF ARKANSAS		
ADDRESS (number and street) ☐ (check if different than previously reported)		
Twin city Bank, Suite 715		
CITY, STATE and ZIP CODE		3 ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)
North Little Rock, AR 72114		

4. TYPE OF REPORT

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

Monthly Report Due On:

☐ February 20☐ March 20☐ April 20☐ May 20☐ June 20☐ July 20☐ August 20☐ September 20☐ October 20☐ November 20☐ December 20☐ January 31☐ Twelfth day report preceding _____

(Type of Election)

election on _____

in the State of _____

☐ Thirtieth day report following the General Election on _____

in the State of _____

(a) Is this Report an Amendment?

☐ YES☒ NO

SUMMARY

5. Covering Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
July 1 through Dec. 1, 1987		
6. (a) Cash on Hand January 1, 19 <u>87</u>		\$ 24,590.33
(b) Cash on Hand at Beginning of Reporting Period	\$ 40,419.51	
(c) Total Receipts (from Line 18)	\$ 58,286.96	\$ 148,264.89
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 98,706.47	\$ 172,855.22
7. Total Disbursements (from Line 28)	\$ 79,497.78	\$ 153,646.53
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 19,208.69	\$ 19,208.69
9. Debts and Obligations Owed TO the Committee (itemize all on Schedule C and/or Schedule D)	\$	For further information contact:
10. Debts and Obligations Owed BY the Committee (itemize all on Schedule C and/or Schedule D)	\$	Federal Election Commission 990 E Street NW Washington, DC 20463 Toll Free 800 424 9530 Local 202 376 3120

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

Type or Print Name of Treasurer

Philip G. Giesey
Signature of Treasurer
For J. Giesey M. Cullough

Date

2-1-88

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

FEC FORM 3X

Rev. 4-87

88035081947

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

September 21, 1988

REPORT	REPORTING PERIOD	REG./CERT.	FILING
		MAILING DATE*	DATE
October Quarterly	07/01/88**-09/30/88	10/15/88	10/15/88

WHO MUST FILE

PARTY COMMITTEES AND PACs (NONCONNECTED COMMITTEES AND SEPARATE SEGREGATED FUNDS) filing on a quarterly basis must file a quarterly report in October.

WHAT MUST BE REPORTED

All financial activity (not previously reported) that occurred during the reporting period.

REPORTING FORMS

Party committees and PACs use Form 3X (enclosed).

WHERE TO FILE

Consult the instructions on the back of the Form 3X Summary Page. Note State filing requirements also.

LABEL

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

PRE-ELECTION REPORTING

Committees which make contributions or expenditures (including independent expenditures) in connection with a candidate's primary or general election, must also file a 12-day Pre-Election Report if the activity was not previously reported. See the January Record.

LAST-MINUTE INDEPENDENT EXPENDITURES

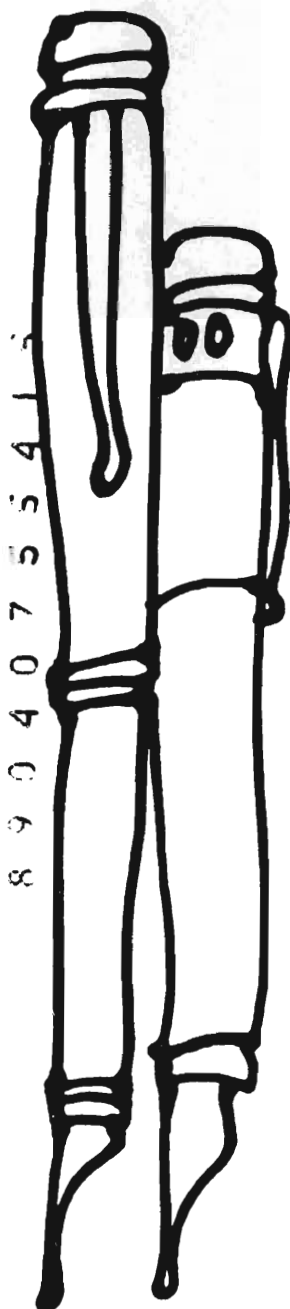
Committees which make an independent expenditure of \$1,000 or more, after the 20th day, but more than 24 hours before an election, must report it within 24 hours.

COMPLIANCE

TREASURERS OF POLITICAL COMMITTEES ARE RESPONSIBLE FOR FILING ALL REPORTS ON TIME. FAILURE TO DO SO IS SUBJECT TO ENFORCEMENT ACTION. COMMITTEES FILING ILLEGIBLE REPORTS OR USING NON-FEC FORMS WILL BE REQUIRED TO REFILE.

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

**From the date of registration, or the close of books of the last report filed, whichever is later.



REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACs

October 3, 1988

I. ALL MONTHLY FILERS

Report	Reporting Period	Reg./Cert. Mailing Date*	Filing Date
Pre-General	10/01/88**-10/19/88	10/24/88	10/27/88
Post-General	10/20/88 -11/28/88	12/08/88	12/08/88

II. QUARTERLY FILERS THAT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 19***

Report	Reporting period	Reg./Cert. Mailing Date*	Filing Date
Pre-General	10/01/88**-10/19/88	10/24/88	10/27/88
Post-General	10/20/88 -11/28/88	12/08/88	12/08/88

III. QUARTERLY FILERS WHICH DO NOT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 19***

Report	Reporting Period	Reg./Cert. Mailing Date*	Filing Date
Post-General	10/01/88**-11/28/88	12/08/88	12/08/88

WHO MUST FILE

Party committees and PACs must follow the above charts in order to determine whether they must file the pre-general election report. All Party committees and PACs, regardless of financial activity, must file the post-general election report.

WHAT MUST BE REPORTED

All financial activity (not previously reported) that occurred during the reporting period.

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

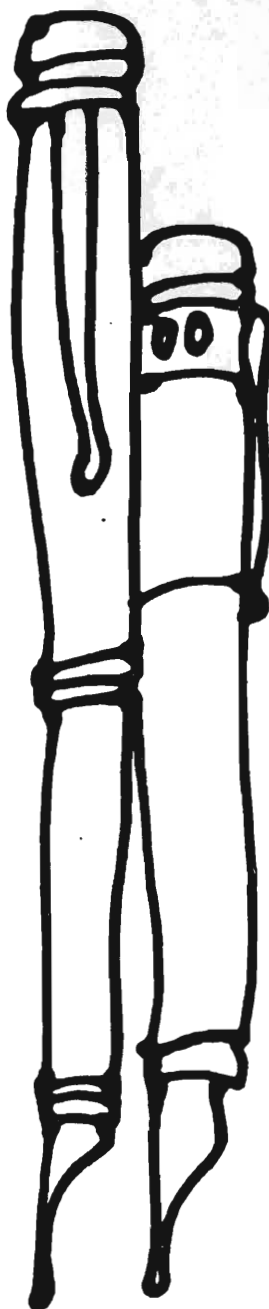
**Or from the date of registration, or the close of books of the last report filed, whichever is later.

***Committees that made general election contributions or expenditures prior to October 1 which have not been previously reported must also follow the Chart II reporting requirements.

FOR INFORMATION, Call: 202/376-3120 or 800/424-9530

(over)

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REPORTING FORMS

Party committees and PACs use Form 3X (enclosed).

WHERE TO FILE

Consult the instructions on the back of the Form 3X Summary Page.
Note State filing requirements also.

LABEL

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

LAST-MINUTE INDEPENDENT EXPENDITURES

Any PAC which makes any independent expenditures aggregating \$1,000 or more during the period beginning October 20 and ending November 6 must report them within 24 hours. Call the FEC for more information.

COMPLIANCE

TREASURERS OF POLITICAL COMMITTEES ARE RESPONSIBLE FOR FILING ALL REPORTS ON TIME. FAILURE TO DO SO IS SUBJECT TO ENFORCEMENT ACTION. COMMITTEES FILING ILLEGIBLE REPORTS OR USING NON-FEC FORMS WILL BE REQUIRED TO REFILE.

89040755417

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than an Authorized Committee
Summary PageFEDERAL ELECTION COMMISSION
Form 2800

OCT 28 1988

REPUBLICAN PARTY OF ARKANSAS

Address (number and street) ☐ Check if address has previously reported

1 Riverfront Place, Suite 715

CITY, STATE and ZIP CODE

North Little Rock, AR 72114

C00084974

☐ This committee qualified as a non-federally
connected committee DURING THIS Reporting Period

4. TYPE OF REPORT

☐ April 15 Quarterly Report☐ July 15 Quarterly Report☒ October 15 Quarterly Report☐ January 31 Year End Report☐ July 31 Mid Year Report (Pre-election Year Only)☐ Termination Report

Monthly Report Due On:

☐ February 28	☐ June 30	☐ October 30
☐ March 30	☐ July 30	☐ November 30
☐ April 30	☐ August 30	☐ December 30
☐ May 30	☐ September 30	☐ January 31

☐ Twelfth day report preceding _____
(Type of Election)

election on _____ in the State of _____

☐ Twelfth day report following the General Election on
_____ in the State of _____(4) Is this Report an Amendment? ☐ YES ☒ NO

SUMMARY

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	7/1/88 through 9/30/88		
6. (a) Cash on Hand January 1, 1988			\$ 14,853.77
(b) Cash on Hand at Beginning of Reporting Period		\$ 18,717.28	
(c) Total Receipts (from Line 10)		\$ 29,006.76	\$ 11,970.27
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 47,724.04	\$ 26,824.04
7. Total Disbursements (from Line 20)		\$ 18,374.00	\$ 97,474.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 29,350.04	\$ 29,350.04
9. Debts and Obligations Owed TO the Committee (Remise all on Schedule C and/or Schedule D)		\$	
10. Debts and Obligations Owed BY the Committee (Remise all on Schedule C and/or Schedule D)		\$	

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

Type or Print Name of Treasurer

J. Richey McCullough

Signature of Treasurer

J. Richey McCullough

Date

Oct. 14, 1988

NOTE Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 9637g

FEC FORM 2800

(revised 4/87)

89040755418
3632989



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20543

100-2

J. Richey McCullough, CPA
Republican Party of Arkansas
Twin City Bank, Suite 715
North Little Rock, AR 72114

NOV 10 1988

Identification Number: C00004954

Reference: 1987-1988 Election Cycle Reports

Dear Mr. McCullough:

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

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
Year End (7/1/87-12/31/87)	01/31/88	02/08/88
October Quarterly (7/1/88-9/30/88)	10/15/88	10/28/88

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

You may submit a letter of explanation in response to this notification. If, however, you have any questions, please feel free to contact Paul Dickson on our toll-free number, (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

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

8 0 0 0 3 3 6 5 1 1 2 1



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

EQ-7

January 6, 1989

J. Richey Mc Cullough CPA
Republican Party of Arkansas
Twin City Bank, Suite 715
North Little Rock, AR 72114

Identification Number: C00004954

Reference: 30 Day Post-General Report (through 11/28/88)

Dear Mr. Mc Cullough:

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

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

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

If you have any questions, please contact Paul W. Dickson on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

A handwritten signature in cursive script that reads "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division

TELECON

Analyst: Paul W. Dickson

Contact: J. Richey McCullough CPA, Treasurer

Committee: Republican Party of Arkansas

Date: 2/2/89

Subject: Non-Filing of 30 Day Post-General Report

Mr. McCullough apologized for the lateness of the report but said that it had been mailed on the 30th of January.

89040755421

FEDERAL ELECTION COMMISSION
FEC FORM 3X
MAY 1998

FEB-2 11 9-88

1. NAME OF COMMITTEE (Enter)

REPUBLICAN PARTY OF ARKANSAS

ADDRESS (number and street)

1 Riverfront Place, Suite 350

CITY, STATE and ZIP CODE

North Little Rock, AR 72114

2. FEC IDENTIFICATION NUMBER

C00084954

☐ This committee qualified as a non-federally financed committee during this Reporting Period.

4. TYPE OF REPORT

☐ April 15 Quarterly Report☐ July 15 Quarterly Report☐ October 15 Quarterly Report☐ January 31 Year End Report☐ July 31 Mid Year Report (Post-election Year End)☐ Termination Report

Monthly Report Due On:

☐ February 28	☐ June 30	☐ October 30
☐ March 30	☐ July 30	☐ November 30
☐ April 30	☐ August 30	☐ December 30
☐ May 30	☐ September 30	☐ January 31

☐ Twelfth day report preceding _____ (Type of Election)

election on _____ in the State of _____

☒ Twelfth day report following the General Election on

11/8/88 in the State of Arkansas

(4) Is this Report an Amendment? ☐ YES ☒ NO

SUMMARY

5. Covering Period <u>10/1/88</u> through <u>11/30/88</u>		COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, 19 <u>88</u>			\$ 14,853.77
(b) Cash on Hand at Beginning of Reporting Period		\$29,350.04	
(c) Total Receipts (from Line 18)		\$11,341.34	\$123,311.61
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$40,691.38	\$138,165.38
7. Total Disbursements (from Line 28)		\$17,000.00	\$114,474.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$23,691.38	\$ 23,691.38
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		\$	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)		\$	

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

Type or Print Name of Treasurer

Richey McCullough

Signature of Treasurer



Date

01/27/89

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

FEC FORM 3X

(revised 4/87)

FEDERAL ELECTION CAMPAIGN ACT OF 1971		2010/2011	
II. CONTRIBUTIONS			
(a) Individual Contributions			
(b) Political Party Committees			
(c) Other Political Committees (such as PACs)			
(d) TOTAL CONTRIBUTIONS (add 11(a), 12, 13, 14, 15, 16 and 17)		11,341.34	123,311.61
12. TRANSFERS FROM AFFILIATED OTHER PARTY COMMITTEES			
13. ALL LOANS RECEIVED			
14. LOAN REPAYMENTS RECEIVED			
15. OFFSETS TO OPERATING EXPENDITURES (Political Debts, etc.)			
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			
17. OTHER RECEIPTS (Dividends, Interest, etc.)			
18. TOTAL RECEIPTS (add 11(a), 12, 13, 14, 15, 16 and 17)		11,341.34	123,311.61
III. EXPENDITURES			
19. OPERATING EXPENDITURES		6,000.00	101,374.00
20. TRANSFERS TO AFFILIATED OTHER PARTY COMMITTEES			2,100.00
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		10,000.00	10,000.00
22. INDEPENDENT EXPENDITURES (use Schedule E)			
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d) (see 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		1,000.00	1,000.00
(c) Other Political Committees (such as PACs)			
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))		1,000.00	1,000.00
27. OTHER DISBURSEMENTS			
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)		17,000.00	114,474.00
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))		11,341.34	123,311.61
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))		1,000.00	1,000.00
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)		10,341.34	122,311.61
32. TOTAL OPERATING EXPENDITURES (from Line 19)		6,000.00	101,374.00
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)			
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)		6,000.00	101,374.00

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RD

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Attachment 10 page 3 of 3			
Republican Party of Arkansas			
A. Full Name, Mailing Address and ZIP Code Roger Bell Camp 911 714 Maple St Camden, AR 71701	Purpose of Disbursement Volitional Contribution Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 10-3-88	Amount of Each Disbursement This Period \$5000.00
B. Full Name, Mailing Address and ZIP Code Dr. P. Hengschler, H. Camp PO Box 999 Harrison, AR 72401	Purpose of Disbursement Volitional Contribution Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 10-3-88	Amount of Each Disbursement This Period \$5000.00
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)			10,000.00

89 MAY -8 PM 5:06

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD Referral 89NF-57
STAFF MEMBER: Tamara Kapper

SOURCE: INTERNALLY GENERATED

**RESPONDENTS: Republican Party of Arkansas and
J. Richey McCullough, as treasurer**

**RELEVANT STATUTES: 2 U.S.C. § 434(a)(4)(A)(i), (ii), (iii) & (iv)
2 U.S.C. § 433(c)
11 C.F.R. § 104.5(c)(1)(i), (ii) and (iii)
11 C.F.R. § 104.5(c)(2)(i)(B)**

INTERNAL REPORTS CHECKED: Referral Materials

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Office of the General Counsel received a referral from the Reports Analysis Division ("RAD") on March 30, 1989. The basis for the attached referral is the failure of the Republican Party of Arkansas and J. Richey McCullough, as treasurer, ("RPARK") to timely file four reports in the 1987-1988 election cycle.

II. FACTUAL AND LEGAL ANALYSIS

A. Late Filing

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires unauthorized political committees to file on either a quarterly or monthly basis. 2 U.S.C. § 434(a)(4). Committees opting to file quarterly are required to file

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quarterly reports in a year in which a regularly scheduled general election is held. These reports are due on the 15th day after the last day of each calendar quarter, except the last report for the year is due January 31 of the following year.

2 U.S.C. § 434(a)(4)(A)(i).

The Act provides that for years in which regularly scheduled elections are held, all unauthorized committees shall file a pre-election report no later than the 12th day before any election in which such committee makes a contribution to or expenditure on behalf of a candidate in such election. 2 U.S.C.

§ 434(a)(4)(A)(ii). Thus, the due date for the 1988 12 Day Pre-General Report was October 27, 1988. In addition to the filing of the pre-election report, the Act requires that unauthorized committees file a post-election report no later than the 30th day after the general election. Thus, the due date for the 1988 30 Day Post-General Report was December 8, 1988.

2 U.S.C. § 434(a)(4)(A)(iii).

In calendar years without a regularly scheduled general election, unauthorized committees are required to file twice annually at six month intervals. The first report is due on July 31 and the second report is due on January 31 of the following year. 2 U.S.C. § 434(a)(4)(A)(iv).

RPARK was notified on December 18, 1987, that the 1987 Year End Report was due on January 31, 1988. RPARK failed to file this report until February 8, 1988. RPARK was notified on September 21, 1988, that the 1988 October Quarterly Report was

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due on October 15, 1988. RPARK failed to file this report until October 28, 1988.

On October 3, 1988, RPARK was notified that all committees making contributions or expenditures in connection with the general election during the period ending October 19, 1988, must file a pre-election report by October 27, 1988.

On November 10, 1988, RAD sent RPARK a chronic late filer notice regarding the failure to timely file the 1987 Year End and the 1988 October Quarterly Reports. The notice advised that any additional late filings could result in legal enforcement action. On January 6, 1989, RAD sent RPARK a non-filer notice for failure to file the 1988 30 Day Post-General Report. RPARK failed to file this report until February 2, 1989. The 30 Day Post-General Report disclosed two (2) contributions totalling \$10,000 made to two (2) different federal candidates on October 3, 1988, indicating RPARK's failure to timely file the 1988 12 Day Pre-General Report due on October 27, 1988. Therefore, this Office recommends that the Commission open a MUR and find reason to believe the Republican Party of Arkansas and J. Richey McCullough, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), (ii), (iii) and (iv).

B. Change of Address

The Act provides that any change in information previously submitted in a Statement of Organization shall be reported in accordance with Section 432(g) no later than 10 days after the date of change. 2 U.S.C. § 433(c). According to RPARK's last

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Statement of Organization, filed February 22, 1988, RPARK's address was Twin City Bank, Suite 715, in North Little Rock, Arkansas, and RAD mailed all correspondence to this address. The last report of receipts and disbursements with this address, however, was the 1987 Year End Report. The 1988 April, July and October Quarterly Reports disclose the address to be 1 Riverfront Place, Suite 715, in North Little Rock, Arkansas. Lastly, the 1988 30 Day Post-General and Year End Reports disclose the address to be 1 Riverfront Place, Suite 550, North Little Rock, Arkansas. The Commission has not received amended Statements of Organizations from RPARK, reflecting the changes of addresses. In addition, RPARK has not notified the Commission of a change in address as requested by the check-off box on its Reports of Receipts and Disbursements. Therefore, the Office of the General Counsel recommends that the Commission also find reason to believe the Republican Party of Arkansas and J. Richey McCullough, as treasurer, violated 2 U.S.C. § 433(c).

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

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IV. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe the Republican Party of Arkansas and J. Richey McCullough, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i), (ii), (iii) and (iv), and 433(c), and enter into conciliation prior to probable cause to believe.
3. Approve the attached letter, Factual and Legal Analysis, and proposed conciliation agreement.

Lawrence M. Noble
General Counsel

May 8, 1957
Date

BY:

George F. Rishe
George F. Rishe
Acting Associate General Counsel

Attachments:

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

89040755432

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Republican Party of Arkansas and)
J. Richey McCullough, as treasurer)

RAD Ref. 89NF-57

(MUR
2875)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 11, 1989, the Commission decided by a vote of 5-0 to take the following actions in RAD Ref. 89NF-57:

1. Open a MUR.
2. Find reason to believe the Republican Party of Arkansas and J. Richey McCullough, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i), (ii), (iii) and (iv), and 433(c), and enter into conciliation prior to probable cause to believe.
3. Approve the letter, Factual and Legal Analysis, and proposed conciliation agreement, as recommended in the First General Counsel's report signed May 8, 1989.

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

Attest:

5-12-89

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Mon., 5-8-89, 5:06
Circulated on 48 hour tally basis: Tues., 5-9-89, 11:00
Deadline for vote: Thurs., 5-11-89, 11:00

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 18, 1989

J. Richey McCullough, Treasurer
Republican Party of Arkansas
1 Riverfront Place, Suite 550
North Little Rock, AR 72114

RE: MUR 2875
Republican Party of
Arkansas and J. Richey
McCullough, as treasurer

Dear Mr. McCullough:

On May 11, 1989, the Federal Election Commission found that there is reason to believe the Republican Party of Arkansas ("Committee") and you, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i), (ii), (iii) and (iv), and 433(c), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

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.

In order to expedite the resolution of this matter, the Commission has also decided to offer to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. Enclosed is a conciliation agreement that the Commission has approved.

J. Richey McCullough
Page 2

If you are interested in expediting the resolution of this matter by pursuing preprobable cause conciliation and if you agree with the provisions of the enclosed agreement, please sign and return the agreement, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

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

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such 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 Tamara Kapper, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Danny L. McDonald
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form
Conciliation Agreement

3 2 0 4 0 7 5 5 4 3 5



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 13, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

J. Richey McCullough, Treasurer
Republican Party of Arkansas
1 Riverfront Place, Suite 550
North Little Rock, AR 72114

RE: MUR 2875

Dear Mr. McCullough:

On May 18, 1989, you were notified that 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 five 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 Tamara Kapper, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

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June 7, 1989

69 JUN 13 AM 11:27

Federal Election Commission
Washington, D. C. 20463

ATTENTION: Danny L. McDonald

Re: MUR 2875

Dear Mr. McDonald:

This letter is in response to your letter to me dated May 18, 1989. Please note that the letter was received at the Republican Headquarters on May 23, 1989. I did not get the letter until May 26, 1989.

It appears that we may have been in violation of the acts stated in your letter.

Since we did not mail our reports by certified mail, I cannot disprove the late filing of the 1987 Year End Report or the 1988 October Quarterly Report.

I have no knowledge of receiving any notification of a pre-election report due by October 27, 1988. In fact, I was not even aware the report had to be filed until I got your letter. I also was not aware that we had to file a 30 day post election report until I was notified by phone in January. I have a full time public accounting practice and could not go to Little Rock until January 30. The report was then filed.

We are making every effort to learn all the FEC requirements so that we will not be in violation of any laws. I plan to attend an FEC training school in July.

Thank you.

Yours very truly.

J. Richey McCullough
J. Richey McCullough,
Treasurer

REPUBLICAN PARTY OF ARKANSAS

One Riverfront Place, Suite 550, North Little Rock, AR 72114. (501) 372-7301

RECEIVED
FEDERAL ELECTION COMMISSION
89 JUN 14 AM 8:52

Doc 3047

BEFORE THE FEDERAL ELECTION COMMISSION

89 JUL -6 AM 11:51

In the Matter of)

Republican Party of Arkansas)
and J. Richey McCullough, as)
treasurer)

MUR 2875

GENERAL COUNSEL'S REPORT

SENSITIVE

I. BACKGROUND

Attached for Commission approval is a conciliation agreement signed by J. Richey McCullough, treasurer of the Republican Party of Arkansas.

On May 11, 1989, the Commission found reason to believe that the Republican Party of Arkansas and J. Richey McCullough, as treasurer violated 2 U.S.C. §§ 434(a)(4)(A)(i), (ii), (iii) and (iv), and 433(c). Also on that same date, the Commission decided to enter into conciliation prior to a finding of probable cause to believe.

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II. RECOMMENDATIONS

1. Approve the revised conciliation agreement with the Republican Party of Arkansas and J. Richey McCullough, as treasurer.
2. Approve the attached letter.
3. Close the file in this matter.

Lawrence M. Noble
General Counsel

Date

7-5-89

BY:

Lois G. Lerner
Associate General Counsel

Attachments

1. Signed Conciliation Agreement, dated 6/7/89
2. Proposed Letter

Staff Assigned: Tamara Kapper

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Republican Party of Arkansas) MUR 2875
and J. Richey McCullough, as)
treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 10, 1989, the Commission decided by a vote of 6-0 to take the following actions in MUR 2875:

1. Approve the revised conciliation agreement with the Republican Party of Arkansas and J. Richey McCullough, as treasurer.
2. Approve the letter attached to the General Counsel's report dated July 5, 1989.
3. Close the file in this matter.

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

Attest:

7-10-89

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in FEC Secretariat at 11:51 a.m. on July 6, 1989.
Circulated to the Commission at 4:00 p.m. on July 6, 1989.
Deadline for vote: 4:00 p.m. on July 10, 1989.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 13, 1989

J. Richey McCullough, Treasurer
Republican Party of Arkansas
1 Riverfront Place, Suite 550
North Little Rock, AR 72114

RE: MUR 2875
Republican Party of Arkansas
and J. Richey McCullough, as
treasurer

Dear Mr. McCullough:

On July 10, 1989, 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)(i), (ii), (iii) and (iv) and 433(c), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to the Republican Party of Arkansas and you, as treasurer. This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

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

Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please be advised that payment of the civil penalty and the filing of an amended Statement of Organization are due within 30 days of the date

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that the Commission signs the conciliation agreement. If you have any questions, please contact Tamara Kapper, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel



BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

89040755442

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Republican Party of Arkansas and
J. Richey McCullough, as treasurer

MUR 2875

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Republican Party of Arkansas and J. Richey McCullough, as treasurer ("Respondents") violated 2 U.S.C. §§ 434 (a) (4) (A) (i), (ii), (iii) and (iv), and 433 (c).

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:

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1. The Republican Party of Arkansas is a political committee within the meaning of 2 U.S.C. § 431 (4).

2. J. Richey McCullough is the treasurer of the Republican Party of Arkansas.

3. Pursuant to 2 U.S.C. § 434(a) (4) (A) (iv), Respondents were required to file a 1987 Year End Report on January 31, 1988. Respondents failed to file this report until February 8, 1988, 8 days late, disclosing \$58,286 in receipts and \$79,497 in disbursements.

4. Pursuant to 2 U.S.C. § 434 (a) (4) (A) (i), Respondents were required to file a 1988 October Quarterly Report on October 15, 1988. Respondents failed to file this report until October 28, 1988, 13 days late, disclosing \$29,006 in receipts and \$18,374 in disbursements.

5. Pursuant 2 U.S.C. § 434(a) (4) (A) (ii), Respondents were required to file a 1988 12 Day Pre-General Election Report on October 27, 1988. Respondents failed to file this report until February 2, 1989, 98 days late, disclosing \$4,370 in receipts and \$17,000 in disbursements.

6. Pursuant 2 U.S.C. § 434(a)(4) (A) (iii), Respondents were required to file a 1988 30 Day Post-General Election Report on December 8, 1988. Respondents failed to file this report until February 2, 1989, 56 days late, disclosing \$6,971 in receipts and \$0 in disbursements.

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7. Pursuant to 2 U.S.C. § 433(c), Respondents were required to file an amended Statement of Organization within 10 days of their change in address.

8. Respondents changed their address but failed to file an amended Statement of Organization.

V. Respondents failed to file timely their 1987 Year End Report and their 1988 October Quarterly, 12 Day Pre-General and 30 Day Post-General Reports in violation of 2 U.S.C. § 434(a) (4) (A) (i), (ii), (iii) and (iv), and failed to file an amended Statement of Organization in violation of 2 U.S.C. § 433(c).

VI. 1. Respondents will pay a civil penalty to the Federal Election Commission in the amount of two thousand five hundred dollars (\$2,500), pursuant to 2 U.S.C. § 437g(a) (5) (A).

2. Respondents will file an amended Statement of Organization, as required by 2 U.S.C. § 433(c).

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.

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

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

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY:


Lois G. Lerner
Associate General Counsel

7/12/89
Date

FOR THE RESPONDENTS:


J. Richer McCullough
Treasurer

June 7, 1989
Date

89040755446



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2875

DATE FILMED 7/21/89 CAMERA NO. 4

CAMERAMAN AS

89040755447



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

THE FOLLOWING MATERIAL IS BEING ADDED TO THE
PUBLIC RECORD IN (CLOSED) MUR 2875

87040764039

CLOSED

REPUBLICAN PARTY OF ARKANSAS
STATE ACCOUNT

ONE RIVER FRONT PLACE SUITE
NORTH LITTLE ROCK, AR 72114

001258

81-783/820

Aug 11 1989



Pay to the

Order of

Federal Election Commission 2500.00

Two thousand five hundred & 00/100 Dollars

ONE BANK
One National Bank
120 Main Street, P. O. Box 5761
North Little Rock, Arkansas 72119-5761

For FEC fine Due 8/12/89

J. Riley McCallough

⑈001258⑈ ⑆082007830⑆ 00⑈04⑈3609⑈

CAC 3763

MEMORANDUM

TO: DEBRA A. TRIMIEW

TO: CHERYL T WILLIAMS

FROM: CHERYL T WILLIAMS

FROM: DEBRA A. TRIMIEW

CHECK NO. 001258

(A COPY OF WHICH IS ATTACHED) RELATING TO

MUR 2875

AND NAME

Republican Party of Arkansas

(Kapper)
WAS RECEIVED ON

8/14/89

PLEASE INDICATE THE ACCOUNT INTO

WHICH IT SHOULD BE DEPOSITED:

/ ✓ /

BUDGET CLEARING ACCOUNT

{ 95FES75.16 }

/

/

CIVIL PENALTIES ACCOUNT

{ 95-1099.160 }

/

/

OTHER

SIGNATURE

Debra A. Trimiew

DATE

8/17/89

89 AUG 16 PM 3:26

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 13, 1989

*Call FEC on
Stmnt. of Organization
requested 7/26/89
JLM*

J. Richey McCullough, Treasurer
Republican Party of Arkansas
1 Riverfront Place, Suite 550
North Little Rock, AR 72114

RE: MUR 2875
Republican Party of Arkansas
and J. Richey McCullough, as
treasurer

Dear Mr. McCullough:

On July 10, 1989, 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)(i), (ii), (iii) and (iv) and 433(c), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to the Republican Party of Arkansas and you, as treasurer. This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

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

Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please be advised that payment of the civil penalty and the filing of an amended Statement of Organization are due within 30 days of the date

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	}	
	}	MUR 2875
Republican Party of Arkansas and	}	
J. Richey McCullough, as treasurer	}	

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Republican Party of Arkansas and J. Richey McCullough, as treasurer ("Respondents") violated 2 U.S.C. §§ 434 (a) (4) (A) (i), (ii), (iii) and (iv), and 433 (c).

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

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

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

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

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

1. The Republican Party of Arkansas is a political committee within the meaning of 2 U.S.C. § 431 (4).

2. J. Richey McCullough is the treasurer of the Republican Party of Arkansas.

3. Pursuant to 2 U.S.C. § 434(a) (4) (A) (iv), Respondents were required to file a 1987 Year End Report on January 31, 1988. Respondents failed to file this report until February 8, 1988, 8 days late, disclosing \$58,286 in receipts and \$79,497 in disbursements.

4. Pursuant to 2 U.S.C. § 434 (a) (4) (A) (i), Respondents were required to file a 1988 October Quarterly Report on October 15, 1988. Respondents failed to file this report until October 28, 1988, 13 days late, disclosing \$29,006 in receipts and \$18,374 in disbursements.

5. Pursuant 2 U.S.C. § 434(a) (4) (A) (ii), Respondents were required to file a 1988 12 Day Pre-General Election Report on October 27, 1988. Respondents failed to file this report until February 2, 1989, 98 days late, disclosing \$4,370 in receipts and \$17,000 in disbursements.

6. Pursuant 2 U.S.C. § 434(a)(4) (A) (iii), Respondents were required to file a 1988 30 Day Post-General Election Report on December 8, 1988. Respondents failed to file this report until February 2, 1989, 56 days late, disclosing \$6,971 in receipts and \$0 in disbursements.

7. Pursuant to 2 U.S.C. § 433(c), Respondents were required to file an amended Statement of Organization within 10 days of their change in address.

8. Respondents changed their address but failed to file an amended Statement of Organization.

V. Respondents failed to file timely their 1987 Year End Report and their 1988 October Quarterly, 12 Day Pre-General and 30 Day Post-General Reports in violation of 2 U.S.C. § 434(a) (4) (A) (i), (ii), (iii) and (iv), and failed to file an amended Statement of Organization in violation of 2 U.S.C. § 433(c).

VI. 1. Respondents will pay a civil penalty to the Federal Election Commission in the amount of two thousand five hundred dollars (\$2,500), pursuant to 2 U.S.C. § 437g(a) (5) (A).

2. Respondents will file an amended Statement of Organization, as required by 2 U.S.C. § 433(c).

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 requirements contained in this agreement and to so notify the Commission.

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

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY:


Lois G. Lerner
Associate General Counsel

7/12/89
Date

FOR THE RESPONDENTS:


J. Richer McCullough
Treasurer

June 7, 1989
Date

STATEMENT OF ORGANIZATION

(See reverse side for instructions)

RECEIVED
FEDERAL ELECTION COMMISSION
MAY 1989

1. (a) NAME OF COMMITTEE IN FULL Republican Party of Arkansas	(Check if name is changed)	2. DATE 89 AUG 16 PM 12:06
(b) Number and Street Address #1 Riverfront Pl. Suite 550	(Check if address is changed)	3. FEC IDENTIFICATION NUMBER C00084954
(c) City, State and ZIP Code North Little Rock, AR 72114		4. IS THIS STATEMENT AN AMENDMENT? ☒ YES ☐ NO

5. TYPE OF COMMITTEE (Check one)

- ☐ (a) This committee is a principal campaign committee. (Complete the candidate information below.)
- ☐ (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)
- | Name of Candidate | Candidate Party Affiliation | Office Sought | State/District |
|-------------------|-----------------------------|---------------|----------------|
| | | | |
- ☐ (c) This committee supports/opposes only one candidate _____ and is NOT an authorized committee.
(name of candidate)
- ☒ (d) This committee is a State committee of the Republican Party.
(National, State or subordinate) (Democratic, Republican, etc.)
- ☐ (e) This committee is a separate segregated fund.
- ☐ (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund or a party committee.

6. Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship

Type of Connected Organization

☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization ☐ Membership Organization ☐ Trade Association ☐ Cooperative

7. Custodian of Records: Identify by name, address (phone number -- optional) and position of the person in possession of committee books and records.

Full Name	Mailing Address	Title or Position
Sally A. Meech	#1 Riverfront Pl., Ste. 550 N. Little Rock, AR 72114	Bookkeeper

8. Treasurer: List the name and address (phone number -- optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name	Mailing Address	Title or Position
J. Richey McCullough	#1 Riverfront Pl., Ste. 550 N. Little Rock, AR 72114	Treasurer

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
Worthen Bank	200 West Capitol Ave. Little Rock 72203
One National Bank	120 Main St. No. Little Rock 72114
Twin City Bank	#1 Riverfront Pl. No. Little Rock 72114

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

TYPE OR PRINT NAME OF TREASURER J. Richey McCullough	SIGNATURE OF TREASURER <i>J. Richey McCullough</i>	DATE August 1, 1989
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NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g. ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

For further information contact:
Federal Election Commission
Toll-free 800-424-9530
Local 202-376-3120

FEC FORM 1
(revised 4/87)