



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3133

DATE FILMED 12/26/90 CAMERA NO. 2

CAMERAMAN AS

90040812119

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 19 July 1990

ANALYST: Donald L. Averett

I. COMMITTEE: Enron Political Action Committee
(FKA HNG/Internorth PAC) (C00104810)
Robbie Leaver, Treasurer
1400 Smith Street, Suite 4428
Houston, TX 77002

II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(B)
11 CFR §104.5(c)(3)

III. BACKGROUND:

Failure to Timely File the 1990 May Monthly Report

The Enron Political Action Committee (FKA HNG/Internorth PAC)("the Committee") failed to file the 1990 May Monthly Report of Receipts and Disbursements covering the period from April 1, 1990 to April 30, 1990 in a timely manner. The Committee was notified on February 28, 1990 that the report was due on May 20, 1990 (Attachment 2). A Non-Filer Notice was sent to the Committee on June 12, 1990 (Attachment 3).

On July 6, 1990 the Reports Analysis Division ("RAD") analyst telephoned Ms. Robbie Leaver, the treasurer. The message on her answering machine stated that she would be on vacation from July 2, 1990 to July 10, 1990 and requested that any messages be left with Ms. Jerrie Ann Warner (Attachment 4). On July 6, 1990 the RAD analyst telephoned Ms. Jerrie Ann Warner. Ms. Warner was not available, so the RAD analyst left a message on her answering machine informing her that the Commission had not received the Committee's May Monthly Report (Attachment 5). On July 11, 1990 the RAD analyst contacted Ms. Leaver and advised her that the May Monthly Report had not been received. Ms. Leaver stated that the report would be filed immediately (Attachment 6).

ENRON POLITICAL ACTION COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

On July 17, 1990, the 1990 May Monthly Report was filed
(Attachment 7).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

90040812121

YOU MAY ENTER UP TO 9 FILES AT THIS TIME

Attachment 1

1989-1990
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

PAGE

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	# OF COVERED DATE	FILED DATE	TYPE OF FILE
FEDERAL ELECTION COMMISSION (FEC) (FKA HNG/INTERNORTH PAC)						
1988 STATEMENT OF ORGANIZATION - AMENDMENT						
	FEBRUARY MONTHLY	10,681	5,221	10JAN89	1	89FEC/878/2701
	MARCH MONTHLY	10,390	2,425	10JAN89 -31JAN89	16	89FEC/880/5172
	1ST LETTER INFORMATIONAL NOTICE			1FEB89 -28FEB89	16	89FEC/882/1200
	APRIL MONTHLY	15,331	12,857	1FEB89 -28FEB89	1	89FEC/882/3022
	1ST LETTER INFORMATIONAL NOTICE			1MAR89 -31MAR89	27	89FEC/891/1070
	MAY MONTHLY	13,617	14,500	1MAR89 -31MAR89	1	89FEC/891/2100
	1ST LETTER INFORMATIONAL NOTICE			1APR89 -30APR89	29	89FEC/892/2571
	JUNE MONTHLY	13,977	12,157	1APR89 -30APR89	1	89FEC/892/3022
	1ST LETTER INFORMATIONAL NOTICE			1MAY89 -31MAY89	26	89FEC/897/4701
	JULY MONTHLY	14,117	16,850	1MAY89 -31MAY89	1	89FEC/897/3022
	1ST LETTER INFORMATIONAL NOTICE			1JUN89 -30JUN89	29	89FEC/897/5171
	AUGUST MONTHLY	14,897	7,220	1JUN89 -30JUN89	1	89FEC/897/3022
	SEPTEMBER MONTHLY	13,887	19,220	1JUL89 -31JUL89	31	89FEC/897/5172
	SEPTEMBER MONTHLY - AMENDMENT	13,887	19,220	1AUG89 -31AUG89	26	89FEC/897/4701
	REQUEST FOR ADDITIONAL INFORMATION			1AUG89 -31AUG89	2	89FEC/897/3022
	OCTOBER MONTHLY	13,790	6,220	1AUG89 -31AUG89	1	89FEC/897/4701
	OCTOBER MONTHLY - AMENDMENT	13,790	6,220	1SEP89 -30SEP89	27	89FEC/897/5171
	REQUEST FOR ADDITIONAL INFORMATION			1SEP89 -30SEP89	2	89FEC/897/3022
	NOVEMBER MONTHLY	12,830	32,481	1SEP89 -30SEP89	1	89FEC/897/4701
	NOTICE OF FAILURE TO FILE			1OCT89 -31OCT89	31	89FEC/897/5171
	DECEMBER MONTHLY	13,720	13,750	1OCT89 -31OCT89	1	89FEC/897/4701
	YEAR-END	13,677	10,325	1NOV89 -30NOV89	26	89FEC/897/5171
	1989 MISCELLANEOUS NOTICE FROM FEC			1DEC89 -31DEC89	27	90FEC/897/5171
	FEBRUARY MONTHLY	13,980	19,350	10MAY90	2	90FEC/897/5171
	NOTICE OF FAILURE TO FILE			1JAN90 -31JAN90	27	90FEC/897/5171
	MARCH MONTHLY	14,047	27,750	1JAN90 -31JAN90	1	90FEC/897/5171
	NOTICE OF FAILURE TO FILE			1FEB90 -28FEB90	31	90FEC/897/5171
	REQUEST FOR ADDITIONAL INFORMATION			1FEB90 -28FEB90	1	90FEC/897/5171
	REQUEST FOR ADDITIONAL INFORMATION AND			1FEB90 -28FEB90	1	90FEC/897/5171
	APRIL MONTHLY	15,667	12,250	1FEB90 -28FEB90	2	90FEC/897/5171
	NOTICE OF FAILURE TO FILE			1MAR90 -31MAR90	28	90FEC/897/5171
	MAY MONTHLY	15,130	19,900	1MAR90 -31MAR90	1	90FEC/897/5171
	NOTICE OF FAILURE TO FILE			1APR90 -30APR90	31	90FEC/897/5171
	NOTICE OF FAILURE TO FILE			1APR90 -30APR90	1	90FEC/897/5171
				1MAY90 -31MAY90	1	90FEC/897/5171
	TOTAL	219,857	232,361		453	TOTAL 943.9

All reports listed above have been reviewed (other than the 1990 M5)
Cash on Hand balance as of 04/30/90--\$-10,174
Debts owed by/to the committee as of 4/30/90--\$0.00

February 28, 1990

**REPORTING NOTICE FOR MONTHLY FILERS
ELECTION YEAR 1990**

The Commission's records indicate that your committee will file monthly reports during 1990. This notice will assist you in complying with the monthly filing requirements.

* * * *

MONTHLY REPORTS

Monthly reports must be filed no later than the 20th day of each month. 11 CFR 104.5(c)(3). Each report must include all financial activity that occurred during the previous month. For example, the next monthly report due in 1990 should be filed by March 20, 1990, and should include all activity between February 1 and February 28, 1990. NOTE: During November, December and January, monthly filers must file Pre- and Post-General election reports and a Year-End report instead of their monthly reports. (See chart on reverse side.)

You are required to use FEC Form 3X to file each report. Two of them have been enclosed for your use. You may duplicate these forms, or you may call the Information Services Division for additional copies (800/424-9530 or 202/376-3120).

(over)

MONTHLY REPORTS 1990

REPORT	PERIOD COVERED	REG./CERT. MAILING DATE*	FILING DATE
February	01/01 - 01/31	02/20/90	02/20/90
March	02/01 - 02/28	03/20/90	03/20/90
April	03/01 - 03/31	04/20/90	04/20/90
May	04/01 - 04/30	05/20/90	05/20/90
June	05/01 - 05/31	06/20/90	06/20/90
July	06/01 - 06/30	07/20/90	07/20/90
August	07/01 - 07/31	08/20/90	08/20/90
September	08/01 - 08/31	09/20/90	09/20/90
October	09/01 - 09/30	10/20/90	10/20/90
Pre-General	10/01 - 10/17	10/22/90	10/25/90
Post-General	10/18 - 11/26	12/06/90	12/06/90
Year-End	11/27 - 12/31	01/31/91	01/31/91

COMPLIANCE

Treasurers of political committees are responsible for filing all reports on time. Failure to do so is subject to enforcement action. Committees filing illegible reports or using non-FEC forms will be required to refile.

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

20040312124



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

Attachment 3

RQ-7

June 12, 1990

Robbie Leaver, Treasurer
Enron Political Action Committee
(FKA HNG/Internorth PAC)
1400 Smith Street, Suite 4428
Houston, TX 77002

Identification Number: C00104810

Reference: May Monthly Report (4/1/90-4/30/90)

Dear Mr. Leaver:

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 previously notified of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or 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).

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 Donald Averett 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

40312125

* TYPE ENRON.15

TELECON

ANALYST: Donald L. Averett

CONVERSATION WITH: N/A

COMMITTEE: Enron Political Action Committee
(COO104810)

DATE: 7/6/90

SUBJECT: Non-filing of the May Monthly Report--due 5/20/90

I telephoned Ms. Robbie [redacted] Committee treasurer.

5 The message on Ms. Leaver's answering machine stated that she
2 ould be on vacation from July 2 through July 10, 1990 and
1 Requested that any messages be forwarded to Ms. Jerrie Ann Warner
2 I left a message on Ms. Leaver's machine requesting that she return
3 my call

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TYPE ENRON: 16

TELECON

ANALYST: Donald L. Everett

CONVERSATION WITH: N/A

COMMITTEE: Enron Political Action Committee
(CO0104810)

DATE: 7/6/90

SUBJECT: Non-filing of the May Monthly Report--due 5/20/90

*telephoned Ms. Jerrie Ann Warner. Ms. Warner was not
available, so I left a message on her answering machine advising
her that the committee's May Monthly Report had not been received
and requesting that she return my call

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TYPE ENRON.17

TELECON

ANALYST: Donald L. Averett

CONVERSATION WITH: Robbie Leaver, Treasurer

COMMITTEE: Enron Political Action Committee
(C00104810)

DATE: 7/11/90

SUBJECT: Non-filing of the May Monthly Report--due 5/20/90

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REPORT OF RECEIPTS AND DISBURSEMENTS AND DELIVERED

For Other Than An Authorized Committee

(Summary Page)

Attachment 7

SO. 17 10 12

1 PRE PREC MAILING LABEL

OR
TYPE ON PRINT

1 NAME OF COMMITTEE IS ON Enron Political Action Committee		2 FEC IDENTIFICATION NUMBER C00104810
ADDRESS (number and street) ☐ Check if different than previously reported 1400 Smith Street, Suite 4428		3 ☐ This committee qualified as a multicandidate committee (DEFERRED) THIS Reporting Period on _____ (date)
CITY, STATE and ZIP CODE Houston, TX 77002		

4. TYPE OF REPORT

(a) April 15 Quarterly Report

July 15 Quarterly Report

October 15 Quarterly Report

January 31 Year End Report

July 31 Mid-Year Report (Non-election Year Only)

Termination Report

Monthly Report Due On

☐ February 28	☐ June 20	☐ October 20
☐ March 28	☐ July 20	☐ November 20
☐ April 28	☐ August 20	☐ December 20
☒ May 20	☐ September 20	☐ January 31

☐ Twelfth day report preceding _____ (Type of Election)

election on _____ in the State of _____

☐ Twelfth day report following the General Election on _____ in the State of _____

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

SUMMARY

5	Covering Period April 1 through April 30, 1990	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6	(a) Cash on Hand January 1, 19 90		\$ 10,247.83
	(b) Cash on Hand at Beginning of Reporting Period	\$ (5,405.18)	
	(c) Total Receipts (from Line 18)	\$ 15,130.20	\$ 58,827.19
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 9,725.02	\$ 69,075.02
7	Total Disbursements (from Line 28)	\$ 19,900.00	\$ 79,250.00
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ (10,174.98)	\$ (10,174.98)
9	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ - 0 -	
10	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ - 0 -	

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

Type or Print Name of Treasurer
Robbie Leaver

Signature of Treasurer:

Robbie Leaver

Date

July 16, 1990

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 18 U.S.C. §437g

FEC FORM 3X

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

90 OCT -1 AM 11:20

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD Referral: 90NF-15
Staff Member: Noriega E. James

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

RESPONDENTS: Enron Political Action Committee
(FKA HNG/Internorth PAC) and
Robbie Leaver, as treasurer

RELEVANT STATUTES: 2 U.S.C. § 434(a)(4)(B)

INTERNAL REPORTS CHECKED: Referral Materials

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

20040312130
The Reports Analysis Division ("RAD") referred the Enron Political Action Committee (FKA HNG/Internorth PAC) ("the Committee") and its treasurer, to the Office of the General Counsel on July 19, 1990. The basis of the attached RAD referral is the failure of the Committee to file its 1990 May Monthly Report of Receipts and Disbursements, in a timely manner, in violation of 2 U.S.C. § 434(a)(4)(B). The 1990 May Monthly Report was filed on July 17, 1990.

II. FACTUAL AND LEGAL ANALYSIS

For the factual and legal analysis, see Attachment 2.

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

92040812131

IV. RECOMMENDATIONS

1. Open a MUR.

2. Find reason to believe that Enron Political Action Committee (FKA HNG/Internorth PAC) and Robbie Leaver, as treasurer, violated 2 U.S.C. § 434(a)(4)(B), and enter into conciliation prior to a finding of probable cause to believe.

3. Approve the appropriate letter, the attached Factual and Legal Analysis and proposed conciliation agreement.

Lawrence M. Noble
General Counsel

September 28, 1990
Date

BY:

Lois G. Lerner *LD*
Lois G. Lerner
Associate General Counsel

Attachments:

1. RAD Referral
2. Factual and Legal Analysis
3. Conciliation Agreement

4001132

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Enron Political Action Committee) RAD Referral 90NF-15
(FKA HNG/Internorth PAC) and)
Robbie Leaver, as treasurer)

(MUR)
3/33

CERTIFICATIONS

I, Marjorie W. Emmons Secretary of the Federal Election Commission, do hereby certify that on October 3, 1990, the Commission decided by a vote of 5-1 to take the following actions in RAD Referral 90NF-15:

1. Open a MUR.
2. Find reason to believe that Enron Political Action Committee (FKA HNG/Internorth PAC) and Robbie Leaver, as treasurer, violated 2 U.S.C. § 434(a)(4)(B), and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the letter, the Factual and Legal Analysis and proposed conciliation agreement, as recommended in the General Counsel's Report dated September 28, 1990.

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

Attest:

Oct 4, 1990
Date

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

Received in the Secretariat: Mon., Oct. 1, 1990 11:20 a.m.
Circulated to the Commission: Mon., Oct. 1, 1990 4:00 p.m.
Deadline for vote: Wed., Oct. 3, 1990 4:00 p.m.

90040312133



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

October 19, 1990

Robbie Leaver, Treasurer
Enron Political Action Committee
(FKA HNG/Internorth PAC)
1400 Smith Street, Suite 4428
Houston, TX 77002

RE: MUR 3133

Dear Ms. Leaver:

On October 3, 1990, the Federal Election Commission found that there is reason to believe Enron Political Action Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(B), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

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

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

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

If you are interested in expediting the resolution of this matter by pursuing preprobable cause conciliation and if you agree with the provisions of the enclosed agreement, please sign and return the agreement, along with the civil penalty, to the

20040312134

Robbie Leaver, Treasurer
Page 2

Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

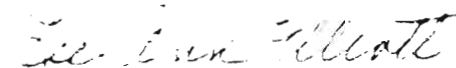
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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

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

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

Sincerely,



Lee-Ann Elliott
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Conciliation Agreement

000403135

90 NOV -2 PM 4:47

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)
Enron Political Action Committee) MUR 3133
(FKA HNG/Internorth PAC) and)
Robbie Leaver, as treasurer)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Robbie Leaver, the treasurer of Enron Political Action Committee.

The attached agreement contains no changes from the agreement approved by the Commission on October 3, 1990. The civil penalty payment of \$1,100, which is due no more than 30 days from the date this agreement becomes effective, has not been received.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Enron Political Action Committee and Robbie Leaver, as treasurer.
2. Close the file.
3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

Date

BY:

Lois G. Lerner
Associate General Counsel

Attachments
Conciliation Agreement

Staff Assigned: Noriega E. James

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Enron Political Action Committee) MUR 3133
(FKA HNG/Internorth PAC) and)
Robbie Leaver, as treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 13, 1990, the Commission decided by a vote of 4-1 to take the following actions in MUR 3133:

1. Accept the conciliation agreement with Enron Political Action Committee and Robbie Leaver, as treasurer, as recommended in the General Counsel's Report dated November 1, 1990.
2. Close the file.
3. Approve the appropriate letter, as recommended in the General Counsel's Report dated November 1, 1990.

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

Attest:

11/13/90
Date

Wanda Arnold
for Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Friday, Nov. 2, 1990 4:47 p.m.
Circulated to the Commission: Monday, Nov 5, 1990 11:00 a.m.
Deadline for vote: Tuesday, Nov. 13, 1990 4:00 p.m.

dr

0040812137



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

November 28, 1990

CLOSED

Robbie Leaver, Treasurer
Enron Political Action Committee
(FKA HNG/Internorth PAC)
1400 Smith Street, Suite 4428
Houston, TX 77002

RE: MUR 3133

Dear Ms. Leaver:

On November 13, 1990, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your behalf in settlement of a violation of 2 U.S.C. § 434(a)(4)(B), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter.

This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel. Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Noriega E. James, the staff member assigned to this matter, at (202) 375-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 3133
Enron Political Action)
Committee (FKA HNG/Internorth)
PAC) and Robbie Leaver, as)
treasurer)

CONCILIATION AGREEMENT

63121804000
This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Enron Political Action Committee and Robbie Leaver, as treasurer, ("Respondents") violated 2 U.S.C. § 434(a)(4)(B).

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

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

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

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

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

1. Respondent, Enron Political Action Committee (FKA

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FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
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HNG/Internorth PAC) is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Respondent Robbie Leaver is the treasurer of Enron Political Action Committee.

3. Section 434(a)(4)(B) provides that all political committees, other than authorized committees of a candidate, shall file monthly reports no later than the 20th day after the last day of each month delineating all receipts and disbursements made during the preceding month and complete as of the last day of the month.

4. Respondents were required to file the 1990 May Monthly Report no later than May 20, 1990. Respondents did not file the report until July 17, 1990, fifty-eight (58) days late, disclosing \$15,130.20 in receipts and \$19,900 in disbursements.

V. Respondents failed to file the 1990 May Monthly Report in a timely fashion in violation of 2 U.S.C. § 434(a)(4)(B).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of one thousand one hundred dollars (\$1,100), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

VIII. This agreement shall become effective as of the date

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

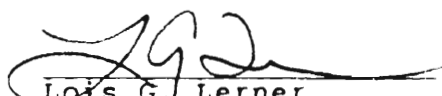
IX. Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

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

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY:


Lois G. Lerner
Associate General Counsel

Date

11/27/90

FOR THE RESPONDENTS:


Robbie Leaver
Treasurer

Date

October 24, 1990

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FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

THIS IS THE END OF MUR # 3133

DATE FILMED 12/26/90 CAMERA NO. 2

CAMERAMAN AS

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