

# FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3013

DATE FILMED 3-27-92 CAMERA NO. 3

CAMERAMAN IMH

#### OFFICE OF GENERAL COUNSEL

DATE: 10 July 1989

ANALYST: Elizabeth Jones

I. COMMITTEE: National Conservative Congressional Committee

(C00202143)

L. William Bonsib, Jr., Treasurer

P.O. Box 1807

Washington, DC 20013

II. RELEVANT STATUTE: 2 U.S.C. \$441b(a)

2 U.S.C. \$434(a)(4)(A)(1) & (iv)

11 CFR 104.5(c)(1)(i) and (2)(i)

### III. BACKGROUND:

A. Apparent Corporate Financing of a Non-Connected Committee 2 U.S.C. §441b(a)

The National Conservative Congressional Committee ("the Committee") registered on February 5, 1986, as a non-connected committee (Attachment 2). Schedule D of the Committee's first report, the 1986 April Quarterly Report, disclosed a debt owed to Bonsib, Inc. for direct mail, an amount incurred this period of \$122,741.01, payments this period of \$15,500 and an outstanding ending balance of \$107,241.01. The report disclosed no administrative expense payments (Attachment 3). A Request For Additional Information ("RFAI"), dated May 21, 1986, requested clarification regarding the manner in which the Committee handled the administrative expenses it incurred (Attachment Mr. L. William Bonsib, the Committee's treasurer, submitted a response dated June 9, 1986, which explained the Committee contracted that had with fundraiser/consultant to pay office and overhead expenses, and that administrative expenses were included in the Line 19 total of the Detailed Summary Page. He enclosed an FEC FORM 3x which noted several changes from the original A \$122,741.01 disbursement to Bonsib, Inc. on Schedule B for direct mail was changed to \$15,500. amount of debt incurred during the reporting period on Schedule D was changed from \$122,741.01 to \$15,500, and the purpose of the debt was changed to read "Direct mail & Admin. expense." (Attachment 5).

RATIONAL COMSERVATIVE SECRESIONAL CONSTITUES
REPORTS ANALYSIS OGC REFERRAL PAGE 2

Two subsequent reports disclosed an increase in the debt owed to Bonsib, Inc. (Attachments 6 and 7). The 1986 July Quarterly Report disclosed an increase in the debt of \$3,408.27 and a payment of \$1,000 bringing the total outstanding debt to \$109,649.28. An increase of \$4,579.49 and a payment of \$2,636.39 were revealed on the 1986 Amended October Quarterly Report resulting in an outstanding debt of \$111,592.38. Both payments were made to Bonsib, Inc. and were disclosed on Schedule B supporting Line 19.

After not filing any reports subsequent to the 1987 April Quarterly Report, the Committee requested termination by letter received August 31, 1988 (Attachment 9). Committee did not provide clarification in the letter of the disposition of \$2,834.28 in residual funds and the \$111,592.38 debt owed by the Committee disclosed on the Committee's 1987 April Quarterly Report (Attachment 8). On September 23, 1988, the Reports Analysis Division ("RAD") sent Informational requesting analyst an Notice clarification of the residual funds and outstanding debt (Attachment 10). On December 23, 1988, the RAD analyst received a letter from the Committee dated January 1, 1988 (sic), regarding said debt (Attachment 11). The letter stated the following:

At the establishment of the Committee, the needed funds for starting the work of the Committee were furnished by Bonsib, Inc., Mr. L.W. Bonsib, chairman. Mr. Bonsib was advised that a loan by a corporation was permissible under the law by members of the Federal Election Commission, counsel and others. He was also advised that the corporation might actually pay expenses, without liability to the Corporation or FEC regulations.

In two (2) RFAIs dated March 29, 1989, which referenced all of the reports previously submitted by the Committee, the RAD analyst questioned the Committee's failure to properly disclose the contributions/loans made by Bonsib, Inc. which were referenced in the January 1, 1988 (sic) letter. The letter also advised the Committee that a contribution from a corporation is prohibited by the Act, unless made from a separate segregated fund established by the corporation (Attachments 12 and 13). When the Committee failed to respond to the RFAIs, Second Notices were sent on April 20, 1989 (Attachments 14 and 15).

MATIONAL CONSERVATIVE ONGRESSIONAL COMMITTEE REPORTS ANALYSIS OGC REFERRAL PAGE 3

On May 5, 1989, Mr. Bonsib spoke with a RAD representative and explained that he did not understand what the Commission wanted (Attachment 16). He explained that he had filed a debt settlement statement (as part of the letter dated January 1, 1986 (sic)). The representative told him that the letter he sent did not suffice as a debt settlement and outlined the necessary requirements. The representative determined that "...Mr. Bonsib had used the term 'loan' incorrectly and was instead referring to the funds advanced by Bonsib, Inc. that have already been reported as debts." The representative suggested that Mr. Bonsib send a letter clarifying his position.

On June 19, 1989, Mr. Bonsib filed a letter which requested a meeting with a RAD analyst (Attachment 17). The RAD analyst telephoned Mr. Bonsib and arranged a meeting for the following day (Attachment 18).

On June 20, 1989, Mr. Bonsib met with RAD analysts. In the meeting, many of the matters that were discussed in the previous meeting of December 13, 1988, were again discussed. The RAD analysts explained to Mr. Bonsib that the Committee needed to file the 1988 Year End Report, answer all of the outstanding RFAIs, and file a debt settlement statement (Attachment 19). Later on that day, Mr. Bonsib telephoned the RAD analyst to discuss the Committee's residual funds totalling \$2,000. The RAD analyst explained that the Committee should report where the money went and disclose whether any portion went toward the outstanding debt. Mr. Bonsib stated that there was never \$2,000 in the Committee's bank account because there was never a bank account. He stated that there was only a cash account and that all bills were paid by Bonsib, Inc. (Attachment 20).

On June 22, 1989, the analyst returned a call from Mr. Bonsib. Mr. Bonsib stated that the Committee's accountant deducted the amount in the cash account from the amount owed to Bonsib, Inc.. When he asked the RAD analyst if this transaction was okay, the RAD analyst told him that she would have to see the Committee's report to be sure. The analyst added that if there was a problem with the transaction, the Committee would be sent an RFAI (Attachment 21).

On June 27, 1989, the Committee filed what appears to be a Debt Settlement Statement and a 1989 report with the coverage dates of January 1 through July 15, 1989 (Attachments 22 and 23).

0

0

0

0

4

0

N

0

B. Failure to File and Failure to Timely File Reports
2 U.S.C. 434(a) (4) (A) (i) and (iv)
11 CFR 104.5(c) (1) (i) and (2) (i)

The Committee failed to timely file five (5) reports during the 1987-1988 election cycle. The reports were also not filed by Election Day, November 8, 1988. The reports are the 1987 Mid-Year and Year End Reports and the 1988 April Quarterly, July Quarterly and October Quarterly Reports. Additionally, the Committee has not yet filed the 1988 Year End Report. Prior Notices were sent for all of the above reports (Attachments 24, 26 - 29 and 38).

On December 7, 1987, a Mon-Filer Notice was sent to the Committee for failing to file the 1987 Mid-Year Report (Attachment 25). A Non-Filer Notice which referenced the 1987 Year End, 1988 April Quarterly, 1988 July Quarterly and 1988 October Quarterly Reports was sent on November 8, 1988 (Attachment 30).

On August 31, 1988, the Committee sent a letter to the Commission requesting termination of the Committee (Attachment 9).

On September 23, 1988, an Informational Notice was sent to the Committee advising that reports should be filed until the Committee satisfied the conditions of 11 CFR 102.3(a) because the last report filed disclosed a \$111,592.38 debt and \$2,834.28 in residual funds (Attachment 10).

The RAD analyst attempted to call Mr. Bonsib on December 5, 1988. The receptionist said that he was out, but told the analyst that Mr. Bonsib would return the call (Attachment 31). On December 8, 1988, the analyst tried again to contact Mr. Bonsib, but he was not in his office (Attachment 32).

On December 13, 1988, Mr. Bonsib met with two RAD analysts to discuss the reports which had not been filed (Attachment 33). He explained that he had not filed them because he was having legal problems. He said that the Committee had neither receipts nor disbursements since the Committee's last report was filed on April 15, 1987.

The RAD analysts explained that it was necessary to file the omitted reports. Additionally, the analysts explained that if the Committee settled its outstanding debt, it would have to file a debt settlement statement.

NATIONAL CONSERVATIVE CONGRESSIONAL COMMITTEE REPORTS ANALYSIS OGC REFERRAL PAGE 5

The analysts gave Mr. Bonsib information about debt settlements and FEC FORMS 3X for filing the necessary reports. Mr. Bonsib said he would be filing the reports.

The Committee filed all 1987 and the 1988 April Quarterly, July Quarterly and October Quarterly Reports on December 23, 1988 (Attachments 34-37).

On February 24, 1989, a Non-Filer Notice was sent to the Committee for failure to file the 1988 Year End Report (Attachment 39).

In an apparent response to the Mon-Filer Notice, Mr. Bonsib stated in a letter dated March 16, 1989 that he was told only to file reports through the 1988 30 Day Post-General Report and that he did not understand what was required (Attachment 40).

A RAD representative spoke with Mr. Bonsib on May 5, 1989 (Attachment 16). Mr. Bonsib stated that he thought he had fulfilled all requirements after his previous meeting with two RAD analysts. The representative explained that the 1988 Year End Report filing might not have been mentioned during the December meeting, as it was not due until January 31, 1989. Mr. Bonsib said that the Committee's CPA was difficult to reach as he had been ill; but he would try to contact him regarding the filing.

On June 20, 1989, Mr. Bonsib met with RAD analysts. The RAD analysts explained to Mr. Bonsib that the Committee needed to file the 1988 Year End Report, answer all of the outstanding RFAIs, and file a debt settlement statement (Attachment 20).

On June 27, 1989, the Committee filed what appears to be a debt settlement statement and a 1989 report with the coverage dates of January 1 through July 15, 1989 (Attachments 22 and 23).

To date, the Committee has not filed the 1988 Year End Report.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

# 92040900033

#### LATE FILING HISTORY

| REPORT TYPE                             | PRIOR NOTICE             | DATE DUE | NON-FILER NOTICE        | DATE FILED               |
|---|--------------------------|----------|-------------------------|--------------------------|
| 1987 Mid-Year*<br>(1/1/87-6/30/87)      | 7/7/87 (Attachment 24)   | 7/31/87  | 12/7/87 (Attachment 25) | 12/23/88 (Attachment 34) |
| 1987 Year End<br>(7/1/87-12/31/87)      | 12/18/87 (Attachment 26) | 1/31/88  | 11/8/88 (Attachment 30) | 12/23/88 (Attachment 34) |
| 1988 April Quarterly (1/1/88-3/31/88)   | 3/22/88 (Attachment 27)  | 4/15/88  | 11/8/88 (Attachment 30) | 12/23/88 (Attachment 35) |
| 1988 July Quarterly (4/1/88-6/30/88)    | 6/21/88 (Attachment 28)  | 7/15/88  | 11/8/88 (Attachment 30) | 12/23/88 (Attachment 36) |
| 1988 October Quarterly (7/1/88-9/30/88) | 9/21/88 (Attachment 29)  | 10/15/88 | 11/8/88 (Attachment 30) | 12/23/88 (Attachment 37) |
| 1988 Year End<br>(12/9/88-12/31/88)     | 12/27/88 (Attachment 38) | 1/31/89  | 2/24/89 (Attachment 39) | Not filed                |

The Committee filed a 1987 April Quarterly Report covering the period of January 1, 1987 through March 31, 1987, and the 1987 Year End Report covered 4/1/87 through 12/31/87.

ATTACHMENT page\_\_ of\_3

FEDERAL ELECTION COMMISSION 1989-1990

COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 700\_84

COMMITTEE

DOCUMENT

RECEIPTS

DISBURSEMENTS

# OF MICROFILM

COVERAGE DATES PAGES LOCATION

ID #080202143 NON-PARTY NON-QUALIFIED

:45E 1

TYPE OF FILER

NATIONAL CONSERVATIVE CONGRESSIONAL COMMITTEE

CONNECTED ORGANIZATION: NONE

1989 MISCELLANEOUS REPORT

JULY QUARTERLY

TOTA\_

TO FEC

2.834

2,834

19JUN89

2 89FEC/597/4343

1JAN89 -15JUL89 6 89FEC/598/3795

8 TOTAL PAGES

O ENDING CASH ON HAND as of 7/15/89: \$0

DEBTS AND OBLIGATIONS OWED TO THE COMMITTEE: \$0
DEBTS AND OBLIGATIONS OWED BY THE COMMITTEE: \$108,758

0 4

0 N

0

ATTACHMENT page 2 of 3

### FEDERAL ELECTION COMMISSION 1987-1988

DATE 7:...23

COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DC 32

| COMMITTEE     | DOCU#ENT                                 | RECEIPTS |   | DISBURSEMENTS |                          | # 09 #1090F1LM<br>PASSS LOCATION<br>OF FILES |
|---------------|--|----------|---|---------------|--------------------------|--|
|               |  |          |   |               |                          |  |
| NATIO         | NAL CONSERVATIVE CONGRESSIONAL COMMITTEE |          |   |               | ID +D00202143 NON-       | DOOR NON-SUPLIFIED                           |
|               | ORGANIZATION: NONE                       |          |   |               |                          |  |
| 19            | B7 APRIL QUARTERLY                       | 6        |   | \$            | 1JAN87 -31MPR67          | 3 67983/465/0577                             |
|               | 115" LETTER INFORMATIONAL NOTICE         |          |   |               | IJANET -31MAFET          | 1 87751/495/2989                             |
|               | REQUEST FOR ADDITIONAL INFORMATION       |          |   |               | 13AN57 -31*2967          | E 69FE1/598/0482                             |
|               | RECUEST FOR ADDITIONAL INFORMATION AND   |          |   |               | 1JAN87 -3146887          | 3 89550/592/0848                             |
|               | NOTICE OF FAILURE TO FILE                |          |   |               | 100351 -367TVEL          | 1 87FEC/495/3453                             |
|               | YEAR-ENI                                 | 6        |   | 6             | :APRET -3:DEC87          | 4 88FEC/575/2859                             |
|               | NOTICE OF FAILURE TO FILE                |          |   |               | 100187 -3108087          | 1 58711 564/5362                             |
|               | RECLEST FOR ADDITIONAL INFORMATION       |          |   |               | 1A9767 -31DEU87          | 2 89FEC /552/8488                            |
|               | REQUEST FOR ADDITIONAL INFORMATION 2ND   |          |   |               | 142887 -310EC87          | 3 89710/592/8837                             |
| <b>LO</b> 156 | ES AFRIL OURFTERLY                       | 8        |   | 8             | 1JAN85 -31MAR88          | 6 667FC/575/2 <b>653</b>                     |
| M             | NOTICE OF FAILURE TO FILE                |          |   |               | IJANEE -31MAREE          | 1 88FED/564/ <b>5361</b>                     |
|               | REDUEST FOR ADDITIONAL INFORMATION       |          |   |               | 1JAN98 -31MA988          | £ EFFEC/590/2478                             |
| 0             | REQUEST FOR ADDITIONAL INFORMATION 2ND   |          |   |               | 132499 -3146969          | 3 83-51/592/2632                             |
|               | JULY QUARTERLY                           | 6        |   |               | 165456 -3010785          | 4 88750/575/2863                             |
| 0             | NOTICE OF FAILURE TO FILE                |          |   |               | 145738 -30:0458          | : 86710/564/5368                             |
|               | REGUSET FOR ADDITIONAL INFORMATION       |          |   |               | 16686 -30JUNES           | E 69FEC/598/8476                             |
| 0             | REDUEST FOR ADDITIONAL INFORMATION END   |          |   |               | 1APR88 -37.7LN83         | 3 89FED/592/0031                             |
| 0             | OCTOBER QUARTERLY                        | 6        |   | e             | 1JL_88 -305EP88          | 4 88FEE/575/2867                             |
|               | NOTICE OF FAILURE TO FILE                |          |   |               | 1JUL88 -305EP88          | 1 88FED/564/ <b>5359</b>                     |
| 0             | REQUEST FOR ADDITIONAL INFORMATION       |          |   |               | 1JUL68 -308EP88          | 2 69FEC/598/8474                             |
|               | REDUEST FOR ADDITIONAL INFORMATION 2ND   |          |   |               | 1JUL <b>88 -30</b> 5EP88 | 3 89FED/592/ <b>0828</b>                     |
| 4             | POST-GENERAL                             | ę        |   | £.            | 100186 - 6DEC66          | 4 88FEC/575/2871                             |
| _             | REQUES" FOR ADDITIONAL INFORMATION       |          |   |               | 100788 - 80E038          | 2 89FEC/530/0472                             |
|               | REQUEST FOR ADDITIONAL INFORMATION 2ND   |          |   |               | 100T88 - 8DEC88          | 3 89FEC/592/6825                             |
| CI            | NOTICE OF FAILURE TO FILE                |          |   |               | 9DE088 -31DE088          | 1 89FEC/585/1501                             |
|               | TERMINATION REPORT                       | -        |   | -             | 2780388                  | 2 86FED/543/4986                             |
| 0             | 11ST LETTER INFORMATIONAL NOTICE         |          |   |               | 27AUG88                  | : 88FEC/54 <b>7/4033</b>                     |
| 196           | BS MISCELLANEOUS REPORT TO FEC           |          |   |               | 285A485                  | 3 89550/589/1373                             |
|               | TOTAL                                    | 0        | e | 0             | e                        | 68 TOTAL PAGES                               |

ALL REPORTS ABOVE HAVE BEEN REVIEWED.

ENDING CASH ON HAND as of 12/08/88: \$2,834 DEBTS AND OBLIGATIONS OWED TO THE CUMMITTLE: \$0

DEBTS AND OBLIGATIONS ONED BY THE COMMITTEE: \$111,592



### FEDERAL ELECTION COMMISSION 1985-1986

ATTACHMENT\_\_\_ page 3 of 3 DATE CALMER

COMMITTEE INDE: OF DISCLOSURE DOCUMENTS - (L)

THE AT FILES.

| NATIONAL CONSERMATIVE COMBRESSIONAL COMMITTEE |         |                | ID #C00202147 NUM | -PAST - MIN-DUALIFIED |
|---|---------|----------------|-------------------|-----------------------|
| COMMESTED OF GANIZATION: NOWE                 |         |                |                   |                       |
| 1966 STATEMENT OF ORGANIZATION                |         |                | SFERS:            | 1 85781 401/2792      |
| AFRIL GUARTERLY                               | 15.370  | 121,754        | 134N36 -31M4936   | 5 99FEC 40971945      |
| APRIL CHOSTERLY - AMERDMENT                   | 1: ,774 | 5,547          | 10PH E71PH Da     | ± 85771 417 1207      |
| ARRIL QUETERLY - AMENOMENT                    | 15,576  | 15,515         | 1341E - 31144E-   | 5 35550 428/547       |
| AFRIL CLAFTERLY - AMENDMENT                   | 15,774  | 15,545         | 186 :714453       | E 85FED/44874767      |
| RECUEST FOR ADDITIONAL INFORMATION            |         |                | 174NS: -31YAFS:   | I 56FEC/415/0187      |
| REDUEST FOR ADDITIONAL INFORMATION 2ND        |         |                | 15ANE: -71MSFB:   | 7 EcFEC/416/4781      |
| REDUEST FOR ADDITIONAL INFORMATION            |         |                | 134486 - 7144985  | 1 99FEC/590/0469      |
| REQUEST FOR ADDITIONAL INFORMATION END        |         |                | Tanker - I make   | 3 89FE0/092/0821      |
| JULY DULYTERLY                                | 7,322   | 1,001          | 14488300UMES      | 9 9:727-428/5482      |
| UNLY DULFTERL - AMENGMENT                     | 5,702   | 1,631          | 147666 -1NU-38    | 19 86590 448/4975     |
| NOTICE OF FAILURE TO FILE                     |         |                | 14FF86 +7030 Bi   | 1 85721/416/3480      |
| FEGUSET FOR ADULTIONAL INFORMATION            |         |                | 1APRES -INCOMES   | 1 B1751 443/1658      |
| REPLEST FOR ADDITIONAL INFORMATION 2ND        |         |                | 145586 -7000486   | 5 55FEC:44474070      |
| FEEDEST FOR ACCUTEDAL INFORMATION             |         |                | 144886 -303005    | I 84FED 590/0467      |
| REQUEST FOR ADDITIONAL INFORMATION END        |         |                | 147835 -7 JUS     | 1 64531 1541 W816 N   |
| AMORE CHAPTER UNITED SERVICES                 | 1,5.3   | nes says Tiels | Navada - Tabilhia | c BefEE (438:4258     |
| COTOBER COMPTERLY H AMERICMENT                | 1,525   | 2,502          | 10.167/87725      | - E: ET: 449/4984     |
| REQUEST FOR ADDITIONAL INFORMATION            |         |                | 180184 -309EPB    | 2 85781/443/1812      |
| REQUEST FOR 4000110NAL INFORMATION 2ND        |         |                | 18665-1986-1986   | 1 BufEI 444/4035      |
| PEGLEST FCR AIDITIONAL INFORMATION            |         |                | 130186 -708EFE    | 2 89FE1-590/0465      |
| REQUEST FOR ADDITIONAL INFORMATION OND        |         |                | IJLLS: -115EFE:   | 1 detEC 5e5/0812      |
| ACETHODY CRUL                                 | 1.185   | 3              | 305EP84 - 24NTUE: | 9 87FE1 453/4228      |
| NOTICE OF FAILURE TO FILE                     |         |                | 24NCVO5           | : SuFEC/452/1624 .    |
| REDUEST FOR 4DD1112(MAY IMPORMATION           |         |                | 305EFE6 -24HDV3:  | 2 85550/590/0462      |
| REQUEST FOR ADDITIONAL INFORMATION SHO        |         |                | 303EF86 -24NDV95  | 7 84950/592/0812      |
| AERU-AIT.                                     | Ŷ.      | Çi             | 24NOV96 -310EC8:  | 9 87FEC (4E6/364E     |
| REBUSSI FOR 4001710%-L INFORMATION            |         |                | 34MDV9: -31D9196  | I FFFEC /590/0461     |
| REDUEST FOR ADDITIONAL IMPORMATION DAS        |         |                | 2442086 -315818:  | 3 89FEC 592/0809      |
| 1997 MISCELLANEOUS MOTICE FROM FED            |         |                | 21,14457          | 1 37FEE/455/2965      |
| MISCELLAMEDUS REPORT TO FED                   |         |                | 154PPS"           | 0 87750/465/1027      |
| 187 <b>4</b> .                                | 22,405  |                |                   |                       |

All reports have been reviewed.

Ending Cash On Hand Balance as of 12/08/88: \$2,834 Debts and Obligations owed to the Committee: \$0

Debts and Obligations owed by the Committee: \$111,592

#### CONTINUE OF CONTINUE

|              | Manual Conservative Congression  |  |  |  |
|--------------|--|--|--|--|
|              |  | al distance  | 2-4  | -86  |
|              | MAddres (timber and Bress)<br>PoOs Bost 1807   |  | S. PER laurathum   | · the training   |
|              | and City, Chate and SIP Code   |  | 4. bibba protis  | -  |
|              | Maghington, D.C. 20003<br>First of Committee (man, pro):   |  |  |  |
|              | (b) This commisses is a principal compalyn commisses   | . (Complete the condition to   | Landed nelcon.)  |  |
|              | Of This commisses is an eathertest commisses, and is   | 107 o principal compalys o   | provinces. Complete th   | o aundidos information   |
|              | The of Condain   | Candidate Party Affiliation  | Office Bought  |  |
|              | to) This commisses exportulappease only one conditi  |  |  | is NOT an authorized on  |
|              | Otational, State or calcu  | commission o   | 100  | (Panuldina, etc.)  |
|              | tol This committee is a coparate sugreguesed fund.   |  | G.5-103-641  |  |
|              | (f) This committee supports/exposes more than one t  |  |  |  |
| d.           | Marin of Any Generated<br>Graphispian or Affiliated Generation   | Marine .   | Advantage of   | A Charles  |
|              |  |  |  |  |
|              | Mone   |  |  |  |
|              |  |  |  |  |
| 7. (         | no registering policical committee has identified a "conne<br>presention D Corporation sale Capital Steels O La<br>Consodian of Records: Identify by name, address (she<br>records.  | ber Organization - Officers<br>one number - optional) and  | position, the person in  | P Trade Association C  |
| 7. (         | proporation O'Corporation vu/o Capital Steels O'Le<br>Cassedian of Records: Identify by name, address (she   | ber Organization   | position, the person in  | D Trade Association C  |
| 7. 6         | Described D'Corporation vulo Capital Steels O'Le<br>Described of Records: Identify by name, address (phy<br>records.<br>Full Name<br>TREASURER<br>Treasurer: List the name and address (phone number —   | ter Organization — Ottomb<br>the number — optional) and<br>Malling Address and ESP Oc  | orphip Organization    position, the person in                               | D Trade Assessment Committee  This or Pasision   |
| 7. 6         | Proposition Of Corporation w/o Capital Steels Of Last Control of Capital Steels Of Last Control of Capital Steels Of Last Control of Capital Steels (physics of Capital Steels | ter Organization — Ottomb<br>the number — optional) and<br>Malling Address and ESP Oc  | orphip Organization  position, the person in  de                             | D Trade Assessment Committee  This or Pasision   |
| 7. (         | Proposition O Corporation w/o Capital Stant. O Last Consolian of Records: Identify by name, address (physicism).  Full Name TREASURER  Freezower: List the name and address (phone number — agent (e.e., assistant tressurer).  Full Name L. William Bonsib, Jr.   | ter Organization — Othershine number — optional) and RP Out of the transmitter of the transmitter of   | erphip Organization    position, the person is  do  ! the committee; and the | Title or Position Treasurer          |
| 7. 6         | Proposition Of Corporation w/o Capital Steels Of Last Control of Capital Steels Of Last Control of Capital Steels Of Last Control of Capital Steels (physics of Capital Steels | ter Organization — Olderty Ine number — optional) and Oldelling Address and EP Oc Optional) of the treasurer of Oldelling Address and EP Oc  | erphip Organization    position, the person is  do  ! the committee; and the | D Trade Assessation C Description of committee Title or Position In name and address of or Title or Position |
| 7. (C        | Proposition O Corporation w/o Capital Stant. O Last Consolian of Records: Identify by name, address (physicism).  Full Name TREASURER  Freezower: List the name and address (phone number — agent (e.e., assistant tressurer).  Full Name L. William Bonsib, Jr.   | ther Organization — Otherships and EP On — optional) of the transver of the tr | position, the person in<br>the committee; and the<br>de                      | Title or Position Title or Position Title or Position Title or Position Treasurer Assistant Tr               |
| 7. (<br>B. 1 | Describe D'Corporation w/o Capital Stant. O Las Casadian of Records: Identify by name, address (plus records.  Full Name TREASURER  Treasurer: List the name and address (phone number—spent (e.e., assistant treasurer).  Full Name L. William Bonsib, Jr.,  Daniel C. Heldgraive ,  Bents or Other Depositorits: List all banks or other depo  | ther Organization — Othershine number — optional) and ESP On optional) of the treasurer of the time and ESP On P.O. Box 1807 1   | position, the person in<br>the committee; and the<br>de                      | Title or Position Title or Position Title or Position Title or Position Treasurer Assistant Tr               |

page | of 4

### SEPTION OF RESERVE AND DISCUSSIONS OF THE PARTY OF ARTHURS CONTROL OF THE PARTY OF THE PART

|  | annary Page)   |  | AIR!, 3:2                             |
|--|--|--|---------------------------------------|
| Sing of Quantum the Publi  | 4 1116 07 0  | SPORT (Sheek approprie   |                                       |
| lational Conservative Congressional  | Committee 2 April 1  | -  | Gentler Million torty Res             |
| 000<br>7. 0. Box 1007  |  |  | ]                                     |
| hebineten, D. C. 20013   |  |  |                                       |
| Address Observe and Dress)   | LI MAN S   | I tild Year Report (Mon-f  | leaden Ver Onlyl                      |
| 7. 6. Bex 1807   |  | ly Report for  |                                       |
|  | D Transit  | A day report prespiling _  |                                       |
| Chy, Such and EIP Code   |  |  | _ in the Parts of                     |
| Seshington, D. C. 20013  |  |  |                                       |
| Charle have If address is different than proviously repor  | Third  | pth day report following the   |                                       |
| P88 Handhadan Humber   | -  | in the   | Date of                               |
| 660202343  |  | netion Report  |                                       |
| This committee qualified as a multicondition committee this Reporting Period on  | - IN IN THE PIE  | fraumbannAment?  |                                       |
|  |  | Ves E  | 10                                    |
| SUMMARY  |  | COLUMN A   | COLUMN S                              |
| Courtey Parted   |  |  |                                       |
| Littl Cosh on hand January 1, 10_86  |  |  | . 0                                   |
| (b) Cash on Hand at Baginning of Reporting Parled  |  |  |                                       |
| (a) Total Ressipts (from Line 18)  |  | <sup>8</sup> 16330.58  | \$ 16330.58                           |
| (d) Subsect (add Lines Oth) and Ole) for Column A and  |  | THE RESERVE OF THE PARTY OF THE | 9 16330.58                            |
| Lines Ole) and Ole) for Column O) 7. Total Diduresments (from Line 30)   |  | 4  | THE PROPERTY AND PROPERTY.            |
|  |  |  | 122754.20                             |
| LOash on Hand at Class of Reporting Parled (subtreet Line )  |  | 0  | 0                                     |
| I. Dubus and Collegations Could TO The Committee   |  |  |                                       |
| Dates and Chilgoriess Orest BY the Committee   |  | . \$107241.01  |                                       |
| (Number off on Schodule C or Schodule D)  Willy State (Committee this Naport or the State of the State)  | olly and takes   |  |                                       |
| to true, correct and complete.   |  | Per tertie   | Information combats                   |
| L V, Bone II   | _  | (1)  | ed Bushin Commission<br>8 Grant, MAN. |
|  |  |  | Mysin, D.C. 2000<br>Par 000-010000    |
|  | 4/10/86  |  | 20000                                 |
| State of Sta | Sino .   |  |                                       |
| STATE OF THE ASSESSED OF THE A | the out the person algoing this is   | aport to the parallel of 2 U.  | 16.147                                |
| STATUTE OF THE ASSISSA<br>STO: Submission of tales, or unseed, or management information may   | the est the person signing this is a feet to see that the person signing this is a feet feet feet to see the feet feet feet feet feet feet fee |  |                                       |

| 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1   |  |  |               |
|---|--|--|---------------|
|   | - 200 A 10040 M  |  |               |
| Motional Conservative Conservational Countition   |  | YEAR D.  | Total Control |
|   |  |  | 17.           |
| A RECEIPTO  |  |  |               |
| 11.00177101/TiGHS (subsystem front) PROM:   | TO N WHITE SEE !   |  | 116           |
| (a) technical Pursues Other Tean Publish Committees   |  |  |               |
| (a) Pullified Party Constitutes   |  |  | 110           |
| M Char Publish Committees.  | TAXABLE IN TAX   | -  | 11(e)         |
| 48 TOTAL CONTRIBUTIONS (other than loand) (add 116d, 116s) and 116d)  | CANADA AND AND AND AND AND AND AND AND AN  | 23.23  | 110:          |
| 12 TRANSPERS PROM APPILIATES/OTHER PARTY COMMITTEES   |  |  | 12            |
|   |  |  |               |
| 18.ALL LOAMS RECEIVED   |  | M. Dallace   | 13            |
| M. LOAN REPAYMENTS RECEIVED.  |  |  | 14            |
|   |  |  | 1.17          |
| 16. OFFEETS TO GPERATING EXPENDITURES (Relands, Relation, etc.)   |  |  | 76            |
| 16. REPURIOS OF CONTRIBUTIONS MADE TO PERSAAL GAMDIDATES  | 0 1  | 0  | 140           |
| AND OTHER POLITICAL COMMITTEES  | 1  |  |               |
| 17. OTHER RECEIPTS (Dissounds, Interest, etc.)  |  | 0  | 177           |
| 16. TOTAL RECEIPTS (Add 1166, 12, 13, 14, 16, 18 and 17)  | TALL NE DEMONSTRATE SEA FAIL   | · WL F WARRANT   | 1.            |
| 6.101AL HOLEN 10 VIII 110, 12, 10, 10, 10 III 1//   | FILE MEMBERS BELLS   |  |               |
| II. DISSUMBRITS   |  |  |               |
| 19. OPERATING EXPENDITURES  | SANTAL DESIGNATION PROPERTY  | Line .   | 30            |
| 20. TRANSPERS TO APPILIATED/OTHER PARTY COMMITTEES  |  | Market State of the State of th | 30            |
|   |  |  |               |
| 21.GONTRIBUTIONS TO PEDERAL GANDIDATES AND  |  |  | 21            |
| STIMER POLITICAL COMMITTEES  22. HIDEPENDENT EXPENDITURES (um Bahedulo E)   |  |  | 22            |
|   | , .  |  |               |
| 29.COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES  |  |  | 23            |
| (2 U.S.C. 9 441 old) (Use Schoolsle P)  SALGAN REPAYMENTS MADE  |  |  | 24            |
| BLESON REPAYMENTS MADE  |  |  |               |
| 35. LOANS MADE  |  |  | 25            |
| 1   |  |  |               |
| 28. REPUNDS OF CONTRIBUTIONS TO  thi individual Pursues Other Then Political Committees I part f i clant. Stands. | 2.00   | 2.00   | 266           |
| (b) Political Party Committees  | 0  | 0  | 26 tb         |
| tel Other Political Committees.   | . 0  | 0  | 766           |
| Id TOTAL CONTRIBUTION REFUNDS (Add 20ta), 20th) and 20(c))  | 2.00   | 2.00   | 2510          |
| 27.GTHER DISSURGEMENTS  |  | 0  | 27            |
|   |  |  |               |
| 28.707AL BISSURGEMENTS (add lines 10, 30, 21, 32, 33, 34, 35, 36(4) and 27)                                       | r+345(\$450)   | 144745720  | 26            |
| MI, NET CONTRIBUTIONS AND NET GPERATING EXPENDITURES  |  |  |               |
| 29. TOTAL GOSTRIGUTIONS today than band from Line 1160  | 16330.58   | 16330.58   | 20            |
| SA. TOTAL CONTRIBUTION REPUNCE from Une SOLD  | 2.00   | 2.00   | 20            |
| 81.HET GENTRIGUTIONS today than loand thebreat Line 30 from Line 30   | 16328.59   | 10,20,30   | 31            |
| SE TOTAL GPSRATUS SUPENDITURES from Line 10   | 17775 TV   | 122756,20  | 32            |
| SE OPPOSTO TO GRONATINO EXPONOITURES from Line 10   | Carried to Control of the Control of | 0  | 33            |
| 34.NET GPERATING EXPENSITURES General Line 30 from Line 321   | 122754,20  | 122754.20  | 34            |

### CTORES -

page 3 of 4

-

Any Militarian county from such fragment fragments carry on to said or county one program for the passes of calcular, combination or for community calcular carried to the calcular form of the calcular carried to the calcular carried to calcular carried to calcular carried to calcular carried carried to calcular carried to calcular carried c

#### MANUS OF CONSUMPTION ON PART

| Description      | Sensib Inc. Veshington, D. C. 20001  C. Pull Nim, Making Addressed SP Out  Notional Capital Bank of Veshington Capital Hill Veshington, D. C. 20003  C. Pull Nim, Making Addressed SP Out  Notional Capital Bank of Veshington on Capital Hill Veshington, D. C. 20003  C. Pull Nim, Making Addressed SP Out | Payment on account for   | 3/31/04<br>3/31/06<br>1/31/06<br>2/20/06        | 232741.01<br>Amend of Sun<br>3.86<br>Amend of Sun<br>Management Tria Fer.<br>9.33 |
|--|--|--|---|---|
| RetSenal Capital Seak of Weskington Capital Seak of Weskington Developed Property   Canada   Capital Seak of Weskington Capital   | Hotional Capital Bank of Washington Capital Hill<br>Washington, B. C. 20003<br>D. Addison, Mallon Attorney and SP Code<br>Mational Capital Bank of Washington on Capital Hill<br>Washington, B. C. 20003<br>B. Fed Man, Mallon Address and SP Code   | Bank Charge  Specimen for   Nitrory   Count  Other topolity  Perpens of Statements  Seek Charge  Statements for   Nitrory   Count  Other topolity  Perpens of Statements | 2/22/06<br>************************************ | Amount of Sur.<br>Statements This force<br>9.33                                   |
| Purpose of Diductions   Date   Discount of Barriers   Discount   Discount of Barriers   Discount    | National Capital Senk of Vesking-<br>ben on Capital Sill<br>Washington, D. C. 20003  | Purpose of Bildersonson  Basels: Change  Glacinessay for:    Princey    Games'     Once inputify!  Purpose of Statements   | 2/20/06   | 9.33  |
| District   Prince   District      |  |  | -   | Amount of Book<br>Ottomorross This Paris  |
| P. Pull Name, Malling Address and SIP Gods Purpose of Staturement    Dispurational Staturement   Dispurational Sta | F. Pull Name, Malling Address and 200 Grade  | Cotor Smalled  |   |   |
| Purpose of Oldpursment    Congress and SIP Gold   Cong |  | Purpose of Obburtament  Staturesment for: [   Primary     Queens)  | Gy, yest  | Amount of Boys<br>Status amount This Far-   |
| H. Full Name, Mailing Address and SIP Gods  Purp-iss of Disbursament  Disbursament Too Fermand  Disbursament Too Fermand  Disbursament  Disbursament  Full Name, Mailing Address and SIP Gods  Purp-iss of Disbursament  Disbursam |  | Purpose of Oldpursment  Disbursement for:   Pringry   General  |   | Amount of Bart<br>Chibersonian This Fe-   |
| 1. Pull Name, Malling Address and 21P Gods  Pury—se of Disbursament  Duli—resmant for: ☐ Primary ☐ General  Duli—resmant for: ☐ Primary ☐ General  |  | Purplies of Diductoment  | day, year)                                      | Amount of Boyle<br>Statement This Per .   |
|  | 1. Pull Home, Mailing Address and 21P Godo   | Pursing of Oldurament  |   | Amount of Each<br>Disbursment The Pe  |

## Secto AND GOLIGATIONS

|   | -            | ===         | 1                                       | Britan II Chap     |
|---|--------------|-------------|---|--------------------|
| detical Conservative Congressional                                | This Firsted | This Parket | Restant                                 | of This Forted     |
| And Room, Mariney Andrews and Day Grade of Belleton or Gradews    |              |             |   |                    |
| Sencib Inc<br>P. O. Bex 1807<br>Washington, D. C. 20013           | 0            | \$122741.01 | \$15,500.00                             | <b>\$107241.01</b> |
| term of Bill Proposit: Birect Hail                                | •            |             |   |                    |
| ), Pub Nijms, Mighing Address and Exp Gods of Ordner or Gradier   |              |             |   |                    |
| Name of Only (Purpose):   |              |             |   |                    |
| C. Pull Hymn, Highling Address and Exp Code of Dishter or Gradier |              |             |   |                    |
| Name of Base Proposals  |              |             | :                                       |                    |
| D. Full Name, Malling Address and 219 Code of Delater or Gradies  |              |             |   |                    |
| Nature of Babs (Purpose):   |              | today.      | 5.                                      |                    |
| B. Pull Nume, Mulling Address and 2to Cade of Debter or Gradies   |              |             |   |                    |
| Manuro of Baba (Purposa):   |              | Los         |   |                    |
| P. Pull Hymn, Mylling Address and Eto Godo of Disbear or Gradino  |              |             |   |                    |
| Planting of Grain Proposed  |              |             |   |                    |
| 1) BUSTOTALS This Forms This Page Septions?                       |              |             |   |                    |
| 25 TOTAL This Puried from page who true graph                     |              |             | • |                    |
| IN TOTAL OUTSTANDING LOADS hap Grandy & has pape                  |              |             |   |                    |



## FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 2003

20-3

MAY 2 1 1986

L.W. Bonsib Jr., Treasurer Matienal Conservative Congressional Counittee P.O. Box 1807 Washington, DC 20013

Identification Number: C00202143

Reference: April Quarterly Report (1/1/86-3/31/86)

Dear Mr. Bonsib:

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 itemisation follows:

-Line lla of the Detailed Summary Page discloses a tigure for the total amount of contributions from individuals/persons other than political crumittees. In addition, the memo entry portion of the Detailed Summary Page is blank, and insufficient supporting schedules have been provided. Please amend your report by itemizing all contributions from individuals/persons, which aggregate greater than \$200 in the calendar year, and/or provide a figure for the total amount of unitemized contributions from individuals/persons, which have been received during the reporting period. 11 CFR 104.3(a)(2).

-Your calculations for Lines 6(b) through 8 appear to be incorrect. FEC calculations disclose this amount to be a negative amount. Please provide the corrected total(s) on the Summary Page. Please note that debts should not be expressed as disbursements until payment on such obligations occur.

-Your report discloses no payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political counittee including, but not limited to, rent, utilities, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schoole B, supporting Line 19 of the Detailed Summary Page. (2 U.S.C. \$434(b)(5)) In addition, if expenses have been incurred but not paid in a reporting period, the

2040900042

activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty (60) days or more. 11 CFR 104.11.

If these expenses are being paid by a connected organisation, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. \$433(b)(2).

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR 104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Please provide clarification regarding administrative expenses incurred by your committee and/or amend your report to disclore such expenses according to the referenced provisions of the Act and Commission regulations.

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.

7

:0

60

Sincerely,

Anthony D. Ráymond Senior Reports Analyst

Reports Analysis Division

page 1 of 5

PEC

National Conservative Congressional Committee | 31

June 9, 1986

Mr. Anthony D. Raymond Senior Reports Analyst Reports Analysis Division Federal Election Commission Washington, D.C. 20463

I.D. C000202143

Ref: April Quarterly Report(Jan. thru Mar. 86)

Dear Mr. Raymond:

Confirming my telephone call to you Thursday, we contracted with the fund raiser consultant to pay office and overhead expense. Thus administrative expenses are included in the "operating expenses" on line 19 of the summary page.

The other items are corrected, as outlined in your letter, in the attached FEC Form 3X amended. We regret these errors, but we did not understand the method required for these reports.

We believe we can avoid these errors in future reports.

. Sincerely

L.W. Bonsib Treasurer

cc: Daniel Holdgreiwe Warren Richardson Robert Grimm

**Enclosure: FEC Report 3X** 

FEC

### REPORT OF RECEIPTS AND DISCUSSINGSTYS For a Published Commission Online Then on Authorized Commission

2 JUNIE WIT: 31

| . Chamery I  | Pagel           |                                  |  |
|--|-----------------|----------------------------------|--|
| Lillano of Committee (in Full)   | 4. TYPE OF      | NEPONT (Chesh suppl              | Proto boots                                |
| Metional Conservative Congressional Commit   | - w 🗵 👡         | 16 Quarterly Report              | October 16 Over 10- , 11                   |
| P. O. Sex 1807<br>Veshington, D. C. 20013  | D               | 6 Quarterly Report               | 31 Yes En 11.                              |
| Address Shumber and Street   | D.w.:           | 1 Med You Report the             | en Election Voer Only                      |
| P. O. Box 1807   | <b></b>         | Ny Report for                    |  |
|  | D1000           | th day report presiden           | Water of Co.                               |
| City, State and SIP Gods   | desti           | on on                            | on the 5-010 C' -                          |
| Weehington, D. C. 20013  | Thir            | leth day resert letters          | ng the General Election                    |
| Check here If address is different than previously reported.  2.PBC Education Number   |                 |                                  |  |
| C00202143  | П.              |                                  | the State of                               |
| 2. This committee qualified as a multisend date committee during this Reporting Period on  | tol to this Res | ert en Amendment?                | □ NO                                       |
| SUMMARY  |                 | COLUMN A                         | COLUMN 8                                   |
| S. Courtey Paries  | 1, 1986         | This forted                      | Ostender Year to Da-                       |
| 6. (a) Cosh on hand January 1, 19_85   |                 |                                  |  |
| (b) Cash on Mond at Baginning of Reporting Pariod  |                 | •  0                             | The state of                               |
| (c) Total Recorpts (from Line 18)  |                 | \$ 16330.58                      | \$ 16330.58                                |
| (d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B:   |                 | 16330.58                         | \$ 16330.58                                |
| 7. Total Disbursaments (from Line 36)  |                 | 1.3543.19                        | * 15543.19                                 |
| 8.Coth on Hand at Class of Reporting Paried (subtract Line 7 from Line   | 6(d))           | . 8                              | . 0  |
| 8. Debts and Obligations Owed TO The Committee   |                 | . 8 0                            |  |
| (Itemite off on Schodule C or Schodule D)  10. Debts and Obligations Owed BY the Committee   |                 | ,                                |  |
| (Itemine all on Schodule C or Schodule O)  Seriely that I have examined this Heper's and 18 the best of my a newledge and be-  | er .            | 787.39                           | 3.   |
| II to true, correct and complete   |                 | For to                           | rther info-metion como:                    |
| L. W. Bonsib   |                 |                                  | Autora Boctor Comments                     |
| THE PERSON NAMED TO SECURE   |                 |                                  | depops 11 2AL                              |
|  | - 10 65         |                                  | 748 Per 200-424 St.).<br>unto 201 276 3175 |
| PONATURE OF TREASURER.  Co.  WOTE Submission of to se promocus of income one information may be because of the second of the second of the second one income one inco |                 | ap. 11 1. <b>150 man</b> atan as | T. C.  |
| All process of PAC 1000  |                 |                                  |  |
| - production of 755 7000   |                 |                                  |  |

| - Butterel Guerrysten Guerrestanel Guntasee   | Complete to the state of   |  |
|---|--|--|
| •:  | A STATE OF THE PARTY OF THE PAR |  |
| Lasteria  |  |  |
| M.CONTEMPLTERS (who then being proper)<br>(a) beginning Purson Other Then Deputy Committees,                | PRODUCT OF THE PROPERTY OF THE |  |
| (Marie Group Medicalizat ()   |  |  |
| Manufact Commission   |  |  |
| CO TERMS CONTRIBUTIONS larger data band half 116s, 116s and 116s)   | 14330.38 16330.38  |  |
|   |  |  |
| B. Transpiero prom apprilatementen party committees   |  |  |
| BALL LONG RECEIVED  |  |  |
|   |  |  |
|   |  |  |
| ILOPPOSTO TO GPORATING SUPENBUTURES MICANA, Rebusa, etc.)   |  |  |
| B. REPURIES OF CONTRIOL/TICHS MADE TO FORGRAL CANDIDATES  | Control of the second of the s |  |
| AND STREET POLITICAL STREET TOOS 7.6THER RESERVE (Distance, Inches, St.)                                    |  |  |
| 7.077030 (1305)2715 (2346)46, (1304)6, (12.3  |  |  |
| E TOTAL RESERVES (Add 1966, 12, 16, 14, 15, 19 and 17)  | THE TELEVISION OF THE PARTY OF  |  |
|   |  |  |
| B.GPBRATING EXPENDITURES  | THE TY CHILDREN WAS ALLES  | Walter Land  |
| IL TRANSPERS TO APPILIATES/GTHEN PARTY COMMITTEES   |  |  |
|   |  | distant.   |
| H.GONTRIBUTIONS TO PEDGRAL GANDIGATES AND   |  | and the state of t |
| GTHER POLITICAL COMMITTEES 12. MISSPENCENT EXPENDITURES (up Schools E)                                      |  |  |
|   |  | -  |
| IS.COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES  |  | 110  |
| LLOAN REPAYMENTS MADE   |  |  |
|   |  |  |
| IL LOANS MADE   |  |  |
| IL REPUBLIS OF CONTRIBUTIONS TO   |  |  |
| tol Individuals Persons Other Then Political Commission I as of ficient. fun                                |  | 00   |
| (a) Published Purry Committees  |  |  |
| tel Other Political Committees.  Idl TOTAL GONTRIBUTION REPUNDS (Age 2014, 2014) and 2014)                  |  | 00   |
|   |  |  |
| 17.GTHER GIGGURGEMENTS  |  |  |
| B. TOTAL GEOLOGEMENTS ladd times 10, 30, 21, 32, 30, 34, 35, 3040 and 27).                                  | THE PLANE WAS A STATE OF THE PARTY OF THE PA |  |
|   |  |  |
| M. NET CONTINENTIONS AND NET GEORATING EXPENDITURES  10. TOTAL CONTINENTIONS from their beat from Line 1140 | 1611011  |  |
| DO TOTAL CONTRIBUTION REPUBLIS from Line 2010   | The second secon | 00   |
| 81.NET OGNTRIGUTIONS lother than bond Wateress Line 30 from Line 301  | ····   |  |
| 22. TOTAL GPERATING EXPENSITURES from Line 19   |  | 0  |
| 22.0FF00FT0 TO GF0RATING EXPONDITURES from Line 10  |  |  |
| 24 NET CORRETING CHICAGOTHERS Charme Line 22 from Line 22)  | 45545.10   15545.19  |  |

### ITEMERO DISSURGEMENTS

PARE 5 Page 4 of 5

| of golderfree in full   |   |                                       |   |
|---|---|---------------------------------------|---|
| Mational Conservative Congression   | al Committee  |                                       |   |
| Sonoib, Inc.<br>Washington, D. C. 20001   | Pupper of Deburgment Reimbursement for postage chack to Postage Statutement for   Princy   General Other Intelliging Date | 2/12/86                               | Section of Early Section 17 to 17.              |
| Boneib Inc. Washington, D. C. 20001   | Purpose of Disbursament Payment on account for Biract Hail Dubursament for Primary Garage                                 | Date (manth,<br>day year)<br>3/31/86  | Amount of Esc.<br>Blabutament This P.           |
| Full Name, Mailine Address and SIP Gods  National Capital Bank of Washington Capital Hill Washington, D. C. 20003 | Other (specify)  Purpose of Disbursament  on Bank Charge  Disbursament for Primary General  Other (specify)               | Date fronth<br>day year!<br>1/31/86   | Amount of Ea.<br>Disbursement Tr. 1<br>3 . 8 £  |
| National Capital Bank of Washing-<br>ten on Capital Hill<br>Washington, D. C. 20003                               | Purpose of Disbursement Bank Charge  Debursement for Primary General  Other (specify)                                     | Dete -month,<br>day, year!<br>2/28/86 | Amount of Earth Disburshment This services 9.31 |
| E. Full Name, Mailing Address and 21P Code  | Purpose of Disbursament  Disbursament for Primary General Other (specify)   | Dete 'menth,<br>de eer i              | Amount of Ea-<br>Disbursement This              |
| F. Full Name, Mailing Address and SIP Cade  | Purpose of Disbursamens  Disbursament for Printery General Other (seecify)  | Date (month day, year)                | Amount of E Debursement This -                  |
| G. Full Name, Mailing Address and 21P Cade  | Purpose of Disbursement  Disbursement for: Primary Genual   | Date Imenth,<br>day year's            | Amount of Est<br>Dissurption of This F          |
| H Full Name, Mailing Address and ZIP Code   | Purpose of Disbursoment  Disbursoment for Primary I General   | Date (man**                           | Amount of Ex                                    |
| Full Rame, Malling Address and EIP Code   | Other ispecify) Purcose = 1 D soursement  | Date impre-                           | Amount of                                       |
| A is all D shurromones this Page is all and   | Cabb siment for Primary General Street Med fy   |                                       |   |

page 5 of 5

SCHLOULE D

### BESTS AND COLISATIONS Excluding Leans

The White A

| ine of Committee in Full<br>National Conservative Congressional          | Select Septembre<br>The Period | Market.   | Payment<br>This<br>Paymed | Bolome or 1<br>of This Po- |
|--|--------------------------------|-----------|---------------------------|----------------------------|
| Sensib Ene P. O. Best 1807 Reshington, D. C. 20013                       | 0                              | 15,500.00 | \$15,500.00               | <b>61072</b> 41.           |
| bare of Date Papent:<br>Direct mail & Admin. expense                     |                                |           |                           |                            |
| Pull Name, Mailing Address and Sip Code of Debier or Graduer             |                                |           | , i                       |                            |
| Nature of Bobs (Purpose).  |                                |           |                           |                            |
| C. Full Home, Malling Address and <b>3to Gods o</b> f Debter or Creditor |                                |           |                           |                            |
| Nature of Babs (Purpose):  |                                |           | * A Company To Son        | A                          |
| D. Pull Name, Malling Address and Stp Code of Daboer or Creditor         |                                |           |                           |                            |
| Nature of Coat (Purpose).  |                                |           |                           |                            |
| E. Full Name, Mailling Address and 20 Gods of Debter or Creditor         |                                |           |                           |                            |
| Nature of Data (Purpose)   |                                |           |                           |                            |
| F. Fuit Name, Mailing Address and Zie Code of Debser or Credito          |                                |           |                           |                            |
| Notice of Balls (Person)   | 1. t.                          |           | Suite in                  | 1                          |
| 11 SUSTETALS This Parked Three Page Indicated                            |                                |           |                           |                            |
| 31 TOTAL This Parted from page this time entry)                          |                                |           |                           |                            |
| 3 TOTAL GUTGTANDING LOAKS from Briedin & rest page                       | o ·                            |           |                           | 1                          |

# REPORT OF RESERVES AND BISSURGEMENTS For a Palitical Committee Other Than on Authorized Committee

(Summary Page)

| .Name of Commisso tin Pulli  | N. C.                 | PORT (Chest sports                     | tote bound   |
|--|-----------------------|--|--|
| Mational Conservative Congressional Comm   | 14-m - word           | Guartarly Report                       | Outer 15 Over 14 "   |
| tee<br>P. O. Bex 1807  | (E)-10                | Querterly Report                       | January 31 Year Errs   |
| Vachington, D. C. 20013  |                       |  |  |
| Address (Humber and Street)  |                       | Mid Year Report Disc                   | a-Blection Year Only   |
| P. O. Box 1807   |                       | y Report for                           |  |
| Bity, State and 21P Code   | Tunglitel             | h day report preseding                 | West of Can- or  |
|  | election              | n en                                   | on the State of  |
| Washington, D. C. 20013  | Thirtie               | th day report followin                 | she General Election   |
| Check here if address is different than previously reported.   |                       |  |  |
| 2.PEC Identification Number<br>C00202143   |                       |  | M Suu o'   |
| 3. This committee qualified as a multicendidate committee during this Reporting Parised onHat_yet_qualified  |                       | netion Report<br>ort on Amendmont?<br> | ] NO   |
| BIAMARA  | - I - June 1995       |  |  |
| S.Covering Period _April_1, 1986_ through _Jume.   | 21-1186-              | ODLUMN A<br>This Period                | Column 8   |
| 6.(a) Cash on hand January 1, 19 <u>86</u>   |                       |  | * 785.39   |
| (b) Cash on Mand at Beginning of Reporting Period  |                       | 8 785.39                               | 1  |
| (c) Total Receipts (from Line 18)  |                       | 3322.50                                | 8 19653.0  |
| (d) Subtotal (add Lines 6(b) and 6(c) for Column A and   |                       | SA107. 89                              | 20438.4  |
| Lines 6(a) and 6(c) for Column 8)  |                       |  |  |
| 7. Total Disbursaments (from Line 28)  |                       | محـ ٥٥متـــ                            | 1 16546 6  |
| 8.Cash on Hand at Class of Reporting Period (subtract Line 7 from  | Line Bidl)            | 83106.39                               | 3 3  |
| 9. Debts and Obligations Owed TO The Committee   |                       | . 8 109664.21                          | 0.5  |
| (Itemize oil on Schodule C or Schodule D)  10. Dobts and Obligations Owed BY the Committee   |                       | •                                      | 7  |
| (Itemize ell en Schedule C er Schedule D)  |                       |  |  |
| I certify that I have examined this Maport and to the best of my knowledge on it is true, correct and complete  L. W. Bonsib  Type as Frint Name at Wittimer | 8 toliol              | بية بيا                                | ster information contact<br>Reduct Section Commission<br>50 & Street, N.W. |
| The desired by Andrews   |                       |  | Maryen, DC 204D  |
| 1, 1   | July 15.              | 1986                                   | Tell Pres 800-424-9630<br>Least 302-376-3130                               |
| MEMAYUNE OF VINEASUNER   |                       |  |  |
| ADTE Submission of false promotus, or incomplete information may subject   |                       |  |  |
| All grovious varuons of PEC (  | 79MH 3 and +6C P9MH 3 |  | FEC FORM 2h 2 8"   |
|  |                       |  |  |

SETTINGS CHARACTY PAGE of Business and Statements

| Mational Conservative Consessional Countries  | Prom: April 1, 1986 to June 1.   |  |  |
|---|--|--|--|
|   | GOLLINO A  | COLUMN B   |  |
| A CAMPAGE AND A |  | 14.  |  |
| CONTRIBUTIONS better than leand FROM:   |  | 3  |  |
| At Indicate Person Other Then Political Committees.   | THE PLAN SHAPE   |  |  |
| Atoma Barry Volumber 8 1, 150,00 1  |  | ی  |  |
| Cal Published Payter Committeet   |  | -  |  |
| (d) Other Published Commitment  | 0  | 3 322.50   |  |
| (4) TOTAL CONTRIBUTIONS tother than board todd 11(a), 11(b) and 11(a))  | 3.323.30   | The state of the s |  |
| LTRANSPERS FROM APPILIATED/OTHER PARTY COMMITTEES   | .,,  | O CONTRACTOR OF THE PARTY OF TH |  |
| LALL LOANS RECEIVED   | .0   | 36   |  |
| I.LOAN REPAYMENTS RECEIVED  |  | 0  |  |
| S. OFFICETE TO OPERATING EXPENDITURES (Refunds, Rebotes, etc.)  |  | A CONTRACTOR OF THE PARTY OF TH |  |
|   |  | Mark Comment of the  |  |
| 6.REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES  |  | (2.7)  |  |
| 7.OTHER RECEIPTS (Divisionds, Interest, etc.)   |  | 0  |  |
| 8.TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 16, 16 and 17)   | personal and Marian swap and the course of the course  | The state of the s |  |
| :   | The state of the s |  |  |
| II. DISBURSEMENTS   |  | 12.17  |  |
| 9. OPERATING EXPENDITURES   | 1.000.00   | 1.000.00   |  |
| TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTES   |  | au t   |  |
| 21.CONTRIBUTIONS TO FEDERAL CANDIDATES AND  |  |  |  |
| OTHER POLITICAL COMMITTEES  | I HALL MAN   | Ether Control of the Western   |  |
| 22 14/CEPENDENT EXPENDITURES (uso Schoolulo E)  | The second second  | San San Maria San San San  |  |
| 23 COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES  | Control of the second s |  |  |
| (2 U.S.C. 8441 a(d)) (Use Schadule F)   |  | Comments to be a second  |  |
| 14 LOAN REPAYMENTS MADE   |  |  |  |
|   | - 40 to 30 to 50   | <b>第四百位是《新疆》</b>   |  |
| 25. LOANS MADE  | A STATE OF THE STA | AND THE PROPERTY OF THE PARTY O |  |
|   | والمجال المساسل المسادر  | STATE OF THE PARTY |  |
| 26 REFUNDS OF CONTRIBUTIONS TO  |  | THE RESERVE THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TWO IS NAMED IN COLUMN TWO I |  |
| * (a) Individuals/Persons Other Than Political Committees Insufficient fund   |  | 1.50   |  |
| (2) Political Party Committees  | 0  |  |  |
| 'c' Other Political Committees  | 1,50   | 1.50   |  |
| Upon Continuo itan nerano inco soidi, seisi ene suiti   |  | 经不够的证据   |  |
| 27 OTHER DISBURSEMENTS  |  | 0  |  |
| 28 TOTAL D:SBURSEMENTS (edd lines 19. 20, 21, 22, 23, 24, 25, 26(d) and 27)   |  | 1-001-50   |  |
|   | 204-19-19-19-19  |  |  |
| (II, HET CONTRIBUTIONS AND HET OPERATING EXPENDITURES   |  | 1971年1971年1971年1971年1971年1971年1971年1971  |  |
| 29.TOTAL CONTRIBUTIONS lether then leant) from Line 11(d)   | 3.322.50   | 3 322 50   |  |
| 33.TOTAL CONTRIBUTION REFUNDS from Line 28(d)   | 1.30   |  |  |
| 31.NET CONTRIBUTIONS (ether than leans) (Subtrest Line 30 from Line 20)   | 3.324.00   | 7 324 00   |  |
| 22 2024   | Charles and the co   |  |  |
| 33.TOTAL OPERATING EXPENDITURES from Line 19  | 1,000,00   | 1.000.00   |  |
|   |  |  |  |

5 0

0 0

0

### ITEMIZED DISSURSEMENTS

Use commune orbital rails for comb communey of the

PAGE

ATTACHMENT\_6\_

FOR LINE NUMBE

information aspited from each Reports and Bustoments may not be said or used by any person for the gargest of sahethms contributions in furnishing the name and address of any political committee to salets contributions from each committee

VALE OF COMMENTED IN THE

Matienal Conservative Congressional Committee

| A. Pull Name, Making Address and 210 Octo<br>Bone 15 Inc.<br>Weehington, D. C. 20013 | Color (mostly) postage Dec  | 5-22-86                    | Amount of Earl<br>Debuttement This:    |
|--|---|----------------------------|--|
| S. Pull Hame, Malling Address and 21P Gods   | Purpose of Disburgament   | Date Imensh,               | Amount of Est?                         |
| National Capital Bank<br>on Capital Will<br>Washington, D.C. 20003                   | Insufficient funds Discression for:   Primary   General Other (specify) | 6-6-86                     | \$1.50                                 |
| G. Full Name, Malling Address and 21P Code   | Purpose of Olibursomens   | Core (month,<br>day, year) | Amount of Ex.<br>Distursement This Pr  |
|  | Disbursement for:   Frimary   General   Other (spealty)                 | 1.                         |  |
| D. Full Name, Mailing Address and 21P Godo   | Purpase of Disbursomens   | Dote (magen,<br>day, year) | Amount of East<br>Disbursement This of |
|  | Disbursoment for:PrimaryGeneralGeneral                                  |                            |  |
| E. Full Name, Malling Address and EIP Gode   | Purpose of Disburganiess  | Date menth,<br>day, year!  | Amount of Ear                          |
|  | Disbursement for: Primary General Other (specify)                       |                            |  |
| F. Puli Nome, Molling Address and ZIP Code   | Purpose of Disbursement   | Date (manth,<br>day, year) | Amount of Car<br>Disbursement This     |
|  | Disbursement for: Printery General Other (specify)                      |                            |  |
| B. Pull Name, Mailing Address and ZIP Code   | Purpose of Disbursomens   | Date (mpnth.               | Amount of Fa<br>Disbursement Tri 1     |
|  | Disbursoment for: Primery General Other (specify)                       |                            |  |
| H. Full Name, Malling Address and ZIP Code   | Purpose of Disbursement   | Date (month, day, yee'     | Amount of Eu<br>Dispursement Tri       |
|  | Disbursement for Primary General Other (specify)                        | <b>-</b>                   |  |
| Full Name, Mailing Address and ZIP Code  | Purpose of Disbursement   | Date Imprim                | Amount<br>I soursimn                   |
|  | Disbursement for Primary General Other (specify)                        | 1                          |  |
| TAL of Disbursements This Page (aptional)  |   |                            | 1.001.50                               |
| . This Period flast page this line number enly)                                      |   |                            | 1,001.50                               |

DEETS AND OCLIGATIONS Exchiding Loans

ATTACHHENT\_6 page 4 of

Payme. Uwt. . Name of Committee in Full) Balance of Far Mational Conservative -Congressional Connittee

A. Put Name Maline Address and Bo Code of Debies or Credito Bonoth Inc. \$1000.00 \$109649.28 8107241.01 P.O. Box 1807 8 3408.27 20013 Washington, D.C. Nature of Babt Purpose): 9. Full Name, Malling Address and Zie Code of Debter or Creditor Nature of Dobt (Purpose): C. Full Name, Malling Address and Zip Code of Debter or Creditor Nature of Dobt (Purpose): D. Full Name, Malling Address and Zip Code of Debter or Creditor 0 0 0 Nature of Dabi (Purposs): E. Full Name, Mailing Address and Zip Code of Debter or Creditor T 0 CV Nature of Dobt (Purpose): 0 F. Full Name, Mailing Address and Zip Code of Dabtor or Creditor Nature of Dobt (Purpose). 1) SUSTQTALS This Period This Page (options) 3) TOTAL GUTSTANDING LOANS from Schodule C liest page entyl

SCENE AT THE PEC P.4. THE MET City, State and 219 Code ADENSTON D.C. MELD A City report tellagons the Corneré Ste. Her Charle have If patrick is different their processity reported CHARLES AS 2. This committee qualified as a multi-Out Is this Report on Advance this Reporting Period on MED-NET-E VES. **□** 100 -0 S. Courses Perce July 1 1985 The Country of ---4. 1 6. 1 tol Cash on Hand at Baylanang of Reporting Parish . . . . . ...... 0 3/05.09 8 21221.00 . . Add Substant looks Lungs Bibl and Big! for Column A great . . . \$ 21221.00 6 4574.30 Lines Stat and Stat for Column St 7 Total Disbursaments (from Late 26) 1 26 M. 20 1 19163.00 8 Cosh on Hand of Linne of Reporting Paried (subtract Lass ? from ... and Gid!) \$ 2030.00 \$ 20.30.00 9 Dates and Obligations Ored TO The Committee Ilternise all on Schoolule C or Schoolule DI 10 Dobts and Obligations Guidd RY the Committee \* **4579.49** (framing all on Schedule C or Schedule D)

Tabling that there province this the off and to the tablic they expended ying typics. L. W. Bonsib And Declarity or ready ---14 Apr 2014 143 **(2) (4) (4) (4)** All printed streets of FEC PORM 3 and FEC PORM \$1 are playing and should no large to seri 1064 4.Mil. . . .

ATTACHMENT

# GETAILED GMBAAY PAGE of Receipts and Delaurement

| Retions? Convervetive Congressional Committee  | 9-mm 7/1/06                   | . 9/30/06   |
|--|-------------------------------|---|
|  | COLUMN A<br>Track This Person | CALMED S<br>Search Top-To-Sea   |
| L 9000/770   |                               |   |
| CONTRIBUTIONS festig than based PROM   |                               | · · ·   |
| 64 Indebbala Persons Stiles Than Parallel Commissions  Change Street Uniquested S 7053 | AN CAMP                       | 621221.60   |
| Gal Publish Party Committees   |                               |   |
| (a) Other Publish Committees   | 82860.00                      | 821221.00   |
| 2. TRANSPORE FROM APPILIATED/OTHER PARTY COMMITTEES                                    |                               |   |
| BALL LOANS RECEIVED  |                               |   |
| A LOAN REPAYMENTS RECEIVED.  |                               |   |
|  |                               | الأقس والمعجد   |
| 6. OFFSETS TO OPERATING EXPENDITURES (Returns, Rebute), etc.                           |                               |   |
| B. REPUNDS OF CONTRIBUTIONS ADE TO FEDERAL CANDIDATES                                  |                               |   |
| AND OTHER POLITICAL COMMITTEES  FOTHER RECEIPTS (Dividends, Interest, etc.)            |                               |   |
| D. TOTAL RECEIPTS (Add 1168, 12, 13, 14, 16, 16 and 17)                                | DETRO                         | BENTHAM S   |
|  |                               |   |
| COPERATING EXPENDITURES  | (2655.5)                      | A STORAL  |
| TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES   |                               |   |
| H.CONTRIBUTIONS TO FEDERAL CANDIDATES AND  |                               |   |
| - OTHER POLITICAL COMMITTEES   |                               | W   |
| 2. INCEPENDENT EXPENDITURES lass Schoolule El  |                               | * Language of the second  |
| )<br>IL COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES                              |                               |   |
| (2 U.S.C. 6441 aid)) (Um Behadulo F)   |                               | A   |
| LOAN REPAYMENTS MADE   |                               |   |
| D. CAME MADE   |                               |   |
| III-LOANS MADE   | THE PERSON NAMED IN           |   |
| B. REFUNDS OF CONTRIBUTIONS TO   | 11.5                          | "一件"的   |
| fel Individuals/Persons Other Than Political Committees                                | TONG BASES                    | 83.50   |
| (b) Political Party Committees   |                               |   |
| (c) Other Political Committees   |                               | 1   |
| Idi TOTAL CONTRIBUTION REFUNDS (Aut 25ta), 25(b) and 25(c)                             | 5. Ho                         | SHEET TO STATE OF THE STATE OF |
| 77. OTHER BISBURSEMENTS  |                               |   |
| E TOTAL DISSURSEMENTS (and times 19 20, 21, 22, 23 24 25 26(d) and 27).                | Toronto Contraction           | 20102-00  |
| M. MET GENTRIGUTIONS AND NET OPERATING EXPENDITURES                                    |                               |   |
| ID TOTAL CONTRIBUTIONS lether then leans) from Line 111d1                              | 84568.00                      | 821221.08   |
| IN TOTAL CONTRIBUTION REFUNDS from Line 2840   |                               | 1.50  |
| DI NET CONTRIGUTIONS festier than leant) (Subtrast Line 30 from Line 29) .             | 21562.00                      | \$21217.58<br>100 100 100 100 100 100 100 100 100 100   |
| 32. TOTAL OPERATING EXPENDITURES from Line 19  | CM No. 39                     | \$19178.50  |
| 23. OFFSETS TO OPERATING EXPENDITURES from Line 16                                     |                               | 1 -44444 2144   |
| 34. NET CPERATING EXPENDITURES (Subtrest Line 35 from Line 32)                         |                               | Starra sa   |

10

0 0

0 6

0

4

9 2 0

page 3 of 4

£2636.39

" Reserve of Ser-8.21.91 mhiagton, S.C. 200/3 in the last Charges of Con-C. Pall Street, Malloy Ashing and ST State must be: | Steers | | Com-Amount of La D. Pull Home, Mylling Address and SIP Ondo me The ... Brawnens for Blancy Barrer Chier tempolity) mont The E. Pull Home, Malling Address and SIP Gods Distributed to: | | Pringy | | Control Down temely. Purpose of Distangement F. Pull Hams, Harling Address and ZIP Gods Amount of La. ~~ Other topsoly) 2 G. Pull Hame, Malling Address and 20° Cade Purpose of Disbursament Con Impath, day, year! Amount of tar 5 Dethartement for: | Dremary | Concept 6.3 Color tepesity) Purpose of District Contract Amount of Far-14. Full Hame, Mailing Address and 21P Code Deburament for Debugs Gerand Other topsoity) Amount of Ex 1. Pull Name, Malling Address and SIP Code Purpose of Distauranting Description to Trans. Garage Other Ispacity SUSTOTAL of Distancements This Page lubtions

TOTAL This Period feest suip this intersion her or .

PARTACHENT 7

- September

FEE

| The Supercular Californicas,   | -25-       | 是        | E        | 無          |
|--|------------|----------|----------|------------|
|  | 9100000.20 | 04879.¢0 | 00030.20 | 6111992.34 |
|  |            |          |          |            |
| ii. Pall lijan, liighig Addres <del>gal</del> iide liigh di liighig ar linghig |            |          |          |            |
| i<br>Name of State Proposal :  | 45.50      |          |          | 3          |
| L. Pull Parry, Making Address and Shy Cods of Biology or Gradies               |            |          |          |            |
| Iterary of Orbit Purposel:   |            |          |          |            |
| D. Full Norms, Malling Address and Stp Gods of Batter or Goddeer               |            |          |          |            |
| Tenuro of Date (Purpose):  |            |          |          | 7          |
| I. Pull Home, Malling Address and Sta Code of Dideor or Gradier                | 754        |          |          |            |
| Nature of Date (Purpose):  | ·          |          |          | <u>.</u>   |
| F. Full Hame, Mulling Address and 2ty Code of Debter or Creditor               |            |          |          |            |
| Nation of Bate (Purpose)   |            |          |          |            |
| 11 SUSTOTALS This Puried This Page Septional)                                  |            |          |          |            |
| 2) TOTAL This Period Hose page this time entry)                                |            |          |          |            |
| SI TOTAL GUTSTANDING LOANS from Schools C Rest page on                         | ly)        |          |          |            |

•

7 7

**C**.

page\_1\_ of 3

### REPORT OF RESENTS AND SIGNARGENESITS For a Patitional Committee Other Then on Authorized Committee

(Summery Page)

MAND DELIVERED

| 1. Name of Committee (In Pull)   | 4. TYPE OF R            | SPORT IGNOR OFFI                        | pripus bososi  |
|--|-------------------------|---|--|
| NATIONAL CONSERVATIVE  | (a) X April 1           | B Quarterly Report                      | October 15 Querte , 11-  |
| CONTRESSIONAL CONMITTEE  | Day 11                  | Querterly Report                        | January 31 Year Envisor  |
| A-90'00 (Number and Sugar)   |                         |   | on-Election Year Only  |
| 90 · 1497  |                         |   |  |
|  |                         | y Report for                            |  |
| City, State and ZIP Code   | ☐ Twelft                | h day report presedin                   | 17 mps of Every on   |
| HANHINGTON D.C. 20013  | election                | n en                                    | in the State of  |
| Chash Lare If address to different then proviously reported.   | Thirsie                 | th day report follows                   | ng the General Election  |
| vedmutt neitreight 237.5   | on                      |   | the State of   |
| This committee qualified as a multicendidate committee during this Reporting Period on NOT YET GUALIFIED   |                         | etion Report<br>rt en Amendment?<br>ves | () NO  |
| Summary  Sum |                         | ; COLUMN A<br>This Period               | COLUMN B<br>Calendar Year to Date                                      |
| 5 (4) Cash on hand January 1, 19 <u>57</u>   |                         |   | 6 2.634.28   |
| 11.1 Cash on Hand at Beginning of Reporting Period   |                         | 85.468.5                                |  |
| (c) Total Receipts (from Line 18)  |                         | \$ 0.00                                 | 8 40-00  |
|  |                         | 8 D.DD                                  | AS. PEA.S  |
| Lines Big) and Big) for Column B) 7. Total Disbursements (from Line 28)  |                         | \$ 0.00                                 | 8 •0.00  |
| B Cash on Hand at Close of Reporting Period (subtrect Line 7 from Line   | 6(d))                   | 45.PEA.5                                | 3 - AZW - ZA   |
| 9 Debts and Obligations Owed TO The Committee  |                         | 8                                       |  |
| (Itemize all on Schedule C or Schedule D)  Debts and Obligations Owed BY the Committee  (Itemize all on Schedule C or Schedule D)  |                         | * 777'245'36                            |  |
| cort fy that I have aramined this Report and to the best of my knowledge and balls<br>1.5 " .e., correct and complete  |                         | Sou Ave                                 | ther information contact   |
| L.H. BONZIR  |                         |   | Redgraf Bocton Cummanon  |
| roe cr Frint Name of Treasurer   |                         |   | 989 & Street, N.W.<br>Washington, D.C. 20423<br>Tall Piec 600-424-9530 |
| GNATURE OF TREASURER DOWN  |                         |   | Lead 302-376-3137  |
| THE Summission of these erromeous or in complete information mus subject the po  | er son signing this rap | ort to the penant et of 2               | USC 643':  |
| All primos repens of PEC FORM:   | and PEC PORM &          | ers abundate and phaseld the            | lungs to used  |
| TTE. Summission of these principles of in complete information must subject the pr   | erson signing this rep  | ure abundans and chaudd no              |  |

### DETAILED SUMMARY PAGE of Receipts and Disbursoments (Page / FEL FORM 3x)

| THE PARTY OF THE P | V 1/87   | TAPELS OF 1: 1   |
|--|--|--|
| "MATIONAL CONCERVATIVE CONGRESSIONAL COMMITTEE   | •  | Annual Control of the |
|  | COLUMPs A  | Lateride Veet Tu (Jain   |
| I RECEIPTS   | Salar Contraction of the Contrac | and the second   |
| 11 CONTRIBUTION'S tother than lumb) FROM   | The state of the state of the  |  |
| fai Individuals/Persons Other Than Pulit (al Committees  | 60.00  | 60.70  |
| (Memu Entry Unitemized &   | The Property of the Control of the C | 7  |
| tol Political Porty Committees   |  |  |
| (c) Other Political Committees   |  |  |
| IGITOTAL CONTRIBUTIONS Inther than loans! tedd 11(a) 11(b) and 11(c)   | 2 7 38 P   |  |
| ". THANSFERS I HOM AFFILIATED OTHER PARTY COMMITTEES   | 40.00  | <u>+0.00</u>   |
| . THE STREET STREET AND  |  | - TO D   |
| 13 ALL LOANS RECEIVED  | <b>40.00</b>   | 40.00  |
| N TO COUNTY IV   | * 54 120 700   | (P*15)   |
| 14 LUAN REPAYMENTS RECLIAND  | <b>40.03</b>   | •0.00  |
| A COMMUNICATION COLORS   | Stort Marie  |  |
| 15 OF FRETS TO OPERATING EXPENDITURES (No units, Retails , et.   | •n-00  | <b>60</b> 00   |
| The second secon |  |  |
| 16 HEF UNITS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATE  | •0.00  | •0.00  |
| AND OTHER POLITICAL COMMITTLES   |  |  |
| 1/ OTHER RECEIPTS (Dividends Interest, Ptc )   | •0.00  | 60.00  |
|  | 77.5   |  |
| 18 TOTAL RECEIPTS (Add 11) 12 13 14 15 16 and 171  | - 40.00 · · · ·  | 1 00:00  |
|  |  |  |
| II DISBURSEMENTS   | 14000  |  |
| 14 OPERATING EXPENDITURES  | €U.U3  | 40.00  |
|  |  |  |
| 20 TRAINITERS TO AFFICIATED OTHER PARTS COMMITTEES   | 40.00  | <b>*U.U</b> U  |
|  |  |  |
| 21 CONTRIBUTIONS TO FEDERAL CANDIDATES AND   | +0.00  | ♦0.00  |
| OTHER POLITICAL COMMITTEES   | 101 200 1  |  |
| 22 INDEPENDENT EXPENDITURES (use Schedule E)   | 60.00  | <u>+0.00</u>   |
|  | F.V. Co.   | 40.00  |
| 23 COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES   | 90.00  | •0.00  |
| (2 U.S.C. 8441 ald)) (Use Schodule F)  '4 LOAN REPAYMENTS MADE   |  |  |
|  | <b>60.03</b>   | \$0.00   |
| . LOANS MADE   | maticks:   | 4D DD  |
| · CONTURAUL  | <b>♦0.00</b>   | •0.00  |
| Seath Audition the atthetion of the tax  |  | •  |
| 25 PERUNDS OF CONTRIBUTIONS TO A CONTRIBUTION OF THE CONTRIBUTION  |  | <b>-</b> ‡   |
| to the attention of the state o | 1  | •  |
| refittion Problem (Consistings)  | •  | •  |
| the common expression of the company | <b>≜</b> B.00  | •0.00  |
| The state of the s | <u> </u>   | 1 · *U·W · · · · · · · ·   |
| Constitute to the agreement that the con-  | •3.00  | <b>40.00</b>   |
| A CONTRACT OF THE STATE OF THE  |  | 1  |
| ESTIMATED THE EMPLOYED SHOWN IN THE STATE OF | •B • BD  | •0-30  |
|  | 74.00  |  |
| III NET CONTRIBUTIONS AND NET OPI HATING EXPENDITURES  | 1  | }  |
| TUTAL CONTROL 1 of the second of the control   |  |  |
| "OTAL CONTINUE I AN AREA SELECTION AND AND AND   |  | 1  |
| 1. 1.6 T CONTRIBUTIONS SHOW IN COMP. CARRIED LINE STORY AS A SECOND  | •0.02  | •3.00  |
|  |  | 1 40.00  |
| Man offer to A Plant a SPI Northern a County on Long 19  |  | .1   |
| COSE TO THE PERMATENCE ENTENDED CHES Some Cone To  | 1"   | •  |
| 3 "A for marketing pages, and the following states of month  | <b>a</b> 2.02  | a0.00  |
|  |  |  |

page 3 of 3

SCHEDULE D (Revised 3/80)

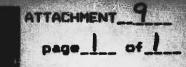
m, 0,.. 0, 0

6-6

### DEBTS AND OBLIGATIONS Excluding Loans

Page : ut to to the Link touching at another the mention of the touch numbered ine

| Name of Committee (in Full) MATIONAL CONSERVATIVE CONGRESSIONAL COMUTTEE   | Contracting<br>Colores Copining<br>This Period | Amount<br>Incurred<br>This Period | Payment<br>The<br>Pared | Determing<br>Belance at Class<br>of This Per ad |
|--|--|-----------------------------------|-------------------------|---|
| A " utt Name, Mailing Address and Zip Code of Debtor or Cretic   | itui   |                                   |                         |   |
| ONSIB INC.   |  |                                   |                         |   |
| MASHTHETON, D.C. 27013   |  |                                   |                         | 1   |
| MANAGEMENTON, B.C. SANTA   | 111.592.38                                     | <b>♦0.00</b>                      | 40.00                   | \$11.592.36                                     |
| Nature of Orig (Postor)  | 11 11 12                                       |                                   | <b>196</b>              |   |
| 11 - Frill Name, Mailing Address and Zip Code of Debtor or Crest   | itui   | SCAL MAR                          |                         |   |
|  |  |                                   |                         |   |
|  |  |                                   |                         |   |
| Nature of Debt (Purpose)   |  | A STATE OF                        | 16.3                    |   |
| C Full Name, Mailing Artdress and Zip Code of Debter or Credi  | itor   |                                   |                         |   |
|  |  |                                   |                         |   |
|  |  |                                   |                         |   |
| Nature of Debt (Purpose)   |  |                                   | **                      |   |
| 17 F. H. Name, Mailing Address and Zip Code of Debtor or Credi   | 1101   |                                   |                         |   |
|  |  |                                   |                         |   |
| Nature of Debt (Purpuse)   | i  |                                   |                         |   |
| t trui Name Mailing Address and Ziti Code of Debtor or Cred  | 1101   |                                   |                         |   |
|  |  | <b>!</b>                          |                         |   |
|  |  |                                   |                         |   |
| Mat are set Diebe (Psiepowe)   |  |                                   |                         |   |
|  | I .  |                                   |                         |   |
| to a Name Mailing Address and Zic Code of Delitor or Circ  | iten   | 1                                 |                         | 700   |
| For a Number Mailing Address and Zip Code of Delitor or Circu  | 110  |                                   |                         |   |
| For a Number Mailing Address and Zig: Code of Delitor or Creo  | ileu   | į                                 |                         |   |
| F. (C.) Name: Mailing Address and Zig: Code of Defitor or Greo<br>Nat. (C.) Code of Code | .100   | !                                 |                         |   |
| Mat a e of Ebess (forsome  | alto   |                                   |                         |   |
| Nature of Degrado Symposis<br>1 - 1 - 1 f of Δρ. for the star of Dias Pain Augmental?  | iten   |                                   |                         |   |
| Mat a er off Edelph of organise  |  |                                   |                         | •0.00   |



Door Teap:

You suggested some time ago that we terminate this subject non-suspected complies.

We were relactant to its as since the hoped to get finding to accomplish the goals of the committee.

Since that has not been precible, we are forced to take up your recommendation.

Please do whatever is incountry to thirminate this possenitte.

We very such appriciate your helpfulness during the existence of this committee. Naturally, we hope that at some time we will be able to reverse this action.

Please acknoledge this communication.

With perment regards and apod wishes

LWB/mdt

w

m

C

All les generaling - a philosophical

2.0. The 2017

Contification Withers Michael

Beforence: Sechlastica Builds athough 8/27/865

Boor Mr. Benefits

serior of the report of the state of the distribution of the second of t

in constanting office and states. It is excited that a constanting office and states in a constant that the fallowing conflictes indeed to the things and states and states and states and states and states are the fall and the states and states are the terms and states are the terms are the states and states are the terms are the states and states are states and rectant that states are the consistency and the states are states and rectant the states are states and the states are states a

Sincerely

Missboth Venes

Reports Analysis Division

ATTACHMEN'

### hticaal Conservative Past

#### STATEMENT

regarding the termination of this Committee and the retirement of the accumulated debt of the Committee:

At the establishment of the Committee, the needed funds for starting the work of the Committee were furnished by Bonsib, Inc., Mr. L. W. Bonsib, chairman: Mr. Bonsib was advised that a loan by a corporation was permissible under the law by members of the Federal Election Commission, counsel and others. He was also advised that the corporation might actually pay expenses, without liability to the Corporation or FEC regulations.

Since it was intended that the direct mail solicitations would quickly pay the loan and any remaining expenses, Mr. Bonsib gave only passing notice to the growing debt. This anticipation and calculation was based on former experience in fund raising for elections.

Lack of pre-election time not only prevented the success of the fund raising effort, but also repayment of initial loans. Additional debt, created by this failure, was funded by Bonsib, Inc.

Since the Committee had no other funds and since there was and is no money to repay the loan, Bonsib, Inc. has followed previous corporate practices with commercial (and/or political) accounts (NCCSA, Truman and/ other clients), and since there is no hope of collection or other means for recovery, it was decided to settle the Committee's accounts so that the Committee could cease operations thus eliminating any further expense to the Committee, Bonsib, Inc. or L. W. Bonsib.

Obviously no funds or in-kind contributions were made to any candidates or committees.

January 1, 1988

00000

17 8

CI

1.0

2.7

.

Bonsib, chairman



### FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 2001

RQ-2

WR 29 M

L. William Bonsib, Jr., Treasurer Wational Conservative Congressional Committee P.O. Box 1807 Washington, DC 20003

Identification Number: C00202143

Reference: 1986 April Quarterly (1/1/86-3/31/86), 1986 July Quarterly (4/1/86-6/30/86), 1986 October Quarterly (7/1/86-9/30/86), 30 Day Post-General (9/30/86-11/24/86) and 1986 Year End (11/24/86-12/31/86) Reports

Dear Mr. Bonsib:

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 itemisation follows:

-In a letter dated January 1, 1988 (sic), your committee stated the following:

-At the establishment of the Committee, the needed funds for starting the work of the Committee were furnished by Bonsib, Inc., Mr. L.W. Bonsib, chairman. Mr. Bonsib was advised that a loan by a corporation was permissible under the law by members of the Federal Election Commission, counsel and others. He was also advised that the corporation might actually pay expenses, without liability to the Corporation or FEC regulations.

A review of the reports filed by your committee indicates that the receipt of contributions/loans made by Bonsib, Inc. was not disclosed. Please amend your reports accordingly. You are advised that a contribution from a corporation is prohibited by the Act, unless made from a separate segregated fund established by the corporation. (2 U.S.C. \$441b(a)) If you have received a corporate contribution(s), the Commission recommends that you refund the full amount 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 in writing and provide the contributor with the eption of receiving a refund. You may wish to seek a written authorization (either before or after the transfer-out) from the donor for any transfer-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 transfersout should be disclosed on a supporting Schedule B for Line 26 or 20 of the report covering the period during which they are made.

Although the Commission may take further legal steps concerning the acceptance of a prohibited contribution, prompt action by your committee to refund or transferout the amount 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 Pederal 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.

2

Sincerely,

Elisabeth Jones Reports Analyst

Reports Analysis Division



## PEDERAL ELECTION COMMISSION

M-3

MR 20 MM

%: William Denoib, Trocourer Whitemal Concervative Congressional Countries P.O. Der 1007 Washington, BC 20003

Edentification Number: C00202143

Reference: 1907 April Querterly (1/1/07-3/31/07), 1907 Year End (4/1/07-12/31/07), 1908 April Quarterly (1/1/08-3/31/00), Suly Querterly (4/1/08-4/30/06), Cotober Quarterly (7/1/08-9/30/06) and 30 Day Post-General (10/1/08-12/0/06) Reports

Dear Mr. Densibe

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 itemisation follows:

-In a letter dated January 1, 1988 (sie), your committee stated the following:

At the establishment of the Committee, the needed funds for starting the work of the Committee were furnished by Bonsib, Inc., Mr. L.W. Bonsib, shairman. Mr. Bonsib was advised that a loan by a corporation was permissible under the law by members of the Pederal Election Commission, counsel and others. He was also advised that the Gorporation might actually pay expenses, without liability to the Corporation or FEC regulations.

A review of the reports filed by your committee indicates that the receipt of contributions/loans made by Bonsib, Inc. was not disclosed. Please amend your reports accordingly. You are advised that a contribution from a corporation is prohibited by the Act, unless made from a separate segregated fund established by the corporation. (2 U.S.C. \$441b(a)) If you have received a corporate contribution(s), the Commission recommends that you refund the full amount to the donor(s) in accordance with 11 GPR 183.3(b).

Please idders the Completion Impediately is writing and growth a photocopy of your chept for the return or branche-cut. In the past interests of the committee, all telephs and Objectors-cut should be sade within thirty they of the transcript receipt of the contribution. The 11 MR 163.3(b). Include and transfers-cut should be disclosed on a supporting debodule I for him 26 or 26 of the report severing the period during which they are made.

Although the Commission may take further legal steps concerning the acceptance of a probibited constitution, prompt action by your committee to refund or transferent the account will be taken into consideration.

0

0.0

M

200

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

Sincerely,

Elisabeth Jones

Reports Analyst Reports Analysis Division



#### FEDERAL ELECTION COMMISSION

WASHINGTON DE JOH

**m**-3

April 20, 1909

L. William Boneib Jr., Tressurer Mational Conservative Congressional Committee P.O. Box 1807 Washington, DC 20003

Identification Number: C00202143

Reference: April Quarterly (1/1/86-3/31/86), July Quarterly (4/1/86-6/30/86), October Quarterly (7/1/86-9/30/86), 30 Day Post-General (9/30/86-11/24/86) and Year End (11/24/86-12/31/86) Reports

Dear Mr. Bonsib:

0

9 2

10

3

This letter is to inform you that as of April 19, 1989, the Commission has not received your response to our request for additional information, dated March 29, 1989. That motice requested information essential to full public disclosure of your Pederal election financial activity and to ensure compliance with provisions of the Pederal Election Campaign Act (the Act). A copy of our original request is enciosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Elizabeth Jones on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,

John D. Gibson

Assistant Staff Director Reports Analysis Division

who Colon

Enclosure



### FEDERAL ELECTION COMMISSION

WASHINGTON DE AMILI

BQ-3

April 20, 1989

L. William Bonsib Jr., Treasurer Mational Conservative Congressional Committee P.O. Box 1807 Washington, DC 20003

Identification Number: C00202143

Reference: April Quarterly (1/1/87-3/31/87), Year End (4/1/87-12/31/87), April Quarterly (1/1/88-3/31/88), July Quarterly (4/1/88-6/30/88), October Quarterly (7/1/88-9/30/88) and 30 Day Post-General (10/1/88-12/8/88) Reports

Dear Mr. Bonsib:

8

SIO

200

20

00

90

m

This letter is to inform you that as of April 19, 1989, the Commission has not received your response to our request for additional information, dated March 29, 1989. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Blisabeth Jones on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,

John D. Gibeon

Assistant Staff Director Reports Analysis Division

AND Ston

Reclosure

#### TELECON

Conversation with William Bonsib FEC Representative: Lisa Stolaruk May 5, 1989

0

0

0

0

0

4

0

N

0

Mr. Bonsib returned my call this morning and explained that he did not know what the Commission wanted from his committee. He said that, after meeting with Tony Raymond and Elizabeth Jones, he submitted the late reports as well as a debt settlement statement. Then, when he thought that everything had been taken care of, he received more letters from the FEC and a letter for failure to file the 1988 Year End Report.

I explained that, since the meeting was held on December 13th of 1988, the Year End filing was probably not mentioned because it was not due to be filed until the end of January. Additionally, I noted that the letter he sent to the Commission did not suffice as a debt settlement. I briefly explained the steps that need to be addressed and noted that the Committee needed to continue filing reports until the Commission reviews and determines the legitimacy of the debt settlement. I told Mr. Bonsib that I would send a copy of the regulation to him in today's mail.

I reminded Mr. Bonsib that we have not received a response to our latest Requests for Additional Information regarding his statement that Bonsib, Inc. loaned the committee money. After discussing the statement, it appeared that Mr. Bonsib had used the term "loan" incorrectly and was instead referring to the funds advanced by Bonsib, Inc. that have already been reported as debts. I recommended that he send a letter of clarification.

Mr. Bonsib explained that his CPA has had a stroke and that he is difficult to reach by phone, but that he would attempt to get in touch with him regarding necessary filings and responses. I stated that he could call me directly if he needed any assistance.

### Marie Sangharated Sept. 32.007 Wellyder, 28 2000

Tables MACL-Res

June 15, 1989

Mr. Anthony Raymond FRC 900 B St. NW Weiblegton, D.C. 20463

Day Ton:

7

0

10

9 0 3

It is absolutely accessary that I talk with you. If you wish to have someone the in attendance when we most, that is ok. I have nothing Higgs! to discuss. Otherwise, it isn't accessary that you have another person there.

Please suply so that we may meet at an appointed hour, saving us both a lot of time. Otherwise I will have to wait you out at your office until I am able to see you.

It is absolutely necessary that we terminate the FBC matter with our company.

LWB/md

L. W. Bossib

#### TELECON

ANALYSTS: TONY RAYMOND

CONVERGATION WITH: BILL BONSIB

COMMITTEE: NATIONAL CONSERVATIVE CONGRESSIONAL COMMITTEE

DATE: JUNE 19, 1989

0

0 0 6

0

4

0

9 2

SUBJECT(S): TO SCHEDULE AN APPOINTMENT

I spoke with Mr. Bonsib and we scheduled an appointment for tomorrow (June 20, 1989) at FEC.

#### TELECON

ANALYSTS: LISA STOLARUK, TONY RAYMOND, AND ELIZABETH JONES

CONVERSATION WITH: BILL BONSIB

COMMITTEE: NATIONAL CONSERVATIVE CONGRESSIONAL COMMITTEE

DATE: JUNE 20, 1989

SUBJECT(S): NON-FILING OF YEAR END REPORT AND DEBT SETTLEMENT

Mr. Bonsib met with Lisa Stolaruk, Tony Raymond, and me to discuss the outstanding RFAI's and debt settlement. Mr. Bonsib said that he did not understand what we wanted and he wanted to get rid of his filing requirement.

Lisa explained that he needed to file the Year End, answer the Outstanding RFAI's, and file a debt settlement statement. He stated that he did not understand the RFAI's. Lisa explained that there was an inconsistency between his reports which itemized debts and his letter which stated that the Committee had received loans from Bonsib, Inc. He said that he was told by an FEC official at a large meeting at the time of the Committee was formed that it was all right for a corporation to pay the expenses of a committee. He could not remember the officials name or the location of the meeting but said he would research it.

Tony explained the solicitation requirements of non-connected committees and separate segregated funds. He explained that once the Committee solicited outside the company it became a non-connected committee and could not have a corporation pay administrative expenses.

The Bonsib reiterated what he was allegedly told by the FEC official.

Lisa explained to Mr. Bonsib that his letter of January, 1989

Odid not suffice as a debt settlement statement because it did not follow the steps outlined in the Act. Mr. Bonsib said he did not understand the Act. Tony outlined the steps needed, and both Lisa and Tony told him to include any extenuating circumstances that might influence the

Commission. Also, they explained that the Commission might not approve the debt settlement statements.

Mr. Bonsib did state that Bonsib, Inc. extends credit to others. Lisa reiterated that the Year End Report should be filed, as well as the upcoming 1989 Mid-Year Report. # TY NCCBEJ.

TELECON

ANALYST: ELIZABETH JONES

CONVERSATION WITH: BILL BONSIB

COMMITTEE: NATIONAL CONSERVATIVE CONGRESSIONAL COMMITTEE

DATE: JUNE 20, 1989

SUBJECT(S): DISPENSATION OF RESIDUAL FUNDS

Mr. Bonsib called and said that he wanted to know what to do about the residual funds. He said the Committee no longer had the \$2000. I told him that he needed to show where the money went. If it went toward the debt, the payment must be shown on Schedule D.

Mr. Bonsib said that there never was \$2000. I asked if he never had \$2000 in the Committee's bank account. He replied that there never was a bank account, only a cash account. He said the bills were paid by Bonsib, Inc.

\*

0 6

9 2 0

ANALYST: ELIZABETH JONES

CONVERSATION WITH: BILL BONSIB

COMMITTEE: NATIONAL CONSERVATIVE CONGRESSIONAL COMMITTEE

DATE: JUNE 22, 1989

0

0 0

0

0

0

9 2

SUBJECT (8): RESIDUAL FUNDS

I returned Mr. Bonsib's call. He stated that he hadn't needed to call as his CPA had taken care of the report. He said that the accountant had deducted the amount in the cash account from the amount owed to Bonsib, Inc. He asked if that were okay, but I told him I could not be sure until I saw the report. I said that I would sent him an RFAI if there were any problems.

## of the Pedant Station Commission offices, Washington, S.C. POLLOWING A MISSTON OF ANTHONY PAYMOND, BLISASSTH JOHES, AND LIBA STOCKFUK, SUPERVISER, AND SO, 1880:

#### Mational Conservative Party Congressional Committee

#### Annuary 1, 1994 Mannay

#### of 1998 Independent Political Patrice Compiles, Managines of secret and Police.

- 1. Mr. Boneib attended the first public meeting of the Pederal Election Commission and made cortain arrangements for an independent political action committee, but acting was done until it was possible for us to attempt to make manay to finance condidates.
- a. At the time of the first public meeting, a group of employees and efficials of FEC emplained the regulations, etc.
- b. It is, and was, Mr. Beneib's benest belief that he was told in the emeting that it was appropriate for a corporation to pay the start-up costs of a PAC, to reinburse the corporation later as possible.
- 2. When it seemed practical and possible for NCPCC to raise funds by mail, we began the direct mail program. One important affect on fund raising was that it was begun at a time really too late for large contributions. Although Mr. Beneib has raised funds for compaigns by mail for 50 years, he was unable to determine what was wrong with this package. The receipts fell for short of the costs and the effort was discontinued.
- 3. Obviously no funds or in-kind contributions were paid to candidates.
- 4. Since there was no one owing any amounts to the committee, and it being impossible to collect amounts due, if any, Bonsib, Inc. paid all debts of all kinds due to others by the committee, .
- 5. Correction of Error in previous statement: Centrary to the previous statement, no loans were made to or by the MCPCC. The term "loan" was used in its generic form.

Subscribed and sworn to this 20th day of June, 1989:

THE NATIONAL CONCERNMENT PARTY CONGRESSIONAL CONSCITTED PAC

L. W. Boneib, Treasurer

~

M

0

0

.0

:2

~

## POLLOWING A NEWSTRING OF ANTHONY PAYMOND, BLIZABETH JONES, AND LIBA STOCKAFUK, SUPERMISER, JUNE SD, 1989 at the Federal Elector Commission offices, Westington, D.C.:

Boneib, Inc.

#### January 1, 1988 PRVISED STATEMENT

## Disposition of assets and Debts.

- 1, Correction of Error in previous statement: Centrary to the previous statement, no loans were made to any organization or person by or to the MCPCC Federal Election Commission. The term "loan" was used in its generic form.
- 2. Since the direct mail solicitations were unsuccessful and the committee had no other funds to repay the loan, Bonsib, Inc. wrote off all debts in full. The same practice was followed in this case as with a previous political account. It was determined that there was no possibility of collection, therefore there was no possibility of a Corporate contribution to the PAC.
- 3. Because of the debt Bonsib, Inc. has incurred by assuming the debts of the PAC, there was and is no possibility of there being a contribution by Bonsib, Inc. to the PAC.

Subscribed and sworn to this 20th day of June, 1989:

Lusail

1.. W. Bonsib, Chairman

hv

| page | 013 |
|------|-----|

HEP TH'OF THE THE THE SECOND THEMS

THE REAL PROPERTY OF THE PERTY OF THE PERTY

M \_ 1 2 7 / TO THE STREET, IN SAID NATJONAL COMSERVATIVE CONGRESSIONAL CONNITTEE Ther are about | | Check & attended then presently right 88 C00202143 E WE had 20 GOOS IASTINGTON. D.C. POOLS 4. TYPE OF REPORT (a) April 15 Quarterly Report Sty Report Due On 00 Pobruery 20 O (X July 15 Querterly Report 0 October 18 Quarterly Report [1] January 31 Year End Report Twelfth day report proc (Type of Election) July 31 Mid Year Report (Non-election Year Only) Thirtieth day report following the General Electro-Termination Report in the State of \_ L YES NO is this Report an Amendment? SUMMARY **COLUMN A** COLUMN B This Period inder Year-to-Det Covering Period 1-1-89-Cash on Hand January 1, 19 49 (a) \$ :2634.28 85. PEAS (6) Cash on Hand at Beginning of Reporting Period 1.0 (c) Total Receipts (from Line 18) 0.00 0.00 Subtotal (add Lines 6(b) and 6(c) for Column A and \$ 0.00 Lines 6(a) and 6(c) for Column (1) 3.00 Toto Disbursements of amitimo (26) \$ 45. PEAS 85.4EAS Cash on Hand at Closs of Reporting Period (subtract Line 7 from . G(d)) \$ 0.00 2.m For further information Det 4 and Obligations () wed TO the Committee S (Her ize all on Schedule: C and/or Schedule Li) 0.00 Federal Election ( Debis and Obligations Owed BY the Committee 999 E Street, NW (Ho: Je all on Schedule C and/or Schedule I)) Washington, DC 20463 Toll Free 800-424-9530 10A75A. 10 I certify hat I have examined this Report and to the best of my -nowledge and belief it is true, correct and con plete Local 202-376-3120 Type or I ant Name of Treat and Signatur of Treas 7-15-69

NOTE. Sur mission of false a money is, or incomplete information may see out the person signing this Report to the penalties of 2 U.S.C. §437;

F

EC FORM

(revised

## Charles Charles Not

|  |         | Brand Krana |                 |
|--|---------|-------------|-----------------|
| MATTANA CAMPERNATE CAMPERSTANA   | Page    | Str.        |                 |
| COMMITTEE  | GOLLONA |             |                 |
| 1. CONTRIBUTIONS (other than bons) PROM:   |         |             |                 |
| (a) Inchibutes/Persons Other Than Political Committees   |         |             |                 |
| (i) Nomiced (use Schedule A)   | 8:38    | 8:88        |                 |
| All Total of contributions from individuals  | 0.00    | 8.00        |                 |
| (b) Political Party Committees   | 0.00    | 0.00        |                 |
| (d) Other Political Committees (such as PACs)  | 0.00    | 0.00        |                 |
| 10 TOTAL CONTRIBUTIONS (add 11(a)(III), (b), and (c))  | 9.00    | 0.00        |                 |
| 2. TRANSFERS FROM APPILIATED/OTHER PARTY COMMITTEES  | 0.00    | 0.00        |                 |
| 13. ALL LOANS RECEIVED   | 0.00    | 0.00        |                 |
| 4. LOAN REPAYMENTS RECEIVED  | 0.00    | 0.00        |                 |
| IS. OFFSETS TO OPERATING EXPENDITURES (Relunds Rebates, etc.)                                      |         |             |                 |
| 16. REPUNDS OF CONTRIBUTIONS MADE TO PEDERAL CANDIDATES  | 0.00    | 0.00        |                 |
| AND OTHER POLITICAL COMMITTEES   | 0.00    | 0.00        |                 |
| 17. OTHER RECEIPTS (Dividends, Interest, etc.)   | 0.00    | 0.00        |                 |
| 18. TOTAL RECEIPTS (and 11(d), 12, 13, 14, 15, 16 and 17)  | 0.00    | 0.00        |                 |
| M. CHEBURSEMENTS   | نِا     |             |                 |
| 19. OPERATING EXPENDITURES   | 0.00    | 0.00        |                 |
| 20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES   | 0.00    | 0.00        |                 |
| 21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES                             | 0.00    |             |                 |
| 22. INDEPENDENT EXPENDITURES (use Schedule E)  |         | 0.00        | TANKS DE        |
| 23 COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES   | 0.00    | 0.00        |                 |
| (2 U S.C. 441a(d)) (use Schedule F).   | 0.00    | n.nn        |                 |
| 24 LOAN REPAYMENTS MADE  | 35.4665 | 85.4665     |                 |
| 25 LOANS MADE  | 0.00    | 0.00        |                 |
| 26. REFUNDS OF CONTRIBUTIONS TO:   |         |             |                 |
| (a) Individuais/Persons Other Than Political Committees  | 0.00    | 0.00        |                 |
| (b) Political Party Committees   | 0.00    | 0.00        |                 |
| (c) Other Folitical Committees (such as PACs)  | 0.00    | 0.00        | -               |
| (d) TOTAL CONTRIBUTION REFUNDS (add 26(a). (b), and (c))   | n.nn    | 0.00        |                 |
| 27 OTHER DISBURSEMENTS   |         |             |                 |
| 28 TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)                              | 2126.25 | 2424.24     | - Mines         |
| M. NET CONTRIBUTIONS/OPERATING EXPENDITURES  |         |             |                 |
| 29 TOTAL CONTRIBUTIONS (other than loans)( from Line 11(d))  | 0.00    | 0.00        |                 |
| 30 TOTAL CONTRIBUTION REFUNDS (from Line 26(d))  | 0.00    | 0.00        |                 |
| 31 NET CONTRIBUTIONS (other than loans)(subtract Line 30 from 29)                                  | 0.00    | 0.00        | William Service |
| 12 TOTAL ODERATING EVERNOUTINES ALL LAND   |         |             |                 |
| 22 TOTAL OPERATING EXPENDITURES (from Line 19) 33 OFFSETS TO OPERATING EXPENDITURES (from Line 15) | 2.00    | 0.00        |                 |
| 34 NET OPERATING EXPENDITURES (subtract Line 33 from 32)   | 0.00    | 0-00        | 114-114         |
| THE STEER AND EAST ENDIT ONES (SUBTRACT LINE 35 HOUR SE)   | 0.00    | 0.00        |                 |

water 4

040900079

| CONSTALL CONTINUE CONTRETERORY   |                     | 255                  | Έ        | - TELE-   |
|--|---------------------|----------------------|----------|-----------|
| POISS THE.  POY 1877  POY  | 9111-5 <b>-9-36</b> | •0-00                | 02634.23 | 30475-30  |
| Paid of all Balance of Constitutions   |                     |                      |          |           |
| 6. I de Marier. Alader : dabberge and c'ar Gode al Ibilitie in Cen.  | •••                 |                      |          |           |
| Post on set Ebrist (Postuper)  |                     | 1.11<br>1.10<br>1.10 |          |           |
| 1. Your Rame: Marring Aubbris and 24t Code of Debton in Con  |                     |                      |          |           |
| Pasticia se Carago (Paragones)   |                     |                      | 1        |           |
| 10 1 Service Mening distribute and Eq. Craft of Politics on Con  | <b>1600</b>         |                      |          |           |
| Byonic Alberta (Processe)  | l                   |                      | T        |           |
| to a figure Minima Albanica and Sai Carbo of Ebelies as Cit  | Polotess            | •                    |          |           |
| Marian of Albert Mineron 1   |                     | 1                    | <u> </u> | Ţ.        |
| f of a Section Africance stage out and the Cambrast Chapters on Con  | oglete :            |                      |          |           |
| No. 1 mars 1 m   | . •                 | <del></del>          |          |           |
| to the second se |                     |                      |          | . 62.4.59 |
|  | . top fart page of  | . <u> </u>           |          |           |

### SEMI-ANNUAL

## REPORT NOTICE

#### FEDERAL ELECTION COMMISSION

PARTIES AND PACE

July 7, 1987

THE MET FILE

ALL PARTY CONSUTTERS AND PACE (MONCONNECTED CONSUTTERS AND SEPARATE SEGREGATED FUNDS) must file a report in July.

#### DEPOSITION DOTTO

00000

0

0

N

<u>Semiannual</u>. The Mid-Year Report is due July 31 and must disclose financial activity that occurred from January 1 through June 30, 1987. Committees which have previously filed 1987 reports should only report activity from the closing date of the last report filed.

Monthly. If the committee chooses to file on a monthly basis, the next monthly report is due July 20 and must disclose financial activity from June 1 through June 30, 1987. Monthly reports are due by the 20th of each month and cover all financial activity of the previous month.

#### WAT MOST BE INFORMED

A report must disclose all receipts and disbursements (not previously reported) 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.

#### MEETS AND BOW TO FILL

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 should be made directly on the label.

#### CHANGE IN FILING PROQUENCY

Committees that wish to change their reporting schedule (for example, from monthly to semiannual) 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.

#### COMPLETANCE

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.

(QVEE)

#### 1987 UPCOKING FILING SCHEDULE PARTIES AND PACE

00

0 0

0

0

0

4

2 0

0

Retain this report notice for future reference. The next notice will be sent December 18, 1987. Also, see the January 1987 issue of the FEC Record, which lists 1987 reporting dates.

| CONTACTOR PER | 230               | Reg./Cert.         |                   |
|---------------|-------------------|--------------------|-------------------|
| Report        | Period Covered 1/ | Mailing<br>Date 2/ | Filing<br>Date 2/ |
| Mid-Year      | 01/01 - 06/30     | 07/31/07           | 07/31/87          |
| Year-End      | 07/01 - 12/31     | 01/31/88           | 01/31/88          |

| Report    | Period Covered 1/ | Reg./Cert.<br>Mailing<br>Date 2/ | Filing Date 2/ |
|-----------|-------------------|----------------------------------|----------------|
| July      | 06/01 - 06/30     | 07/20/87                         | 07/20/87       |
| August    | 07/01 - 07/31     | 08/20/87                         | 08/20/87       |
| September | 08/01 - 08/31     | 09/20/87                         | 09/20/87       |
| October   | 09/01 - 09/30     | 10/20/87                         | 10/20/87       |
| Hovember  | 10/01 - 10/31     | 11/20/87                         | 11/20/87       |
| December  | 11/01 - 11/30     | 12/20/87                         | 12/20/87       |
| Year-End  | 12/01 - 12/31     | 01/31/88                         | 01/31/88       |

 $<sup>1/\</sup>lambda$  newly registered committee should refer to "MEAT MUST BE REPORTED," on the reverse side.

<sup>2/</sup> Reports sent by certified or registered mail must be postmarked by the mailing date. Reports mailed first class or hand delivered must be received by the filing date.



### FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20063

RQ-7

DEC 7 1987

L. William Bonsib, Jr., Treasurer Wational Conservative Congressional Committee P.O. Box 1807 Washington, DC 20003

Identification Number: C00202143

Reference: Mid-Year Report (4/1/87/-6/30/87)

Dear Mr. Bonsibe

8

0

0

...

->

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, MM, 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 Joseph Pennington on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

John D. Gibeon

Assistant Staff Director Reports Analysis Division

hun 460~

page\_L\_ of\_L

### YEAR-END

## REPORT NOTICE

#### FEDERAL ELECTION COMMISSION

PARTIES AND PACE

December 18, 1987

THE MEET FILE

ALL PARTY CONSISTEES and PACS (MON-CONSISTED CONSISTEES AND SEPARATE SEGMEGATED FUNDS) must file a Year End Report in January.

#### PERCETTING PATES

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.

#### WAS 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.

#### WEEKS AND BOW TO FILE

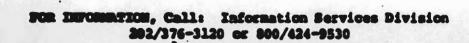
Committees should consult the instructions on the enclosed FEC Form 3x for details. Affix the peel-off label from the envelope to line 1 of the report. Any corrections in the information should be made directly on the label.

#### CHANGE IN FILING PREQUENCY

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.

#### CONTAINER

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.





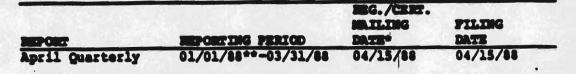
#### QUARTERLY

## REPORT NOTICE

#### FEDERAL ELECTION COMMISSION

PARTIES AND PACE

March 22, 1988



#### WED MINT FILE

PARTY CONSITTEES AND PACE (MONCONNECTED CONSITTEES AND SEPARATE SEGMEGATED FUNDS) filing on a quarterly basis must file their next report in April.

#### WEST BE THE TARM

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

#### MEPORPTING PORMS

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

#### WEEK TO FILE

Consult the instructions on the back of the Form 3% Summary Page. Note state filing requirements also.

#### LARET

4

0

0

0

0

9

0

0

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

#### PER-ELECTION IMPORTING

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

#### LAST-MINUTE DESPRESSIVE 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

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

<sup>\*</sup>Reports sent by registered or certified mall must be postmarked by the mailing date. Otherwise, they must be received by the filing date.

<sup>\*\*</sup>From the date of registration, of the close of books of the last report filed, whichever is later.

## **GUARTERLY**

## REPORT NOTICE

Page 1 of

#### FEDERAL ELECTION COMMISSION

PARTIES AND PACE

June 21, 1988

|                |                     | MEG./CERT.       |                |
|----------------|---------------------|------------------|----------------|
| REPORT         | REPORTING PERIOD    | MAILING<br>DATE* | FILING<br>DATE |
| July Quarterly | 04/01/88**-06/30/88 | 07/15/88         | 07/15/88       |

#### WHO MUST PILE

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

#### WEAT MUST BE REPORTED

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

#### REPORTING PORMS

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

#### WHERE TO PILE

Consult the instructions on the back of the Form 3X Summary Page. Mote state filing requirements also.

#### LARRI

2

0

0

00

0

0

4

0

N

0

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 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.

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

<sup>\*\*</sup>From the date of registration, or the close of books of the last report filed, whichever is later.

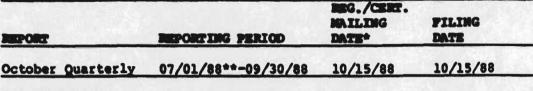
# REPORT NOTICE

page | of

#### FEDERAL ELECTION COMMISSION

PARTIES AND PACS

September 21, 1988



#### WHO MINT FILE

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

#### WAT MUST BE DEPOSTED

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

#### REPORTING PORMS

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

O

8

0

0

0

0

0

4

0

N

0

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.

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

<sup>\*\*</sup>From the date of registration, or the close of books of the last report filed, whichever is later.



### FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 2006)

**20-7** 

Movember 8, 1988

L. William Bonsib Jr., Treasurer Wational Conservative Congressional Committee P.O. Box 1807 Washington, DC 20003

Identification Number: C00202143

Reference: 1987 Year End (7/1/87-12/31/87), 1988 April Quarterly (1/1/88-3/31/88), 1988 July Quarterly (4/1/88-6/30/88) and 1988 October Quarterly (7/1/88-9/30/88) Reports

Dear Mr. Bonsib:

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 Reports of Receipts and Disbursements. You were notified previously of the due dates for these reports.

It is important that you file these reports immediately with the Federal Election Commission, 999 E Street, WW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). Copies of the reports 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 regarding this matter, please contact Elizabeth Jones on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

John D. Gibson Assistant Staff Director Reports Analysis Division

#### TELECON

ANALYST: ELIZABETH JONES

COMMITTEE: NATIONAL CONSERVATIVE CONGRESSIONAL COMMITTEE

SPOKE WITH: RECEPTIONIST AT BONSIB, INC.

DATE: 12/5/88

8

0

0 6

0

0 4

9 2

SUBJECT: NON-FILING OF REPORTS

I spoke with the receptionist who said that Mr. Bonsib was out, but that she would have him return my call. I gave her my telephone number.

THE EDI

Page\_L\_ of ]

ANALYST: ELIZABETH JONES

COMMITTEE: MATERNAL CONSERVATIVE CONSRESSIONALL CONNITTEE

SPOKE WITH: RECEPTIONIST

DATE: 12/8/89

8

0

0 6

0

4

0

9 2

SUBJECT: NON-FILING OF REPORTS

I tried to call Mr. Bonsib again. The receptionist told me that he wasn't in, but he would return my call.

\$ type NCC3EJ.;4

TELECON

ANALYSTS: TONY RAYHOND AND ELIZABETH JONES

COMMITTEE: NATIONAL CONSERVATIVE CONGRESSIONAL COMMITTEE

SPOKE WITH: L. WILLIAM BONSIB

DATE: 12/13/88

SUBJECT: NON-FILING OF REPORTS

Mr. Bonsib said that he had had trouble filing the reports because he had been involved in a law suit. He said that none of the figures had changed since his previous filing.

Tony explained that Mr. Bonsib still needed to file the omitted reports for the public record. He told Mr. Bonsib that one report covering 4/1/87 through 12/31/87 would satisfy the requirements for 1987, but that five reports covering 1/1/88-3/31/88, 4/1/88-6/30/88, 7/1/88-9/30/88, 10/1/88-12/8/88, and 12/9788-12/31/88 would be needed for 1988. Mr. Bonsib mas told to file Summary and Detailed Summary Pages and a Schedule D for each report unless changes were made in the Committee's activities. He said he would comply.

Mr. Bonsib was given a C Index for his communities on which Tony outlined everything that needed to be filed and Dank FEC Forms 3%.

- The RAD analysts explained that it was necessary to file the omitted reports. Additionally, the analysts explained that if the Committee settled any of its outstanding debts, it would have to file debt settlement statements.
- ON Mr. Bonsib said he would file the necessary reports.

2 0

0

0

Page 1 of 2

No. of Parts

Daniel Design

|                   |   | The same of the sa |                        |                      |
|-------------------|---|--|------------------------|----------------------|
|                   |   | electron   |                        |                      |
| •                 | See Asset on Americant (1) this (2) to  | •  |                        |                      |
| 00                | - Ang Parks   | SECTION A  | -                      | Toron                |
|                   |   |  | NAME OF TAXABLE PARTY. |                      |
| (11)              | Cost on Hard James 1, 18.57   |  | 2 203                  | 18.00                |
| (1)               | Coath on Hand darway 1, 10, 102.  | 8 '2434.54   | **                     | 4-84                 |
| (c)               | Coath on Hand at Buglinning of Repeating Parlack                                | 8 20.00<br>8 D.00  | **                     | 0.00                 |
| (m)<br>(c)<br>(d) | Coath on Hand at Bughnship of Reporting Period                                  |  |                        | 1                    |
| (4)               | Coath on Hand at Bughning of Repeating Period                                   | 8 0-00   | 8                      | 0.00                 |
| (d)<br>To         | Coath on Hand at Baglinstop of Repeating Portacl  Total Receipts (from Line 10) | \$ D.00<br>\$ D.00   | 8<br>8<br>8            | 0.00                 |
| (d)<br>Te         | Cosh on Hand at Bughesing of Reputing Parises  Total Receipts (from Line 10)    | \$ 0.00<br>\$ 0.00<br>\$ 0.00  | 8<br>8<br>8            | 0.00<br>0.00<br>0.00 |

2 5

THE FURNISH

32/33/8A

Ameliani a 60

| promise the state of the state  |  | B 6-34-  |
|--|--|--|
| CONTRACTOR OF THE PARTY OF THE  | <b>夏</b> 尔   | THE VIEW   |
| T. COMMONICAL MAN SAN MINE VIEW  | · .  | , , ,  |
| to be to the trans one by his post of the contract of the cont |  |  |
| ( Territori fen Balantin I):   | がある。<br>・ ・ ・ ・ ・ ・ ・ ・ ・ ・ ・ ・ ・ ・ ・ ・ ・ ・ ・  | COLUMN TO SERVICE AND ADDRESS OF THE PARTY O |
|  | A THE PARTY OF THE |  |
| Portrail Party Committees.   | A  | - COO -  |
| Cher Political Committees (such as PARIs)  |  | -4-40 -  |
|  |  |  |
| 8. Therefore from appliated other party committees   |  |  |
| S. ALL LOANS RECEIVED  |  | 0.00   |
| 4. LOAN REPAYMENTS RECEIVED  |  | 0.00   |
| IS. OFFEETS TO OFERATORS EXPENDITURES (RANGE/Rations, etc.)  |  | 0.00   |
| IL REPLACE OF CONTRIBUTIONS MICE TO PEDERAL GAUDDATES  |  |  |
| AND OTHER POLITICAL COMMETTEES   |  |  |
| 17. OTHER RECEIPTS (Childends, Interest, etc.)   |  | 0.00   |
| 18. TOTAL RECEIPTS (mid 11(4), 12, 15, 14, 15, 16 and 17)  | A PROPERTY OF  |  |
|  |  |  |
| IS. OPERATING EXPENDITURES   |  |  |
| IS. TRANSFERS TO APPLIATEDICTHER PARTY COMMITTEES  |  | 0.00   |
| H. CONTRIBUTIONS TO PEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES  |  | - B-00   |
| 12. INDEPENDENT EXPENDITURES (uso Substitute E)  |  | - Control of   |
| 2. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES   | A-00   |  |
| (2 U.S.C. 441e/d)) (use Schedule P)  | 0.00   | 0.04   |
| M. LOAN REPAYMENTS MADE  |  |  |
|  | 0.00   |  |
| IS. LOANS MADE   | 0.00   | 0.00   |
| IS. REFUNDS OF CONTRIBUTIONS TO:   |  | 1  |
| (a) Individuals/Persons Other Than Political Committees (b) Political Party Committees   | 0.00   | 0.00   |
| (c) Other Political Committees (such as PACe)  | 0.00   | 0.00   |
| (d) TOTAL CONTRIBUTION REFUNDS (add 28(a), (b), and (c))   | 0.00   | 0.00   |
| 17. OTHER DISBURGEMENTS  |  | SCHOOL SECTION AND ADDRESS OF THE PARTY OF T |
| 19. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 20(d)   | 0.00   | 0.03   |
| and 27)  | 0.00   | 0.00   |
| EL NET CONTRIBUTIONS/OPERATING EXPENDITURES  |  |  |
| 9. TOTAL CONTRIBUTIONS (other than leane)( from Line 11(d))  | 0.00   | 0.00   |
| IO. TOTAL CONTRIBUTION REPUNDS (from Line 2016)  | 0.00   | 0.00   |
| 11. MET CONTRIBUTIONS (ether than leans)(subtract Line 30 from 39).  | 0.00   |  |
| 12. TOTAL OPERATING EXPENDITURES (from Line 18)  | 2.00   | - B- BD  |
| D. OFFSETS TO OFERATING EXPENDITURES (from Line 18)  | 0.00   | 0.00   |
| M. NET OPERATING EXPENDITURES (outstreet Line 39 from 32)  | ALL THE MAKE THE   | STATE OF THE PARTY |

FEC FORM X

|             | Constanty Playant 1974-197  | 0          | Manager D Ady I                                |                   | Course<br>Course         |
|-------------|---|------------|--|-------------------|--------------------------|
|             | r 16 Charlerly Players y 31 Year Brid Players   | [] Test    | fay 89 (7) Bajis<br>In day report proceeding , |                   | - Annany                 |
|             | Mid Year Papert Plan-shellen Your Criss   | ****       | n en   | (f)s<br>in the Su | so o' Chadlen)           |
|             |   | [ ] Thurse | th day report followin                         | 0 Po Co           | Me I Boch                |
| Torre       | ation Report  |            | m the Buts                                     |                   |                          |
|             |   |            |  |                   |                          |
| 0 946       | Report on Amendment 1 VES Ly  | NO         |  |                   |                          |
| Cc. ng Pa   | or I-1- Tomb 3  | - 31-81    | COLUMN A                                       | Culoni            | OLUMN B                  |
| (a) Cosh    | on Hand January 1, 10_87  |            |  | 8 2 6 3           | 4.28                     |
|             |   |            | 85.PEAS  |                   |                          |
| (b) Cash    | on Hand at Beginning of Reporting Period  |            | and the second second                          |                   |                          |
|             | on Hand at Bagarang of Haparang Penad.  |            | 0.00   | 8                 | 0.0                      |
| IC: Total I | Receipts (from Line 18)<br>iai (add Lines 8(b) and 8(c) for Column A and  | 8          |  | 8                 |                          |
| IC: Total I | Recepts (from Line 18)  | 8          | 0.00   |                   | ٥٠:                      |
| ic Tetal i  | Peccepts (from Line 16)<br>ini (add Lines 6(b) and 6(c) for Column A and<br>Lines 6(a) and 6(c) for Column 8)   |            | 0.00   | 8                 | 0.0<br>0.0<br>0.0<br>2.0 |
| (c) Tetal ( | Receipts (from Line 18)  (a) (add Lines 6(b) and 6(c) for Column A and Lines 6(b) and 6(d) for Column B)  (a) (from Line 38)  (d at Close of Reporting Period (subtrast Line 3) | 8          | 00.00<br>00.00<br>00.00<br>85.4685             | 8                 | 3.0                      |
| To Jesteria | Recepts (from Line 16)  ai (add Lines 6(6) and 6(c) for Column A and Lines 6(a) and 6(c) for Column 8)  sements (from Line 80)  d at Close of Reporting Period (subtrest Line 2 | 8          | 0.00   | 8                 | 9.0<br>9.0<br>2.34.6     |

| The second secon | k *** | 10. 37                       |
|--|-------|------------------------------|
| THE HE SHE WAS AND THE WAS AND ADDRESS OF THE PARTY OF TH | 42    | the property of              |
| The state of the s |       |                              |
| Carlo  |       |                              |
|  |       |                              |
| A the problem to tellion   | 0.00  |                              |
| Constitution of the consti | 0.00  | 0.00                         |
| TOTAL CONTRACTOR SAIL PLACE, St. and (c)   | 8.00  | 0.00                         |
| 12. TRANSPERS PROM APPLIATES CHIST FABRY SCHOOTTES   | 0.00  | 0.00                         |
| 18. ALL LONIS RECEIVED   | 8.00  | 0.00                         |
| 14 LOAN REPAYMENTS RECEIVED  | 0.00  | 0.00                         |
| 15 OFFEETS TO OFERATION EXPENDITURES (Rehards, Potentes, etc.)   | 0.00  | 0.00                         |
| 16. NOPUNDS OF COMPINEUTIONS MADE TO PEDENAL CANDIDATES  | 0.00  | 0.00                         |
| 17 OTHER RECEIPTS (Chidends, Interest, etc.)   |       |                              |
|  | 0.00  |                              |
| 18. TOTAL RECEIPTS (add 11(4), 18, 18, 14, 16, 16 and 17)  | 2.50  | 0.00                         |
| 19 OPERATING EXPENDITURES  |       |                              |
|  | 0.00  | 0.00                         |
| 20. TRANSPERS TO APPLIATEDIOTHER PARTY COMMITTEES  | 0.00  | 0.00                         |
| 21. CONTRIBUTIONS TO PEDERAL CANDIDATES AND OTHER POLITICAL CONDITTIES   | A.00  | 0.00                         |
| 22 INDEPENDENT EXPENDITURES (uso Sciedulo E)   | 0.00  | 0.00                         |
| 23 COOPDINATED EXPENDITURES MADE BY PARTY COMMITTEES   |       |                              |
| @USC. 441atal Ago Briendo F).  | 0.00  |                              |
| 24 LOAN REPAYMENTS MADE  | 0.00  | 0.00                         |
| 25 LOANS MADE  | 0.00  | 0.00                         |
| M REPUNDS OF CONTRIBUTIONS TO:   |       |                              |
| (a) Individuals/Pernora Other Than Political Committees  | 0.00  | 0.00                         |
| (b) Political Party Committees   | 0.00  | 0.00                         |
| (4) TOTAL CONTRIBUTION REPUNDS (and 20(a), (b), and (c))   | 0.00  | 0.00                         |
| 27 OTHER DISBURSEMENTS   |       | THE PERSON NAMED IN COLUMN 1 |
| 20 TOTAL DISBURGEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d)  | 0.00  | 0.00                         |
| grd 27)  | 0.00  | 0.00                         |
| M. HET GOOTTEN HEND CO-WANTED ENGINEETUNES   | 0.00  |                              |
| TOTAL CONTRIBUTION REPUBLISHED LINE (194)  | 2.00  | 0.00 -                       |
| 11 NET CONTRIBUTIONS (other than learning about Line 30 from 21)   | 0.00  | 0.00                         |
|  | ų.    | S. C.                        |
| 70 LOLYT OLEVYLING ETAENOLINGES WIND THE IN  | 7.00  | 3.00                         |
| A. OFFSETS TO OPERATING EXPENDITURES from Line 15)   | 0.30  | .00                          |

|       |       |  | 14.4-1 T   | THE PROPERTY AND ADDRESS OF THE PERSON NAMED IN COLUMN TWO |
|-------|-------|--|--|--|
|       | ŗ.    |  | The state of the s |  |
|       | 45    |  | Electric   |  |
| ي. ري | No.   |  |  |  |
|       | 7     |  | District Co.   | B === .  |
|       | E     |  | Barre Barre  |  |
|       | E     |  |  | (Approximate)  |
|       | 13    |  |  | , in the Case of Case  |
|       | . [   |  | with the   |  |
|       |       |  | 4  |  |
|       |       | 11. Take 4 100 for   | - Office A   | OCUME S  |
| _     | -     | Cash on Hand January 1, 19, 572  |  | 4 2624 - 24  |
|       | •     | Cook on Hand at Beginning of Reporting Parties                                   | 8 8434-S8  |  |
|       | (44   | Total Receipts (from Line 10)  | 8 9.80   | 30.0   |
|       | 10    | Subtated (add Lines 1994) and 1994 for Opheron A and                             | \$ 0.00  | 8 0.00   |
| 7.    | Tex 1 | Debursements (from Line 26)  | 8 0.00   | 8 3.00   |
| 0.    | 0     | on Hand at Class of Reporting Ported (subtract Line 7 from Line 6(d)) .          | 8 2834-50  | 35.4665 8  |
| •     | Det ( | and Colgations Creed TO the Commisses<br>on all on Bahadulo C andler Bahadulo D) | \$ 0.00  | No later Assessed  |
| 10    | Deb e | and Colgations Owed BY the Committee   |  | Reduced Blacken Comm   |

Type or I at Name of Tressure

A STATE OF THE PERSON NAMED IN

Cur Domit

48/E: \56

Whetheren, DC 2045; The Prop 80' 424-653; Lead 207-37:-3120

NOTE Su which of later, error our or incomplete information may subject the person arguing this Report to the parallels of 2 U + C. \$437.

PEC FORM (

page 2 of 2

|  |  | THE PERSON   |
|--|--|--|
|  |  | 1  |
| The state of the s |  |  |
| The second secon |  |  |
| The same of the sa | 20 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1   | The same of  |
|  | major at the second  | WE A CONTRACT OF THE PARTY OF T |
|  | 10   | Water Art  |
|  |  | X AV   |
| THE PERSON APPLIATED TO THE PERSON AND THE PERSON APPLIATED TO THE PERSON APPL | MARKET STREET  |  |
|  | Miles & Arminan  |  |
| the state of the s |  |  |
| LOS CONTRACTOR CONTRACTOR  |  |  |
| and the second second  | The state of the s |  |
| A continues of transmitted by a continue of the continue of th |  |  |
| The state of the s |  |  |
| Onen recerts characteristics   | The state of the s | ALCOHOL: NAME OF THE OWNER,  |
|  |  |  |
| TOTAL HOLD TO COMPANY TO THE REAL PROPERTY   |  | 0.00   |
|  |  | Market Company   |
| CPENATING DIPENDITURES   |  | G-AG   |
| A TRANSFERS TO APPLIATEDIOTHER PARTY COMMITTEES  |  | G-BD.  |
| CONTRIBUTIONS TO PEDERAL CANDIDATES AND OTHER  |  | 0.00   |
| . HOSPENDENT EXPENDITURES and Extended ED  |  | The same of the sa |
| . COORDINATE J EXPENDITURES MADE BY PARTY COMMITTEES   | 0.00   |  |
| E U.S.C. 441still) have Behadde F).  | 0.00   | n.na.  |
| 4. LOAN REPAYMENTS MADE  | 0.00   | 0.02   |
| LOAMS MADE   |  |  |
| . REPUBLIC OF CONTINEUTIONS TO:  | 0.00   | 0.00   |
| tal Individuals/Persons Other Than Political Committees  | 0.00   | 0.00   |
| (b) Political Party Committees   | 0.00   | 0.00   |
| (d) TOTAL CONTRIBUTION REPUNDS (and St(a), (b), and (c))   | 0.00   | 0.00   |
| COTHER DISSURSEMENTS   |  |  |
| I. YOYAL DISSURSEMENTS (add 10, SD, ST, SE, SA, SA, SA, SA,  | 0.00   | 0.03   |
| end 27)  | 0.00   | 0.00   |
| TOTAL CONTROLLINGS (other than benefit than Line 1166).  |  | 0.00   |
| . NOTAL CONTROL TROU REPUBLIS (Notal Line 1916)  |  | 4.00   |
| . NET CONTINUITIONS serve than benefit about like 30 from 20.  | STREET N. BERNELLE   |  |
| . TOTAL OPERATING EXPENDITURES (Sup Life 18)   | 0.00   | 0.00   |
| OPPETS TO CHERATING EXPENDENTIAL COMPLETE STATE OF THE LED 18)   | Service W. Maries N.   | 0.00   |
| M. NET CPERATING EXPENDITURES (SAME) LINE AS SOME SEE  |  |  |

|  | 12.70  |             |                                       |  |                                    |
|--|--|-------------|---------------------------------------|--|------------------------------------|
| ( Ady 16 Constanty Report  |  |             | 40 D                                  |  | -                                  |
| A come to come to come   |  |             |                                       |  |                                    |
| -  |  | -           | y report properties                   |  |                                    |
| - C and the tree Report Po   |  |             |                                       |  |                                    |
|  | ALC:   | 1           |                                       |  |                                    |
| C Broketin Breek   | 74   |             |                                       |  |                                    |
|  |  |             |                                       |  |                                    |
| (b) to this Report on Amendmen   | er 🗆 ws 📮 no   |             |                                       |  |                                    |
| (b) to this Report on Amendmus  OUR  Conv. ring Parisol. 7-1-1   | 10 10 Q 10<br>10 Q 10<br>11 10 Q 10  |             | GLIMBI A<br>Morvage                   | 00   | LUBBIN D                           |
|  | 17 1 400 1 400<br>1000 1 400<br>10 |             |                                       | 000  | Yes-10-0                           |
|  | 42   |             | 2434.24 ×                             | Ottoda   | Yes-10-0                           |
| (a) Cash on Hand Jenuary 1, 1  | 42   |             | 2434.24<br>2434.24                    | Ottoda   | Yes-10-0                           |
| (a) Cash on Hand January 1, 16 (b) Cash on Hand at Beginning   | of Reporting Plates  O Column A and  |             |                                       | Ottoda   | - 28                               |
| (a) Cash on Hand Jenuary 1, 16 (b) Cash on Hand at Beginning (c) Total Receipts (from Line 16 (d) Subtatal (add Lines 6(b) an  | d Reporting Parties  Of the Column A and   |             | 0.00                                  | 8 8634   | 0.0                                |
| (a) Cash on Hand Jenuary 1, 16 (b) Cash on Hand at Beginning (c) Total Receipts (from Line 16 (d) Substati (add Lines 6(b) and Lines 8(a) and 8(b) for Tes: Disbursements (from Line 36  | d Reporting Parties  Of the Column A and   | 8           | 0.00                                  | \$ 2434<br>\$ 1  | 0.0                                |
| (a) Cash on Hand Jenuary 1, 16 (b) Cash on Hand at Beginning (c) Total Receipts (from Line 16) and (d) Subtatel (add Lines 8(b) and Lines 8(b) and 8(b) for Total Debuttements (from Line 38 Cash on Hand at Clase of Reports  | ed Reporting Plated  d O(a) for Column A one or Column B)  | 8           | 0.00<br>0.00                          | \$ 2434<br>\$ 3<br>\$ 5  | 0.0                                |
| (a) Cash on Hand Jenuary 1, 16 (b) Cash on Hand at Beginning (c) Total Receipts (from Line 16) and Lines 8(a) and 8(a) for Lines 8(a) and 8(a) for Total Debursements (from Line 36 Cash on Hand at Class of Reports Det 1 and Collegations Owed TO 8 (file- are all on Behedule C a Alex 1                                      | of Reporting Ported  d O(a) for Column A and or Column B)  Ty Ported (subtrest Line 7 from Line O(d)) The Committee Schedule D)  | 8 8 8       | 0.00<br>0.00<br>0.00<br>0.00<br>0.00  | S CASA  S  S  For Lorder  Particular  Part | 0.0<br>0.0<br>0.0<br>0.0<br>0.0    |
| (a) Cash on Hand Jenuary 1, 16 (b) Cash on Hand at Beginning (c) Total Receipts (from Line 16) and (d) Subtatel (add Lines 6(b) and Lines 8(b) and 6(b) for Total Debureaments (from Line 36 Cash on Hand at Close of Reports Det 1 and Chigations Cued TO 6 (to-120 at on Schoolute C analys) (to-120 at on Schoolute C analys) | of Reporting Ported  d O(a) for Column A and or Column B)  Ty Ported (subtrest Line 7 from Line O(d)) The Committee Schedule D)  | 8 8 8 8 8 8 | 0.00<br>0.00<br>0.00<br>84.85<br>0.00 | S B B B B B B B B B B B B B B B B B B B  | 0.0<br>9.0<br>9.0<br>3.0<br>2134.2 |

135752667

page 2 of 2

A CONTROL OF THE CONT

| The same of the sa | A PART TERM  | 12207            |  |  |
|--|--|------------------|--|--|
| the same of the sa |  | Sample           |  |  |
|  | A STATE OF THE STA | in military in . |  |  |
| Service Designation of the service o | A SALA   |                  |  |  |
| TE ALL LONG RECEIVED   |  | 4.00             |  |  |
| 14. LOAN REPAYMENTS RECEIVED   |  | 0.00             |  |  |
| 14. OFFECTS TO GENERATION (SPECIALITIES) (Proceeding Services)   | - mn   | 0.00             |  |  |
| 17. OTHER RECEIPTS (Distance leaves of a l |  | 1.00             |  |  |
| 16. TOTAL RECEIPTS (MIN 1196, 16, 16, 16, 16, 16 MIN 17)   |  | 0.00             |  |  |
| 18. OPERATING EXPENSITURES   |  | 0.00             |  |  |
| SO. TRANSPERS TO APPRIAÎTEDICTHER PARTY COMMITTEES ST. CONTRIBUTIONS TO PEDERAL CAMBIDATES AND CITIES  | 0.00   | 0.00             |  |  |
| 22. INDEPENDENT EXPENDITURES (uso Schools S)   | 4-00   | 0.00             |  |  |
| 22. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 L S.C. 461atill) has Sthead P.  | 0.00   | 0.00             |  |  |
| 84. LOAN REPAYMENTS MADE   |  | 0.02             |  |  |
| 28. REFUNL OF CONTRIBUTIONS TO: (a)   dwdwsia/Persons Other Than Pulliford Committees  | 0.00   | 0.00             |  |  |
| (b) Political Party Committees   | 0.00   | 0.00             |  |  |
| (d) TOTAL CONTRIBUTION REPURDS (add 25(a), (b), and (d) 27 OTHER DISBURSEMENTS   |  | 0.00             |  |  |
| SO. YOTAL DISBURGEMENTS (add 19, 50, 21, 22, 53, 34, 58, 50(d) and 27)   | 0.00   | 0.00             |  |  |
| E. TOTAL CONTRIBUTIONS forms from bound from Line 1966).  1. TOTAL CONTRIBUTION REPURCE from Line 2006).  1. MET CONTRIBUTIONS (other from boundings out Line 20 from 20).   | . 0.00   | 0.00             |  |  |
| 2. TOTAL OPERATING EXPENDITIONS does the the   | 0.00   | 8-80             |  |  |
| AL NET OPE LATING EXPENDITURE I MARKET LINE STRONG   | . 0.00   | 0.00             |  |  |

# REPORT NOTICE

PAGE 1 01 2

# FEDERAL ELECTION COMMISSION

PARTIES AND PACE

December 27, 1988

|            |                     | MG./CERT. |          |
|------------|---------------------|-----------|----------|
| MEPORT     | REPORTING PERIOD    | MATLING   | FILING   |
| Year-End . | 11/29/88**-12/31/88 | 01/31/89  | 01/31/89 |

#### THE PART PRIZE

ALL PARTY COMMITTEES AND PACS (MCMCOMMECTED COMMITTEES AND SEPARATE SEGREGATED FUNDS) must file a Year-End Report.

#### WEAT MOST BE REPORTED

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

#### INPOSTING PORMS

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

#### THE TO FILE

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

#### LABOT.

0

6.0

0

0

0

0

4

0

N

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

#### COMPLIANCE

TREASURERS OF POLITICAL COMMITTEES ARE RESPONSIBLE FOR FILING ALL REPORTS ON TIME. PAILURE TO DO SO IS SUBJECT TO EMPORCEMENT ACTION. CONMITTEES FILING ILLEGIBLE REPORTS OR USING MON-FEC PORMS WILL BE REQUIRED TO REFILE.

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

(OVEI)

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

<sup>\*\*</sup>Or from the date of registration, or the close of books of the last report filed, whichever is later.

#### I. SECLAMONIAL FILESS\*

| MEPORT.  | PERIOD COVERED    | MAILING<br>DATES | PILING<br>DATE |
|----------|-------------------|------------------|----------------|
| Mid-Year | 01/01/89-06/30/89 | 07/31/89         | 07/31/89       |
| Year-End | 07/01/89-12/31/89 | 01/31/90         | 01/31/90       |

II. MONTHLY FILENCOS

0

0

0 6

0

9204

| Marcar    | PERIOD COVERED    | MG./CERT.<br>MAILING<br>DATE | FILING<br>DATE |
|-----------|-------------------|------------------------------|----------------|
| Pebruary  | 01/01/89-01/31/89 | 02/20/89                     | 02/20/89       |
| March     | 02/01/89-02/28/89 | 03/20/89                     | 03/20/89       |
| April     | 03/01/89-03/31/89 | 04/20/89                     | 04/20/89       |
| May       | 04/01/89-04/30/89 | 05/20/89                     | 05/20/89       |
| June      | 05/01/89-05/31/89 | 06/20/89                     | 06/20/89       |
| July      | 06/01/89-06/30/89 | 07/20/89                     | 07/20/89       |
| August    | 07/01/89-07/31/89 | 08/20/89                     | 08/20/89       |
| September | 08/01/89-08/31/89 | 09/20/89                     | 09/20/89       |
| October   | 09/01/89-09/30/89 | 10/20/89                     | 10/20/89       |
| Movember  | 10/01/89-10/31/89 | 11/20/89                     | 11/20/89       |
| December  | 11/01/89-11/30/89 | 12/20/89                     | 12/20/89       |
| Year-End  | 12/01/89-12/31/89 | 01/31/90                     | 01/31/90       |

<sup>\*</sup>Committees that filed quarterly reports in 1988 are only required to file semiannualy in 1989.

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

<sup>\*\*\*</sup>Monthly filers that wish to change their filing status must notify the Commission in writing.



# FEDERAL ELECTION COMMISSION

**20-7** 

WASHINGTON DC 2001

Pobruary 24, 2009

L. William Bonsib, Jr., Treasurer Matienal Conservative Congressional Consittee P.O. Ber 1807 Washington, DC 20003

Identification Number: C00202143

Reference: Year End Report (12/9/88-12/31/88)

Dear Mr. Bonsib:

It has come to the attention of the Pederal Election Commission that you may have failed to file the above referenced Report of Receipts and Disbursements as required by the Pederal Election Campaign Act. You were previously notified of the due date and coverage dates of the report.

The Commission notes that your committee has filed a partial report. It is necessary to submit a report govering the entire reporting period for your filing to be considered complete.

It is important that you file this report immediately with the Pederal Election Commission, 999 E Street, WM, Washington, DC 20463 (or with the Clerk of the Bouse or the Secretary of the Senate, as appropriate). A copy of the report o: its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

The failure to file this report may result in an audit or legal enforcement action.

If you have any questions regarding this matter, please contact Elizabeth Jones on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

John D. Gibson

Assistant Staff Director

Reports Analysis Division

L- 15 (DILL) DOMON

---

# Bonsib Moorporated Equited XXI Plut Office Place 1807 Washington, D. C. 20013

March 16, 1909

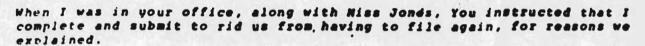
Nr. Athony Raymond PEC Washington, D. 20463

Dear Tonu:

904000000

æ

**C**-



I am being bugged by Miss Jones and others in E

Although I followed your instructions on the debt and asked you to reply if ok, we have not heard from you.

When in your office, you noted the exact forms necessary. We attach a copu of this. You will note only 12/8/88 was included.

I have called at least 50 times, but told you were not at your desk. Please reply.

L. W. Bonsib

ngerelu.

LWB/mdt

89 MAR 20 41: 9: 25

137



# PEDERAL ELECTION COMMISSION 999 E Street, N.WF9 NOV -7 AM 9:47 Washington, D.C. 20463

FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

RAD Referral #89L-30

STAFF MEMBER: Rosie Smith

SOURCE: INTERNALLY GENERATED

RESPONDENT(S): National Conservative Congressional Committee and L. William Bonsib, Jr., as treasurer Bonsib, Inc. and L. William Bonsib, Jr., as Chairman

RELEVANT STATUTE(S): 2 U.S.C. \$ 441b(a) & (b)(2) 2 U.S.C. \$ 432(h)(1) 2 U.S.C. \$ 434(a)(4)(A)(i) & (iv) 11 C.F.R. \$ 100.7(a)(4) 11 C.F.R. \$ 114.10

INTERNAL REPORTS CHECKED: Referral Materials

FEDERAL AGENCIES CHECKED: none

### I. GENERATION OF MATTER

This referral stems from a review by the Reports Analysis Division ("RAD") of reports filed by the National Conservative Congressional Committee ("NCCC"), which registered on February 5, 1986 as a nonconnected committee. NCCC's reports and its responses to a series of RFAIs indicate that it may have accepted \$130,728.77 in apparent corporate contributions during 1986 from Bonsib, Inc., of which \$19,136.39 was reimbursed. In addition, NCCC filed five reports late and has failed to file a sixth report. Finally, statements made by NCCC's treasurer to the RAD analyst indicate that NCCC may never have established, or failed to maintain an account at its campaign depository.

L. William Bonsib, Jr. is both the Treasurer of NCCC and the Chairman of Bonsib, Inc. ("the corporation"). Shortly after the committee was formed, it contracted with Bonsib, Inc. to conduct a

direct mail fundraising effort. The corporation incurred a total of \$130,728.77 in fundraising and administrative expenses. The direct mail operation resulted in receipts of \$21,221.08, of which \$19,136.39 was ultimately paid to the corporation. NCCC began with no cash on hand, and had no other source of funds.

Consequently, the committee never repaid the outstanding debt of \$111,592.38, and made no contributions or other expenditures in connection with federal elections.

#### II. FACTUAL AND LEGAL ANALYSIS

# A. Corporate Contributions

The Federal Election Campaign Act of 1971, as amended (the "Act" or "FECA") prohibits corporations from making contributions or expenditures in connection with federal elections. 2 U.S.C. \$ 441b(a). This provision also prohibits officers and directors of corporations from consenting to the making of such corporate contributions or expenditures. Id. The Act defines "contribution or expenditure" to include any direct or indirect payment or "anything of value," but excludes the costs for the establishment, administration and solicitation of contributions to a separate segregated fund of the corporation. The Commission's regulations at 11 C.F.R. § 100.7(a)(4) provide that the extension of credit for a length of time beyond normal business or trade practice is a contribution absent commercially reasonable collection attempts. However, section 114.10 permits corporations to extend credit to political committees provided the credit is extended in the ordinary course of business and the terms are substantially similar to extensions of credit to nonpolitical debtors of similar risk and size of obligation. 1

NCCC registered as a nonconnected committee on February 5, 1986. The committee's first report (1986 April Quarterly) indicated that the committee began with no cash on hand and arranged to have the corporation pay its initial administrative and fundraising expenses with the expectation of reimbursement from the proceeds of the direct mail. NCCC's amended 1986 April Quarterly Report indicates that the corporation incurred \$122,741.01 in administrative and direct mail expenses on behalf of NCCC. These fundraising efforts did not clear a profit, as NCCC's reports indicate total contributions of \$16,330.58 during this period. NCCC's expenditures during the first quarter of 1986 include \$15,500 in payment to Bonsib, Inc., which resulted in an outstanding debt of \$107,241.01 owed to the corporation as of March 31, 1986. Subsequent increases in the amount owed and additional payments produced an outstanding debt of \$111,592.38 and a cash on hand balance of \$2834.28 as of January 1, 1987. Since then, the committee's financial activity has consisted of applying the \$2834.28 cash on hand balance to reduce the outstanding debt to \$108,758.10. NCCC's reports and Mr. Bonsib's statements indicate that NCCC has made no contributions to candidates or other committees, and no disbursements other than

<sup>1.</sup> In Advisory Opinion 1979-36, the Commission addressed a situation where a direct mail fundraising firm sought to expend funds to operate a direct mail campaign for a candidate's committee with the expectation of subsequent reimbursement by the campaign from the proceeds of the fundraising efforts. The Commission concluded that no corporate contribution would result if the proposed financial arrangement is normal industry practice, and if credit is extended in the ordinary course of the firm's business with terms which are substantially similar to those given to political and nonpolitical debtors of similar risk and size of obligation, and if the costs charged for the services are at least the normal charge for services of that type.

for administrative and fundraising purposes. However, the amount of contributions received and expenditures made by NCCC during the first quarter of 1986 is sufficient to trigger political committee status.

Mr. Bonsib has provided RAD with a written statement to the effect that he was advised by "members of the Federal Election Commission, counsel, and others" that a corporate loan was permissible, and that "the corporation might actually pay expenses." Attachment 1. Although the FECA permits corporations to pay the administration and solicitation expenses of their separate segregated funds, NCCC was set up as a nonconnected committee rather than a separate segregated fund. Moreover, given the magnitude of the direct mail expenditures, it does not appear that the solicitations were confined to the corporation's restricted class. Consequently, at this point it is not possible to treat NCCC as though it was a separate segregated fund, or to permit the corporation to pay NCCC's establishment, administration, and solicitation expenses under 2 U.S.C. § 441b(b)(2).

At this point, further information is needed to determine whether Bonsib, Inc. is a commercial vendor whose ordinary course of business is to provide direct mail services to political or nonpolitical clients. If the corporation is not in the business of providing direct mail fundraising services to other customers, then the activity in question here would fall outside the scope of AO 1979-36 and 11 C.F.R. § 114.10. If on the other hand, direct mail fundraising is the corporation's regular business, it is unlikely that the credit requirements of 11 C.F.R. § 114.10 have been satisfied. What distinguishes this situation from other

extensions of credit by corporate vendors such as the situation approved in AO 1979-36 is that the committee and the corporate creditor appear to be established and controlled by the same individual, thereby raising questions as to whether this was an arms length transaction or simply an attempt to evade the prohibitions against corporate expenditures. The size of the sums advanced to NCCC, which had just been formed and would have had no previous credit history, coupled with the fact that NCCC has never repaid most of the amount owed, as well as the apparent dual role played by Mr. Bonsib as the chairman of the corporation and the treasurer of the committee, suggest that the extension of credit was not made in the ordinary course of business, and that the company did not treat the debt in a commercially reasonable manner under 11 C.F.R. \$ 114.10. Therefore, this Office recommends the Commission find reason to believe tht NCCC, Bonsib, Inc., and William Bonsib, Jr. violated 2 U.S.C. § 441b.

This Office also recommends the Commission seek additional information is needed regarding the terms on which credit was extended to NCCC, whether these terms are consistent with extensions of credit by the corporation to other nonpolitical clients of similar risk and size of obligation, and whether Bonsib, Inc. made commercially reasonable attempts to collect the \$111,592.38 in debts owed by NCCC before deciding to write off this amount. See 11 C.F.R. \$ 100.7(a)(4) and \$ 114.10(c). Although Mr. Bonsib has stated that the corporation "followed previous corporate practices with commercial (and/or political) accounts" in deciding to settle NCCC's account, further information is needed to evaluate whether this action is consistent with Bonsib, Inc.'s previous practices and with

standard industry practice.

### B. Failure to File Timely Reports

The Act requires unauthorized committees opting to file quarterly reports to file no later than the 15th day after the last day of each calendar quarter to file Mid-Year Reports no later than July 31, and to file Year End Reports by January 31 of the following year. 2 U.S.C. \$ 434(a)(4)(A). In the instant case, NCCC failed to file its 1987 Mid-Year and Year End Reports and its 1988 April, July and October Quarterly Reports until December 23, 1988. To date, NCCC has not filed its 1988 Year End Report. Therefore, there is reason to believe NCCC and L. William Bonsib, Jr., as treasurer, violated 2 U.S.C. \$\$ 434(a)(4)(A)(i) and (iv).

# C. Campaign Depository

Section 432(h)(1) of the FECA requires each political committee to maintain at least one checking account at its campaign depository. This provision also requires the deposit of all receipts in the depository account and the making of disbursements (other than petty cash) by check from such account. On NCCC's Statement of Organization, National Capitol Bank is listed as the committee's sole depository. However, in a conversation with the RAD analyst on June 20, 1989, Mr. Bonsib stated that there never was a bank account for the committee, only a cash account, and that the committee's bills were paid by the corporation. Therefore, there is reason to believe NCCC and its treasurer violated 2 U.S.C. § 432(h)(1).

- Find reason to believe that the National Conservative Congressional Committee and L. William Bonsib, Jr. as treasurer
- Find reason to believe that Bonsib, Inc. and L. William Bonsib, Jr. as Chairman violated 2 U.S.C. \$ 441b(a).
- Find reason to believe that the National Conservative Congressional Committee and L. William Bonsib, Jr. as treasurer violated 2 U.S.C. \$\$ 434(a)(4)(A)(i) and (iv).
- Find reason to believe that the National Conservative Congressional Committee and L. William Bonsib, Jr. as treasurer violated 2 U.S.C. \$ 432(h)(1).
- Approve the attached letters, the attached Factual and Legal Analyses, and the attached interrogatories and requests for the production of documents.

Lawrence M. Noble General Counsel

11-6-89

BY:

Date

0

0

0

4

0

N

0

Associate General Counsel

#### Attachments:

- 1. Referral Materials
- 2. Proposed Letters (2) and Factual and Legal Analyses (2)
- 3. Proposed Interrogatories and Requests for the Production of Documents (2)



# FEDERAL ELECTION COMMISSION

WASHINGTON DC 20463

| TO THE TANK |  |
|-------------|--|
| MEMORAND    | MU   |
| TO:         | LAWRENCE M. NOBLE<br>GENERAL COUNSEL   |
| FROM:       | MARJORIE W. EMMONS / DELORES HARRIS PHOTOS COMMISSION SECRETARY                    |
| DATE:       | NOVEMBER 9, 1989   |
| SUBJECT:    | RAD REFERRAL 89L-30<br>FIRST GENERAL COUNSEL'S REPORT<br>DATED NOVEMBER 6, 1989    |
| The         | above-captioned document was circulated to the                                     |
| Commissio   | on on Tuesday, November 7, 1989 at 4:00 p.m.                                       |
| as indica   | ated by the name(s) checked below:   |
|             | Commissioner Aikens XXXX   |
|             | Commissioner Elliott   |
|             | Commissioner Josefiak  |
|             | Commissioner McDonald  |
|             | Commissioner McGarry   |
|             | Commissioner Thomas  |
|             | s matter will be placed on the meeting agenda day, November 28, 1989 at 10:00 a.m. |

Please notify us who will represent your Division before the

Commission on this matter.

#### BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

0

0

0

0

0

N

0

National Conservative Congressional)
Committee and L. William Bonsib, )
Jr., as treasurer )
Bonsib, Inc. and L. William Bonsib, )
Jr., as Chairman )

RAD Referred 30/3

#### CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on November 28, 1989, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions with respect to the above-captioned referral:

- 1. Open a MUR.
- 2. Find reason to believe that the National Conservative Congressional Committee and L. William Bonsib, Jr., as treasurer, violated 2 U.S.C. \$44lb(a).
- 3. Find reason to believe that Bonsib, Inc. and L. William Bonsib, Jr., as Chairman, violated 2 U.S.C. \$ 441b(a).
- 4. Find reason to believe that the National Conservative Congressional Committee and L. William Bonsib, Jr., as treasurer, violated 2 U.S.C. \$\$ 434(a)(4)(A)(i) and (iv).

(continued)



#### FEDERAL ELECTION COMMISSION

AASHINGTON DC 20463

December 11, 1989

L. William Bonsib Jr., Treasurer National Conservative Congressional Committee P. O. Box 1807 Washington, D.C. 20013

RE: MUR 3013

Dear Mr. Bonsib:

On November 28, 1989, the Federal Election Commission found that there is reason to believe The National Conservative Congressional Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 432(h)(1), § 434(a)(4)(A)(i) and (iv) and § 441b(a), 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 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. § 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.

L. William Bonsib, Jr. Page 2 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. §§ 437q(a)(4)(B) and 437q(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 Rosie Smith, the attorney assigned to this matter, at (202) 376-8200. Sincerely, 0 0 inici Danny L. McDonald Chairman 0 Enclosures CV Factual and Legal Analysis Procedures 0 Designation of Counsel Form Ouestions

92040900115

#### BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

MUR: 3013

#### INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS

TO: L. William Bonsib, Jr., Treasurer
National Conservative Congressional Committee
P. O. Box 1807
Washington, D.C. 20013

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request. In addition, the Commission hereby requests that you produce the documents specified below, in their entirety, for inspection and copying at the Office of the General Counsel, Federal Election Commission, Room 659, 999 E Street, N.W., Washington, D.C. 20463, on or before the same deadline, and continue to produce those documents each day thereafter as may be necessary for counsel for the Commission to complete their examination and reproduction of those documents. Clear and legible copies or duplicates of the documents which, where applicable, show both sides of the documents may be submitted in lieu of the production of the originals.

production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records. Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response. The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response. 0 0 If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to 0 do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge 0 you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information. Should you claim a privilege with respect to any documents, communications, or other items about which information is N requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests. Unless otherwise indicated, the discovery request shall refer to the time period from February 5, 1986 to the present. The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary respon~s or amendments during the course of this investigation if you btain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

INSTRUCTIONS

In answering these interrogatories and request for

MUR 3013

Page 2

L. William Bonsib, Jr.

MUR 3013 L. William Bonsib, Jr. Page 3 **DEFINITIONS** For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows: "You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof. "Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity. "Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type - 0 in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, 0 ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets; circulars, leaflets, reports, 0 memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained. 0 "Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, N if any, appearing thereon, the date on which the document was 0 prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document. "Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person. "And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

MUR 3013 L. William Bonsib, Jr. Page 4 1. With respect to services and goods obtained by NCCC from Bonsib, Inc. during 1986: State the nature of the goods and services provided by Bonsib, Inc. Was there a written agreement for the provision of such goods and services? If so provide copies of all documents comprising the agreement and all subsequent documents relating to the agreement. If not, describe in detail all terms of the agreement. Identify all persons who represented or acted on behalf of NCCC in its dealings with Bonsib, Inc. 8 State the costs incurred for the services and goods provided by Bonsib, Inc. and state the total amount of payments, including the date and amount of each payment, which NCCC paid to Bonsib, Inc. in 1986, 1987, 1988 and 0 1989, respectively. 0 Describe all efforts undertaken by NCCC during the years 0 1986 through 1989, to satisfy the outstanding debt including but not limited to fundraising efforts, reduction of 0 overhead and administrative costs and liquidation of committee assets. 4 Produce all documents or records of transactions between 0 NCCC and Bonsib, Inc. which relate to reference the 2 responses to 1.a. through 1.e. above. 0 2. NCCC's Statement of Organization lists National Capital Bank, 316 Pennsylvania Ave., S.E., Washington, D.C. 20003 as the sole depository institution for NCCC. List each account held by NCCC at National Capital Bank and indicate the type of account (e.g. checking, savings, C.D., etc.) and the date each account was opened and closed. Please identify each person authorized by NCCC to have access to these accounts. Please list all other accounts held by NCCC at any other depository institution, and include for each the type of account, the dates the account was opened and closed, and the identification of each person authorized by NCCC to have access to the account.

MUR 3013 L. William Bonsib, Jr. Page 5 d. Were all of NCCC's receipts, including contributions, deposited in an account at NCCC's depository institution list in response to 2.a. and 2.c. above? If no, explain what was done with each receipt not deposited in NCCC's depository institution. Were all disbursements made by NCCC (except petty cash) made by means of checks or similar drafts drawn on accounts listed in response to 2.a. or 2.c. above? If no, please explain how such disbursements were made. Were any of Bonsib, Inc.'s funds deposited in NCCC's depository account(s)? If yes, please explain what amounts were deposited, the reasons therefor, and when, if ever, such amounts were withdrawn. 0 0 1 3. Please identify each person who was consulted or assisted in the preparation of the answers to these interrogatories. 0 0 4 0 N 0

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 3013

RESPONDENT(S):

National Conservative

Congressional Committee and

L. William Bonsib, Jr., as treasurer

# A. Corporate Contributions

The Federal Election Campaign Act of 1971, as amended (the "Act" or "FECA") prohibits corporations from making contributions or expenditures in connection with federal elections. 2 U.S.C. § 441b(a). This provision also prohibits officers and directors of corporations from consenting to the making of such corporate contributions or expenditures. Id. The Act defines "contribution or expenditure" to include any direct or indirect payment or "anything of value," but excludes the costs for the establishment, administration and solicitation of contributions to a separate segregated fund of the corporation. The Commission's regulations at 11 C.F.R. § 100.7(a)(4) provide that the extension of credit for a length of time beyond normal business or trade practice is a contribution absent commercially reasonable collection attempts. However, section 114.10 permits corporations to extend credit to political committees provided the credit is extended in the ordinary course of business and the terms are substantially similar to extensions of credit to nonpolitical debtors of similar

risk and size of obligation. 1

The National Conservative Congressional Committee ("NCCC") registered as a nonconnected committee on February 5, 1986. The committee's first report (1986 April Quarterly) indicated that the committee began with no cash on hand and arranged to have the Bonsib, Inc. ("the corporation") pay its initial administrative and fundraising expenses with the expectation of reimbursement from the proceeds of the direct mail. L. William Bonsib, Jr. was simultaneously the treasurer of NCCC and the Chairman of Bonsib, Inc. NCCC's amended 1986 April Quarterly Report indicates that the corporation incurred \$122,741.01 in administrative and direct mail expenses on behalf of NCCC. These fundraising efforts did not clear a profit, as NCCC's reports indicate total contributions of \$16,330.58 during this period. NCCC's expenditures during the first quarter of 1986 include \$15,500 in payment to Bonsib, Inc., which resulted in an outstanding debt of \$107,241.01 owed to the corporation as of March 31, 1986. Subsequent increases in the amount owed and additional payments produced an outstanding debt of \$111,592.38 and a cash on hand balance of \$2,834.28 as of January 1, 1987. Since then, the committee's financial activity

<sup>1.</sup> In Advisory Opinion 1979-36, the Commission addressed a situation where a direct mail fundraising firm sought to expend funds to operate a direct mail campaign for a candidate's committee with the expectation of subsequent reimbursement by the campaign from the proceeds of the fundraising efforts. The Commission concluded that no corporate contribution would result if the proposed financial arrangement is normal industry practice, and if credit is extended in the ordinary course of the firm's business with terms which are substantially similar to those given to political and nonpolitical debtors of similar risk and size of obligation, and if the costs charged for the services are at least the normal charge for services of that type.

has consisted of applying the \$2,834.28 cash on hand balance to reduce the outstanding debt to \$108,758.10. NCCC's reports and Mr. Bonsib's statements indicate that NCCC has made no contributions to candidates or other committees, and no disbursements other than for administrative and fundraising purposes. However, the amount of contributions received and expenditures made by NCCC during the first quarter of 1986 is sufficient to trigger political committee status.

Mr. Bonsib has provided RAD with a written statement to the effect that he was advised by "members of the Federal Election Commission, counsel, and others" that a corporate loan was permissible, and that "the corporation might actually pay expenses." Attachment 1. Although the FECA permits corporations to pay the administration and solicitation expenses of their separate segregated funds, NCCC was set up as a nonconnected committee rather than a separate segregated fund. Moreover, given the magnitude of the direct mail expenditures, it does not appear that the solicitations were confined to the corporation's restricted class. Consequently, at this point it is not possible to treat NCCC as though it was a separate segregated fund, or to permit the corporation to pay NCCC's establishment, administration, and solicitation expenses under 2 U.S.C. § 441b(b)(2).

At this point, further information is needed to determine whether Bonsib, Inc. is a commercial vendor whose ordinary course of business is to provide direct mail services to political or nonpolitical clients. If the corporation is not in the business

of providing direct mail fundraising services to other customers, then the activity in question here would fall outside the scope of AO 1979-36 and 11 C.F.R. § 114.10. If on the other hand, direct mail fundraising is the corporation's regular business, it is unlikely that the credit requirements of 11 C.F.R. § 114.10 have been satisfied. What distinguishes this situation from other extensions of credit by corporate vendors such as the situation approved in AO 1979-36 is that the committee and the corporate creditor appear to be established and controlled by the same individual, thereby raising questions as to whether this was an arms length transaction or simply an attempt to evade the prohibitions against corporate expenditures. The size of the sums advanced to NCCC, which had just been formed and would have had no previous credit history, coupled with the fact that NCCC has never repaid most of the amount owed, as well as the apparent dual role played by Mr. Bonsib as the chairman of the corporation and the treasurer of the committee, suggest that the extension of credit was not made in the ordinary course of business, and that the company did not treat the debt in a commercially reasonable manner under 11 C.F.R. \$ 114.10.

In order to determine whether the requirements of 11 C.F.R. § 114.10 and the guidelines set out in Advisory Opinion 1979-36 have been met, additional information is needed regarding the terms on which credit was extended to NCCC, whether these terms are consistent with extensions of credit by the corporation to other nonpolitical clients of similar risk and size of obligation, and whether Bonsib, Inc. made commercially reasonable

attempts to collect the \$111,592.38 in debts owed by NCCC before deciding to write off this amount. See 11 C.F.R. \$ 100.7(a)(4) and \$ 114.10(c). Although Mr. Bonsib has stated that the corporation "followed previous corporate practices with commercial (and/or political) accounts" in deciding to settle NCCC's account, further information is needed to evaluate whether this action is consistent with Bonsib, Inc.'s previous practices and with standard industry practice.

In conclusion, it appears at this point that the transactions between NCCC and Bonsib, Inc. did not comply with the requirements set out at 11 C.F.R. § 114.10, and thus resulted in impermissible corporate contributions. Therefore, the Office of the General Counsel recommends that the Commission find reason to believe that NCCC, Bonsib, Inc., and L. William Bonsib, Jr., as treasurer, violated 2 U.S.C. § 441b(a).

# B. Failure to File Timely Reports

The Act requires unauthorized committees opting to file quarterly reports to file no later than the 15th day after the last day of each calendar quarter to file Mid-Year Reports no later than July 31, and to file Year End Reports by January 31 of the following year. 2 U.S.C. § 434(a)(4)(A). In the instant case, NCCC failed to file its 1987 Mid-Year and Year End Reports and its 1988 April, July and October Quarterly Reports until December 23, 1988. To date, NCCC has not filed its 1988 Year End Report. Therefore, there is reason to believe NCCC and L. William Bonsib, Jr., as treasurer, violated 2 U.S.C.§ 434(a)(4).

# C. Campaign Depository

Section 432(h)(1) of the FECA requires each political committee to maintain at least one checking account at its campaign depository. This provision also requires the deposit of all receipts in the depository account and the making of disbursements (other than petty cash) by check from such account. On NCCC's Statement of Organization, National Capitol Bank is listed as the committee's sole depository. However, in a conversation with the RAD analyst on June 20, 1989, Mr. Bonsib stated that there never was a bank account for the committee, only a cash account, and that the committee's bills were paid by the corporation. Therefore, there is reason to believe NCCC and its treasurer violated 2 U.S.C. § 432(h)(1).



# FEDERAL ELECTION COMMISSION

WASHINGTON DC 20463

December 11, 1989

L. William Bonsib, Jr., Chairman Bonsib, Inc. P. O. Box 1807 Washington, D.C. 20013

RE: MUR 3013

Dear Mr. Bonsib:

On November 28, 1989, the Federal Election Commission found that there is reason to believe Bonsib, Inc., and you, as Chairman, violated 2 U.S.C. \$ 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against Bonsib, Inc., and you, as Chairman. 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 Bonsib, Inc. and you, as Chairman, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

L. William Bonsib. Jr. Page 2 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 Rosie Smith, the attorney assigned to this matter, at (202) 376-8200. Sincerely, 0 Danny L. McDonald 0 Chairman 0 Enclosures Factual and Legal Analysis Procedures Designation of Counsel Form Questions N

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

MUR 3013

#### INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS

TO: L. William Bonsib, Jr., Chairman Bonsib, Inc.
P. O. Box 1807
Washington, D.C. 20013

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request. In addition, the Commission hereby requests that you produce the documents specified below, in their entirety, for inspection and copying at the Office of the General Counsel, Federal Election Commission, Room 659, 999 E Street, N.W., Washington, D.C. 20463, on or before the same deadline, and continue to produce those documents each day thereafter as may be necessary for counsel for the Commission to complete their examination and reproduction of those documents. Clear and legible copies or duplicates of the documents which, where applicable, show both sides of the documents may be submitted in lieu of the production of the originals.

MUR 3013 L. William Bonsib, Jr. Page 2

#### INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from February 5, 1986 to the present.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

MUR 3013 L. William Bonsib, Jr. Page 3 **DEFINITIONS** For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows: "You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof. "Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity. "Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, 0 telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video 0 recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data 0 compilations from which information can be obtained. 4 "Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, N if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of 0 the document, the location of the document, the number of pages comprising the document. "Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person. "And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

#### FEDERAL ELECTION COMMISSION

#### FACTUAL AND LEGAL ANALYSIS

MUR: 3013

RESPONDENT(S): Bonsib, Inc. and

L. William Bonsib, Jr., as Chairman

The Federal Election Campaign Act of 1971, as amended (the "Act" or "FECA") prohibits corporations from making contributions or expenditures in connection with federal elections. 2 U.S.C. § 441b(a). This provision also prohibits officers and directors of corporations from consenting to the making of such corporate contributions or expenditures. Id. The Act defines "contribution or expenditure" to include any direct or indirect payment or "anything of value," but excludes the costs for the establishment, administration and solicitation of contributions to a separate segregated fund of the corporation. The Commission's regulations at 11 C.F.R. \$ 100.7(a)(4) provide that the extension of credit for a length of time beyond normal business or trade practice is a contribution absent commercially reasonable collection attempts. However, section 114.10 permits corporations to extend credit to political committees provided the credit is extended in the ordinary course of business and the terms are substantially similar to extensions of credit to nonpolitical debtors of similar risk and size of obligation. 1

<sup>1.</sup> In Advisory Opinion 1979-36, the Commission addressed a situation where a direct mail fundraising firm sought to expend funds to operate a direct mail campaign for a candidate's committee with the expectation of subsequent reimbursement by the campaign from the proceeds of the fundraising efforts. The

The National Conservative Congressional Committee ("NCCC") registered as a nonconnected committee on February 5, 1986. The committee's first report (1986 April Quarterly) indicated that the committee began with no cash on hand and arranged to have Bonsib, Inc. ("the corporation") pay its initial administrative and fundraising expenses with the expectation of reimbursement from the proceeds of the direct mail. L. William Bonsib, Jr. was simultaneously the treasurer of NCCC and the Chairman of Bonsib, Inc. NCCC's amended 1986 April Quarterly Report indicates that the corporation incurred \$122,741.01 in administrative and direct mail expenses on behalf of NCCC. These fundraising efforts did not clear a profit, as NCCC's reports indicate total contributions of \$16,330.58 during this period. NCCC's expenditures during the first quarter of 1986 include \$15,500 in payment to Bonsib, Inc., which resulted in an outstanding debt of \$107,241.01 owed to the corporation as of March 31, 1986. Subsequent increases in the amount owed and additional payments produced an outstanding debt of \$111,592.38 and a cash on hand balance of \$2834.28 as of January 1, 1987. Since then, the committee's financial activity has consisted of applying the \$2834.28 cash on hand balance to reduce the outstanding debt to \$108,758.10. NCCC's reports and Mr. Bonsib's statements indicate that NCCC has made no

<sup>(</sup>Footnote 1 continued from previous page)
Commission concluded that no corporate contribution would result
if the proposed financial arrangement is normal industry practice,
and if credit is extended in the ordinary course of the firm's
business with terms which are substantially similar to those given
to political and nonpolitical debtors of similar risk and size of
obligation, and if the costs charged for the services are at least
the normal charge for services of that type.

contributions to candidates or other committees, and no disbursements other than for administrative and fundraising purposes. However, the amount of contributions received and expenditures made by NCCC during the first quarter of 1986 is sufficient to trigger political committee status.

Mr. Bonsib has provided RAD with a written statement to the effect that he was advised by "members of the Federal Election Commission, counsel, and others" that a corporate loan was permissible, and that "the corporation might actually pay expenses." Attachment 1. Although the FECA permits corporations to pay the administration and solicitation expenses of their separate segregated funds, NCCC was set up as a nonconnected committee rather than a separate segregated fund. Moreover, given the magnitude of the direct mail expenditures, it does not appear that the solicitations were confined to the corporation's restricted class. Consequently, at this point it is not possible to treat NCCC as though it was a separate segregated fund, or to permit the corporation to pay NCCC's establishment, administration, and solicitation expenses under 2 U.S.C. § 441b(b)(2).

At this point, further information is needed to determine whether Bonsib, Inc. is a commercial vendor whose ordinary course of business is to provide direct mail services to political or nonpolitical clients. If the corporation is not in the business of providing direct mail fundraising services to other customers, then the activity in question here would fall outside the scope of AO 1979-36 and 11 C.F.R. § 114.10. If on the other hand, direct

mail fundraising is the corporation's regular business, it is unlikely that the credit requirements of 11 C.F.R. § 114.10 have been satisfied. What distinguishes this situation from other extensions of credit by corporate vendors such as the situation approved in AO 1979-36 is that the committee and the corporate creditor appear to be established and controlled by the same individual, thereby raising questions as to whether this was an arms length transaction or simply an attempt to evade the prohibitions against corporate expenditures. The size of the sums advanced to NCCC, which had just been formed and would have had no previous credit history, coupled with the fact that NCCC has never repaid most of the amount owed, as well as the apparent dual role played by Mr. Bonsib as the chairman of the corporation and the treasurer of the committee, suggest that the extension of credit was not made in the ordinary course of business, and that the company did not treat the debt in a commercially reasonable manner under 11 C.F.R. § 114.10.

In order to determine whether the requirements of 11 C.F.R. § 114.10 and the guidelines set out in Advisory Opinion 1979-36 have been met, additional information is needed regarding the terms on which credit was extended to NCCC, whether these terms are consistent with extensions of credit by the corporation to other nonpolitical clients of similar risk and size of obligation, and whether Bonsib, Inc. made commercially reasonable attempts to collect the \$111,592.38 in debts owed by NCCC before deciding to write off this amount. See 11 C.F.R. § 100.7(a)(4) and § 114.10(c). Although Mr. Bonsib has stated that the

corporation "followed previous corporate practices with commercial (and/or political) accounts" in deciding to settle NCCC's account, further information is needed to evaluate whether this action is consistent with Bonsib, Inc.'s previous practices and with standard industry practice.

In conclusion, it appears at this point that the transactions between NCCC and Bonsib, Inc. did not comply with the requirements set out at 11 C.F.R. § 114.10, and thus resulted in impermissible corporate contributions. Therefore, the Office of the General Counsel recommends that the Commission find reason to believe that NCCC, Bonsib, Inc., and L. William Bonsib, Jr. violated 2 U.S.C. § 441b(a).



#### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 19, 1990

## CERTIFIED MAIL REQUESTED

L. William Bonsib, Jr., Treasurer National Conservative Congressional Committee P. O. Box 1807 Washington, D.C. 20013

RE: MUR 3013

Dear Mr. Bonsib:

On December 11, 1989, you were notified that the Federal Election Commission found reason to believe that the National Conservative Congressional Committee and you, as treasurer, violated 2 U.S.C. § 432(h)(1), § 434(a)(4)(A)(i) and (iv) and § 441b(a). On that same date, you were sent interrogatories and a request for production of documents.

Please note that pursuant to 2 U.S.C. § 437d(a)(1) and (3), the Commission may require the production of written answers to questions and the production of documentary evidence. Insofar as more than 15 days have elapsed without a response from you, the Office of the General Counsel will make further recommendations to the Commission unless we receive a response from you within 7 days of receipt of this letter.

Should you have any questions, please contact Rosie Smith, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble General Counsel

BY: Lois G. Lerner

Associate General Counsel

9204090

 $\infty$ 

M

0



#### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 19, 1990

## CERTIFIED MAIL RETURN RECEIPT REQUESTED

L. William Bonsib, Jr., Chairman Bonsib, Inc.
P. O. Box 1807
Washington, D.C. 20013

RE: MUR 3013

Dear Mr. Bonsib:

M

0

0

0

0

4

0

2

On December 11, 1989, you were notified that the Federal Election Commission found reason to believe that Bonsib, Inc. and you, as Chairman, violated 2 U.S.C. § 441b(a). On that same date, you were sent interrogatories and a request for production of documents.

Please note that pursuant to 2 U.S.C. \$ 437d(a)(1) and (3), the Commission may require the production of written answers to questions and the production of documentary evidence. Insofar as more than 15 days have elapsed without a response from you, the Office of the General Counsel will make further recommendations to the Commission unless we receive a response from you within 7 days of receipt of this letter.

Should you have any questions, please contact Rosie Smith, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble General Counsel

BY: Lois G. Lerner

Associate General Counsel



90 MAR 21 MIII: 17

#### BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

| In the Matter of                                      | )          |
|---|------------|
|   | ) MUR 3013 |
| National Conservative Congressional Committee, and    | }          |
| L. William Bonsib, Jr., as treasurer Bonsib, Inc. and | }          |
| L. William Bonsib, Jr., as chairman                   | )          |

#### GENERAL COUNSEL'S REPORT

#### I. BACKGROUND

On November 28, 1989, the Federal Election Commission found reason to believe that the National Conservative Congressional Committee (the "Committee") and its treasurer violated 2 U.S.C. \$ 432(h)(1), \$ 434(a)(4)(A)(i) and (iv) and \$ 441b(a) by accepting corporate contributions, failing to maintain a checking account at the Committee's designated campaign depository, and failing to file timely reports. The Commission also found reason to believe that Bonsib, Inc. ("the Corporation") and its Chairman violated 2 U.S.C. § 441b(a) by making corporate contributions. On December 11, 1989, this Office notified the Committee and the corporation of the Commission's findings and forwarded written questions to the Committee and the corporation at that time. January 19, 1990, this Office sent reminder letters to the Committee and the Corporation via certified mail. On February 6, 1990 this Office received the return receipts, however, the Committee and the corporation have still failed to respond to the Commission's finding and submit answers to the questions.

-2-Therefore, this Office recommends that the Commission authorize the attached subpoenas and orders to the National Conservative Congressional Committee and L. William Bonsib, Jr. as treasurer, and to Bonsib, Inc. and L. William Bonsib, Jr. as chairman. II. RECOMMENDATIONS Authorize the attached subpoenas and orders to the National Conservative Congressional Committee and L. William Bonsib, Jr. as treasurer, and to Bonsib, Inc. and L. William Bonsib, Jr. as chairman. Approve the attached letters. Lawrence M. Noble General Counsel 0 0 3/20/90 0 0 Associate General Counsel 4 Attachments 1. Subpoenas/Orders (2) 0 2. Letters (2) N Staff Assigned: Rosie Smith 0

#### BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
)
National Conservative Congressional
Committee, and
L. William Bonsib, Jr., as treasurer
Bonsib, Inc. and
L. William Bonsib, Jr., as chairman
)

#### CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 30, 1990, the Commission decided by a vote of 6-0 to take the following actions in MUR 3013:

- Authorize the subpoenas and orders to the National Conservative Congressional Committee and L. William Bonsib, Jr. as treasurer, and to Bonsib, Inc. and L. William Bonsib, Jr. as chairman, as recommended in the General Counsel's report dated March 20, 1990.
- Approve the letters, as recommended in the General Counsel's report dated March 20, 1990.

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

Attest:

3-30-90

Date

Margare W. Emmons

Marjorie W. Emmons Secretary of the Commission

Received in the Secretariat: Wed., March 21, 1990 11:17 a.m. Circulated to the Commission: Wed., March 21, 1990 4:00 p.m. Deadline for vote: Fri., March 30, 1990 4:00 p.m.



0

0

0

0

4

0

N

0

#### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 9, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

L. William Bonsib, Jr., Chairman Bonsib, Inc. P.O. Box 1807 Washington, D.C. 20013

RE: MUR 3013

Dear Mr. Bonsib:

On December 11, 1989, you were notified that the Federal Election Commission had found reason to believe Bonsib, Inc. and you, as Chairman, violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended.

Pursuant to its investigation of this matter, the Commission has issued the attached subpoena and order requiring Bonsib, Inc. and you to provide information which will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this Order and Subpoena. It is required that you submit all answers to questions under oath within 15 days of your receipt of this Order and Subpoena.

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

Sincerely,

Lawrence M. Noble General Counsel

BY:

Lois G. Lerner

Associate General Counsel

Enclosure Order and Subpoena

In the Matter of MUR 3013 SUBPOENA TO PRODUCE DOCUMENTS ORDER TO SUBMIT WRITTEN ANSWERS TO: L. William Bonsib, Jr., Chairman Bonsib, Inc. P.O. Box 1807 Washington, D.C. 20013 Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit 0 written answers to the questions attached to this Order and 0 subpoenas you to produce the documents requested on the attachment 0 to this Subpoena. Legible copies which, where applicable, show 0 both sides of the documents may be substituted for originals. 4 Such answers must be submitted under oath and must be 0 forwarded to the Office of the General Counsel, Federal Election N Commission, 999 E Street, N.W., Washington, D.C. 20463, along 0 with the requested documents within 15 days of receipt of this Order and Subpoena.

BEFORE THE FEDERAL ELECTION COMMISSION

MUR 3013 L. William Bonsib., Jr. Page 2 WHEREFORE, the Chairman of the Federal Election Commission has hereunto set her hand in Washington, D.C. on this day of april, 1990. Federal Election Commission ATTEST: 5 Margerie W. Emmons Secretary Secretary to the Commission 0 Attachments 0 Document Request 0 Questions 0 4 0 N 0

MUR 3013 L. William Bonsib, Jr. Page 3 INSTRUCTIONS In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records. Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response. The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response. If you cannot answer the following interrogatories in full 0 after exercising due diligence to secure the full information to 0 do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or 0 knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information. 4 Should you claim a privilege with respect to any documents, O communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of 0 privilege must specify in detail all the grounds on which it Unless otherwise indicated, the discovery request shall refer to the time period from February 5, 1986 to the present. The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

organization or entity. 0 0 0 0 0 C pages comprising the document. 0 receive service of process for such person.

MUR 3013

Page 4

L. William Bonsib, Jr.

**DEFINITIONS** 

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

MUR 3013 L. William Bonsib, Jr. Page 6 Did Bonsib, Inc. sell goods and services to other political committees (as defined by § 431(4) of the FECA) from January 1985 through January 1989? If so, identify all such political committees. State the nature of goods and services Bonsib, Inc. provided to each committee. b. State whether any committees were extended credit by Bonsib, Inc. for the provision of goods or services, and state the amount of credit extended and the period of time involved in extension of credit. Did Bonsib, Inc. use the guidelines described in 3. above to 6. collect the debts described in 5 above? If not, please describe any variations. If so, produce all documents relating to your debt collection efforts. 7. Mr. Bonsib has stated to Reports Analysis Division staff that Bonsib, Inc. followed previous corporate practice in 0 settling NCCC's account. 0 When was the decision to settle NCCC's account made? 0 Please identify all persons involved in this decision. 0 Please explain in detail the reasons for this decision. c. 4 0 Produce all records relating to this decision. d. Has Bonsib, Inc. settled other political or N nonpolitical accounts from 1985 to the present? If yes, please identify all such accounts and explain in detail the 0 reasons for such decisions. 8. Please identify each person who was consulted or assisted in the preparation of the answers to these interrogatories.





#### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 9, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

L. William Bonsib, Jr., Treasurer National Conservative Congressional Committee P.O. Box 1807 Washington, D.C. 20013

RE: MUR 3013

Dear Mr. Bonsib:

On December 11, 1989, you were notified that the Federal Election Commission had found reason to believe the National Conservative Congressional Committee and you, as treasurer, violated 2 U.S.C. § 432(h)(1), § 434(a)(4)(A)(i) and (iv) and § 441b(a), provisions of the Federal Election Campaign Act of 1971, as amended.

Pursuant to its investigation of this matter, the Commission has issued the attached subpoena and order requiring the National Conservative Congressional Committee and you to provide information which will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this Order and Subpoena. It is required that you submit all answers to questions under oath within 15 days of your receipt of this Order and Subpoena.

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

Sincerely,

Lawrence M. Noble General Counsel

BY: Lois G. Lerner

Associate General Counsel

Enclosure Order and Subpoena

BEFORE THE FEDERAL ELECTION COMMISSION In the Matter of MUR 3013 SUBPOENA TO PRODUCE DOCUMENTS ORDER TO SUBMIT WRITTEN ANSWERS L. William Bonsib, Jr., Treasurer National Conservative Congressional Committee P.O. Box 1807 Washington, D.C. 20013 Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit 0 written answers to the questions attached to this Order and 0 subpoenas you to produce the documents requested on the attachment 0 to this Subpoena. Legible copies which, where applicable, show 0 4 both sides of the documents may be substituted for originals. 0 Such answers must be submitted under oath and must be 2 forwarded to the Office of the General Counsel, Federal Election 0 Commission, 999 E Street, N.W., Washington, D.C. 20463, along with the requested documents within 15 days of receipt of this Order and Subpoena.

MUR 3013 L. William Bonsib., Jr. Page 2 WHEREFORE, the Chairman of the Federal Election Commission has hereunto set her hand in Washington, D.C. on this 300, april , 1990. Federal Election Commission ATTEST: Marione W. Emmene Secretary to the Commission 0 0 Attachments Document Request 0 Questions 0 4 0 N 0

MUR 3013 L. William Bonsib, Jr. Page 3

#### INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from February 5, 1986 to the present.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

MUR 3013 L. William Bonsib, Jr. Page 4

#### DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

MUR 3013 L. William Bonsib, Jr. Page 6 d. Were all of NCCC's receipts, including contributions, deposited in an account at NCCC's depository institution list in response to 2.a. and 2.c. above? If no, explain what was done with each receipt not deposited in NCCC's depository institution. Were all disbursements made by NCCC (except petty cash) made by means of checks or similar drafts drawn on accounts listed in response to 2.a. or 2.c. above? If no, please explain how such disbursements were made. f. Were any of Bonsib, Inc.'s funds deposited in NCCC's depository account(s)? If yes, please explain what amounts were deposited, the reasons therefore, and when, if ever, such amounts were withdrawn. 3. Please identify each person who was consulted or assisted in the preparation of the answers to these interrogatories. 0 0 0 0 4 0  $\sim$ 0

# JOHN DAVID HEMENWAY ATTORNEY AT LAW

4816 RODMAN ST., N.W. WASHINGTON, D.C. 20016 (202) 244 - 4819 RECEIVED RESERA - LECTION COMMISSION

90 APR 27 AM 11: 03

SPECE OF SEVERAL COURS

April 25, 1990

Federal Election Commission
Attn: Ms. Rosie Smith
Office of the General Counsel
Washington, D.C. 20463

RE: MUR 3013 FEC ltr dtd 4/9/90

Dear Ms. Smith,

This letter is written specifically at your request to provide you with the assurance that I have been retained by Mr. L. William Bonsib, Jr., listed in your files as "Chairman, Bonsib, Inc." to assist Mr. Bonsib in facilitating responses to your inquiries. This assurance is herewith provided you as you requested during our telephone call yesterday, April 24, 1990.

For the record, let me also state that correspondence pertaining to the FEC subpoena and other matters transmitted by letter of April 9, 1990 to Mr. Bonsib was stayed on April 20, 1990 in your absence on leave by Lois G. Lerner, Assoc. Gen. Counsel, pending a reasonable chance for you to confer with incoming counsel. Ms. Lerner expected you to contact me in this regard and you have now done so.

These preliminaries having been made on both sides, I shall await your next call in the expectation that you will find that this letter meets your requirements. I feel certain that Mr. Bonsib will cooperate with you and the FEC to the extent reasonably possible in connection with the above referenced case. The bankruptcy of Bonsib, Inc. may well suggest to yhou and the FEC that the prudent course is to close out the FEC inquiry.

singerely yours,

John D. Hemenway

cc: Lois G. Lerner L.W. Bonsib

\_\_\_

0

3

0

4

 $\bigcirc$ 

0

OBC 699)
PECENED
PECENED

#### JOHN DAVID HEMENWAY

ATTORNEY AT LAW 4816 RODMAN ST., N.W.

4816 RODMAN ST., N.W. WASHINGTON, D.C. 20016 (202) 244 - 4819 90 JUL 19 AM 10: 18

90 JUL 19 PH 2: 30

July 17, 1990

RE: MUR -3-0-5

3013

Federal Election Commission
Attn: Ms. Rosie Smith
Office of the General Counsel
Washington, D.C. 20463

Dear Ms. Smith,

At your request the original copy of the FEC form for designation of counsel is enclosed, in which Mr. L.W. Bonsib indicates that the undersigned is designated as his counsel in the above referenced matter.

I also attach, per our conversations, the US Bankruptcy Court of the Eastern District of Virginia, Alexandria Division "ORDER CLOSING CASE" as of February 27, 1990.

Please note that although I represent Mr. Bonsib, this response to the FEC correspondence in no way implies that Mr. Bonsib retains any liability in any matter beyond his discharge of duties within "Bonsib, Inc." But for his exercise of office in that organization, he would not have had any contact whatsoever with the FEC.

We respectfully suggest that, with the receipt of the bankruptcy report, the FEC consider MUR 3031 closed and so order.

Attachments:

0 0

0

0

4

0

N

0

1. Order of Feb 27, 1990 from East District of Va Bank. Ct.

2. Trustee's Report

3. Original, Attorney designation

Sincerely yours,

John D. Hemenway

PIA DIVISION TER: 07 AJER: 89-02233-AT IN RE: BONSIB, INC CASE NUMBER: SSN/ID: 0 52-1003274 309 YOAKUN PARKWAY

> APT 1616 ALEXANDRIA, VA 22304-3916

> > U. S. BANKRUPTCY COURT SUITE 408 206 NORTH WASHINGTON STREET ALEXANDRIA, VA 22314-2528

ORDER CLOSING CASE \*\* CHAPTER 7 NO ASSET \*

IT IS ORDERED THAT:

HENRY J. COUNTS TRUSTEE, IS DISCHARGED AS TRUSTEE OF THE ESTATE OF THE ABOVE-NAMED DEBTOR(S) AND THE BOND IS CANCELLED.

0 THE "CHAPTER 7 NO DISTRIBUTION CASE" HAVING BEEN FULLY ADMINISTERED, THE CASE IS HEREBY CLOSED ON THIS DATE: FEBRUARY 27, 1990 0

> DATED MARCH 1, 1990 AT ALEXANDRIA, VA FOR THE COURT

ROBERT M. WILY, CLERK

ID

0 0

4

O

2 0

#### UNITED STATES BANKRUPTCY COURT FOR Eastern District of Virginia Alexandria Division

In Re:

0 9

0

0

0

0

4

0

N

.0

CASE NO. 89-02233-AT

BONSIB, INC.

Debtor(s)

(Chapter 7)

#### TRUSTEE'S REPORT OF NO DISTRIBUTION

To the U.S. Bankruptcy Judge for the Eastern District of Virginia:

HENRY COUNTS, JR., trustee of the estate of the above-named debtor(s), reports that he has neither received any property nor paid any money on account of this estate; that he has made diligent inquiry into the whereabouts of property belonging to the estate; and that there are no assets in the estate over and above the exemptions claimed by the debtor.

Wherefore he prays that this report be approved, and that he be discharged from office.

Dated: Uce 8. 1989

Trustes

RECEIVED DEC 1 1 1989

#### STATEMENT OF DESIGNATION OF COUNSEL

| NAME OF COUNSEL: | John D. HEMENWAY       |
|------------------|------------------------|
| ADDRESS:         | 4816 Rodman St., N.W.  |
|                  | Washington, D.C. 20016 |
|                  | (202) 244-4819         |

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

May 5, 1990 Date

0

0

0

0

4

0

N

0

Signature

RESPONDENT'S NAME: L. W. Bonsib

ADDRESS: Post Office Box 1807

Washington, D.C.

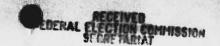
20013

HOME PHONE:

(Use phone number of attorney)

BUSINESS PHONE:

(Use phone number of attorney)



## BEFORE THE PEDERAL ELECTION COMMISSIONAUG -9 AM 7: 27

In the Matter of

National Conservative Congressional Committee and L. William Bonsib, Jr., as treasurer

Bonsib, Inc. and L. William Bonsib, Jr., as chairman MUR 3013

SENSITIVE EXECUTIVE SESSION

AUG 1 4 1990

#### GENERAL COUNSEL'S REPORT

#### I. BACKGROUND

On November 28, 1989, the Federal Election Commission found reason to believe that the National Conservative Congressional Committee (the "Committee") and its treasurer violated 2 U.S.C. \$ 432(h)(1), \$ 434(a)(4)(A)(i) and (iv) and \$ 441b(a) by accepting corporate contributions, failing to maintain a checking account at the Committee's designated campaign depository, and failing to file timely reports. The Commission also found reason to believe that Bonsib, Inc. ("the Corporation") and its Chairman violated 2 U.S.C. \$ 441b(a) by making corporate contributions. On December 11, 1989, this Office notified the Committee and the Corporation of the Commission's finding and forwarded written questions to the Committee and the Corporation at that time.

On January 19, 1990, this Office sent a reminder letter to the Committee and the Corporation via certified mail. Although this Office received the return receipts on February 6, 1990, the Committee and the Corporation failed to submit answers to the questions. On April 9, 1990, the Commission sent subpoenas and orders to the Committee and the Corporation, which were received on April 13, 1990. In telephone conversations on April 20, 1990 and April 23, 1990, John D. Hemenway indicated that he represented L. William Bonsib, Jr. in this matter and that the Corporation had

undergone a Chapter 7 bankruptcy proceeding. At that time,

John D. Hemenway agreed to submit a designation of counsel
together with a copy of the court decree granting a Chapter 7
discharge. On April 27, 1990, this Office received a letter from
John D. Hemenway indicating that he had been retained by
L. William Bonsib, Jr. However, no enclosures accompanied this
letter. In three subsequent telephone conversations on May 2,
June 4, and July 9, 1990, John D. Hemenway indicated that he would
send the appropriate designation of counsel form and the
appropriate court orders forthwith. These materials were received
on July 19, 1990. To date, however, this Office has not received
responses to the subpoena and order.

#### II. DISCUSSION

In his most recent letter, counsel submits that the Commission should take no further action and close the file in this matter in light of the corporation's bankruptcy proceedings. The request that the Commission close this investigation should be denied for two reasons. First, the court documents reflect that only the Corporation was a party to the bankruptcy proceeding. There is no indication that the litigation affected the status of the Committee, which was organized as a nonconnected political committee, and not as a separate segregated fund of the Corporation. Secondly, although the bankruptcy decree may well affect the Commission's ability to obtain a civil penalty from the Corporation, it should not hinder the investigation of the making or acceptance of a sizable corporate contribution, or the investigation of the Committee's failure to maintain an account at its designated campaign depository. Accordingly, this Office recommends that the Commission reject Respondents' request to take

no further action and close the file in this matter.

#### III. REQUEST FOR AUTHORIZATION OF SUBPOENA ENFORCEMENT

The investigation of this matter cannot proceed until the Commission receives responses to the subpoenas and orders. Accordingly, subpoena enforcement may well be necessary. This Office recommends that respondents be given a final opportunity to comply with the outstanding discovery requests. In the event that the respondents do not comply with the subpoenas within ten days of receipt of the attached letters, this Office requests authorization to file a civil suit in the United States District Court.

#### IV. RECOMMENDATIONS

- Deny the request to take no further action and close the file in this matter.
- 2. Authorize the Office of the General Counsel to institute a civil subpoena enforcement against the National Conservative Congressional Committee and L. William Bonsib, Jr., as treasurer and against Bonsib, Inc. and L. William Bonsib, Jr., as chairman in the event that they do not comply with the subpoenas and orders within 10 days of service of notice.
  - 3. Approve the attached letter.

0

0

0

0

N 0

General Counsel

#### Attachments

- 1. 4/27/90 Letter from John D. Hemenway
- 7/19/90 Letter from John D. Hemenway
- Proposed letter (1) 3.

Staff assigned: Rosie Smith

#### BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

National Conservative Congressional
Committee and
L. William Bonsib, Jr., as treasurer;
Bonsib, Inc. and
L. William Bonsib, Jr., as chairman.

#### CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on August 14, 1990, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 3013:

- 1. Deny the request to take no further action and close the file in this matter.
- 2. Authorize the Office of the General Counsel to institute a civil subpoena enforcement against the National Conservative Congressional Committee and L. William Bonsib, Jr. as treasurer, and against Bonsib, Inc. and L. William Bonsib, Jr. as chairman, in the event that they do not comply with the subpoenas and orders within ten days of service of notice.

(continued)

3. Approve the letter attached to the General Counsel's report dated August 8, 1990.

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

Attest:

8-15-90 Date

0 0

0

0

4

9 2 0

Marjorie W. Emmons
Secretary of the Commission



#### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 24, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John D. Hemenway 4816 Rodman Street, N.W. Washington, D.C. 20016

RE: MUR 3013

Dear Mr. Hemenway:

On April 9, 1990, the Commission sent Subpoenas to Produce Documents and Orders to Submit Written Answers to your clients Bonsib, Inc. and the National Conservative Congressional Committee. The subpoenas and orders were received by your clients on April 13, 1990. To date the Commission has not received responses to the subpoenas and orders. On August , 1990, the Commission rejected your request to take no further action and close the file in this matter.

As a result of your failure to respond to the discovery request, the Commission has authorized the Office of the General Counsel to institute a civil action for relief in the United States District Court to enforce the subpoenas and orders if your responses are not received within ten days of receipt of this letter.

Should you have any questions, or should you wish to comply fully with the Subpoenas and Orders prior to suit, please contact Rosie Smith, the attorney assigned to this matter, at (202) 376-8200 within five days of your receipt of this letter.

Sincerely,

Lawrence M. Noble General Counsel

BY:

Lois G./Lerner

Associate General Counsel

Enclosure
Copy of Orders and Subpoenas

### UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA FEDERAL ELECTION COMMISSION, 999 E Street, N.W. Washington, D.C. 20463 Petitioner Misc. No. 90-280 v. PETITION FOR ORDER NATIONAL CONSERVATIVE CONGRESSIONAL COMMITTEE ENFORCING SUBPOENAS P.O. Box 1807 AND ORDERS Washington, D.C. 20013 and L. WILLIAM BONSIB, Jr., as as Treasurer of the National Conservative Congressional Committee F. ... P.O. Box 1807 Washington, D.C. 20013 0.7 -1 and CLE" BONSIB, INC. P.O. Box 1807 Washington, D.C. 20013 Respondents. PETITION OF FEDERAL ELECTION COMMISSION FOR AN

## ORDER ENFORCING ADMINISTRATIVE SUBPOENAS AND ORDERS

0

0

0

0

4

0

N

0

Petitioner, the Federal Election Commission (hereinafter the "Commission"), hereby petitions this Court to enforce administrative subpoenas and orders previously issued by the Commission to respondents National Conservative Congressional Committee and L. William Bonsib, Jr., as treasurer of the National Conservative Congressional Committee, and Bonsib, Inc. and represents the following:

This is a proceeding for enforcement of administrative subpoenas and orders issued by the Commission pursuant to

#### 2 U.S.C. \$ 437d(a)(3).

- Jurisdiction is conferred upon this Court by
   U.S.C. § 437d(b) and 28 U.S.C. § 1345.
- Petitioner is the agency of the United States government empowered with exclusive primary jurisdiction to administer, interpret, and enforce the Federal Election Campaign Act of 1971, as amended (the "Act"). 2 U.S.C. \$\$ 431 et seq. The Commission is authorized by statute to institute investigations of possible violations of the Act. 2 U.S.C. § 437g(a)(2). In this regard, the Commission is specifically empowered to order any person to submit, under oath, such written reports and answers to questions as the Commission may prescribe. 2 U.S.C. § 437d(a)(1). Furthermore, the Commission is also specifically empowered to require by subpoena the production of documentary evidence relating to its investigations. 2 U.S.C. § 437d(a)(3). In addition, the Commission is expressly authorized to initiate civil actions in the United States district courts to obtain judicial enforcement of such Commission subpoenas. 2 U.S.C. \$ 437d(b).
- 4. The mailing address for the National Conservative

  Congressional Committee and L. William Bonsib, Jr., as treasurer,
  is P.O. Box 1807, Washington, D.C., 20013. The mailing address
  for Bonsib, Inc. is P.O. Box 1807, Washington, D.C., 20013.
- 5. Acting on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, on November 28, 1989, the Commission found reason to believe that the National Conservative Congressional Committee and L. William

- 6. After the respondents failed to submit answers to the written questions, on March 30, 1990, the Commission authorized the issuance of Subpoenas to Produce Documents and Orders to Submit Written Answers to the respondents. On April 9, 1990, the Commission sent the subpoenas and orders to the respondents by certified letters. On April 13, 1990, the respondents received the subpoenas and orders. The respondents have failed to comply with the Commission's subpoenas and orders.
- 7. On August 14, 1990, the Commission, by the affirmative vote of at least four of its members, authorized the Office of the General Counsel to institute a civil action pursuant to 2 U.S.C. § 437d(b) to enforce the subpoenas and orders to respondents National Conservative Congressional Committee and L. William Bonsib, Jr., as its treasurer and Bonsib, Inc. The Commission notified counsel for the respondents of the authorization for suit by a certified letter dated August 24, 1990. Counsel for the respondents received this letter on August 28, 1990.
  - 8. As of the date of the submission of this petition,

92040900170

respondents National Conservative Congressional Committee and
L. William Bonsib, Jr., as treasurer of the National Conservative
Congressional Committee, and Bonsib, Inc. have failed to comply
with Commission's subpoenas and orders.

9. The petitioner Commission has satisfied all of the
jurisdictional prerequisites to the filing of this suit.

10. No prior applications have been made for the relief
sought herein.

WHEREFORE, the Federal Election Commission prays:

(a) That this Court issue forthwith the attached order
directing respondents National Conservative Congressional

- (a) That this Court issue forthwith the attached order directing respondents National Conservative Congressional Committee and L. William Bonsib, Jr., as treasurer of the National Conservative Congressional Committee, and Bonsib, Inc. to appear before this Court on a day certain, to be fixed by the Court,—and to show cause, if there be any, why an order should not be issued directing respondents National Conservative Congressional Committee and L. William Bonsib, Jr., as treasurer of the National Conservative Congressional Committee, and Bonsib, Inc. to comply with petitioner's subpoenas and orders;
- (b) That, after such opportunity to show cause, an order be issued directing respondents National Conservative Congressional Committee and L. William Bonsib, Jr., as treasurer of the National Conservative Congressional Committee, and Bonsib, Inc. to produce the documents requested and to answer the Commission's questions in compliance with the Commission's subpoenas and orders, no later than thirty (30) days after the issuance of such order;

92040900171

-5-(c) That the Federal Election Commission be awarded its costs in this proceeding; and (d) That the Federal Election Commission be granted such further relief as may be necessary and appropriate. Respectfully submitted, awrence M. Noble General Counsel (D.C. Bar No. 244434) Richard B. Bader Associate General Counsel (D.C. Bar No. 911073) David M. FitzGerald Assistant General Counsel Attorney October 1, 1990 FOR THE PETITIONER FEDERAL ELECTION COMMISSION 999 E Street, N.W. Washington, D.C. 20463 (202) 376-8200

N

0 0 6

0

4

9 2 0

FILED

OCT 2 5 1990

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

JAMES F. DAVEY, Clerk

FEDERAL ELECTION COMMISSION

v.

Petitioner,

Misc. No. 90-280

ORDER TO SHOW CAUSE

NATIONAL CONSERVATIVE CONGRESSIONAL COMMITTEE, et al. )

#### ORDER TO SHOW CAUSE

The Federal Election Commission has petitioned this Court for an order requiring respondents National Conservative

Congressional Committee and L. William Bonsib, Jr., as its treasurer, and Bonsib, Inc. to show cause why the Commission's subpoenas and orders requiring the respondents to answer questions and to produce written documents and materials should not be enforced. It appearing to the Court that there is good cause for entry of such order;

IT IS HEREBY ORDERED that the Federal Election Commission's petition for an order to show cause is GRANTED; and

MI

IT IS FURTHER ORDERED that if respondents believe it
necessary for the Court to hear live testimony they must file
affidavits reflecting such testimony (or if a proposed witness is
not available to provide such an affidavit, a specific
description of the witness' proposed testimony) and explain why
respondents believe live testimony is required; and

IT IS FURTHER ORDERED that, if respondents intend to file pleadings, affidavits, exhibits, motions or other papers in the opposition to said petition for the order requested, such papers shall be filed and served no later than 15 days from the date of this order. Such submission shall include in the case of any affidavits, exhibits or objections not previously submitted or made to the Commission in support of a motion to quash the subpoenas, an explanation as to why such affidavits, exhibits, or objections were not so submitted or made. The Commission shall have the opportunity to file a reply to any such papers in opposition to said petition no later than 15 days after the Commission receives respondents' papers in opposition; and

IT IS FURTHER ORDERED that, pursuant to Fed. R. Civ. P. 81(a)(3), that this is a summary proceeding and that no party shall be entitled to discovery without further order of the Court upon a specific showing of need; and absent the consent of all parties the dates for a hearing and the filing of papers established by this Order shall not be altered without prior order of the Court upon good cause shown.

92040900174

-3-

IT IS FURTHER ORDERED that, in addition to the methods of service permitted under Fed. R. Civ. P. 4, the petition and this order may be served by any form of mail or courier service requiring a return receipt showing delivery to respondents.

Date United STATES DISTRICT JODGE

0

0 0

0

4

0

CI 0



## FEDERAL ELECTION COMMISSION

WASHINGTON DI JUAN

November 6, 1990

#### RAND DELIVERED

John D. Hemenway, Esq. 4816 Rodman Street, N.W. Washington, D.C. 20016

> RE: FEC v. National Conservative Congressional Committee, et al., Misc; No. 90-280

Dear Mr. Hemenway:

Thank you for meeting with me this morning. As we discussed by telephone this afternoon, in an attempt to resolve this matter before the show cause hearing scheduled for November 28, 1990, the Office of the General Counsel has reconsidered your offer to bring your client, L. William Bonsib, Jr., to Washington, D.C. for a deposition. Therefore, as we agreed today, the deposition of L. William Bonsib, Jr., will take place on Tuesday, November 13, 1990 at 1:30 p.m. at 999 E Street, N.W. While this Office does not waive its rights to enforce the subpoenas and orders, it is our hope that this deposition will provide the information that the investigation seeks.

Enclosed for your review and signature, please find the stipulation extending the time for you to respond to the Commission's petition for an order enforcing its administrative subpostas and orders and extending the time for the Commission to respond to your opposition to its petition and your motion to dismiss. Thank you for your consideration in this matter and I look forward to seeing you on November 13, 1990.

Franciszka A. Monarski

Attorney

FEC v. Nat'l Conservative Cong. Comm. Misc. 90-280 ATTACHMENT 4

ATTORNEY AT LAW

WASHINGTON, D.C. 20016

November 16, 1990

Ms. Franciszka A. Monarski
Attorney at Law
Federal Election Commission
Office of the General Counsel
999 E Street, N.W., Rm 657
Washington, D.C. 20463

RE: MUR 3013 REQUEST FOR REIMBURSEMENT

Dear Ms. Monarski,

Reference is made to our several conversations concerning the travel arrangements of Mr. L.W. Bonsib to Washington for the purpose of attending your deposition on November 13, 1990.

I am informed by Mr. Bonsib that his travel arrangements were as follows:

10:00 am Nov. 11, 1990: lv. Lexington, KY for Washington, D.C. (Overnight at a motel on the road at Grayson, KY, because the trip is 620 miles);

9:00 am Nov. 12, 1990: continue trip to Washington, arriving 8:30pm (overnight in Washington, D.C. area);

1:30 pm Nov. 13,1990: attend deposition at the F.E.C., as requested, until 5:00pm. Overnight in the Washington, D.C. area to get an early start.

9:00 am Nov. 14, 1990: lv. Washington, D.C. area for Lexington, KY. (Overnight at a motel on the road because trip is 620 miles):

9:00 am Nov. 15 1990: continue trip to Lexington, KY, arriving at 10:00 pm.

TOTAL MILEAGE: 1,240 miles; TIME INVOLVED: 5 days.

Mr. Bonsib travelled with Mrs. Bonsib, because, as you saw at the deposition, his physical condition made it advisable for Mrs. Bonsib to do the driving. He is not requesting reimbursement for her since that was not part of our deal.

I will be pleased to work with you or assist you in any way that will expedite the reimbursement of allowable travel expenses as previously discussed. If it is necessary for Mr. Bonsib to certify to the above, please let me know; otherwise I will be pleased to certify for him.

cc: L.W. Bonsib

Sincerely yours,

John D. Hemenway Counsel for Bonsib

20409001

0

NOVEMBER 11, 1990, DEPOSITION OF LOUIS W. BONSIB IS LOCATED AT THE END OF THIS FILE

## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

FEDERAL ELECTION COMMISSION

Petitioner,

Misc. No. 90-280

V.

Notice of Dismissal

NATIONAL CONSERVATIVE CONGRESSIONAL COMMITTEE, et al.

Respondents.

## Notice Of Dismissal

Pursuant to Fed. R. Civ. P. 41(a)(1), petitioner Federal Election Commission (the "Commission") hereby dismisses the above-entitled proceeding, without prejudice, since respondent L. William Bonsib, Jr. has voluntarily appeared before representatives of the Commission and provided a deposition concerning the matters addressed by the subpoenas and orders that are the subject matter of this proceeding.

Respectfully submitted,

Noble Lawrence M. General Counsel

(D.C. Bar No. 244434)

Associate General Counsel

(D.C. Bar No. 911073)



## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 21, 1990

Edwin G. Crowley
Ace-Federal Reporters, Inc.
444 North Capitol Street
Washington, D.C. 20001

Dear Mr. Crowley:

As we discussed on December 18, 1990, I am returning the original transcript of Louis W. Bonsib's deposition for you to forward to the witness for his signature. Mr. Bonsib's address is:

Louis William Bonsib, Jr. P.O. Box 1807 Washington, D.C. 20013

If you have any questions, you may reach me at (202) 376-8200.

Sincerely

Rosie Smith Senior Attorney

Enclosure

CV

00

0

0 6

0

4

0

9 2

Deposition of Louis William Bonsib



91 MAR -4 PM 1:38

#### BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

National Conservative Congressional
Committee, and
L. William Bonsib, Jr., as treasurer

Bonsib, Inc. and
L. William Bonsib, Jr., as chairman

## GENERAL COUNSEL'S REPORT

The Office of the General Counsel is prepared to close the investigation in this matter as to the National Conservative Congressional Committee, Bonsib, Inc. and L. William Bonsib, Jr., based on the assessment of the information presently

available

11

Lawrence M. Noble General Counsel

#### BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

) MUR 3013

National Conservative Congressional
Committee, and
L. William Bonsib, Jr., as treasurer

Bonsib, Inc. and
L. William Bonsib, Jr., as chairman

#### GENERAL COUNSEL'S BRIEF

## I. STATEMENT OF THE CASE

On November 28, 1989, the Federal Election Commission found reason to believe that the National Conservative Congressional Committee ("NCCC") and its treasurer, L. William Bonsib, Jr., violated 2 U.S.C. § 432(h)(1), § 434(a)(4)(A)(i) and (iv) and § 441b(a) by accepting corporate contributions, failing to maintain a checking account at its designated campaign depository, and failing to file timely reports. The Commission also found reason to believe that Bonsib, Inc. ("the corporation") and its Chairman, L. William Bonsib, Jr., violated 2 U.S.C. § 441b(a) by making corporate contributions. On December 11, 1989, this Office notified NCCC and the corporation of the Commission's findings and forwarded written questions to them at that time. When NCCC and the corporation failed to submit answers to the questions, the Commission sent subpoenas on April 9, 1990. Instead of responding to the subpoenas, counsel for the respondents submitted a copy of a Bankruptcy Court decree granting the respondent corporation a Chapter 7 discharge, and requested that the Commission take no further action. This Office notified counsel for the respondents by

certified letter dated Aug. 24, 1990, that the Commission had denied the respondents' requests and had granted the respondents an additional 10 days to comply with the subpoenas. When no responses were received, the Office of the General Counsel filed a civil suit to enforce the subpoenas on October 1, 1990. In an attempt to resolve this matter prior to the show cause hearing, respondent's counsel voluntarily brought his client, L. William Bonsib, Jr. to the FEC's offices for a deposition, which was held on November 13, 1990. The deposition has provided sufficient information to close the investigation.

## II. ANALYSIS

## A. Corporate Contributions

The Federal Election Campaign Act of 1971, as amended (the "Act" or "FECA") prohibits corporations from making contributions or expenditures in connection with federal elections. 2 U.S.C. § 441b(a). This provision also prohibits officers and directors of corporations from consenting to the making of such corporate contributions or expenditures. Id. The Act defines "contribution or expenditure" to include any direct or indirect payment or "anything of value," but excludes the establishment, administration and solicitation of contributions to a separate segregated fund of the corporation.

The Commission's regulations at 11 C.F.R. § 114.10 permit corporations to extend credit to political committees provided the credit is extended in the ordinary course of business and the terms are substantially similar to extensions of credit to

nonpolitical debtors of similar risk and size of obligation. 1

However, 11 C.F.R. § 100.7(a)(4) provides that the extension of credit for a length of time beyond normal business or trade practice is a contribution absent commercially reasonable collection attempts.

In Advisory Opinion 1979-36, the Commission addressed a situation where a direct mail fundraising firm sought to expend funds to operate a direct mail campaign for a candidate's committee with the expectation of subsequent reimbursement by the campaign from the proceeds of the fundraising efforts. The Commission concluded that no corporate contribution would result if the proposed financial arrangement is normal industry practice, and if credit is extended in the ordinary course of the firm's business with terms which are substantially similar to those given to political and nonpolitical debtors of similar risk and size of obligation, and if the costs charged for the services are at least the normal charge for services of that type.

NCCC registered as a nonconnected committee on February 5, 1986. The committee's first report (1986 April Quarterly)

<sup>1.</sup> Section 114.10 was replaced by new 11 C.F.R. Part 116 on Oct. 3, 1990. Changes to 11 C.F.R. § 100.7(a)(4) also took effect on that date. However, the situation presented in this enforcement action is being analyzed under the previous rules, since they were in effect when the activities in question occurred. The application of the new rules would not change the General.Counsel's recommendations.

<sup>2.</sup> The First General Counsel's report addressed the possibility that Mr. Bonsib intended to establish the NCCC as a separate segregated fund of Bonsib, Inc. Mr. Bonsib had indicated in a written statement to RAD that he was advised by "members of the

indicated that the committee began with no cash on hand and contracted to have the corporation pay its initial administrative and fundraising expenses with the expectation of reimbursement from the proceeds of the direct mail. L. William Bonsib, Jr. was simultaneously the chairman of Bonsib, Inc. and listed as treasurer of NCCC. NCCC's amended 1986 April Quarterly Report indicates that the corporation incurred \$122,741.01 in administrative and direct mail expenses on behalf of NCCC. These fundraising efforts did not clear a profit, as NCCC's reports indicate total receipts of \$16,330.58 during this period. NCCC's expenditures during the first quarter of 1986 include \$15,500 in payment to Bonsib, Inc., which resulted in an outstanding debt of \$107,241.01 owed to the company as of March 31, 1986. Subsequent increases in the amount owed and additional payments produced an outstanding debt of \$111,592.38 and a cash on hand balance of \$2,834.28 as of January 1, 1987.

Since then, the committee's financial activity has consisted entirely of applying the \$2,834.28 cash on hand balance to reduce the outstanding debt to \$108,758.10. NCCC's reports and Mr. Bonsib's statements indicate that NCCC has made no contributions to candidates or other committees, and no disbursements other than for administrative and fundraising

<sup>(</sup>Footnote 2 continued from previous page)
Federal Election Commission, counsel, and others" that a
corporate loan was permissible, and that "the corporation might
actually pay expenses." The evidence provided by Mr. Bonsib in
his deposition now indicates that it was never his intention to
form a corporate separate segregated fund. It now appears that
his statement to RAD regarding corporate payment of committee
expenses was probably a reference to Advisory Opinion 1979-36.

purposes. See Deposition of Louis William Bonsib at p. 38 (Nov. 13, 1990). However, the amount of contributions received and expenditures made by NCCC during the first quarter of 1986 is sufficient to trigger political committee status.

The information provided by Mr. Bonsib during the deposition revealed that Bonsib, Inc. was an advertising and public relations firm that provided direct mail services. Bonsib Deposition at pp. 10 and 22. Mr. Bonsib estimated that during the 1980s, its clients were approximately 80% political candidates and 20% commercial clients. 3 Id. at 19. With regard to Bonsib, Inc.'s usual credit practice, Mr. Bonsib testified that the corporation's contracts always called for advance payment, and that fundraising letters would not be sent out without advance payment. Id. at p. 25. However, if a client fell behind in payments, the corporation would extend credit, but as little as possible. He further indicated that if payment was not forthcoming, his collection practices included collection agencies and legal steps, including lawsuits. Mr. Bonsib could not think of any examples where these steps were not taken. Id. at pp. 25-26.

In the instant case, Mr. Bonsib indicated that NCCC was in fact created for one of his political clients, but was unable to

<sup>3.</sup> Although Bonsib, Inc. was formally dissolved on September 12, 1989, following the bankruptcy proceedings, Mr. Bonsib also stated that he is in the process of incorporating another company in the same line of business, which is currently doing business as "Bonsib Agency." Id., at pp. 12, 27 and 54.

recall the specific client. 4 Id. at p. 32. Mr. Bonsib did remember that Daniel C. Holdgreiwe, listed as assistant treasurer, was a client of Bonsib, Inc. However, he could not remember whether Mr. Holdgreiwe was a candidate or the nature of his position in the NCCC. Id. at p. 36. Mr. Bonsib did recall that the purpose of the committee was to elect conservatives to Congress. To this end, Mr. Bonsib estimated that thousands of fundraising letters were sent out, using a mailing list obtained from a list broker. Id. at pp. 37, and 38-39. He also acknowledged that the fundraiser was extremely unsuccessful. Id. at p. 61. When questioned about the almost \$123,000 having been advanced by the corporation to NCCC, Mr. Bonsib affirmed that the committee's report accurately reflected what was done at the time, and that the corporation had never had another situation like that. Id. at pp. 44, and 50-51. In fact, this situation was one of the reasons Bonsib, Inc. ended up filing for bankruptcy, since the corporation owed its suppliers and paid as many of them as possible from corporate funds. Id. at pp. 51 and 63. Mr. Bonsib was unable to recall whether collection efforts were made in this instance. Id. at p. 65.

Given this testimony, it is clear that the requirements of 11 C.F.R. § 114.10 and the guidelines set out in Advisory

<sup>4.</sup> Mr. Bonsib has not produced any of the corporate or committee records sought by the subpoenas regarding the activities under investigation. Mr. Bonsib testified that all the corporation's records were thrown out after the corporation asked the referee in bankruptcy what should be done with them, and the referee said to throw them out. Id. at p. 28.

Opinion 1979-36 have not been met. The terms on which credit was extended to NCCC were not consistent with extensions of credit by the corporation to other nonpolitical clients of similar risk and size of obligation. Moreover, in sharp contrast to Bonsib, Inc.'s previous practices, and in contrast to standard industry practice, little, if any, attempt was made to collect the \$108,758.10 in remaining debts owed by NCCC before Bonsib, Inc. decided to write off this amount. The size of the sums advanced to NCCC, which had just been formed and had no previous credit history, coupled with the fact that NCCC has never repaid most of the amount owed, as well as the apparent dual role played by Mr. Bonsib as chairman of the corporation and treasurer of the committee, demonstrate that the extension of credit was not made in the ordinary course of business, and that the corporation did not treat the debt in a commercially reasonable manner under 11 C.F.R. § 114.10.

In conclusion, the transactions between NCCC and Bonsib, Inc. resulted in the making and acceptance of an impermissible corporate contribution. Therefore, the General Counsel recommends that there is probable cause to believe that NCCC, L. William Bonsib, Jr., as treasurer, Bonsib, Inc., and L. William Bonsib, Jr., as chairman, violated 2 U.S.C. § 441b(a).

# B. Failure to File Timely Reports

The Act requires unauthorized committees opting to file quarterly reports to file no later than the 15th day after the last day of each calendar quarter, to file Mid-Year Reports no later than July 31, and to file Year End Reports by January 31

92040900191

of the following year. 2 U.S.C. § 434(a)(4)(A). In the instant case, NCCC failed to file its 1987 Mid-Year and Year End Reports and its 1988 April, July and October quarterly Reports until December 23, 1988. To date, NCCC has not filed its 1988 Year End Report. Therefore, the General Counsel recommends that there is probable cause to believe that NCCC and L. William Bonsib, Jr., as treasurer, violated 2 U.S.C. § 434(a)(4).

# C. Campaign Depository

Section 432(h)(1) of the FECA requires each political committee to maintain at least one checking account at its campaign depository. This provision also requires the deposit of all receipts in the depository account and the making of all disbursements (other than petty cash) by check from such account. On NCCC's Statement of Organization, National Capitol Bank is listed as the committee's sole depository. In a conversation with the RAD analyst on June 20, 1989, Mr. Bonsib stated that there never was a bank account for the committee, only a cash account, and that the committee's bills were paid by the corporation. However, during the November 13, 1990 deposition, Mr. Bonsib indicated that NCCC and Bonsib, Inc. had entirely separate bank accounts and that the contributions received in response to the fundraising appeal would have all been deposited in NCCC's account at National Capitol Bank. Therefore, the General Counsel recommends that there is no probable cause to believe NCCC and its treasurer violated 2 U.S.C. § 432(h)(1).

# III. GENERAL COUNSEL'S RECOMMENDATIONS

- Find probable cause to believe that the National Conservative Congressional Committee and L. William Bonsib, Jr., as treasurer, violated 2 U.S.C. § 441b(a).
- Find probable cause to believe that Bonsib, Inc., and L. William Bonsib, Jr., as Chairman, violated 2 U.S.C. § 441b(a).
- 3. Find probable cause to believe that the National Conservative Congressional Committee and L. William Bonsib, Jr., as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (iv).
- Find no probable cause to believe that the National Conservative Congressional Committee and L. William Bonsib, Jr., as treasurer, violated 2 U.S.C. § 432(h)(1).

0

0 0 0

0

4

0 N 0

General Counsel



91 MAR -4 PM 1:38

# FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 4, 1991

# MEMORANDUM

SENSITIVE

TO:

0 6

0

4

0

2

The Commission

FROM:

Lawrence M. Noble General Counsel

SUBJECT:

MUR 3013

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondents of the General Counsel's intent to recommend to the Commission findings of probable cause and no probable cause to believe were mailed on March 4, 1991. Following receipt of the respondents' reply to this notice, this Office will make a further report to the Commission.

## Attachments

- 1. Brief
- 2. Letter to respondent

Staff person: Rosie Smith



# FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 4, 1991

John D. Hemenway, Esq. 4816 Rodman Street, N.W. Washington, D.C. 20016

RE: MUR 3013

Dear Mr. Hemenway:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by your clients, on November 28, 1989, the Federal Election Commission found reason to believe that your clients, Bonsib, Inc. and the National Conservative Congressional Committee, violated 2 U.S.C. § 432(h)(1), § 434(a)(4)(A)(i) and (iv), and § 441b(a) and instituted an investigation in this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that violations have occurred.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

John D. Hemenway, Esq. Page 2 A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement. Should you have any questions, please contact Rosie Smith, the attorney assigned to this matter, at (202) 376-8200. Sincerely, Lawrence M. Noble General Counsel Enclosure Brief 0 0 0 CI 0

ATTORNEY AT LAW

WASHINGTON, D.C. 20016 (202) 244-4819

March 9, 1991

SECRETARY OF THE COMMISSION Federal Election Commission Office of the General Counsel 999 E Street, N.W.,

RE: MUR 3013 REQUEST FOR EXTENSION

Washington, D.C. 20463

Dear Secretary,

0

0

0

0

0

4

0

CI

0

Reference is made to correspondence directed to me on March 4, 1991 by the General Counsel of the FEC in the above referenced case now before your Commission.

Since I am no longer counsel for L. William Bonsib, Jr. and never was counsel for Bonsib, Inc., which no longer exists, I have returned the correspondence to the sender.

However, in view of your regulations and the fact that I will not be counsel for Mr. Bonsib, I must inform the Commission that:

- 1. Mr. Bonsib has never been served properly with these or any other materials in the case. I made a special appearance in the United States District case and assisted the FEC in conducting a deposition, which FEC Staff felt the matter required;
- 2. The FEC has never reimbursed Mr. Bonsib for travel to Washington in connection with that deposition, which responsible FEC officials agreed to do; moreover, the FEC never has even replied to Bonsib's claim for reimbursement transmitted by letter (as recommended by office of the General Counsel) over my signature. I will, no doubt, be called as a witness as to the facts in Bonsib's claim for reimbursement. Your attention is drawn to pp 6 and 84 of the Bonsib Transcript which contains the colloquy between Messrs. Hemenway and Fitzgerald in this matter.
- 3. You are therefore requested to forward the returned and all future correspondence to Mr. Bonsib or his new counsel. Since I will not be filing for Mr. Bonsib, I take this occasion to notify you that your deadline of a responsive brief within 15 days can not reasonably be met by me or anyone else and that, therefore, a resetting of deadlines by your Commission is herewith requested until Mr. Bonsib is able to locate new counsel in the matter to whom you can send the materials posted to me on March 4, 1991, which were returned on March 9, 1991.

Attachments:

Ltr to Lawrence M. Noble, Esq. from JDH dtd March 9 w/attach.

Sincerely yours,

John D. Hemenway

ATTORNEY AT LAW 4816 RODMAN ST., N.W. WASHINGTON, D.C. 20016 (202) 244-4819 FEDERAL ELECTION CONTRIBUTION CONTRIBUTION

91 MAR 21 AM 9: 34

March 9, 1991

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

RE: MUR 3013

Dear Mr. Noble,

Receipt of your letter addressed to me of March 4, 1991 is acknowledged together with its enclosures. That letter is herewith returned together with its enclosures, since I have withdrawn as counsel for Mr. L. William Bonsib, Jr. Please address all future correspondence in this matter to Mr. L. William Bonsib, Jr. or to his counsel.

With respect to the correspondence you sent to me in the mistaken impression that I still was Mr. Bonsib's attorney, let me state for the record the following:

- (1) I represented only L. William Bonsib and never other entities to which you refer. The corporation, as you know from your records no longer exists, having gone into bankruptcy, the pertinent records of which have been provided you; and, the committee is evidently a creature of the corporation, from what little I know about it.
- (2) Please inform your Commission that Mr. Bonsib still awaits a response to his letter to your office from me dated November 16, 1990, requesting rather minimal payment for Mr. Bonsib's expenses in travelling to Washington, voluntarily, to attend a deposition you arranged at the FEC. I was informed that these expenses would be reimbursed and I so informed (incorrectly, as it appears) my client. I can establish beyond any doubt in a court of law that I was given such assurances by responsible persons in your agency and I can not understand your agency's behavior in reneging on this arrangement, which has played no small part in my withdrawal from the case.

I shall, of course, make myself available as a witness to the above events should counsel for Bonsib so desire. It is my impression that everything L. William Bonsib could tell the FEC was told the FEC during deposition and that he spoke the truth during his deposition concerning prior contacts with the FEC. Frankly, it makes me wonder what public service you may believe you are performing in going beyond the deposition.

92040900197

I enclose a request for a continuance, as you advise until you properly serve Mr. Bonsib with your brief and until he has a chance to obtain local counsel. Please take note that your mailing of the returned documents to me do not constitute service upon L. William Bonsib, Jr. nor any of the other entities you named in your letter or its attachments. Attachments: Sincerely yours, JDH ltr 11-16-90 to FEC Letter to Sec. of FEC Return of FEC correspondence dated March 4, 1991 John D. Hemenway 0 0 0 0 4 0 N cc: 0 Ms. Franciszka A. Monarski Attorney at Law Ms. Rosie Smith, Attorney at Law

NATIONAL CONSERVATIVE CONGRESSIONAL COMMITTEE, et al., Respondents. AFFIDAVIT OF L. WILLIAM BONSIB, JR. 0 The undersigned, L. William Bonsib, Jr., resident in Kentucky, states the following under oath: 0 I have no objection to the withdrawal from the above-0 captioned lawsuit of John D. Hemenway as my attorney. 0 Attorney Hemenway consented to enter the case for the purpose of representing me before the Federal Election Commission 4 0 during a deposition. CV The Federal Election Commission named me in a lawsuit, 0. evidently for the purpose of forcing my appearance at a deposition. This was totally unnecessary, for I was always quite willing to come voluntarily, provided my travel expenses were paid. I understand from Attorney Hemenway that the Federal Election Commission agreed to pay these expenses, but then, at the deposition, decided to renege on the arrangement. 5. Attorney Hemenway is not now authorized to accept service of process of any kind for me and he never has been so authorized.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA (Civil Division)

Misc. No. 90-280

FEDERAL ELECTION COMMISSION

v.

Petitioner.

I asked Mr. Hemenway to appear before this Court as a courtesy to the Court, for I believe that one should always show respect to our legal institutions and not merely ignore matters one knows are before the court. However, on a continuing basis it would work a great hardship and cause an expense I can not afford to continue to deal with a legal matter in Washington when I am resident in Kentucky.

- 6. Therefore, in the future, I shall attempt to require the Federal Election Commission to deal with me directly or through counsel I shall engage from Kentucky.
- 7. It is my understanding that Mr. Hemenway requires this written statement under the Federal Court Rules in order formally to withdraw from his representation of my affairs and it is for this reason that I have prepared this affidavit.

I make the above statements under oath this 15th day of March, 1991, and in the knowledge that I am subject to the penalties of perjury if these statements are not true.

L. WILLIAM BONSIB, JR.

2040900201

0

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA (Civil Division)

FEDERAL ELECTION COMMISSION

Petitioner.

v.

Misc. No. 90-280

NATIONAL CONSERVATIVE CONGRESSIONAL COMMITTEE, et al.,

Respondents.

# MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION TO WITHDRAW APPEARANCE

Counsel for L. William Bonsib, Jr. entered a special appearance for Mr. Bonsib in the above-captioned cause to attempt to clear up procedural difficulties Mr. Bonsib was having with the Federal Elections Commission (FEC).

Mr. Bonsib is an older person and has difficulty in recalling details about business conducted a number of years earlier, but he made a considerable effort to come to Washington to make an appearance at a deposition, with his wife assisting in driving and with the assistance of undersigned counsel, who had agreed to represent him for this limited purpose.

This phase of the matter having been concluded, the commitment of counsel further to represent Mr. Bonsib is concluded, as indicated in paragraph 2 of the attached affidavit of L. William Bonsib, Jr.

Unfortunately, the FEC has refused to make any compensation to Bonsib for his travel and per diem, despite its promise to undersigned counsel to do so. This has complicated communication between counsel and Bonsib and Hemenway has not been paid fully for his services, despite the capacity of the Bonsib family to meet the modest bills rendered.

The procedural posture of the case is that the FEC filed to dismiss this action without prejudice on November 20, 1990. There also is an outstanding motion by the undersigned to sanction the FEC to the extent of the amount owed to Bonsib for his agreement to travel to Washington from his residence in Kentucky, but there is nothing that Bonsib can do to force the FEC to pay an account the FEC declares that it does not owe and will not pay short of extensive litigation that is not worth the candle and the undersigned counsel can not afford to assume the burden of this litigation, even though he is willing to present evidence, should incoming counsel for Bonsib (when named) require the presentation of such evidence which would include testimony of undersigned counsel as a witness.

Local practice permits withdrawal of counsel when a trial date has not been set and when the party's written consent has been obtained. See Rule 201 (c). That is the situation here.

Rendering moot the present motion for sanctions before the Court to require payment of the claimed obligation to Bonsib would not prejudice the interests of any party for it could be renewed, if desired by Bonsib and if considered meritorious by the Court.

3 WHEREFORE, undersigned counsel respectfully requests that his motion to withdraw will be granted. March 11, 1991 Respectfully submitted, John D. Hemenway 4816 Rodman St., N.W. Washington, D.C. 20016 (202) 244-4819 M 0 2 0 0 0 0 4 0 N 0

92040900204

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA (Civil Division)

FEDERAL ELECTION COMMISSION

Petitioner.

v.

Misc. No. 90-280

NATIONAL CONSERVATIVE CONGRESSIONAL COMMITTEE, et al.,

Respondents.

## MOTION TO WITHDRAW APPEARANCE

Comes now counsel for L. William Bonsib, Jr., acting under the authority of local rule 201 (c) of this Honorable Court, to move the Court to give leave to counsel to withdraw his appearance in behalf of L. William Bonsib, Jr.

Since the procedural posture of this case is dormant, counsel also suggests that the Court may wish to find all pending motions before it submitted by the undersigned counsel moot.

In support of his motion, counsel offers a sworn affidavit signed by L. William Bonsib, a memorandum of points and authorities in support of this motion and, for the convenience of the Court, a draft Order.

March 11, 1991

Respectfylly submitted,

John D/ Hemenway 4816 Rodman St., N.W. Washington, D.C. 20016 (202) 244-4819 92040900205

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA (Civil Division)

FEDERAL ELECTION COMMISSION

Petitioner.

v.

Misc. No. 90-280

NATIONAL CONSERVATIVE CONGRESSIONAL COMMITTEE, et al.,

Respondents.

## ORDER

Counsel for L. William Bonsib, Jr. has moved for leave to withdraw his appearance and submits a sworn affidavit from Mr. Bonsib supporting this motion. Counsel had entered a special appearance.

Having considered the motion with affidavit signed by L. William Bonsib, Jr. and the entire record and noting that the requirements of local rule 201 (c) appear to be met in other respects, it is this \_\_\_\_\_ day of \_\_\_\_\_\_,1991 hereby

#### ORDERED:

- 1. That John D. Hemenway is granted permission to withdraw as counsel for L. William Bonsib, Jr.; it is also ordered:
- 2. That the above-captioned action is dismissed without prejudice as requested by the Federal Elections Commission (FEC) on November 20, 1990 in the FEC "Notice of Dismissal;" and it is finally ordered:
- 3. That all other outstanding motions in this action are and ought to be moot.

LOUIS F. OBERDORFER, JUDGE UNITED STATES DISTRICT COURT

2 Please send copies of signed order to: John D. Hemenway 4816 Rodman St., N.W. Washington, D.C. 20016 Laurence M. Noble, Esq. Federal Election Commission 999 E. Street, N. W. Washington, D.C. 20463 N 0 0 0 0 4 0 CV 0

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA (Civil Division)

FEDERAL ELECTION COMMISSION

Petitioner.

v.

Misc. No. 90-280

NATIONAL CONSERVATIVE CONGRESSIONAL COMMITTEE, et al.,

Respondents.

#### CERTIFICATE OF SERVICE

The undersigned certifies that on the 18th day of March, 1991, he caused to have true copies of the forgoing Motion to Withdraw Appearance all of its related attachments served upon Laurence M. Noble, Esq., Federal Election Commission, 999 E. Street, N.W., Washington, D.C. 20463 by United States Mail, first class, all postage prepaid.

John D. Hemenway



#### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 12, 1991

John D. Hemenway, Esq. 4816 Rodman Street, N.W. Washington, D.C. 20016

RE: MUR 3013

Dear Mr. Hemenway:

0

0

N

0

0

0

0

4

2 0

0

This is to acknowledge receipt of your letter dated March 9, 1991, which was received on March 21, 1991. We understand that you have withdrawn as counsel in MUR 3013 pending before the Federal Election Commission.

Sincerely,

Lawrence M. Noble General Counsel

BY:

Lois G. Lerner

Associate General Counsel



#### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 12, 1991

#### CERTIFIED MAIL RETURN RECEIPT REQUESTED

Louis William Bonsib, Jr. P.O. Box 1807 Washington, D.C. 20013

RE: MUR 3013

Dear Mr. Bonsib:

0

N

0 0

0

4

0

N

0

In light of the withdrawal of your counsel, John D. Hemenway, from MUR 3013, enclosed please find a copy of the General Counsel's Brief and attached letter, which were sent to Mr. Hemenway on March 4, 1991.

Sincerely,

Lawrence M. Noble General Counsel

BY:

Lois G. Lerner

Associate General Counsel

Enclosures Letter Brief

FEDERAL SECRETARIAT

### BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

|  | OFHOITIE          |
|--|-------------------|
| In the Matter of                                   | JUN 2 5 1991      |
| National Conservative Congressional Committee, and | ) MUR 3013        |
| L. William Bonsib, Jr., as treasurer               | EXECUTIVE SESSION |
| Bonsib, Inc. and                                   |                   |

#### GENERAL COUNSEL'S REPORT

#### I. BACKGROUND

L. William Bonsib, Jr., as chairman

On November 28, 1989, the Federal Election Commission found reason to believe that the National Conservative Congressional Committee ("NCCC") and its treasurer, L. William Bonsib, Jr., violated 2 U.S.C. \$\$ 432(h)(1), 434(a)(4)(A)(i) and (iv) and \$ 441b(a) by accepting corporate contributions, failing to maintain a checking account at its designated campaign depository, and failing to file timely reports. The Commission also found reason to believe that Bonsib, Inc. ("the corporation") and its Chairman, L. William Bonsib, Jr., violated 2 U.S.C. \$ 441b(a) by making corporate contributions. On December 11, 1989, this Office notified NCCC and the corporation of the Commission's findings and forwarded written questions to them at that time. When NCCC and the corporation failed to submit answers to the questions, the Commission sent subpoenas on April 9, 1990. Instead of responding to the subpoenas, counsel for the respondents submitted a copy of a Bankruptcy Court decree granting the respondent corporation a Chapter 7 discharge, and requested that the Commission take no further action. This Office notified counsel for the respondents

by certified letter dated August 24, 1990, that the Commission had denied the respondents' requests and had granted the respondents an additional 10 days to comply with the subpoenas. When no responses were received, the Office of the General Counsel filed a civil suit to enforce the subpoenas on October 1, 1990. In an attempt to resolve this matter prior to the show cause hearing, respondent's counsel voluntarily brought his client, L. William Bonsib, Jr. to the FEC's offices for a deposition, which was held on November 13, 1990. The deposition provided sufficient information to close the investigation. Accordingly, the General Counsel's brief was mailed to counsel for the respondents on March 4, 1991. Upon subsequent notification that respondent's counsel had withdrawn in the MUR, this Office sent by certified letter a copy of the General Counsel's Brief to the respondents on April 12, 1991. The respondents have not submitted a responsive brief or requested an extension of time to do so.

#### II. ANALYSIS

A detailed analysis of the alleged violations is found on pages 2 through 8 of the General Counsel's Brief.

#### III. <u>DISCUSSION OF CONCILIATION AND CIVIL PENALTY</u>

#### BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )

National Conservative Congressional ) MUR 3013
Committee and L. William Bonsib, )
as treasurer; )

Bonsib, Inc. and )
L. William Bonsib, Jr., as Chairman.

#### CORRECTED CERTIFICATION

- I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on June 25, 1991, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 3013:
  - Find probable cause to believe that the National Conservative Congressional Committee and L. William Bonsib, Jr., as treasurer, violated 2 U.S.C. § 441b(a).
  - Find probable cause to believe that Bonsib, Inc., and L. William Bonsib, Jr., as Chairman, violated 2 U.S.C. § 441b(a).
  - 3. Find probable cause to believe that the National Conservative Congressional Committee and L. William Bonsib, Jr., as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (iv).

(continued)



#### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 28, 1991

### CERTIFIED MAIL RETURN RECEIPT REQUESTED

Louis William Bonsib, Jr. P.O. Box 1807 Washington, D.C. 20013

RE: MUR 3013

Dear Mr. Bonsib:

On June 25, 1991, the Federal Election Commission found that there is probable cause to believe the National Conservative Congressional Committee and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (iv) and § 441b(a), provisions of the Federal Election Campaign Act of 1971, as amended. The Commission also found that there is probable cause to believe that Bonsib, Inc. and you, as chairman, violated 2 U.S.C. § 441(b)(a).

The Commission has a duty to attempt to correct such violations for a period of 30 to 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement during that period, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission within ten days. I will then recommend that the Commission accept the agreement. Please make your check for the civil penalty payable to the Federal Election Commission.

Louis William Bonsib, Jr. Page 2 If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Rosie Smith, the senior attorney assigned to this matter, at (202) 376-8200. Sincerely, Lawrence M. Noble General Counsel Enclosure Conciliation Agreement N 0 0 0 0 0 0

RECEIVED
F.E.C.
SECRETARIAT
BEFORE THE FEDERAL ELECTION COMMISSION
91 AUG 23 PM 5: 00

In the Matter of

National Conservative Congressional Committee and L. William Bonsib, Jr., as treasurer

Bonsib, Inc. and L. William Bonsib, Jr., as chairman MUR 3013

SENSITIVE SEP 1 7 1991

**EXECUTIVE SESSION** 

GENERAL COUNSEL'S REPORT

#### I. BACKGROUND

On June 25, 1991, the Federal Election Commission found there is probable cause to believe that the National Conservative Congressional Committee ("NCCC") and its treasurer, L. William Bonsib, Jr., violated 2 U.S.C. § 434(a)(4)(A)(i) and (iv) and § 441b(a). The Commission also found probable cause to believe that Bonsib, Inc. ("the Corporation") and its Chairman, L. William Bonsib, Jr., violated 2 U.S.C. § 441b(a). The Commission's notification and proposed conciliation agreement were mailed directly to Respondents on June 28, 1991, return receipt requested. On July 22, 1991, the letter was returned to this Office marked "Refused."

This Office has not received any response to its prior attempts to contact the Respondents after receiving a letter on March 21, 1991, indicating that counsel for the respondents had withdrawn in the MUR. On April 12, 1991, this Office sent by certified letter a copy of the General Counsel's Brief to the Respondents. A return receipt, signed on April 23, 1991 was received. However, the Respondents did not submit a responsive

brief or request an extension of time to do so.

The lack of response to the General Counsel's Brief, and the refusal to accept the letter containing the proposed conciliation agreement, is consistent with Respondents' continued failure to respond to the Commission throughout this enforcement matter, which ultimately necessitated the issuance of discovery subpoenas and the initiation of a civil suit to enforce them. Consequently, this Office recommends that the Commission authorize the Office of the General Counsel to file a civil suit for relief in the United States District Court.

#### II. RECOMMENDATIONS

N

0

0

0

0

4

2

0

- 1. Authorize the Office of the General Counsel to file a civil suit for relief in United States District Court against the National Conservative Congressional Committee, and L. William Bonsib, Jr., as treasurer, and against Bonsib, Inc. and L. William Bonsib, Jr., as chairman.
- 2. Approve the appropriate letter.

8/23/9/ Date

Lawrence M. Nobie General Counsel

Staff Assigned: Rosie Smith

#### BEFORE THE FEDERAL ELECTION COMMISSION

MUR 3013

In the Matter of National Conservative Congressional) Committee and L. William Bonsib, Jr., as treasurer; Bonsib, Inc. and L. William Bonsib,) Jr., as chairman.

#### CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on September 17, 1991, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 3013:

- 1. Authorize the Office of the General Counsel to file a civil suit for relief in United States District Court against the National Conservative Congressional Committee, and L. William Bonsib, Jr., as treasurer, and against Bonsib, Inc. and L. William Bonsib, Jr., as chairman.
- Approve the appropriate letter as recommended 2. in the General Counsel's report dated August 23, 1991.

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

Attest:

N

0

0

0

0

4

0

N

0

Marjorie W. Emmons Secretary of the Commission



#### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 23, 1991

Mr. Louis William Bonsib, Jr. P.O. Box 182 Wilmore, KY 40390

RE: MUR 3013

Dear Mr. Bonsib:

0

N

N

0

0

0

0

4

0

N

0

You were previously notified that on June 25, 1991, the Federal Election Commission found probable cause to believe that the National Conservative Congressional Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (iv) and § 441b(a), provisions of the Federal Election Campaign Act of 1971, as amended. The Commission also found that there is probable cause to believe that Bonsib, Inc. and you, as chairman, violated 2 U.S.C. § 441b(a).

As a result of our inability to settle this matter through conciliation within the allowable time period, the Commission has authorized the General Counsel to institute a civil action for relief in the United States District Court.

Should you have any questions, or should you wish to settle this matter prior to suit, please contact V. Colleen Miller, Acting Assistant General Counsel, at (202) 376-8200, within five days of your receipt of this letter.

Sincerely,

Lawrence M. Noble General Counsel



#### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 19, 1992

#### MENORANDUM

TO:

The Commission

FROM:

Lawrence M. Noble

General Counsel

Richard B. Bader V Associate General Counsel

Stephen E. Hershkowitz Assistant General Counsel

Frania Monarski Cam

Attorney

RE:

National Conservative Congressional Committee and L. William Bonsib, Jr., as Treasurer

Bonsib, Inc. and L. William Bonsib, Jr., as Chairman

On June 25, 1991, the Commission found probable cause to believe that the National Conservative Congressional Committee ("NCCC") and L. William Bonsib, Jr., as treasurer, violated 2 U.S.C. § 441b(a) by knowingly accepting a \$122,741.01 corporate contribution from Bonsib, Inc. in connection with fundraising expenses for a direct mail solicitation and 2 U.S.C. §§ 434(a)(4)(A)(i) and (iv) by failing to file the 1987 Mid-Year Report, the 1987 Year End Report, the 1988 April Quarterly Report, the 1988 July Quarterly Report, the 1988 October Quarterly Report and the 1988 Year End Report. In addition, the Commission found probable cause to believe that Bonsib, Inc. and L. William Bonsib, Jr., as chairman, violated 2 U.S.C. § 441b(a) by knowingly making a \$122,741.01 corporate contribution to NCCC.

Unable to obtain a response to offers to discuss conciliation, the Commission, on September 17, 1991, authorized the Office of the General Counsel to file suit against NCCC, Bonsib, Inc., and L. William Bonsib, Jr., as treasurer of NCCC and as chairman of Bonsib, Inc., for violations of the Federal Election Campaign Act of 1971, as amended (the "Act"). Staff from this Office finally has been able to get a response from Mr. Bonsib and his wife and, based on new information, recommends

-2that the Commission not file suit against NCCC, Bonsib, Inc. or Mr. Bonsib. This Office recommends that the Commission not pursue Mr. Bonsib for the violations of the Act. Mr. Bonsib is seventy-six years old, retired and is in failing physical health. N N 0 Second, NCCC no longer exists as a political committee. 0 Bonsib, Inc. incurred \$122,741.01 in administrative and fundraising expenses on behalf of NCCC with the expectation of 0 reimbursement from the proceeds of a direct mail solicitation. The fundraising efforts did not clear a profit, NCCC did not make 0 any contributions to any candidates or committees, and NCCC could 4 not repay Bonsib, Inc. for the expenses incurred. As a result, Bonsib, Inc. filed for bankruptcy and was dissolved. 0 Third, the Commission cannot pursue relief against Bonsib, N Inc. because it received a bankruptcy discharge in a "Chapter 7 No Distribution Case" on February 27, 1990 in the United States 0 Bankruptcy Court for the Eastern District of Virginia. Attachment 2. Thereafter, Bonsib, Inc. was formally dissolved. Accordingly, Bonsib, Inc. no longer exists and cannot be sued. Based on the foregoing facts, this Office recommends that the Commission not file suit against the National Conservative Congressional Caucus, Bonsib, Inc. and L. William Bonsib, as treasurer of the committee and chairman of Bonsib, Inc.

#### BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

) MUR 3013

National Conservative Congressional

Committee and L. William Bonsib, Jr.,

as treasurer;

Bonsib, Inc. and L. William Bonsib, Jr.,)

as Chairman.

#### CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on March 3, 1992, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions with respect to the above-captioned matter:

- Direct the Office of General Counsel not to file suit against the National Conservative Congressional Caucus, Bonsib, Inc., and L. William Bonsib, as treasurer of the committee and chairman of Bonsib, Inc.
- 2. Direct the Office of General Counsel to send a letter as agreed during the meeting discussion of this date.
- Close the file.

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

Attest:

3-4-92

Secretary of the Commission



#### FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 9, 1992

#### BY CERTIFIED MAIL

Mr. L. William Bonsib, Jr. 214 Lake View Drive Nicholasville, KY 40356

Re: MUR 3013

National Conservative Congressional Committee and L. William Bonsib, Jr., as treasurer

Dear Mr. Bonsib:

You were previously notified that on June 25, 1991, the Federal Election Commission found that there was probable cause to believe that the National Conservative Congressional Committee and you, as treasurer, violated 2 U.S.C. §§ 441b(a), 434(a)(4)(A)(i) and 434(a)(4)(A)(iv). On that same date, the Commission also found that there was probable cause to believe that Bonsib, Inc. and you, as chairman, violated 2 U.S.C. § 441b(a). As a result of our inability to settle this matter through conciliation within the allowable time period, the Commission, on September 17, 1991, authorized the General Counsel to institute a civil action for relief in the United States District Court.

In consideration of your present circumstances and the fact that your corporation and the political committee are no longer in existence, the Commission determined, on March 3, 1992, to take no further action at this time against the National Conservative Congressional Committee, Bonsib, Inc. and you, as treasurer of the committee and chairman of Bonsib, Inc. The Commission further determined to close the file in this matter, reserving its right to reopen the file if you should again become active in federal election campaigns.

The Commission reminds you that a corporation, which extends credit to a political committee and fails to make a commercially reasonable attempt to collect the debt, makes a prohibited corporate contribution in violation of 2 U.S.C. § 441b, and a

L. William Bonsib, Jr. Page 2 political committee and its treasurer that accepts such a contribution also violate that provision. If you have any questions concerning this matter, please contact Frania Monarski at (800) 424-9530. Sincerely, Lawrence M. Noble General Counsel 2 N N 0 0 0 0 2 0

## ACE-FEDERAL REPORTERS, INC.

THREAT LECTION COMMISSION

98 DEC 17 PH 12: 18

444 North Capitol Street Washington, D.C. 20001 (202) 347-3700 (800) 336-6646

STENOTYPE REPORTERS

FAX 202/737-3638

7 December 1990

Louis W. Bonsib

C/o Ms. Rosie Smith
Federal Election Commission
999 E Street, N.W., Sixth Floor
Washington, D. C. 20643

Re:

Deposition of LOUIS W. BONSIB Washington DC, 13 November 1990

Dear Mr. Bonsib:

As you review your deposition, if you feel that the court reporter has taken down your response to any question incorrectly, you may change it by drawing one line through the word or words and printing the correction above the error. Also, please place your initials in the right margin opposite the change. You may find that the court reporter accurately transcribed everything you said, in which case you will have no corrections to make. Please list your changes on the attached sheet.

You must sign the transcript before a notary public or other official authorized to administer the Oath. Space is provided on Page 85.

Please return this transcript to my attention at the above address as soon as possible, or 30 days at the latest.

Sincerely,

Edwin G. Crowley

Deposition Supervisor

epholing

2040900226

0

EGC/tta

## UNIGINAL TRANSCRIPT OF PROCEEDINGS

UNITED STATES OF AMERICA

BEFORE THE

FEDERAL ELECTION COMMISSION

IN RE: M U R 3013

0

DEPOSITION OF LOUIS WILLIAM BONSIB

Washington, D. C.

Tuesday, November 13, 1990

ACE-FEDERAL REPORTERS, INC.

Stenotype Reporters

444 North Capitol Street Washington, D.C. 20001 (202) 347-3700

Nationwide Coverage

800-336-6646

0

0

2 6

## UNITED STATES OF AMERICA BEFORE THE

#### FEDERAL ELECTION COMMISSION

IN RE: M U R 3013

#### DEPOSITION OF LOUIS WILLIAM BONSIB

Washington, D. C.
Tuesday, November 13, 1990

Deposition of LOUIS WILLIAM BONSIB, called for examination pursuant to notice of deposition, at the Federal Election Commission, 999 E Street, N.W., Sixth Floor, at 1:30 p.m. before RONALD J. WILSON, a Notary Public within and for the District of Columbia, when were present on behalf of the respective parties:

ROSIE SMITH, ESQ.
LISA E. KLEIN, ESQ.
DAVID FITZGERALD, ESQ.
FRANIA MONARSKI, ESQ.
Federal Election Commission
999 E Street, N.W.
Washington, D. C.
On behalf of the Commission.

JOHN E. HEMENWAY, ESQ. Attorney at Law 4816 Rodman Street, N.W. Washington, D. C. 20016 On behalf of the Deponent.

ACE-FEDERAL REPORTERS, INC.

# 4 0 9

0

N

| <u></u> | <u> </u> | 14 | <u> </u> | <br>14 |  |
|---------|----------|----|----------|--------|--|
| _       |          |    |          |        |  |
|         |          |    |          |        |  |

| WITNESS                      | EXAMINATION |
|------------------------------|-------------|
| Louis William Bonsib         |             |
| by Mr. Smith                 | 3           |
| by Mr. Smith<br>by Ms. Klein | 78          |
| by Mr. Fitzgerald            | 81          |

#### EXHIBITS

| BONSIB DEPOSITION NUMBER              | IDENTIFIED |
|---------------------------------------|------------|
| Exhibit 1 - Statement of organization | 35         |

2

3

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

0

#### PROCEEDINGS

Whereupon,

#### LOUIS WILLIAM BONSIB

was called as a witness and, having first been duly sworn, was examined and testified as follows:

#### EXAMINATION

BY MS. SMITH:

Q Okay. We are here at the FEC on November 13, 1990 taking the deposition in MUR 3013.

Mr. Bonsib, I don't know whether you have had your deposition taken before, but let me start by explaining a few of the procedures to you. It is my understanding that that you think this investigation should be dropped, and our goal today is to find out what information you can give us that might support that action.

So in order to find out what happened, I will be asking you a series of questions about activities you or other people may have conducted. It is very important that you answer my questions verbally, since the court reporter cannot record gestures or nonverbal responses.

It is also important that you answer each

ACE-FEDERAL REPORTERS, INC.

202-347-3700

Nationwide Coverage

800-336-6646

920409 (231

question fully and completely. If you don't hear or understand the question, let me know and I will try to speak louder or rephrase it so it is clear.

Also, if you fail to indicate that you have not understood, I will assume that you have, in fact, completely understood and completely answered a question. However, if at any time you realize that the answer you gave may have been incomplete or inaccurate, just let me know and we can go back and you will have a chance to modify it if you need to.

You just have taken an oath to swear to tell the truth and you should therefore treat your testimony here today as though you were testifying in a court of law before a judge and a jury.

If you need to take a break -- and I realize this is hard work for all of us -- or would like to confer with your lawyer, let me know and I will instruct the court reporter and we can take a break.

Lastly, let me remind you that all investigations conducted by the FEC are confidential until they are closed.

Do you understand each of these instructions?

| 1  | A I think so.   |
|----|---|
| 2  | Q Okay.   |
| 3  | MR. HEMENWAY: On the point of procedure, may I          |
| 4  | ask the name of the gentleman to the left of my client? |
| 5  | MR. FITZGERALD: David Fitzgerald.                       |
| 6  | MR. HEMENWAY: He is with the FEC?                       |
| 7  | MR. FITZGERALD: Yes.                                    |
| 8  | MR. HEMENWAY: General Counsel's office?                 |
| 9  | MR. FITZGERALD: Yes. You will see my name on            |
| 10 | the subpoena duces tecum.                               |
| 11 | BY MS. SMITH:   |
| 12 | Q Mr. Bonsib, would you please state your full          |
| 13 | name for the record.                                    |
| 14 | A Louis William Bonsib.                                 |
| 15 | Q Okay. And you are being represented by counsel        |
| 16 | today?  |
| 17 | A Right.  |
| 18 | Q And that is?  |
| 19 | A Mr. Hemenway, John Hemenway.                          |
| 20 | Q Okay. And what is your address?                       |
| 21 | A Same as I gave it earlier, Box 1807, Washington,      |
|    |   |

D.C. 20013.

22

| Q        | And | that | is | a | home | address, | or | a | business |
|----------|-----|------|----|---|------|----------|----|---|----------|
|          |     |      |    |   |      |          |    |   |          |
| address? |     |      |    |   |      |          |    |   |          |

- A Business.
- Q Okay. And the phone number? I guess it is box office. Your business phone number?
  - A 546-7000.
  - Q Okay. And the home address?

MR. HEMENWAY: I believe you were not party, if I may interject, to a conversation that I had with Francesca Monarski which set up this deposition in which it was stipulated -- two things were stipulated, really, that travel expenses here would be reimbursed for Mr. Bonsib, and also that there would be a stipulation that this would not be used in any shape or form as a device to execute service on Mr. Bonsib.

If it should come to pass that his home address has real relevance and is pertinent to some of the questions, then I will instruct Mr. Bonsib to answer that question, but I don't think you have laid any basis, especially in view of our stipulation, agreed stipulation, to probe into where he is actually living.

MR. FITZGERALD: Ms. Monarski is not here, but I

am not sure that that stipulation or your statement of stipulation reflects any agreement between the parties as of this date. She is not here so I cannot answer, but I am not aware that we had agreed at this point to either pay Mr. Bonsib's expenses, nor did we, to my knowledge, enter into stipulation about whether we would ask Mr. Bonsib his address.

MR. HEMENWAY: I understand that; that you could not speak for Ms. Monarski. And I'm sorry she is not here, but I can tell you, you can take my word as an officer of the court that that is what was agreed upon.

MR. FITZGERALD: I will ask Ms. Monarski to come by --

MR. HEMENWAY: Fine. That's another way around it if she is here today. In any event I would be prepared to establish that to the court's satisfaction at any time that I am called upon to do so. I say that with a great deal of assurance. So in any event since it does not encumber this procedure, let's skip over that question and go on to whatever else is pertinent.

MS. SMITH: Are you instructing your witness not to answer, Mr. Hemenway?

|           | MR. HEMEN   | WAY: At  | this time  | I am.   | I am         |
|-----------|-------------|----------|------------|---------|--------------|
| instructi | ing him not | to give  | his actual | place   | of residence |
| at this t | cime. I am  | instruct | ing him no | t to an | swer.        |

MS. SMITH: Very well.

MR. HEMENWAY: You understand the reasons why --

MR. FITZGERALD: Mr. Bonsib is aware of the subpoena?

MR. HEMENWAY: He is aware that the subpoena has not been properly served upon him.

MR. FITZGERALD: He's aware of the preceeding It was filed here in the District of Columbia.

MR. HEMENWAY: Of course.

MR. FITZGERALD: And you got a copy of the papers.

MR. HEMENWAY: I received copies, but I am not authorized to accept service for Mr. Bonsib. For example, I mean this is part of the stipulation, Counsel, just so you will know fully what I agreed to with Ms. Monarski, that this appearance here in Washington, D.C. would not provide the scene for the entrapment of Mr. Bonsib in service of process. In other words, you could not pull

2

3

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

| out of your pocket the process and say, Mr. Bonsib, if you |
|--|
| have not been served up until now, you are now served.     |
| She fully agreed to that, which is proper because          |
| entrapment of that sort, as you know from case law, is not |
| proper service.  |

MR. FITZGERALD: Well, there's an entrapment involved, but --

MR. HEMENWAY: I am guarding against that possibility.

MR. FITZGERALD: Why don't we move on.

MR. HEMENWAY: That is sensible.

BY MS. SMITH:

Q Have you talked to anyone about this deposition that is going to happen today?

A No.

MR. HEMENWAY: You have talked to me.

THE WITNESS: Yes.

MR. HEMENWAY: He assumed you meant other than counsel.

BY MS. SMITH:

Q So you have talked to your counsel?

A Yes.

| 2  | A          | No.  |
|----|------------|--|
| 3  | Q          | Have you looked at any documents or materials to |
| 4  | prepare ye | ourself for today?                               |
| 5  | A          | I don't have any documents.                      |
| 6  | Q          | So you have not looked at any documents?         |
| 7  | A          | No. There aren't any.                            |
| 8  | Q          | What is your occupation?                         |
| 9  | A          | Advertising and public relations.                |
| 10 | Q          | Are you currently employed?                      |
| 11 | A          | Self-employed, yes.                              |
| 12 | Q          | And self-employed at that business address that  |
| 13 | you gave u | 18?  |
| 14 | A          | It will get to me through that address, yes.     |
| 15 |            | MR. HEMENWAY: Any time you cannot hear him, he   |
| 16 | has a bad  | cold, as you can fathom, and if you don't        |
| 17 | understand | d him, ask him to repeat it.                     |
| 18 |            | BY MS. SMITH:                                    |
| 19 | Q          | And so you said advertising. Could you be more   |
| 20 | specific?  |  |
| 21 | A          | Well, there is a lot of different things in      |
| 22 | advertisi  | ng and public relations. One of them, of course, |

Have you talked to anyone else?

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

is political, and that is about all that I can say. I mean that is -- I am not withholding anything.

MR. HEMENWAY: You can give some examples if she wants them.

#### BY MS. SMITH:

Q That would be helpful, yes. Can you give me some examples?

A We raise money for political candidates, and direct their campaigns if they want us to.

Q Do you mean federal candidates?

A All candidates. We don't distinguish between federal or local or whatever.

Q And you say you are self-employed. Are you incorporated or is this --

A We are incorporated, yes. The problem is the way you have it but that corporation is extinct, bankrupted and out of business. We have another corporation that we started after that.

Q You are referring to Bonsib, Inc. as being extinct and out of business?

A Right.

Q What is the corporation that you have now?

| •  | ^           | Bonsib Agency, Inc.                             |
|----|-------------|---|
| 2  | Q           | Okay. And where are they incorporated?          |
| 3  |             | MR. HEMENWAY: Let me interrupt.                 |
| 4  |             | (Counsel confers with witness.)                 |
| 5  |             | THE WITNESS: The-pre-incorporated had not       |
| 6  | actually    | the paper is not finished on that yet but we    |
| 7  | have used   | that name for some time.                        |
| 8  |             | BY MS. SMITH:                                   |
| 9  | Q           | Let me summarize to make sure that I have this  |
| 10 | correct.    | Bonsib Agency, Inc. is the corporation that you |
| 11 | have        |   |
| 12 | A           | Now.  |
| 13 | Q           | that you have now? You are doing business as    |
| 14 | that, but   | it is not has not currently filed as the        |
| 15 | corporation | on as of yet?                                   |
| 16 |             | MR. HEMENWAY: The incorporation is in the       |
| 17 | stages of   | formal completion. It has not formally been     |
| 18 | incorporat  | ced.  |
| 19 |             | MS. SMITH: Okay.                                |
| 20 |             | BY MS. SMITH:                                   |
| 21 | Q           | When was it formed?                             |
| 22 | A           | I don't know. Immediately after the bankruptcy  |

202-347-3700

3

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

of the other corporation. I don't remember the date.

MR. HEMENWAY: When you talk about an incorporation that is in the pre-incorporation stage it is not actually formed until it is incorporated. This is a nit-pick but it is his intention to form this corporation which has not been incorporated yet if that is helpful to you.

#### BY MS. SMITH:

- Q When did you start doing business as Bonsib Agency, Inc.?
  - A Immediately after the bankruptcy.
  - Q And when was that?
- A I don't recall that but I can get it for you. I don't have it on the tip of my tongue.
  - Q Roughly. Was it this year?
    - A No. I am pretty sure it was last year.
- Q 1989?
  - A I am not positive, but I think it is. We can get the actual date. It is a matter of record.
  - Q Okay. And Bonsib Agency is doing business at this P.O. Box address that you gave me; is that correct?
    - A Right.

Q

| -  |  |
|----|--|
| 2  | A Well, I am the president.                          |
| 3  | Q Would you describe for me what you do as           |
| 4  | president?   |
| 5  | A Of which?  |
| 6  | Q Of Bonsib Agency.                                  |
| 7  | A As I described it, essentially I am                |
| 8  | self-employed in the advertising business.           |
| 9  | Q Well, what would be your duties or                 |
| 10 | responsibilities, let's say?                         |
| 11 | A There are so many, I don't know where to start     |
| 12 | or stop.   |
| 13 | Q For example, what do you what do you consider      |
| 14 | the most important aspects of your job?              |
| 15 | A It includes management and solicitation of         |
| 16 | business and so forth. It is not a simple job but it |
| 17 | covers everything.                                   |
| 18 | Q So you are saying management, I assume you have    |
| 19 | some employees?                                      |
| 20 | A Not at the present.                                |
| 21 | Q You have no employees?                             |
| 22 | A Not at the present.                                |

What is your position with Bonsib Agency?

| 1  | Q What is it that you manage in that case?      |
|----|---|
| 2  | A The business. You don't start a business with |
| 3  | 150 employees. You start with none.             |
| 4  | Q Where is the business located, Bonsib Agency? |
| 5  | THE WITNESS: You want to answer that?           |
| 6  | MS. KLEIN: Let the record reflect counsel is    |
| 7  | writing a message to his client.                |
| 8  | THE WITNESS: It is wherever we have accounts,   |
| 9  | where we find the business we go there.         |
| 10 | BY MS. SMITH:                                   |
| 11 | Q Mr. Bonsib, let's focus on your previous      |
| 12 | company, Bonsib, Inc.                           |
| 13 | A Okay.   |
| 14 | Q What was your position with Bonsib, Inc.?     |
| 15 | A The same as I just described.                 |
| 16 | Q Meaning you were the president?               |
| 17 | A Right.  |
| 18 | Q And when was Bonsib, Inc. created?            |
| 19 | A Oh, boy. You don't know, do you?              |
| 20 | MR. HEMENWAY: I have no idea.                   |
| 21 | THE WITNESS: You will have to look it up. I     |
| 22 | really don't know.                              |

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

| large and the condition | MR. | HEMENWAY: | Give | her | an | idea. |  |
|-------------------------|-----|-----------|------|-----|----|-------|--|
|                         |     |           |      |     |    |       |  |

BY MS. SMITH:

Q Just roughly.

MR. HEMENWAY: Give her the best estimate.

THE WITNESS: There are some changes.

Originally it was started about 19 -- that is tough. I don't remember the details -- about 1987 I would guess.

### BY MS. SMITH:

Q Would you say that it is -- it was probably -it would have been created -- it would have been in
existence, excuse me, when you were filing reports with
the Federal Election Commission?

A Oh, yes, sure.

Q Did you begin filing reports in early 1986, so --

A No, we didn't. That is information I don't have.

MR. HEMENWAY: Maybe you have such a report with you and you can remind him. It would be here in the FEC if he filed it.

MS. SMITH: We may go into that at some point. Let's get back to the corporation.

# BY MS. SMITH:

Q I take it you were involved in its creation, Bonsib, Inc. that is?

A Yes. Actually it was in existence long before that. I don't know exactly when it was originally begun. I am not talking about individual articles of incorporation, for example, but anyway, in essence it was in existence as far back as I think 1946 or something like that.

- Q Were you involved in its creation back then?
- A That's right.
- Q And what was the nature of its business?
- A It was almost the same as I described to you which is commercial advertising and then also political advertising.
- Q Could you give me a rough idea how much of its business would be political as opposed to commercial advertising?
  - A At the the beginning you mean?
  - O Yes.
    - A Oh, boy.
- MR. HEMENWAY: Measured how? Volume, hours,

2

3

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

dollars?

MS. SMITH: Dollars.

MR. HEMENWAY: Gross, net?

BY MS. SMITH:

Q Measured whatever way you can recall, if it is a percentage of time or whatever.

A In 1946 it was almost 100 percent, I guess, commercial advertising and gradually over a period of years we got involved in political advertising; is that right? Did I say --

MR. HEMENWAY: Commercial initially.

THE WITNESS: Commercial initially. Over the years we got involved more and more in political advertising.

BY MS. SMITH:

Q Can you think of some of your political clients?

A I could if this were not so late. The unfortunate thing is sometimes they begin as commercial clients and then evolved into political clients but I just can't remember that accurately. I think -- I would be glad to do it if I could, but I don't recall that far

2

3

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

| back. | 1946 | is | a | long | wav | to | go. | vou | know. |
|-------|------|----|---|------|-----|----|-----|-----|-------|
| ~~~   |      |    | - |      |     |    | 3-1 | 1   |       |

- Q Well, let's focus on a later period of time, say, from 1980 afterwards, did you still have a mix of political and commercial clients?
  - A That's right.
- Q Could you tell me how much of your business was political and how much was commercial roughly in the 1980's?
- A That is difficult, too. I would be glad to tell you anything that I can say with confidence, but --
  - Q Just roughly?
- A I don't want to mislead you and I really am not at all sure what the percentage might have been. I would guess it was about -- let's see, what year are you talking about? 1980?

MR. HEMENWAY: 1980 on.

THE WITNESS: I would guess it was about 80/20, something like that, 80 being the political and 20 being the commercial.

# BY MS. SMITH:

Q And as far as those political clients are concerned, would they, for example, include federal

3

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

candidates, candidates for federal offices?

A I don't think so, not that far back, because we had been getting involved in the federal -- we didn't get involved in federal until, taking a guess, but I would think it would have been about -- unfortunately I cannot be sure, but I think maybe it began around, maybe more began about in 1980 or '82, something like that.

Q Okay. What about political action committees?
Would you have clients that were federal, political action
committees?

A I am not aware of anybody as such that were political action committees. They were all either political committees or nothing. That is the best to my knowledge and memory.

Q When you say they were political committees, do you mean they were committees set up by candidates?

A Yes.

Q Okay. What about committees set up by, say, political parties? Did you have any clients in that category?

A Well, we had a couple of them that started out as political candidates and ended as being, I don't know

2

3

5

6

7

8

9

10

11

12

13

14

15

16

17

19

20

21

22

| how to describe them there is a difference between as    | ,   |
|--|-----|
| you you pointed out that difference, but often these     |     |
| people start out and we are left holding the bag so to   |     |
| speak or did happen not any more, but it did happen      |     |
| that way, and we had to continue with this thing; we cou | 110 |
| not just drop it.  |     |

Q Could you explain that? I don't think I quite followed that.

A Suppose you had a client and they were trying to get elected and they didn't, so they gave it up and we were stuck with closing up the Committee and that is what we did. I mean, everybody is in the same boat. It is nothing unusual.

- Q You mean in terms of winding down that person's campaign?
  - A Right.
  - Q What specifically did you --

(Counsel consults with witness.)

MS. SMITH: Mr. Bonsib is conferring with his attorney.

BY MS. SMITH:

Q What specifically did you provide in terms of

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

| goods or services for these political clie | nts | ? |
|--|-----|---|
|--|-----|---|

A We provided the advertising and the plan and the money in most cases and responsibility for what they were doing. If they didn't go ahead with it, as you say we had to wind it down. There were a lot of requirements.

- Q When you say "plan" you mean their -- do you mean --
  - A Their campaign.
  - Q Their campaign strategy and implementing it?
  - A Yes.
  - Q When you say you provided money --
  - A We raised money for them.
  - Q Raised money how?
  - A By mail.
- Q And when you did this where were you getting your list in --
- A We bought every list. We didn't use any that were not purchased.
  - Q Who would you buy these lists from?
  - A List brokers.
- Q And so you would, for example buy a list from a list broker; then what would you do?

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

|     | A    | Test   | it. | If | it  | worked, | it   | was a | small | quantity |
|-----|------|--------|-----|----|-----|---------|------|-------|-------|----------|
| and | mail | it and | see | if | the | funds   | were | sent  | back. |          |

- Q So you would send out -- would you send out letters to names on the list?
  - A Yes.
- Q And those letters would generally be saying what? Asking for --
- A Asking for donations to help the person get elected.
- Q And when the money came back, assuming it did, what would happen then?
- A Well, it would either go directly to that committee or directly to -- I don't remember the names of these things -- verbally employed to collect the money, at that time money out of the envelopes.
  - Q What was that firm?
  - A What?
  - Q What was the name of that firm?
- A I am trying to remember. There was more than one. One that I know did quite a bit of that was -- I can't recall the name of the firm, but the person that did it is --

|         | MR.   | HEMENWAY: | You | are | talking | about | a | bank |
|---------|-------|-----------|-----|-----|---------|-------|---|------|
| holding | in es | crow?     |     |     |         |       |   |      |

THE WITNESS: No, not the bank. We could not use the bank. They were so sloppy with the money. Let's see.

I think the business name was Type and Mail, and they are out in Maryland, and I cannot think of the name of the person who ran it. Nancy Gay, G-a-y.

## BY MS. SMITH:

Q Okay. Now then, when you entered into these arrangements with your candidate clients, how was that usually done? Was there, for example, a written agreement with them?

- A Yes. We had it written up in a contract.
- Q And just so I understand this right, it would be a contract between the candidate and Bonsib, Inc.?
- A Yes, and then the other subsidiary contracts would be with the people who would do the work.
  - Q Who would do the work?
- A I just gave you the name of one. That is one of them there.
  - Q Meaning Nancy Gay?

21

22

| 2  | Q Meaning Nancy  |
|----|--|
| 3  | A Gay. Yes.  |
| 4  | Q And what was generally the payment arrangement       |
| 5  | that you would have with these clients? When would you |
| 6  | get paid for running these direct-mail campaigns?      |
| 7  | A Well, we tried to get paid in advance on them,       |
| 8  | but you cannot always do that, so sometimes they ran   |
| 9  | behind, but we didn't intend to take any risk on them. |
| 10 | Q Would your contracts call for you to be paid in      |
| 11 | advance?   |
| 12 | A Yes. Always.   |
| 13 | Q And let's say if you were not paid in advance        |
| 14 | would you  |
| 15 | A Well, we tried to be kind about it. We didn't        |
| 16 | want to close them up.                                 |
| 17 | Q Let's back up a step. If you were not paid in        |
| 18 | advance, would you send out the fundraising letters?   |
| 19 | A No. We would always get paid in advance, but         |

Pardon?

A

payments, so they fall behind and you try to be kind about

it and extend credit for them, as little as possible, but

the trouble is they don't always keep up with their

800-336-6646

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

| you | have | to | do   | it | once   | in   | a | while. | That | we | did | and | that |
|-----|------|----|------|----|--------|------|---|--------|------|----|-----|-----|------|
| ie  | hout | .1 | 1 44 |    | nounts | . +, | • |        |      |    |     |     |      |

- Q When you did the credit extensions, how was that done? Would there be, for example, a written agreement?
  - A Yes.
  - Q Another one?
- A Yes. Oh, no, not for credit extension. That would be part of the regular agreement. I would not -- we would impose a collection on them. That is all that I can do. I mean, we took all the normal steps to collect the money.
  - O Such as?
- A Well, I am sure you know what they are, but collection agencies and legal steps and so forth.

MR. HEMENWAY: Including even lawsuits?

THE WITNESS: Yes. Lawsuits.

BY MS. SMITH:

- Q Can you think of any examples when you didn't take such steps with a candidate who had fallen behind, as you say?
- A I cannot think of any. Maybe there are, but I cannot think of any. It is a standard practice. As a

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

| matter | of  | fact yo | ur own | regu  | lations | cover | collections | that |
|--------|-----|---------|--------|-------|---------|-------|-------------|------|
| way.   | You | follow  | them t | o the | letter  |       |             |      |

- Q Okay. Now, I understand that Bonsib, Inc. is no longer in existence as you said and that you indicated that sometime in 1989 it was when it was dissolved? I want to make sure --
  - A I think that is correct.

MR. HEMENWAY: What date?

MS. SMITH: Sometime in 1989.

MR. HEMENWAY: I think the fall of 1989.

BY MS. SMITH:

- Q Would you agree with that, Mr. Bonsib?
- A I don't remember. If I had more information I would be glad to give it to you.

MR. HEMENWAY: You got it on that letter inside your coat pocket I think if you still got that.

September 12, 1989. Corporation ID 0284258-1, terminated as of that date.

THE WITNESS: Yes.

BY MS. SMITH:

Q Okay. Next let me ask you about your corporate records for Bonsib, Inc. I guess I will start at the

beginning here.

What sort of records did you keep?

A We kept the normal records of any corporation in addition to those required by the various government organizations we had to deal with, but we don't have them any more for the simple reason when we went bankrupt. We asked the referee in bankruptcy what to do with all these papers and everything else and he said throw them out, so we did.

Q So -- well, when you threw them out -- let me make sure I got this correct -- that would include bank statements?

- A Everything.
- O Well --

A It was a bulky thing. It took three rooms of our office and we sure could not move out and pay for the expense of keeping those records, so we asked him what to do with them and he said throw them out, so we did.

Q So you are saying you threw out the entire three rooms of records?

- A Right.
- Q And that consisted of all of the corporate

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

| records. | There   | wouldn't   | be | any | that | were | overlooked | that |
|----------|---------|------------|----|-----|------|------|------------|------|
| might be | in anot | ther place | 9? |     |      |      |            |      |

- A If they were I would come down and ask you to pay for the storage. It was not cheap.
- Q So do you think there might be records somewhere else, say --
  - A If they were I would have told you.
  - Q Okay. That includes your tax records?
- A That question came up. I think that they were included in everything, but if not, the only thing that was exempted was our own -- my own income records.
  - MR. HEMENWAY: Are you talking about personal?

    THE WITNESS: Personal.
- MR. HEMENWAY: So that is not the corporation.

  THE WITNESS: Nothing was saved from the corporation.

## BY MS. SMITH:

202-347-3700

- Q Nothing was saved, meaning corporate tax records?
  - A We threw everything out.
- Q And when was that that it was all thrown out, just roughly?

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

| A         | I don't have any idea. It was whenever he was  |
|-----------|--|
| involved. | I don't know. That is a matter of record,      |
| too. You  | can find out when he was involved as a referee |
| in bankru | otcy. That is when he said to throw them out.  |

MR. HEMENWAY: For the record, the FEC has a copy of the bankruptcy order from the Eastern District U.S. District Court, Alexandria Division, and I think it probably would be shortly after that date.

THE WITNESS: I would think so.

MR. HEMENWAY: How soon after the day --

THE WITNESS: Almost at the same time. I don't recall exactly.

MR. HEMENWAY: That was spring of 1989, wasn't it? I am guessing, but you have the document.

MS. SMITH: The court documents that were submitted as part of this MUR span a period of time.

There is one I believe that indicated that the case was closed around March of 1990.

MR. HEMENWAY: This year.

MS. SMITH: This year. That's right.

THE WITNESS: The --

MR. HEMENWAY: You are talking about the

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

| ban  | kruptcy  | case? |
|------|----------|-------|
| 2411 | wr abcc. | cuse. |

MS. SMITH: That's right.

MR. HEMENWAY: That would be the date then.

THE WITNESS: Except I think it was much earlier than that.

MR. HEMENWAY: Let's not argue over facts. If you have the document that will establish that.

## BY MS. SMITH:

- Q Well, let's go on now, Mr. Bonsib, to this
  National Conservative Congressional Committee. It is my
  understanding that you are the treasurer of this
  committee; is that correct?
  - A Not now. I was, yes.
  - Q You are not treasurer now, but you were?
  - A Right.
  - Q When did you cease to be treasurer?
- A At the same time all these other things happened. I was working with several people up there the primary one was Tony -- I forgot the last name. But you should have a record of that. They are your own records.
  - Q Tony Raymond, maybe?
  - A Right. I came up here and talked to him, maybe

800-336-6646

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

| in this room, I don't know, and explained to him | what    |
|--|---------|
| happened and what we have to do and he showed me | what to |
| do and we did it and it is my understanding that | was the |
| end of it.                                       |         |

Q I am not sure I am following this. He showed you what to do --

A To end the paperwork. You will find all return or whatever you call it.

MR. HEMENWAY: He means close out of the Committee, I think.

THE WITNESS: Yes.

# BY MS. SMITH:

- Q Okay. So would you agree that you were the treasurer the entire time that the Committee existed?
  - A Yes. Until then.
  - Q There was no other treasurer?
  - A No.
  - Q Was it your idea to form the committee?
- A No. Somebody else -- I forgot who it was -- but somebody else started it and then they dropped it. As I told you they often did that. So we would carry it on and make as clean a thing out of it as we could and close it

| up.  | It wa | as what | t we d | id. 1 | In thi | s case | it   | was a | lot  | more  |
|------|-------|---------|--------|-------|--------|--------|------|-------|------|-------|
| than | the a | average | e comm | ittee | but    | we did | the  | same  | thi  | ng or |
| that | . In  | fact,   | I did  | too m | nuch.  | Obvio  | usly | we c  | ould | not   |
| have | to fi | lle bar | nkrupt | cy.   |        |        |      |       |      |       |

- Q You are saying someone else originally started the Committee; is that correct?
  - A I don't remember who it was.
- Q But when they did that, they started it with you as treasurer?
- A I cannot say that for sure. I recall that often we had to do the paperwork for getting stuff started. So it is possible we did it there, too, I don't know.
  - Q Do you recall when the committee was created?
- A No. You probably have more information on that than I do. It wasn't -- it was not in operation very long so it could not be too much. Finally closed it out when it was obvious the money that was owed to us, we had to give it up.
- Q Well, what if I were to tell you that the reports that were filed specifically on this statement of organization, well, that was filed in February of 1986, does that --

| -  | 4 Bridge (Ball 1996) 1996 1996 1996 1996 1996 1996 199     |
|----|--|
| 2  | head.  |
| 3  | Q That would sound like around                             |
| 4  | A It is possible because a lot of times they               |
| 5  | started and they didn't move very fast but the action, the |
| 6  | primary action of the Committee, as I recall, was smaller  |
| 7  | than that.   |
| 8  | MR. HEMENWAY: Do you have a copy of the                    |
| 9  | statement to show him to remind him of that?               |
| 10 | MS. SMITH: We could do that if need be.                    |
| 11 | MR. HEMENWAY: Would give him a more positive               |
| 12 | response. I am trying to help you with your question.      |
| 13 | BY MS. SMITH:  |
| 14 | Q Mr. Bonsib, you would agree that you started the         |
| 15 | Committee  |
| 16 | A I didn't say that.                                       |
| 17 | Q Well, I'm sorry. Let me rephrase that.                   |
| 18 | You would agree that you filed the beginning               |
| 19 | paperwork for this committee                               |
| 20 | A I am not even sure of that. We often did, but I          |
| 21 | don't know if we did in this case.                         |
| I  |  |

That could be. I don't keep the records in my

MS. SMITH: I would like to have this marked as

22

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

| Exhi | bit 1 |
|------|-------|
|------|-------|

(Bonsib Exhibit 1 identified.)

MS. SMITH: And let the record reflect that I am showing copies of this to Mr. Bonsib and Mr. Hemenway.

MR. HEMENWAY: May I ask, is this the entire document?

MS. SMITH: This is.

MR. HEMENWAY: The statement of organization is a one-page form, is it?

MS. SMITH: It is, yes.

(Counsel consults with witness.)

THE WITNESS: I cannot identify -- not the document but the circumstances around the creation of it -- I don't recall the circumstances.

### BY MS. SMITH:

- Q Mr. Bonsib, when you finish reading this would you let me know?
  - A Go ahead. Something else may trigger.
  - Q Is this your signature?
  - A Yes, that is my signature.
- Q And did you prepare this statement of organization?

18

19

20

21

22

thing.

| 1  |            | MR. HEMENWAY: I am sure he did not.            |
|----|------------|--|
| 2  |            | BY MS. SMITH:                                  |
| 3  | Q          | Who did prepare it?                            |
| 4  | A          | I don't know. Probably a stenographer. It is   |
| 5  | possible.  |  |
| 6  | Q          | What is possible?                              |
| 7  | A          | It is possible it could have been prepared by  |
| 8  | Daniel     |  |
| 9  |            | MR. HEMENWAY: H-o-l-d-g-r-e-i-w-e, Daniel C.   |
| 10 | Daniel wit | th an E.                                       |
| 11 |            | BY MS. SMITH:                                  |
| 12 | Q          | Daniel Holdgreiwe is listed here as assistant  |
| 13 | treasurer  | . Do you know Mr. Holdgreiwe?                  |
| 14 | A          | Yes.   |
| 15 | Q          | In what capacity?                              |
| 16 | A          | He was one of our clients at the time I think. |
| 17 | Q          | He was a client. Was he a political candidate? |

or not. Maybe he was. He is the attorney, was the

attorney and is an attorney, but beyond that I don't

know. I don't know what his position was with this

I cannot tell you if he was involved with that

| 1  | Q Could it have been Mr. Holdgreiwe's idea to set  |
|----|--|
| 2  | up this committee?                                 |
| 3  | A It could have been, but I cannot speculate. I    |
| 4  | don't recall.                                      |
| 5  | Q Do you have a current address for                |
| 6  | Mr. Heldgreiwe?                                    |
| 7  | A I don't have it in my head.                      |
| 8  | MR. HEMENWAY: He may be in the Washington phone    |
| 9  | book in the Virginia area.                         |
| 10 | MS. SMITH: Okay.                                   |
| 11 | BY MS. SMITH:                                      |
| 12 | Q This statement of organization is dated February |
| 13 | 4, 1986.   |
| 14 | Would that be a pretty would that be shortly       |
| 15 | after it was set up?                               |
| 16 | A I assume so. There are no documents to check.    |
| 17 | Q Do you know why the Committee was set up?        |
| 18 | A Sure. It was set up to elect conservatives to    |
| 19 | office, specifically the Congress.                 |
| 20 | Q To the United states Congress?                   |
| 21 | A Right.   |
| 22 | Q And did it have other purposes?                  |

| A | None | that | т | recall. |
|---|------|------|---|---------|

Q Did it -- well, did it make contributions to conservative --

A It was intended to be that way, yes, but I don't think it did, though.

Q Would you agree, then, that it didn't develop as it was expected?

A It sure didn't.

Q Can you describe its life cycle in terms of what activities it did undertake?

A Yes. It sent out a lot of fundraising letters and then the intention being to have some money to pay for some of these candidates. Unfortunately, for some reason which was not our usual experience it didn't make a profit.

Q When you say "sent out a lot" could you give me a rough indication of how many?

A I don't have a slightest idea, not even the slightest.

Q Not even in terms of hundreds? Thousands?

A A thousand, we know that. Thousands. How many more than, we don't know.

3

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

| Q WOU         | ld these  | letters  | nave   | been | sent | out | LO | beobte |
|---------------|-----------|----------|--------|------|------|-----|----|--------|
| that you obta | ined from | m a mail | ing li | st?  |      |     |    |        |

- A Yes. The only sources that we had.
- Q Do you recall where the mailing list would come from?
- A They are all from list brokers. Never did we have anything about list brokers.
- Q Okay. Would these solicitations have been sent out, say, within a few months after the Committee was established?
- A Probably. I don't know if there were any sent out after. We gave up. I assure you of that.
- Q Do you recall what this particular solicitation said?
- A We had a lot of them. There is no way for me to know that.
  - Q Excuse me?
- A We had a lot of them. There is no way for me to know what this one said.
  - Q Do you have a copy of it?
  - A No. I told you I threw away the documents.
  - Q Do I -- so when you threw away your documents

| you  | threw | away   | documents   | of   | the  | National | Conservative |
|------|-------|--------|-------------|------|------|----------|--------------|
| Cond | ressi | onal ( | Committee a | 28 1 | well | ?        |              |

A Right.

Q Can you think of anyone who might have a copy of the solicitation?

A That is almost a joke. No, I have no idea who would have a copy. I doubt anyone, unless they had a purpose in saving it.

Q With regard to this particular fundraising letter, who made the decisions to send it out?

A I would have no idea about that either, I mean if it was in the beginning -- even so I could not tell you because people that decided they were going to change over a period of time and in the end I was the one that did the deciding because I was trying to save the losses, but I didn't save any, so I don't know who was making the decisions at that point.

- Q Did you have any role in those decisions in early 1986 when --
  - A Sure.
  - Q What was your role at that time?
  - A If I was advising a client I would tell him if I

| thought  | the   | letter  | was   | good,  | bad | or | indifferent | and | make | a |
|----------|-------|---------|-------|--------|-----|----|-------------|-----|------|---|
| recommen | ndati | ion. Ti | nat : | is all |     |    |             |     |      |   |

- Q Were you the one who would draft the letters?
- A Not always. Sometimes.
- Q Who else would draft them?
- A Again, it is impossible. We had employees and all kinds of people involved. It is impossible to answer that.
  - Q If we could focus on early 1986 --
- you focus, because I don't have that kind of memory, and I could not possibly tell you with any certainty what you are asking. I would be glad to if I could, but I don't have any real -- I don't have a computer for a head; I have got an ordinary brain and sometimes that is not even good enough, but I am not a computer and there is no way for me to tell you the information that you want. I would be glad to do it if I could, but I cannot.
- Q I certainly understand. Do you recall approximately how many employees Bonsib, Inc. had around 1986?
  - A Not with any accuracy. I suppose we probably

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

had, I don't know, maybe 10 or 15 involved in it.

MR. HEMENWAY: If it fluctuated why don't you give a high and low figure. You hired tempos at times, didn't you?

THE WITNESS: Yes. We hired all kinds of helpers. I would say a high of 20 and a low of 10, maybe even five. I don't know. It is just impossible.

BY MS. SMITH:

- Q Okay. Let's turn back to --
- A The more I think about it, I think the low ought to be lower than that, because -- he mentioned temporaries and sometimes the people would quit without notice, so I would guess maybe -- it seems awful low to me, but maybe five would be more accurate.
  - Q So fluctuating between five and 20 employees?
  - A Something like that, yes.
  - Q Okay.
- A You have to remember there is a lot of vendors involved in this, too. I don't know exactly what your point is but there were all kinds of vendors working on this work.

MR. HEMENWAY: You can call them

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

1 subcontractors.

THE WITNESS: Yes.

BY MS. SMITH:

- Q Let me ask you about some of those. When you sent out this type of fundraiser you would have expenses then, I assume, for what? For example, printers?
  - A Yes, and mailers. All kinds of people.
  - Q Postage?
  - A Of course.

(Counsel consults with witness.)

BY MS. SMITH:

- Q Now, it is my understanding that this National Conservative Congressional Committee started out with no cash on hand when it was created in 1986; is that correct?
- A I don't know. You have to check the records because if there was money in the bank there was, and if there wasn't, then there wasn't. I don't see how you start an organization with money. I don't know how you start an organization with money in the bank.
  - Q Let's assume it had no cash on hand?
  - A Okay.

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

| Q      | An   | nd i | t  | incurred | expenses | as | you | said, | for | this |
|--------|------|------|----|----------|----------|----|-----|-------|-----|------|
| direct | mail | ope  | ra | tion?    |          |    |     |       |     |      |

### A Correct.

- Q Can you roughly estimate how much expenses it incurred?
- A I don't have any idea how much it took. I would have to check the books, myself, to determine that.
- Q But there would have been some expenses before the contributions resulted from this?
  - A Right.
- Q Where did the seed money come from to pay for those beginning expenses?
- A Here we go again. The seed money came from the corporation, as it did for everything else, and I will go through this with you again. I have been through this so many times I am getting tired of hearing it, myself, but we were told when the system was set up originally and I forgot the meeting someplace here in the western part of the district --

MR. HEMENWAY: You be told in the FEC?

THE WITNESS: Right. And they went through the books that they had and so forth told us exactly what we

were supposed to do and not supposed to do and all that sort of stuff, and definitely without any question I personally was told and all the other people at that meeting were told that a corporation could provide the seed money for a political committee.

we didn't provide a lot but we did provide enough to get started on. And it was legal as far as we were concerned and everything that we talked to, as far as the reports were concerned in the beginning. Nobody mentioned it until way at the end of the rope.

# BY MS. SMITH:

Q Do you recall who you might have talked to from the FEC at that time?

A No, because at the time it was a new thing and we didn't know what we would get into and/or not -- all I know is that is what I was personally told and I would swear to that on a stack of Bibles if you hang me for it. The point is there was never any doubt about it.

MR. HEMENWAY: Counsel --

(Counsel shows documents to the witness.)

THE WITNESS: Yes, but this was after the fact.

Tony ran it. I remember it was in some kind of a, I don't

920409 00273

know, stadium? Outdoor event of some kind and I was not involved except that I sat there and listened. That is all. I know that is what was said and nothing that you can say will change that. I know that is what was told.

If other people didn't get that message, then I am wrong, but I know that other people got that message and it was to change the regulations somehow, but we were depending on that information and that is why we did it.

BY MS. SMITH:

Q And that startup money that came from the corporation, do you recall how much that was?

A No. I would have no way of knowing that either, although I know that the very beginning everything had to be provided by them. That would just be printing and so forth and the rest of it would be income from the contributors. I am just guessing at that. I am not saying that is a fact, but either way it would have to go.

Q Well, what if I were to tell you that on the first report that you filed with the Commission for the period ending March 31 of 1986 there were approximately \$123,000 --

800-336-6646

5

7

8

10

11

12

13

14

15

16

17

18

19

20

21

22

|      | A     | That  | would   | not   | surprise   | me   | a  | bit  | because | of | the |
|------|-------|-------|---------|-------|------------|------|----|------|---------|----|-----|
| fact | start | ed be | efore v | ve ha | ad anythin | na t | to | repo | ort.    |    |     |

- Q So that would sound about right?
- A It could be. I am not saying it does but it could be.
- MR. HEMENWAY: I didn't hear the end of the statement.

MS. SMITH: \$123,000.

MR. HEMENWAY: From?

MS. SMITH: From Bonsib, Inc.

THE WITNESS: As I told you before, that was exactly what we were told to do. Exactly -- probably should have made a report more promptly than that, but we had no reason to believe any of that would be questioned. It is easy to question after the fact.

BY MS. SMITH:

- Q So what you are telling me is that Bonsib, Inc. advanced in the nature of 123,000 --
- A I am not saying that. I said we advanced whatever is necessary, but not necessarily that figure because that could well have been partially from contributions, but I am not changing the story a bit. It

| is all on the record and that is what I told Tony Raymond, |
|--|
| that is what I told the ladies in this office and that is  |
| what I told everyone involved with this thing. It is       |
| nothing new. We have not dug up any new secrets. That is   |
| just exactly what we did and what we were what we did do   |
| and told to do and we cannot undo what we did because we   |
| were told to do that. I wish I could think of the name of  |
| the place they had the meeting and that might help because |
| somebody in the FEC  |

MR. HEMENWAY: Civic auditorium down there in the main department on Constitution Avenue? Commerce?

THE WITNESS: No. It was in --

MR. HEMENWAY: In the district?

THE WITNESS: Yes, but not necessarily in the offices. It was just some place I assumed they rented.

BY MS. SMITH:

Q Let me ask you this, Mr. Bonsib. Do you feel that in making this advance that Bonsib, Inc. acted as it would with any other client?

A Absolutely. We were doing all of that without clients not having any idea from Tony Raymond -- of course we were not talking to him then but from anybody that we

were doing anything that was not approved by the FEC.

That is why we do it and that is why we reported.

Wouldn't we be crazy if we knew we were not supposed to do that and made a report of \$123,000? Would that make sense to you? It would not make sense to me. If I was trying to cover up something that is a poor way to cover it up.

Q So you feel then that the \$123,000, that amount would be comparable to amounts that you may have advanced to other clients?

MR. HEMENWAY: He did not say that. Don't put words in his mouth. He is explaining his policy.

### BY MS. SMITH:

Q Do you feel that by advancing \$123,000 to the National Conservative Congressional Committee that that advance was consistent with Bonsib, Inc.'s policies and past practices as with regard to advances to other clients?

(Counsel consults with witness.)

THE WITNESS: Everything we did is in the records. We had months and years to look over the record. There is nothing secret about it. If there is something wrong we should have heard about it early.

2

3

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

#### BY MS. SMITH:

Q So would you normally advance around \$123,000 --

If I had that kind of money I would not have been in the direct-mail or political business or anything. We didn't advance it because we wanted to or we did it to help ourselves in any way, shape or form. We just simply because we thought that was what would be done. We did it and I told everybody that came in contact with this at that time or later. That is what we had done and that is what our purpose and how we understood it the law to be, and I still think it was that way in the beginning, that there was a provision in there that a corporation could advance money to a client or to a candidate or to whatever and it paid back later, get paid back later. We never had to do it before this one time. It is ridiculous to say it was our policy. Like I heard a guy, psychiatrist what was normal and what was not normal. He couldn't convince me what he thought was normal, so anything that is normal -- in a crisis situation you have to do what you have to do.

Q So would it be fair to say that is the first time?

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

|      | A    | The | on | aly t | ime | . We | never  | had | another | situation |
|------|------|-----|----|-------|-----|------|--------|-----|---------|-----------|
| like | that | and | I  | hope  | we  | neve | r have | one |         |           |

MR. HEMENWAY: I think what he is saying is this report accurately reflects what was done at the time.

THE WITNESS: That's right.

BY MS. SMITH:

Q Was what was done in this situation with the \$123,000 the reason why Bonsib, Inc. ended up filing for bankruptcy?

A Of course.

(Counsel consults with witness.)

THE WITNESS: You tell them. I don't know how to start it.

MR. HEMENWAY: You may want to amend the question saying no, that is not your answer, no, it wasn't the sole reason. I will let it go at that.

THE WITNESS: No, it was not the sole reason.

MS. SMITH: Let's take a short break.

(Recess.)

MS. SMITH: On the record.

BY MS. SMITH:

Q Mr. Bonsib, were you the sole owner of Bonsib,

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

Inc.?

A Yes, in effect, yes. I mean, I had the normal corporate setup, but I was the one who made the decisions.

- Q Were you the only stockholder?
- A Yes.
  - O Did it have directors?
- A Yes. It had directors, but they had limited participation. They did it to get involved but not day-to-day work.
  - Q Who were the directors?
- A Who? That indicated how unimportant they were.

  I don't remember who they were. We had a change of
  directors often for various legal reasons, not a lot of
  other reasons, so I just -- I don't recall who they were
  at that time.

MR. HEMENWAY: Would there be a matter of record in Richmond? So you can check with the Richmond corporation counsel.

THE WITNESS: Certainly.

BY MS. SMITH:

Q How about court officers in the past five

| years? Who were the corporate officers | years? | Who | were | the | corporate | officers |
|--|--------|-----|------|-----|-----------|----------|
|--|--------|-----|------|-----|-----------|----------|

A We had all kinds. For the same reasons, for these three were all legal reasons, but I was the only one that mattered. I had the responsibilities for the whole operation.

- Q So you had responsibility over these five to 20 employees that you estimate that you had?
  - A Right.
- Q Could you indicate how many of those five to 20 would not be clerical employees?

A You are asking a lot. My memory is not that good. I could not tell you. I would say normally it would be about two or three and the rest would be clerical. That is just a guess.

- Q And what would those two or three do?
- A They would be generally in charge of getting work out, which could mean all the way from constructing a letter or whatever it happened to be, to the entire package. We didn't have any setup where you go from one desk to another desk and so forth. I know a lot of people do that, but it is a tough job being a fundraiser.
  - Q Does Bonsib Agency have the same clients that

| 1  | Bonsib, Inc. did?  |
|----|--|
| 2  | A None.  |
| 3  | Q None in common at all?                                   |
| 4  | A None.  |
| 5  | Q But it has well, is it in the same business              |
| 6  | would you say?   |
| 7  | A Well, yes. Of course that is controlled a lot            |
| 8  | by who the clients are. None are the same, so that         |
| 9  | answers itself.  |
| 10 | Q Do you view Bonsib Agency as a continuation of           |
| 11 | Bonsib, Inc. in the sense of continuing the same business? |
| 12 | A Sure. As far as considering the same business            |
| 13 | is concerned, but it has no bearing                        |
| 14 | (Counsel consults with witness.)                           |
| 15 | THE WITNESS: it has no bearing on the                      |
| 16 | clients. The same type of client but none are the same.    |
| 17 | BY MS. SMITH:  |
| 18 | Q The same actual client?                                  |
| 19 | A Yes.   |
| 20 | Q Have you been the treasurer for other political          |
| 21 | committees that were clients of Bonsib, Inc.?              |
| 22 | A Yes. But I don't think any of them I am                  |

| beginning to see the light I don't think any of them    |
|---|
| were federal candidates or anything like that. That is  |
| undoubtedly how that is how I got sandbagged, I guess,  |
| into being the treasurer for this organization. I mean, |
| was thinking back. I just assumed it was the same       |
| ballgame as the other candidates have been.             |

- O These others were all nonfederal candidates?
- A Sure. They had to be. Otherwise, we would have been in the same bowl of soup.
- Q About how many of them were there that you were treasurer for a committee?

A I don't know. It changes over a period of time so much I could not even begin to speculate. You do things you have to do in business, you got to make a profit at it. If you are an attorney you have to make a profit at it, but I was not an attorney and if I got paid, the other people got paid and if I didn't get paid, they didn't get paid. It is a rough business. It is not fun.

- Q Could you just estimate, say, less than 10?
- A I am sure it would be less than 10.
- Q Less than five?
- A Probably less than five. I never had more than

920409 0 283

two important clients at a time. We were not doing a -- I am having a tough time thinking of the words, but anyway, we were not doing a knock-down-drag-out job for any of them. We were doing a good job, the best we knew how to do.

Q Okay.

A We didn't have enough clients to get into that act.

Q How many other clients total did you have while you were handling the National Conservative Congressional Committee?

A I have no idea. I mean, probably very few, because we didn't have a lot of clients, but on the other hand I could not tell you exactly.

Q Well, again, less than 10?

A I am sure it was always less than 10 because to have more than 10 would be -- turn out work that was not up to our standard. We were very, very careful about what we did. You don't think so, but my evidence of how careful we were is the fact we did report the way we did it because we were very, very conscious of the need to report in a proper fashion.

As far as I am concerned we did it exactly according to Hoyle. Obviously, you don't think we did, but I was absolutely assured we were doing it correctly and whatever was done wrong was done wrong because we were told to do it that way, not the fact that we were doing so carelessly or in opposition to the rules.

Q When you were handling the National Conservative
Congressional Committee as a client did you have around
the same number of other clients as previously?

A Yes, but it depends on the circumstances. For example, my background for doing it, the Conservative Committee was effected before that, before that I was handling the Republican Congressional Committee, did all the same things for them that I did for the others. So I was not -- it was not that I was dumb or trying to do wrong but I just simply was told it was incorrect, but nobody corrected me.

MR. HEMENWAY: I will state for the record I have not objected to the question but you will acknowledge I am sure it is a fairly imprecise question and for that reason when you read the answer later on, you will have to recall the answer will be no more precise than the

920409 0 285

question. So if you don't know what the antecedents were and you ask how something compares to the indefinite antecedents, then you will have to admit that the answer is imprecise, if you follow that argument.

#### BY MS. SMITH:

Q When Bonsib, Inc. had the National Conservative Congressional Committee as a client did it enter into a written contract with National Conservative Congressional Committee?

A I am sure that they did. I don't have any recollection of it, but I am sure that they did. We did everything the same unless there was a good reason not to change it. That is why you have that deal of the corporate money being used in the beginning, it never got changed, because I was never told that it was any different than what I was told the first time.

Q Do you recall who represented the National Conservative Congressional Committee in its dealings with Bonsib, Inc.?

A No, I could not with any certainty because it changed over a period of time and I don't remember when or how. We were in a tizzy all of the time, figuring out how

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

| to | get | out | of | that. |
|----|-----|-----|----|-------|
|    |     |     |    |       |

- Q Could it have been Daniel C. Holdgreiwe?
- A It could have been.
- Q Do you recall who else you dealt with that was part of the National Conservative Congressional Committee?
- A No, I don't, and the reason is there were several people who were involved as advisors.

MS. SMITH: Let's take a brief break.

(Recess.)

#### BY MS. SMITH:

- Q In dealing with the National Conservative
  Congressional Committee you represented, did you represent
  Bonsib, Inc.?
  - A Right.
  - Q Did you consult with anyone else?
- A I just finished saying there were so many different ones and they changed so fast that I don't recall but I certainly did. You don't do anything without getting somebody's approval.
- Q Did you consult with anybody else within Bonsib, Inc. regarding business?
  - A I could have, but I don't have a record of

| that.  | I don't know who  | it might have been.  | Probably did, |
|--------|-------------------|----------------------|---------------|
| but I  | just don't have a | way of pulling it up | on a          |
| comput | er.               |                      |               |

Q Now, when you advanced the funds -- when Bonsib,
Inc., that is, advanced the funds to the National
Conservative Congressional Committee for this operation,
did it occur to you that the fundraiser might be a
failure?

A Heavens, no. We didn't have any -- if we had anticipation of it being a failure we would not have spent our own money on continuing it. But it was not our experience to have failures. Therefore, we didn't expect it.

More specifically, we tested almost everything that we did so there wouldn't be failures. And when there were failures we just stopped right there and told the client we are sorry but we cannot make it work on a test, so we will not invest in it and we don't want to invest it and that is what we usually did.

There was a different case. It was already out in the mail and had been successful and we expected the rest of it to be successful, but they were not. They were

2

3

4

|        | 5  |
|--------|----|
|        | 6  |
|        | 7  |
|        | 8  |
| × ×    | 9  |
| N<br>N | 10 |
| 2      | 11 |
|        | 12 |
|        | 13 |
| 4      | 14 |
| )      | 15 |
| 7      | 16 |
|        | 17 |
|        | 18 |
|        | 19 |
|        | 20 |
|        | 21 |
|        | 22 |

| extremely unsucces | 81 | ul |  |
|--------------------|----|----|--|
|--------------------|----|----|--|

- Q Just so I understand, so you, did you test --
- A Absolutely. We tested everything.
- Q And the test was successful?
- A The test was successful, that is correct. And we don't know what happened after the test, but something did. It could have been a promo, or somebody that was trying to sabotage us. We don't know what it was.

MR. HEMENWAY: A change in the political environment?

#### BY MS. SMITH:

- Q Do you recall how much was raised in contributions from this fundraiser?
- A You have to check your records out. I don't know. I don't remember.
- Q If I were to tell you that the records indicate around \$21,000 does that --
  - A That is reasonable.

MR. HEMENWAY: Net?

THE WITNESS: No. That is gross.

MS. SMITH: That is gross.

MR. HEMENWAY: In other words, it ran at a loss

2

3

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

920409 0 28

probably?

THE WITNESS: Yes. Didn't start out to be that way, of course.

BY MS. SMITH:

Q Let's focus on that money.

If a contribution was generated from the fundraiser, what would happen to it? Where would it come?

A It would come in the mail to the -- shoot, I can't think of the name.

MR. HEMENWAY: Depository.

THE WITNESS: They would take the check and separate it and deposit it in a bank and the records would go to the Committee, into the Committee's bank account, not ours, and --

BY MS. SMITH:

Q Meaning the National Conservative Congressional Committee's bank account?

A Yes. Whether there was one guy or whatever happened, it would go into one bank account. It never got separated into other bank accounts, so that was the money that was raised, period.

800-336-6646

| ^ | 2 1 1 | - 5 | : 42 |
|---|-------|-----|------|
| Q | All   | OI  | Tr   |

- A All of it.
- Q It was all deposited directly --
- A Correct.

Q -- in the Committee's bank account? Do you recall whether some or all of it was used to pay back Bonsib, Inc.?

A Well, I recall we got small amounts being -- I don't remember what they were. They were in a box where -- we had to get paid something. We had other people who wanted to get paid too, so the only way to pay is get paid by our clients. We didn't in the beginning, but in the end we had to get some funds to pay off the suppliers.

Q If I were to tell you that our records reflect about \$19,000 being paid to Bonsib, Inc., would that sound --

A It probably would because over the period of that time we had to get something out of it. Nobody else got anything out of it. We were the ones that had to pay the suppliers. By the way, most of them were paid, not all of them. We paid as many as possible out of our own corporate funds, because they had to get paid, that is

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

all.

- Q You paid your suppliers yourself?
- A Right.
  - Q Were any of your suppliers not paid?
- A That is a couple smaller ones, yes.
  - Q Do you recall about how much was not paid?
  - A No. It is in the bankruptcy records.
  - Q Did you -- did Bonsib, Inc. make any -- well, did Bonsib, Inc. make any efforts to collect the full amount that was owed?

A Of course. I said we used your own regulations as the method for doing it and turned it over to a collection agency. Since we knew we were not going to get the money -- I guess we probably didn't, but to the extent we did on others. But the point is we soon learned we were not going to get the money at all by anybody, so we did our best to save those suppliers that were good enough to give us credit. We didn't save them all, but a good percentage of them.

Q So just so I have this straight, you did not turn over the National Conservative Congressional Committee, this client, to a collection agency?

| A         | Here we go.   | . I don't remember which ones we  | re  |
|-----------|---------------|-----------------------------------|-----|
| turned o  | ver to the co | ollection agency and which ones w | ere |
| not but   | there was mor | re than just that account that co | uld |
| have been | n collected - | and I should not say that eith    | er, |
| because   | I don't know  | the details, so let's forget it.  | The |
| point is  | we collected  | d as much as we could.            |     |

Q And the amount that you -- well, the amount that you felt you could not collect -- first of all, who made that decision? Was that you?

A You don't have to. You just -- the -- it didn't come in. You cannot put your hands on the money, you cannot pay it out, unless you work for the government, that is.

Q Let's turn to some other things that may have been provided by Bonsib, Inc. to the National Conservative Congressional Committee. For example, was it administrative support provided to the committee?

A Not as such, no. It was handled on a job basis.

Q I don't understand.

A If you provide a letter and we had to provide anything to that letter we would charge for it, just like

800-336-6646

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

any other fundraiser would. And just like ABC, you can't pay out something that you do not collect for, so we didn't give them a separate charge, if that is what you mean for administrative work.

It was just simply if there was work that we had to do administratively that was paid for. We didn't collect it, and at that time I can tell you there was not very much spent that didn't have to be spent, so there would not be too much of that.

But that was a policy, administrative work had to be paid for by the client at the time the work was done. As I say, it was -- it became an emergency situation when we could not get the money in to pay the bills. So we obviously didn't spend any that we didn't have to spend.

Q Well, let me ask you this: You indicated that Bonsib, Inc. worked out of a -- had a three-room office.

MR. HEMENWAY: He didn't say that. He said three rooms were dedicated to records.

THE WITNESS: That is correct.

BY MS. SMITH:

Q Were dedicated to records. Did Bonsib, Inc. and

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

| the | National  | Conservative | Congressional | Committee | share |
|-----|-----------|--------------|---------------|-----------|-------|
| off | ice space | ?            |               |           |       |

- A No.
- Q At any time?
- A No.
  - Q Did they share personnel?
  - A No.
- Q Let's focus on some of Bonsib, Inc.'s bank records. Where did Bonsib, Inc. maintain a bank account?

A Well, I am not sure of all of this. You would have to check with the bank records, but fairly sure that the bulk of the money was kept in the American, First American, but there were several different times when individual clients had their own bank records so that kind of confuses the issue. I have no way of going back to check that because that is their records, not ours.

- Q Would this be during the last five years, First American?
  - A I am sure. Yes.
    - Q Did you have bank accounts anywhere else?
    - A Well, I don't -- I don't know really.
      - MR. HEMENWAY: "You" meaning?

MS. SMITH: Meaning Bonsib, Inc.

THE WITNESS: I know what you meant, but I have no way of knowing which were separated and those that were not separated. Because for instance, at one time there were accounts at the -- oh, shoot, what is the name of the bank down there?

MR. HEMENWAY: Virginia or D.C.?

THE WITNESS: In D.C. In a building on Capitol Hill area. National Capital Bank. There was several accounts in the National Capital Bank, and I mean, I just did not -- I cannot separate them in my mind and tell you what happened, but I think the bulk of them were at the First American as I said.

#### BY MS. SMITH:

Q Let's focus on the National Capital Bank ones.

Roughly what time period were there accounts there held by

Bonsib, Inc.?

A Now you are getting into details that I don't know the answer to. You say "were there accounts there held by Bonsib, Inc."? I am not sure --

MR. HEMENWAY: What time period?

THE WITNESS: I know, but I am not sure we had

2

3

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

920409 0 296

any there under our name and that is what is difficult in answering the question. I know that there were accounts there that we oversaw them, but on the other hand that does not mean it was in our name. We had no way of controlling that.

#### BY MS. SMITH:

Q What do you mean, you oversaw them?

A We would be -- it -- we would be in control of the money coming in and then it would be turned over to the client. It was up to them to pay it out. But I cannot distinguish the impossible and in my mind -- my mind does not compute like a computer. I cannot tell you --

MR. HEMENWAY: It may be helpful for her to hear your explanation of the arrangement at which time an account that you may have had in escrow was turned over to the client.

THE WITNESS: We didn't have escrows on them.

MR. HEMENWAY: What did you have?

THE WITNESS: It was money deposited in the account of the client and from then on it was up to them.

1

3

4

5

6

7 8

9

10

11

12

13

14

15

16 17

18

19

20

21

22

BY MS. SMITH:

Let's start from the beginning with that. would be your normal procedure?

There would be no normal procedure, for the simple reason that it is very difficult to collect money from clients that are running for office. They always have a better reason for spending their money than to pay us. So as a result we just got what we got where we could get it and maybe there is a better way of doing it and nobody has ever showed me how and I have been in the business over 50 years and they take charge of the money when they deposited in the bank and we had nothing to do with it from there on. Some were held that way and some were not. I think in the beginning -- I should not speculate, but I am not sure, but I think perhaps at the beginning -- does that qualify enough, John?

MR. HEMENWAY: If you are not sure, you have to communicate to her that you are not sure.

THE WITNESS: I am not sure, but I think in the beginning that was that way for the -- we were talking about -- I forget what we were talking about -- the Conservative Committee, and whether or not they turned it

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

920409 0 298

back to us or what. I don't remember. I know it was a very chaotic period, because the money was not coming in and we had to pay it out as long as we had it to pay out. It is not a very healthy position to be in, but -- it was unhealthy.

#### BY MS. SMITH:

- Q If we can go back to this statement of organization for the National Conservative Congressional Committee, Exhibit 1. It indicates a deposit into an account at the National Capital Bank?
  - A It started out that way.
  - Q In Washington, D.C. Did you open that account?
- A That is my signature. I guess I technically did.

MR. HEMENWAY: No. This document does not open the account, Bill. This is a report to the FEC. It has no bearing on whether the account was opened by you so the question is a different question. The question is did you go to the bank and make the initial deposit or whatever is required to open the account? Is that the question?

MS. SMITH: That is the question.

THE WITNESS: It is the same building there.

|   |       | MR.   | HEI | MENWAY | : I: | f you  | don | 't re | emem | ber  |     |       |
|---|-------|-------|-----|--------|------|--------|-----|-------|------|------|-----|-------|
|   |       | THE   | WI  | rness: | I    | probal | bly | sent  | it   | down | to  | them. |
| I | don't | know. | I   | could  | not  | tell   | you | one   | way  | or   | the | other |
|   |       | BV I  | ıs. | SMITH  |      |        |     |       |      |      |     |       |

- Q What do you mean you were in the same building?
- A Our offices for a period of time were in that building, the bank building.
  - Q Bonsib, Inc.'s office?
- A In the National Capital Bank building, yes. It was a short time, but we were there.
- Q As treasurer of the National Conservative

  Congressional Committee, would you have access to the
  account at the National Conservative Congressional

  Committee?

MR. HEMENWAY: Do you mean, would you have had?

MS. SMITH: Would you have had?

THE WITNESS: It is possible, yes. I mean, I realize that was done specifically for that organization, but as you well know, government does the same thing.

They have changes in the middle of the stream and they change. They don't bother to go back and correct all of the paperwork to year one, and so we didn't either. As

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

long as the bank was happy, we operated with them.

# BY MS. SMITH:

- Q Do you know if the National Conservative Congressional Committee had any other bank accounts?
  - A I don't know. I have no way of knowing.
- Q Let me go back to this fundraiser again. The contributions that did come in, where would they be deposited?
  - A In the bank.
  - Q Which bank?
- A Well, if you were dealing with the National
  Capital it would be in that bank. If we were dealing with
  American, you know --

MR. HEMENWAY: First American.

THE WITNESS: Things changed as a result of the pressures, you know. And so the result was we may have been dealing with one bank or the other. I don't know, but anyway they all went to the bank. We didn't take nothing, not a dime.

#### BY MS. SMITH:

202-347-3700

- Q So whose account would this be deposited?
- A In the account of the client.

| 1  | MR. HEMENWAY: Would be?                                  |
|----|--|
| 2  | THE WITNESS: The National Conservative                   |
| 3  | Congressional Committee.                                 |
| 4  | BY MS. SMITH:  |
| 5  | Q Did the National Conservative Congressional            |
| 6  | Committee have separate accounts?                        |
| 7  | A Absolutely.  |
| 8  | Q Did it have a joint account?                           |
| 9  | A None.  |
| 10 | Q At any time?   |
| 11 | A At any time. I remember not that I                     |
| 12 | remember. Anything could have happened during those      |
| 13 | chaotic periods, but I don't think it did.               |
| 14 | Q Do you know if this account of the National            |
| 15 | Conservative Congressional Committee at National Capital |
| 16 | bank is still open?                                      |
| 17 | A Certainly I don't think so.                            |
| 18 | Q Why don't you think so?                                |
| 19 | A Because it was all taken out.                          |
| 20 | MR. HEMENWAY: But to answer the question, do             |
| 21 | you know? The answer is, you don't know?                 |
| 22 | THE WITNESS: I don't know that certainly, no.            |

800-336-6646

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

| MR.   | HEMENWAY:     | That   | is | the  | question. |
|-------|---------------|--------|----|------|-----------|
| 7.777 | IIDIIDIAMATI. | THUC . |    | CITO | daeperou. |

THE WITNESS: I am not positive if that is what happened. All I know is that I assume that is what happened because that is usually what happens.

#### BY MS. SMITH:

- Q You think it was all taken out?
- A That's right.
- Q By whom?

A I don't know. Somebody wrote a check and cashed it and that is the way it got out. I may have signed checks even, at that particular moment, because we had a lot of things due, but I sure didn't get any of it, I can tell you that. In fact if I had access to it, we never would have to go bankrupt.

Q So did you have power to withdraw money?

A I don't remember any time that I did, no. It is possible. You are asking questions that took place a long time ago. I have no way of --

MR. HEMENWAY: This could be ascertained by getting the bank records and Mr. Bonsib has no objection to you getting the bank records.

THE WITNESS: I have no objection, but you don't

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

920409 00303

like to be put on the grill because of the fact I don't remember.

#### BY MS. SMITH:

Q Do you have any bank records from National Capital Bank?

#### A None.

MR. HEMENWAY: They have not been destroyed.

They are with the bank, as you know. They are available by subpoena, or without a subpoena. We sign a release if that is enough to get them.

### BY MS. SMITH:

Q With regard to some of the money that was paid by the National Conservative Congressional Committee to Bonsib, Inc., I am referring to the amounts indicated on your 1986 reports, how was that paid?

- A By check.
- O A check drawn on what account?

A Let's go back and look it up. I don't know. I will continue to speculate. I don't know and you don't know, so there is no point in trying to guess.

MR. HEMENWAY: Once again, it is in the records that are available to the FEC. And Mr. Bonsib will

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

92040900304

cooperate in every way possible.

these questions directly. I don't like to be in this position, but on the other hand I don't want to seem reluctant to answer, and neither do I want to say something that I am not sure of. I already said too much about things that I am unsure of.

BY MS. SMITH:

Q Do you view yourself as experienced in political fundraising?

A I ought to be. Look at the -- I don't have -- I don't want to mention the names here, but if I did you would be shocked.

- Q You can mention names?
- A I don't want to mention names.
- Q Do you consider yourself knowledgeable as to the federal laws involved in campaign financing?

A I did up until the point that somebody told me that I had misheard the FEC people who told me to do what, we did do. There have been a lot of arguments about it, too.

MR. HEMENWAY: Mr. Bonsib is not so

5

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

| experienced. He occasionally hires a lawyer. He hired a    |
|--|
| lawyer that led him to the financial bankruptcy and the    |
| lawyer told him what to do with the records, and I believe |
| Mr. Bonsib relies on federal officials to tell him what    |
| the law is of that particular agency. So to that extent    |
| he relies on other people and probably to the extent, too, |
| like we all do.  |

#### BY MS. SMITH:

Q Do you have anything else you would like to add for the record?

A I cannot think of anything. You mentioned everything. You probably mentioned it two or three times.

MS. SMITH: Let's take a brief break.

(Recess.)

MS. SMITH: On the record.

#### **EXAMINATION**

#### BY MS. KLEIN:

Q Mr. Bonsib, you have referenced having attended a meeting where you learned about federal election campaign law?

A Right.

| 2  | A Federal Election Commission. It was new then.   |     |
|----|---|-----|
| 3  | Q During your tenure did you receive notices from | n   |
| 4  | the Federal Election Commission?                  |     |
| 5  | A Yes, we did, but there were so many of them the | 2 t |
| 6  | I would be doing nothing else, but reading them.  |     |
| 7  | Q Did you call anyone?                            |     |
| 8  | A I didn't see a need. I didn't read them in      |     |
| 9  | full, but I tried to keep up on them.             |     |
| 10 | Q Did you ever talk about questions with someone  |     |
| 11 | from the FEC?                                     |     |
| 12 | A Well, again, I didn't have a reason to do that, | ,   |
| 13 | I didn't think.                                   |     |
| 14 | Q You said you talked to Raymond                  |     |
| 15 | A That was after the fact.                        |     |
| 16 | Q After the fact                                  |     |
| 17 | A I did then, yes.                                |     |
| 18 | Q Did you come in and talk to him?                |     |
| 19 | A Right. Several times.                           |     |
| 20 | Q Several times. Three times?                     |     |
| 21 | A Probably more than that. I don't remember       |     |
| 22 | exactly, but probably five or six times, anyway.  |     |

Who sponsored that meeting?

| Q | Did | you | initiate | those | visits? |
|---|-----|-----|----------|-------|---------|
|---|-----|-----|----------|-------|---------|

- A Yes.
- Q Why did you initiate them?

A Because I got the feeling something was wrong with the way we were reporting. That is what I asked him about. He didn't correct me as I expected him to, but he did say we will have to do something about this, so he did.

It didn't stick to the law and when he finally decided to get out of the business I had to, really, because of the decision. I explained that to him and he said we can make out a report here, and that will end all of this for you. So I made out the report, as a matter of fact, to the two ladies sitting there. And he called me up a couple days later I guess and said we would have to change the report and I said, okay, tell me what to do.

And he said come down here and I will show you.

And I came down here again and we went through it word by word and I wrote it down and then he said that was going to be okay. I never heard from him for months after that. I had no idea until relatively recently that there was anything wrong with any of it.

|      | Q   | So   | it was | your  | impre  | ssion | in   | dealing | y wit | th him |
|------|-----|------|--------|-------|--------|-------|------|---------|-------|--------|
| that | you | took | care   | of wh | atever | probl | Lems | there   | may   | have   |
| been | ?   |      |        |       |        |       |      |         |       |        |

- A Right.
- Q Okay. Thank you.

## EXAMINATION

### BY MR. FITZGERALD:

Q Let me go back to the subject we originally started at the beginning, regarding stipulation referred to. I think I spoke to Ms. Monarski that about has a different recollection of the event that you indicated.

MR. HEMENWAY: She didn't hear my recollection.

MR. FITZGERALD: Explain your recollection.

MR. HEMENWAY: I thought we agreed on two things. One was I reported the fact that my client could not afford the cost of coming here, so we had agreed he would would be paid mileage for coming. Second one was that under no circumstances would his trip here be a pretext for facilitating his service, to be served any legal service entering the jurisdiction for purpose of coming here and being served.

MS. MONARSKI: I want to clarify on the record

that I recall when we discussed his travel expenses I said to you I would look into the Commission paying for Mr. Bonsib's travel expenses here, and the Commission would consider it. But I don't recall stipulating to the fact we would definitely pay them and I want to clarify that for you.

The Commission would consider paying his travel expenses. We discussed 24 cents a mile and a witness fee check and I recall that. And I said I would look into the Commission paying for it.

MR. HEMENWAY: The witness fee check, I don't remember that coming up, although that is a usual thing as do you, but what I am -- what I can do is copy a tape recording of our conversation and send it to you, and you can see if that will refresh your memory of our conversation.

MR. FITZGERALD: You can go ahead and do that.

I will tell that you the Commission will certainly consider an application for expenses if and when submitted, but if Mrs. Monarski suggested any kind of blank check, this was not correct and this is not -- the client is not under subpoena. He is here voluntarily.

MR. HEMENWAY: In that connection we agreed to stipulation that I presume you filed with the court?

MS. MONARSKI: Yes.

MR. FITZGERALD: We can consider that. As far as tape recording conversations, I hope you had a beeper on it, because otherwise if it is a telephone tape we will have to notify C&P?

MR. HEMENWAY: Since you have said that the application for funds will be regarded, I think we should do this the easy way. I should submit the application for funds and see whether or not the FEC will honor this.

As far as tape recordings of conversations are concerned, let me tell you I have a long experience in the government, and a tape recorder is an honest man's best friend in this town. I have served in the diplomatic service for years and years and most of my experience is in eastern Europe, and let me tell you a talk on the telephone is a talk on an open street corner of the KGB is your next door neighbor.

MR. FITZGERALD: It is illegal to record telephoned conversation under C&P Regulation unless you are a government official.

| MR. HEMENWAY: You are telling me the government           |
|---|
| can record these conversations and no one else can?       |
| MR. FITZGERALD: There is a limited law                    |
| enforcement for exception, but otherwise there is not, it |
| is not right to record telephone conversations without a  |
| beeper so the person knows                                |
| MR. HEMENWAY: This is improper use of                     |
| telecommunications is not propriety interests of the FEC  |
| along with how America governs itself?                    |
| MR. FITZGERALD: I think every violation of the            |
| law is of interest to officers of the court. I think that |
| concludes the deposition.                                 |

MR. HEMENWAY: How do I get a copy of the record?

MS. KLEIN: I will explain the usual procedure:
You have a copy produced that will be available for your
client's signature and it will be returned to the
Commission.

MR. HEMENWAY: May I say in closing I consider this whole thing conducted in the spirit with which you engaged it, and I'm sorry at the slightly, only slightly sour note at the very end. I am sure it will all work

Out. Thank you very much.

(Whereupon, at 4:05 p.m., the deposition was concluded.)

LOUIS WILLIAM BONSIB

Subscribed and sworn to before me
this\_\_\_\_\_day of\_\_\_\_\_\_, 19\_\_\_\_.

Notary Full.

My Commission Expires

ACE-FEDERAL REPORTERS, INC.

202-347-3700

Nationwide Coverage

I, RONALD J. WILSON , the officer before whom the foregoing deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; that the testimony of said witness was taken in shorthand and thereafter reduced to typewriting by me or under my direction; that said deposition is a true record of the testimony given by said witness; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken; and, further, that I am not a relative or employee of any attorney or counsel employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.

Notary Public in and for the District of Columbia

My Commission Expires MARCH 14, 1991



| DEFOSITION   |
|--------------|
| EXHIBIT      |
| Bruse B      |
| The state of |

# CONTRACTOR OF CONTRACTOR

FEE

|  |  |  | BEFFE 5 PR  |
|--|--|--|---|
| Matienal Consurrative Congress   |  | 2-4  | - 96  |
| Bi-Address (Number and Street)<br>P.O. Box 1807  |  | 3. Plat time the party   |   |
| tel City, State and 29° Crafe  |  | 4. 5 00 00 000000  |   |
| Washinston, D.C. 20003   |  |  |   |
| TYPE OF COMMITTEE (shock cond):  O (a) This agreement is a privated committee committee in a privated committee committee in a privated committee committee in a privated comm | tons, (Complete the quadries in  | formation below.)  |   |
| © (b) This committee is an authorized committee, o   | nd is 1107 a principal compalys o  | promittes. (Complete th  | candidate information below.)   |
| Service Constant   | - Emilion Party All Business   | Cities Saudit  | Burn/Outrig   |
| O (a) This committee comparts/appears only one or  |  | end  | is NOT an authorized commisses.   |
| O MI This committee is a   | trame of or  |  |   |
| Platford, Butt or (  |  | (Compared).  | , Physioliten, etc.)  |
| 6 (6) This commisses is a separate coprogram fund.  5 (1) This commisses authorizates some more than (   | pro Pagard candidate and is NOT  | a caparate caparated he  | and may a party committee.  |
| Mame of Arry Commented<br>Graphingtion or Affiliated Commission  |  |  | Retailenghip  |
|  |  |  |   |
| None   | . L. S   |  |   |
|  |  |  |   |
|  | processed argunisation" above, pt<br>Dilabor Organisation — Differed<br>(phone marries — aptional) and   |  | pnisotion:<br>3 Trade Association <sup>©</sup> Cooperat<br>o pressession of committee books o   |
| Corporation © Corporation w/o Capital Seek   |  | l Mastelan, the parton in  | gnization: D'Trade Association D'Conserve passession of committee books of  |
| Corporation O Corporation tale Capital State Composition of Records: Identify by name, address records. Full Name TREASURER Treasurer: Lat the name and address tahone number  | (phone member — optional) and<br>(Mulling Address and 29° (s   | l desirien, the streen in  | Tido or Postelon  |
| Corporation O'Corporation volo Capital Steels Consection of Records: Identify by name, address records. Full Name TREASURER Treasurer: List the name and address (phone numb agent (e.g., assistant treasurer). Full Name  | (phone member — optional) and<br>(Mulling Address and 29° (s   | Passion, the serven in<br>ide  | Tido or Postelon  |
| Corporation O'Corporation w/o Capital State Compation of Records: Identify by name, address records. Full Name TREASURER  Treasurer: Lat the name and address takens name agent (e.g., assistant treasurer). Full Name L. William Bonsit, Jr.  | (phone member — optional) and (phone and 217 (c)) are a pointed of the treasurer of  | I desirien, the streen in<br>ide<br>If the committee; and th   | Title or Position  Title or Position  name and address of any designs  Title or Position  Treasurer   |
| Corporation O Corporation w/o Capital Steels Composition of Records: Identify by name, address records. Full Name TREASURER Treasurer: List the name and address (phone numb agent (e.g., statistant treasurer). Full Name   | (phone member — optional) one (Stalling Address and 2P (s) or — optional) of the treasurer of (Stalling Address and 2P (s)   | I desirien, the streen in<br>ide<br>If the committee; and th   | Title or Position  Title or Position  name and address of any designs  Title or Position  Treasurer   |
| Comparation O'Corporation w/o Capital State Comparation of Records: Identify by name, address records. Full Name TREASURER  Treasurer: Let the name and address takens name agent (e.g., assistant treasurer). Full Name L. William Bonsit, Jr.  | (phono member — optional) and Malling Address and EP (c) or — optional) of the treasure of Malling Address and EP (c) P.O. Best 1807   | I the committee; and the   | Title or Position  name and address of any designer  Title or Position  Treasurer Assistant Treasure  |
| Corporation D'Corporation vulo Capital State Consedien of Records: Identify by name, address records.  Full Name TREASURER  Treasurer: List the name and address inhore name agent (e.g., assistant treasurer).  Full Name L. William Bonsib, Jr.,  Daniel C. Heldgraive.  Bents or Other Depositories: List all banks or other  | Malling Address and EP & or — optional) of the treasure of Malling Address and EP Co. P.O. Best 1807   | I the committee; and the   | Title or Position  name and address of any designer  Title or Position  Treasurer Assistant Treasure  |
| Corporation D'Corporation w/o Capital State Consection of Reservic: Identify by name, address reservic.  Full Name TREASURER  Treasurer: Lat the name and address inhore name agent (e.g., assistant tressurer).  Full Name L. William Bonsib, Jr.,  Daniel C. Heldgreive.  Bents or Other Depositorite: Lot all bents or other or maintains funds.  | the time of the transfer of th | I the committee; and the M.D.C. 20003  | Title or Position  name and address of any designer  Title or Position  Treasurer Assistant Treasure  |
| Corporation O'Corporation tale Capital Steels Consection of Records: Identify by name, address records. Full Name TREASURER Treasurer: Let the name and address tahone numb agent (e.g., assistant treasurer). Full Name L. William Bonsib, Jr. Daniel C. Haldgraive .  Bents or Other Depositories: Let all banks or other or maintains funds. Name of Bank, Depository, etc.   | the time of the transfer of th | I the committee; and the M.D.C. 20003  | Title or Position  name and address of any designs Title or Position Treasurer Assistant Treasure   |
| Corporation D'Corporation avic Capital State Consolien of Records: Identify by name, address records.  Full Name TREASURER  Treasurer: Let the name and address tahene name agent (e.g., assistant treasurer).  Full Name L. William Bonsit, Jr.,  Daniel C. Haldgraiwa .  Sente or Other Depositories: Let all banks or other or maintains funds.  Name of Sant, Depository, etc.  National Capital Bank  | the time of the transfer of th | the committee; and the M.D.C. 20003  The deposits funds, held drives and EP Code  A Ave SS, Wash:  | Title or Position  name and address of any designer Title or Position Treasurer Assistant Treasure a accounts, room safety deboor be  |
| Corporation D'Corporation sule Capital State  Consider of Records: Identify by name, address records.  Full Name  TREASURER  Treasurer: Lat the name and address tahene name agent (e.g., assistant tressurer).  Full Name  L. William Bonsit, Jr.,  Daniel C. Haldgraive .  Sente or Other Depositories: Let all banks or other or maintains funds.  Name of Sant, Depository, etc.  National Capital Bank  | the transfer — equated and EP to the transfer of the transfer  | I the committee; and the M.D.C. 20003  | Title or Position  name and address of any designer Title or Position Treasurer Assistant Treasure a accounts, room safety deboor be  |
| Corporation Discords: Identify by name, address records.  Full Name TREASURER  Treasurer: List the name and address inhere name agent (e.g., assistant tressurer).  Full Name L. William Bonsib, Jr.,  Daniel C. Heldgreive .  Bents or Other Depositories: List all bents or other or maintains funds.  Name of Bents, Depository, see.  National Capital Bank  | the time of the transfer of th | the committee; and the M.D.C. 20003  The deposits funds, held drives and EP Code  A Ave SS, Wash:  | Title or Position  name and address of any designs Title or Position Treasurer Assistant Treasure a accounts, room safety debook be   |
| Corporation Corporation tale Capital State  Consider of Records: Identify by name, address records.  Full Name  TREASURER  Treasurer: Let the name and address tahone numb agent (e.g., assistant treasurer).  Full Name  L. William Bonsib, Jr.  Daniel C. Haldgraiwa.  State or Other Depositories: Let all banks or other or maintains funds.  Name of State, Depository, etc.  National Capital Bank  crafty that I have examined this Statement and to the  L. William Bonsib, Jr.  pp or Frint Ryme of Treasurer   | the transport of the present of the transport of the t | the committee; and the street of the committee; and the street deposits funds, hold defeat and 2P Code a Ave SE, Wash:   | Title or Position  Income and address of any designer Title or Position Treasurer Assistant Treasure  accounts, room sofety descent be ington, D.C. 20003   |
| Comporation Of Corporation tole Capital Steels Composition of Records: Identify by name, address records. Full Name TREASURER  Treasurer: Let the name and address tahone numb agent (e.g., essistant treasurer). Full Name L. William Bonsib, Jr.  Daniel C. Haldgraiwa.  Stems or Other Depositories: Let all banks or other or maintains funds. Name of Sent, Depository, etc.  National Capital Bank  crufy that I have examined this Statement and to the de. William Bonsib, Jr. pp or Frint Name of Treasurer   | the transport of the present of the  | the committee; and the M.D.C. 20003  The deposits funds, held dense and 2P Code  A Ave SE, Wash:  It is true, correct and of the constraint and th | Title or Position  Title or Position  Treasurer Assistant Treasure  a accounts, room selety deposit be  ington, D.C. 20003  project.  2-4-Fil  Com  |
| Comporation D'Corporation sule Capital State Consolien of Reservic: Identify by name, address reservic.  Full Name TREASURER  Treasurer: Let the name and address tahone numb agent (e.g., assistant treasurer).  Full Name L. William Sonsib, Jr.  Daniel C. Heldgraine.  Bents or Other Depositories: Let all banks or other or maintains funds.  Name of Bents, Depository, etc.  | the transport of the present of the transport of the t | the committee; and the M.D.C. 20003  The deposits funds, held dense and 2P Code  A Ave SE, Wash:  It is true, correct and of the constraint and th | Title or Position  In name and address of any designs Treasurer Assistant Treasur  a account, room softry deposit to  ington, D.C. 20003  propiers.  2-4-Fit  Base  To the constitute of 2 U.S.C. \$4 |





# FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20163

| THIS IS THE END OF MUR# | 3013      |
|-------------------------|-----------|
| DATE FILMED             | CAMERA NO |
| CAMERAMAN               |           |