



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

THIS IS THE BEGINNING OF MUR # 3215

DATE FILMED 4/27/91 CAMERA NO. 4

CAMERAMAN AS

91040334922

REPORTS ANALYSIS REFERRAL**TO****OFFICE OF GENERAL COUNSEL****DATE:** August 10, 1990**ANALYST:** Pat Sheppard

I. COMMITTEE: Mike Easley for Senate Committee
(C00239806)
John R. McArthur, Treasurer
P.O. Box 26416
Raleigh, NC 27611

II. RELEVANT STATUTE: 2 U.S.C. §434(a)(6)
11 CFR §104.5(f)

III. BACKGROUND:**Failure to File Forty-Eight Hour Notifications**

The Mike Easley for Senate Committee ("the Committee") has failed to file the required Forty-Eight (48) Hour Notifications ("48-Hour Notices") for thirteen (13) contributions totaling \$33,000 received prior to the 1990 Primary Election. Eight of the required 48 Hour Notifications were for individuals who had each guaranteed \$1,000 of a \$12,800 bank loan.

The candidate was involved in the 1990 Primary Election held on May 8, 1990. Prior Notice was sent to the Committee on April 2, 1990 (Attachment 2). The Notice includes a section titled "Last Minute Contributions". This section reads "Committees must also file special notices on contributions of \$1,000 or more, received during the April 19 through May 5, 1990 reporting period. The notices must reach the appropriate federal and state offices within 48 hours of the committee's receipt".

Schedules A and C of the 1990 12 Day Pre-Runoff Report indicate that the Committee failed to file thirteen (13) 48-Hour Notices for contributions received during the aforementioned reporting period (Attachment 3). The following is a list of the contributions for which no 48-Hour Notices were filed:

91040334923

MIKE EASLEY FOR SENATE COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

<u>Contributor Name</u>	<u>Date</u>	<u>Amount</u>
R.J. Bedard	5/4/90	\$ 1,000
Yvonne Craig-Aldrich	5/4/90	\$ 1,000
Kenneth C. Aldrich	5/4/90	\$ 1,000
American Postal Workers Union AFL-CIO PAC	5/4/90	\$ 2,000
National Council of Senior Citizens PAC	4/27/90	\$ 5,000
Michael F. Easley (personal loan)	5/4/90	\$15,000
Branch Banking & Trust (loan guaranteed by 16 individuals)	5/4/90	
Christoper Scott		\$ 1,000
John Bode		\$ 1,000
Carolyn Beard		\$ 1,000
James F. Howard Jr.		\$ 1,000
James D. Howard		\$ 1,000
James Stem		\$ 1,000
Susan Skinner		\$ 1,000
Sylvia B. Campbell		\$ 1,000

On June 26, 1990, a Request for Additional Information ("RFAI") was sent to the Committee (Attachment 4). The RFAI noted on an informational basis that the Committee may have failed to file one or more of the required 48-Hour Notices for "last minute" contributions of \$1,000 or more. The notice requested the Committee to review their procedures for checking contributions received during the aforementioned time period. In addition, the notice stated that although the Commission may take legal steps, any response would be taken into consideration.

On July 24, 1990, the Committee responded by letter (Attachment 5). In the letter the Committee acknowledged that they had apparently overlooked reporting the aforementioned contributions.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

21040334924

FEDERAL ELECTION COMMISSION
1989-1990
CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

Attachment # 1
Page 1 of 1

CANDIDATE/COMMITTEE DOCUMENT	OFFICE SOUGHT	PARTY	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
			PRIMARY	GENERAL	PRIMARY	GENERAL			

EASLEY, MICHAEL R	SENATE	DEMOCRATIC PARTY					NORTH CAROLINA 1990 ELECTION	ID# S0NC00095	
1. STATEMENT OF CANDIDATE									
1989 STATEMENT OF CANDIDATE							30OCT89	4	89SEN/005/2884
1990 STATEMENT OF CANDIDATE - AMENDMENT							6FEB90	3	90SEN/005/3736
2. PRINCIPAL CAMPAIGN COMMITTEE									

MINE EASLEY FOR SENATE COMMITTEE							ID #C00239806	SENATE	
1989 STATEMENT OF ORGANIZATION							4DEC89	4	89SEN/010/0355
YEAR-END			100,112		23,692		1JUL89 -31DEC89	24	90SEN/005/3741
YEAR-END - AMENDMENT			-		-		1JUL89 -31DEC89	41	90SEN/006/3064
REQUEST FOR ADDITIONAL INFORMATION							1JUL89 -31DEC89	2	90FEC/630/2672
1990 STATEMENT OF ORGANIZATION - AMENDMENT							6FEB90	2	90SEN/005/3739
48 HOUR CONTRIBUTION NOTICE							30APR90	4	90SEN/005/1054
48 HOUR CONTRIBUTION NOTICE							7MAY90	4	90SEN/005/1527
48 HOUR CONTRIBUTION NOTICE							7MAY90	4	90SEN/005/1531
48 HOUR CONTRIBUTION NOTICE							29MAY90	4	90SEN/010/0593
48 HOUR CONTRIBUTION NOTICE							31MAY90	4	90SEN/010/0754
48 HOUR CONTRIBUTION NOTICE							1JUN90	4	90SEN/010/0853
APRIL QUARTER			186,356		108,410		1JAN90 -31MAR90	40	90SEN/006/1925
APRIL QUARTER - AMENDMENT			186,356		108,410		1JAN90 -31MAR90	5	90SEN/005/0006
APRIL QUARTER - AMENDMENT			-		-		1JAN90 -31MAR90	4	90SEN/005/3062
120 LETTER INFORMATIONAL NOTICE							1JAN90 -31MAR90	3	90FEC/638/2751
PRE-PRIMARY			62,677		124,972		1APR90 -18APR90	19	90SEN/009/0577
PRE-PRIMARY - AMENDMENT			-		-		1APR90 -18APR90	9	90SEN/010/1122
REQUEST FOR ADDITIONAL INFORMATION							1APR90 -18APR90	2	90FEC/641/1203
PRE-RUN-OFF			167,642		229,913		19APR90 -16MAY90	43	90SEN/005/3795
PRE-RUN-OFF - AMENDMENT			-		-		19APR90 -16MAY90	7	90SEN/013/2112
REQUEST FOR ADDITIONAL INFORMATION							19APR90 -16MAY90	4	90FEC/644/1285
REQUEST FOR ADDITIONAL INFORMATION 2ND							19APR90 -16MAY90	5	90FEC/649/2542
TOTAL			516,787	0	486,967	0		238	TOTAL PAGES

3. AUTHORIZED COMMITTEES

COMMITTEE TO ELECT MINE EASLEY							ID #C00242891	SENATE	
1990 STATEMENT OF ORGANIZATION							15MAR90	4	90SEN/006/2308
								4	TOTAL PAGES
								4	AUTH TOT PAGES

4. JOINT FUNDRAISING COMMITTEES AUTHORIZED BY THE CAMPAIGN

All Reports have been reviewed
Cash on Hand as of 5/16/90 - \$29,801.06
Debts as of 5/16/90 - \$68,350.00

REPORT NOTICE

FEDERAL ELECTION COMMISSION

NORTH CAROLINA

April 2, 1990

FOR COMMITTEES ONLY INVOLVED IN THE PRIMARY (05/08/90):

REPORT	REPORTING PERIOD1/	REG./CERT. MAILING DATE2/	FILING DATE
PRE-PRIMARY	04/01/90- 04/18/90	04/23/90	04/26/90
JULY QUARTERLY	04/19/90- 06/30/90	07/15/90	07/15/90

FOR COMMITTEES INVOLVED IN BOTH THE PRIMARY (05/08) AND RUN-OFF (06/05):

REPORT	REPORTING PERIOD1/	REG./CERT. MAILING DATE2/	FILING DATE
PRE-PRIMARY	04/01/90- 04/18/90	04/23/90	04/26/90
PRE-RUN-OFF	04/19/90- 05/16/90	05/21/90	05/24/90
JULY QUARTERLY	05/17/90- 06/30/90	07/15/90	07/15/90

WHO MUST FILE

PRINCIPAL CAMPAIGN COMMITTEES OF CONGRESSIONAL "CANDIDATES" who seek nomination in the May 8, 1990, North Carolina Primary and, if held, the June 5, 1990, Run-off.

WHAT MUST BE REPORTED

All financial activity that occurred during the reporting period (or before, if not previously reported).

REPORTING FORMS

Candidate committees use Form 3 (enclosed). If the campaign has more than one authorized committee, the principal campaign committee must also file a consolidated report on Form 32.

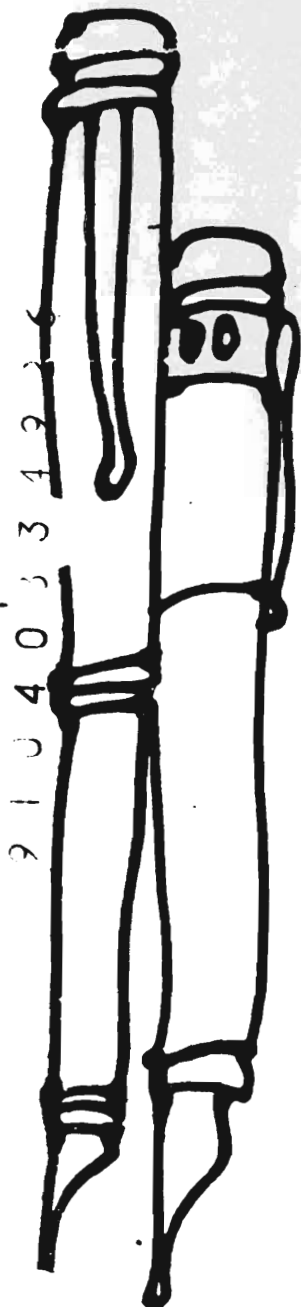
WHERE TO FILE

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

1/The period begins with the close of the last report filed by the committee. If the committee has filed no previous reports, the period begins with the date of the committee's first activity.

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

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



NORTH CAROLINA

LABEL

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

LAST-MINUTE CONTRIBUTIONS

Committees must also file special notices on contributions of \$1,000 or more, received during the following periods:

- o For candidates involved in the Primary: 04/19/90 through 05/05/90
- o For candidates involved in the Run-off: 05/17/90 through 06/02/90

The notice must reach the appropriate federal and state offices within 48 hours of the committee's receipt.

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.

91040834927

SCHEDULE A: PAGE 7 OF
LINE NUMBER 11A

PEC REPORT FOR PERIOD 04/19/90 TO 05/16/90
SCHEDULE A--ITEMIZED RECEIPTS
INDIVIDUAL CONTRIBUTORS

NAME OF COMMITTEE: Easley for Senate Committee

NAME AND ADDRESS	OCCUPATION & EMPLOYER	DATE	AMOUNT	ELECTION
Nancy Denson 407 Hill St. Rocky Mount, NC 27801		05/06/90	200.00	P90
* TOTAL YEAR TO DATE: 250.00 *				
G. Vincent Durham, Jr. 105 Brandywine Court Rocky Mount, NC 27804	Attorney Batts Winslow	06/30/90 06/30/90	100.00 100.00	P90 P90
* TOTAL YEAR TO DATE: 250.00 *				
Harry E. Stewart 1800 St. Mary's Street Raleigh, NC 27608	Investments Self	05/06/90	300.00	P90
* TOTAL YEAR TO DATE: 1300.00 *				
J. R. Jolly, Jr. 8832 Stage Road Raleigh, NC 27614	Attorney Poyner & Spruill	05/11/90	250.00	S90
* TOTAL YEAR TO DATE: 350.00 *				
Margaret R. Tennille 70 Box 5988 Winston-Salem, NC 27113	Retired	06/27/90	50.00	P90
* TOTAL YEAR TO DATE: 250.00 *				
Dale P. Johnson P.O. Box 1460 Clanton, NC 28328		05/15/90	329.28	P90 IN-KIND
* TOTAL YEAR TO DATE: 529.28 *				
Robert S. Havely 1000-310 Brighthurst Drive Raleigh, NC 27605	President Edsource	05/06/90	50.00	P90
* TOTAL YEAR TO DATE: 250.00 *				
R. J. Bedard 25 Third Street, NE Washington, DC 20002	Consultant R.J. Bedard Associ	05/06/90	1000.00	P90
* TOTAL YEAR TO DATE: 1040.00 *				

SCHEDULE A: PAGE 16 OF
LINE NUMBER 11A

FEC REPORT FOR PERIOD 04/19/90 TO 05/16/90
SCHEDULE A--ITEMIZED RECEIPTS
INDIVIDUAL CONTRIBUTORS

NAME OF COMMITTEE: Easley for Senate Committee

NAME AND ADDRESS	OCCUPATION & EMPLOYER	DATE	AMOUNT	ELECTION
Marc Goodson	Producer	05/01/90	1000.00	P90
5750 Wilshire Blvd.	Mark Goodson Produ	05/01/90	1000.00	S90
Los Angeles, CA 90036				

* TOTAL YEAR TO DATE: 2000.00 *

Jay R. Pritsker		05/02/90	500.00	P90
1730 N. Clark				
Apt. 3001				
Chicago, IL 60614				

* TOTAL YEAR TO DATE: 500.00 *

Michael Butler		04/25/90	1000.00	P90
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* TOTAL YEAR TO DATE: 1000.00 *

Dennis Breland	Co-State Manager	04/25/90	1000.00	P90
1932 Wynnton Road	American Family Li			
Columbus, GA 31999				

* TOTAL YEAR TO DATE: 1000.00 *

Don Beck	Sales Coordinator	04/25/90	1000.00	P90
1932 Wynnton Road	American Family Li			
Columbus, GA 31999				

* TOTAL YEAR TO DATE: 1000.00 *

John Shelby Amos	Sales Coordinator	04/25/90	1000.00	P90
1932 Wynnton Road	American Family Li			
Columbus, GA 31999				

* TOTAL YEAR TO DATE: 1000.00 *

Richard A. Holder		05/04/90	500.00	P90
103 Brookwood				
Kinston, NC 28501				

* TOTAL YEAR TO DATE: 500.00 *

Yvonne Craig-Aldrich		05/04/90	1000.00	P90
1221 Ocean Avenue				
No. 207				
Santa Monica, CA 90401				

* TOTAL YEAR TO DATE: 1000.00 *

SCHEDULE A: PAGE 17 OF
LINE NUMBER 11AFEC REPORT FOR PERIOD 01/19/90 TO 01/16/90
SCHEDULE A--ITEMIZED RECEIPTS
INDIVIDUAL CONTRIBUTORSNAME OF COMMITTEE: *Hasley for Senate Committee*

NAME AND ADDRESS	OCCUPATION & EMPLOYER	DATE	AMOUNT	ELECTION
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Kenneth C. Aldrich 1221 Ocean Avenue Apt. 202 Santa Monica, CA 90401		05/04/90	1000.00	P90
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* TOTAL YEAR TO DATE: 1000.00 *

Raymond D. Masher One North Park East PO Box 31705 Dallas, TX 75231	Raymond Masher Com	05/04/90	500.00	P90
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* TOTAL YEAR TO DATE: 500.00 *

Marcus W. Chesnutt PO Drawer 1654 New Bern, NC 28560		05/04/90	250.00	P90
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* TOTAL YEAR TO DATE: 250.00 *

Lawrence H. Blum 10100 Hidden Place Miami, FL 33156		05/04/90	500.00	P90
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* TOTAL YEAR TO DATE: 500.00 *

Harvey Miller 10205 SW 87th Court Miami, FL 33176		05/04/90	500.00	P90
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* TOTAL YEAR TO DATE: 500.00 *

Bernard M. Goldsmith 16 Avenue of Two Rivers S Rumson, NJ 07760	Investment Banker The Update Group,	05/04/90	1000.00	P90
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* TOTAL YEAR TO DATE: 1000.00 *

Paula Levine 3003 Van Ness Street, NW No. 1018W Washington, DC 20008	Fundraiser Self	05/04/90	1000.00	P90
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* TOTAL YEAR TO DATE: 1000.00 *

SCHEDULE A--PAGE 1 OF
LINE NUMBER 110

PEC REPORT FOR PERIOD 04/19/90 TO 05/16/90
SCHEDULE A--ITEMIZED RECEIPTS
OTHER POLITICAL COMMITTEES

NAME OF COMMITTEE: Easley for Senate Committee

COMMITTEE	DATE	AMOUNT	ELECTION
AFGE Political Action Committee 80 F Street, NW Washington, DC 20001	05/02/90	2000.00	P90
* TOTAL YEAR TO DATE: 3000.00 *			

American International Group Employee PAC 70 Pine Street New York, NY 10270	05/02/90	500.00	P90
* TOTAL YEAR TO DATE: 1000.00 *			

American Postal Workers Union AFL-CIO PAC 1300 L Street, NW Washington, DC 20005	05/04/90	2000.00	P90
* TOTAL YEAR TO DATE: 2000.00 *			

Association of Trial Lawyers of America PAC 617 Blenheim Place Raleigh, NC 27612	04/26/90	2500.00	P90
* TOTAL YEAR TO DATE: 2500.00 *			

Colon Willoughby for District Attorney PO Box 2655 Raleigh, NC 27602	04/30/90	100.00	P90
* TOTAL YEAR TO DATE: 200.00 *			

Committee on Political Education AFL-CIO 815 16th Street, NW Washington, DC 20006	05/16/90	5000.00	S90
* TOTAL YEAR TO DATE: 10000.00 *			

Firefighters Interested in Registration and Education PAC 1750 New York Ave, NW Washington, DC 20006	04/30/90	1000.00	P90
* TOTAL YEAR TO DATE: 1000.00 *			

Maintenance of Way Political League 12050 Woodward Avenue Detroit, MI 48203	05/09/90	1000.00	P90
* TOTAL YEAR TO DATE: 1000.00 *			

SCHEDULE A--PAGE 2 OF
LINE NUMBER 11CFEC REPORT FOR PERIOD 04/19/90 TO 05/16/90
SCHEDULE A--ITEMIZED RECEIPTS
OTHER POLITICAL COMMITTEES

NAME OF COMMITTEE: Easley for Senate Committee

COMMITTEE DATE AMOUNT SECTION

National Council of Senior Citizens PAC
925 15th Street, NW
Washington, DC 20005

04/27/90 5000.00 P90

* TOTAL YEAR TO DATE: 5000.00 *

Planters National Bank
PO Box 1220
Rocky Mount, NC 27801

05/09/90 250.00 P90

* TOTAL YEAR TO DATE: 250.00 *

Prudential Bache Political Action Committee
One Seaport Plaza
New York, NY 10292

05/08/90 1000.00 P90

* TOTAL YEAR TO DATE: 1000.00 *

Responsible Citizens Political League
AFL-CIO Building, 5th Floor
815 16th Street, NW
Washington, DC 2000605/03/90 1000.00 P90
05/16/90 1000.00 P90

* TOTAL YEAR TO DATE: 2500.00 *

SUMMARY OF OTHER POLITICAL COMMITTEES CONTRIBUTIONS: 04/19/90 TO 05/16/90

*** TOTAL CONTRIBUTIONS FOR REPORT PERIOD: \$ 22350.00

SCHEDULE C
(Revised 3/80)

LOANS

Page 2 of 2
LINE NUMBER 10
Use separate schedule
for each numbered line!

Name of Committee (in Full)			
Mike Easley Campaign Committee			
A. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Balance Outstanding at Close of This Period
Michael F. Easley (PERSONAL) 216 River Drive Southport, NC 28461 Election: ☒ Primary ☐ General ☐ Other (specify):		25,000.00	25,000.00
Terms: Date Incurred <u>12/31/89</u> Date Due <u>none</u> Interest Rate <u>0</u> (Specify) ☐ Secured			
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
B. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Balance Outstanding at Close of This Period
Michael F. Easley (PERSONAL) 216 River Drive Southport, NC 28461 Election: ☒ Primary ☐ General ☐ Other (specify):		15,000.00	-0-
Terms: Date Incurred <u>05/04/90</u> Date Due <u>NONE</u> Interest Rate <u>0</u> (Specify) ☐ Secured			
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
SUBTOTALS This Period This Page (optional)			25,000.00
TOTALS This Period (last page in this line only)			43,350.00
Carry outstanding balances only to LINE 2, Schedule B, for this line. If on Schedule B, carry forward to appropriate line of Summary.			

PSB

SCHEDULE C
(Revised 3/80)

LOANS

Page 1 of 2
LINE NUMBER 13
Also complete schedule for each numbered line

Name of Committee (or Full)			
Mikeasley Campaign Committee			
A. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Balance Outstanding at Close of This Period
Branch Banking & Trust 333 Fayetteville Street Raleigh, NC 27602		12,800.00	12,800.00
Station ☐ Primary ☐ General ☐ Other (specify)			
Terms Date Incurred <u>05/04/90</u> Date Due <u>08/07/90</u> Interest Rate <u>PRIME + 2%</u> ☐ Secured			
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
J. Donald Hobart 515 N. Bloodworth Street Raleigh, NC 27604		Smith Helms et al	
		Attorney	
		Amount Guaranteed Outstanding	
		\$ 800.00	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
P.R. Latta 1705 Honeysuckle Lane Raleigh, NC 27609		Retired	
		Amount Guaranteed Outstanding	
		\$ 500.00	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
Christopher Scott 1631 St. Mary's Street Raleigh, NC 27605		AFL-CIO	
		State President	
		Amount Guaranteed Outstanding	
		\$ 1000.00	
B. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Balance Outstanding at Close of This Period
Branch Banking & Trust 333 Fayetteville Street Raleigh, NC 27602		5,550.00	5,550.00
Station ☐ Primary ☐ General ☐ Other (specify)			
Terms Date Incurred <u>05/07/90</u> Date Due <u>08/07/90</u> Interest Rate <u>PRIME + 2%</u> ☐ Secured			
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
Willard H. Barbee 2414 Glenwood Avenue Raleigh, NC 27608		IBM	
		Industry Specialist	
		Amount Guaranteed Outstanding	
		\$ 950.00	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
Rita Todd P.O. Box 441 Whiteville, NC 28472		Homemaker	
		Amount Guaranteed Outstanding	
		\$ 1000.00	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
Margaret Herman 3116 Pleasant Plains Road Apex, NC 27502		Homemaker	
		Amount Guaranteed Outstanding	
		\$ 1000.00	
SUBTOTALS This Period This Page (continued)			18,350.00
TOTALS This Period (Run page in this line only)			

Copy continuing balance only to LINE 2, Schedule B, for this line. If on Schedule B, copy forward to appropriate line of Summary.

SCHEDULE A

ITEMIZED RECEIPTS

MEMO ENTRIES

Use separate statement
for each category of the
Detailed Summary Page

FOR LINE NUMBER

ITEM OF CONTRIBUTIONS TO ITEM A: SCHEDULE C-PAGE 1

13

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

NAME OF COMMITTEE (in Full)

Mike Easley Campaign Committee

A Full Name, Mailing Address and ZIP Code

John Bode
2518 White Oak Road
Raleigh, NC 27609

Receipt For

Primary

General

Other (specify)

Name of Employer

Bode Call & Green

Occupation

Attorney

Aggregate Year-to-Date \$

Date (month,
day, year)Amount of Each
Receipt this Period

1000.00

B Full Name, Mailing Address and ZIP Code

Pope McCorkle, III
2642 University Drive
Durham, NC 27707

Receipt For

Primary

General

Other (specify)

Name of Employer

Mike Easley
Campaign Committee

Occupation

Aggregate Year-to-Date \$

Date (month,
day, year)Amount of Each
Receipt this Period

500.00

C Full Name, Mailing Address and ZIP Code

Wendy McCorkle
2642 University Drive
Durham, NC 27707

Receipt For

Primary

General

Other (specify)

Name of Employer

UNC-CH

Occupation

Development Officer

Aggregate Year-to-Date \$

Date (month,
day, year)Amount of Each
Receipt this Period

500.00

D Full Name, Mailing Address and ZIP Code

David Kirby
504 Hertford Street
Raleigh, NC 27604

Receipt For

Primary

General

Other (specify)

Name of Employer

Kirby Wallace Creech
Sarda Zaytoun et al

Occupation

Attorney

Aggregate Year-to-Date \$

Date (month,
day, year)Amount of Each
Receipt this Period

500.00

E Full Name, Mailing Address and ZIP Code

Carolyn Beard
4801 Oak Park Road
Raleigh, NC 27612

Receipt For

Primary

General

Other (specify)

Name of Employer

Self

Occupation

Realtor

Aggregate Year-to-Date \$

Date (month,
day, year)Amount of Each
Receipt this Period

1000.00

F Full Name, Mailing Address and ZIP Code

Susan Rabon
3 Crofters Court
Ireland, NC 28451

Receipt For

Primary

General

Other (specify)

Name of Employer

Carr, Swails et al

Occupation

Attorney

Aggregate Year-to-Date \$

Date (month,
day, year)Amount of Each
Receipt this Period

500.00

G Full Name, Mailing Address and ZIP Code

James F. Howard, Jr.
219 Lord Street
Southport, NC 28461

Receipt For

Primary

General

Other (specify)

Name of Employer

Occupation

Aggregate Year-to-Date \$

Date (month,
day, year)Amount of Each
Receipt this Period

1000.00

GLE TOTAL of Receipts This Page (optional)

TOTAL This Period (list page this line number only)

SCHEDULE A

ITEMIZED RECEIPTS

NEW ENTRIES

LIST OF GUARANTORS TO ITEM A; SCHEDULE C; PAGE 1

Use separate schedules for each category of the Detailed Summary Page

FOR LINE NUMBER

131

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

NAME OF COMMITTEE (in Full)

Mike Easley Campaign Committee

A Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
James D. Howard 101 East 1521 Durham, NC	First Citizens Bank		1000.00
Receipt for: ☐ Primary ☐ General ☐ Other (specify)	Occupation Vice President Aggregate Year-to-Date \$		
B Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
James Stem 4405 Carlswood Court Raleigh, NC 27615	CSX		1000.00
Receipt for: ☐ Primary ☐ General ☐ Other (specify)	Occupation Engineer Aggregate Year-to-Date \$		
C Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Edna SKINNER 14 Chad Drive Durham, NC 27803			1000.00
Receipt for: ☐ Primary ☐ General ☐ Other (specify)	Occupation Homemaker Aggregate Year-to-Date \$		
D Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Sylvia B. Campbell PO Box 637 Elizabethtown, NC 28337			1000.00
Receipt for: ☐ Primary ☐ General ☐ Other (specify)	Occupation Homemaker Aggregate Year-to-Date \$		
E Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Donald W. Draper 721 Georgetown Road Raleigh, NC 27608	DWD Software		750.00
Receipt for: ☐ Primary ☐ General ☐ Other (specify)	Occupation Consultant Aggregate Year-to-Date \$		
F Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Don Drew 4103 Talcott Durham, NC 27705	Phoenix Communications		750.00
Receipt for: ☐ Primary ☐ General ☐ Other (specify)	Occupation Owner Aggregate Year-to-Date \$		
G Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt for: ☐ Primary ☐ General ☐ Other (specify)	Occupation Aggregate Year-to-Date \$		

SUBTOTAL of Receipts This Page (optional)

TOTAL This Page (last page this line number only)



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20541

EQ-2

John R. McArthur, Treasurer
Mike Easley For Senate Committee
P.O. Box 26416
Raleigh, NC 27611

JAN 26 1991

Identification Number: C00239806

Reference: 12 Day Pre-Runoff Report (4/19/90-5/16/90)

Dear Mr. McArthur:

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

-Schedule D of your report itemizes a debt to Shorr & Associates, Inc. with an outstanding beginning balance; however, this debt was not included on your previous report. Please refer to Section 104.11(b) of the FEC Regulations and amend your report(s).

-Schedule A of your report (pertinent portion attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. An individual or a political committee other than a qualified multicandidate committee may not make a contribution to a candidate for federal office in excess of \$1,000 per election. The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. (2 U.S.C. §441a(a) and (f))

The Commission notes that you have requested redesignation and/or reattribution of the excessive amounts. Please be reminded that the corrective action should be done within sixty days of receipt of the excessive amount. Although the Commission may take further legal steps, prompt action by you to refund or seek redesignation or reattribution of the excessive amount will be taken into consideration.

In addition, please note the memo entry format for reporting redesignated/reattributed contributions: The

first part should disclose all of the information for the contribution as it was originally reported on the previous Schedule A; the second part should disclose all of the information for the contribution as it was redesignated/reattributed including the date on which the redesignation/retribution was received.

-Please provide a Schedule B to support the in-kind contribution reported on Schedule A for Line 11(a)(i) of the Detailed Summary Page. All in-kind contributions from individuals, which in the aggregate exceed \$200, should be itemised on Schedule A and Schedule B and included on Lines 11(a)(i) and 17 of the Detailed Summary Page.

-Schedule A of your report indicates that your committee may have failed to file one or more of the required 48 hour notices regarding "last minute" contributions received by your committee after the close of books for the 12 Day Pre-Primary report (April 19, 1990-May 5, 1990). A principal campaign committee must notify the Commission, in writing, within 48 hours of any contribution of \$1,000 or more received between two and twenty days before an election. These contributions are then reported on the next report required to be filed by the committee. To ensure that the Commission is notified of last minute contributions of \$1,000 or more to your campaign, it is recommended that you review your procedures for checking contributions received during the aforementioned time period. Although the Commission may take legal action, any response you wish to make concerning this matter will be taken into consideration. (11 CFR §104.5(f))

PKS

-For future reports, please be advised that you should provide the complete name of any political committee that has contributed to your committee. Reporting only the name of the connected organisation is not adequate.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Secretary of the Senate, 232 Hart Senate Office Building, Washington, DC 20510 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

Pat Sheppard

Pat Sheppard
Senior Reports Analyst
Reports Analysis Division

K
53797
NC DEM C1989

Amended 1990 12 Day Pre-Runoff Report

Attachment # 5

Page 1 of 1

MIKE EASLEY
★ U.S. SENATE ★

RECEIVED
SECRETARY OF THE SENATE
1990 JUL 24 AM 10:05
H.D.

July 11, 1990

Secretary of the Senate
Office of Public Records
232 Hart Senate Office Building
Washington, DC 20510

RE: Amendment to 12 Day Pre-Run-off Report (4/19/90-5/16/90)

Dear Sir or Madam:

This letter is prompted by the FEC involving questionable information contained in the aforementioned report. Following are the itemized amendments requested from the FEC to clarify points of question:

- Debt to Shorr & Associates was not outstanding and should have been listed as incurred for the aforementioned report period. An amended Schedule D is included on the following pages.
- The concern of excessive contributions by individual contributors on the aforementioned report has prompted our office to refund the contributions before our sixty day time period expires. These refunded contributions will be itemized and shown as memo entries on Schedule A on the 1990 Semi-annual report.
- On the following pages please find a Schedule A and a Schedule B to support the in-kind contributions listed on the aforementioned report for Line 11(a)(i) and Line 17 of the Detailed Summary Page.

- Concerning the last minute contributions required for the aforementioned report, these contributions were overlooked when filing the 48 hour reports and the bookkeeping procedures have been rectified to prevent oversights in future reporting.

If there are any other questions concerning this report or its amendment, please do not hesitate to contact me.

Sincerely,

Natalie V. Fussell

Natalie V. Fussell
Assistant Treasurer

991000 4200 81 31 42 91 30 92

90 OCT 22 PM 12:40

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD Referral 90L-37
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: Mike Easley for Senate Committee
and John R. McArthur, as treasurer

RELEVANT STATUTE(S): 2 U.S.C. § 434(a)(6)(A)
11 C.F.R. § 104.5(f)

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred the Mike Easley for Senate Committee (the "Committee"), and John R. McArthur, as treasurer, to the Office of General Counsel for failing to report within 48 hours the receipt of thirteen (13) contributions for \$1,000 or more, totaling \$33,000, which were received after the 20th day, but more than 48 hours before an election. 2 U.S.C. § 434(a)(6)(A).

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, (the "Act") provides that the principal campaign committee of a candidate shall, within 48 hours of receipt, notify the Clerk, the Secretary, or the Commission, and the Secretary of State, as appropriate, in writing, of any contribution of \$1,000 or more received by an authorized committee of such candidate after the 20th day, but more than 48 hours before, any election. 2 U.S.C.

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§ 434(a)(6)(A). This notification requirement is in addition to all other reporting requirements under the Act. 2 U.S.C.

§ 434(a)(6)(B).

Michael Easley participated as a candidate in North Carolina's primary election, held on May 8, 1990. In order to comply with the Act's reporting requirements for that election, the candidate's committee was required to report, within 48 hours of receipt, each contribution of \$1,000 or more received from April 19, 1990 through May 5, 1990.¹

When reviewing the Committee's 12 Day Pre-Runoff Report, RAD determined that between April 27, 1990 and May 4, 1990, the Committee received thirteen (13) contributions of \$1,000 or more, totaling \$33,000 which had not been reported within 48 hours of receipt. See Attachment 1, page 3 (listing contributions received).

On June 26, 1990, RAD informed the Committee of its apparent failure to file notices for these contributions. In its response the Committee stated "these contributions were overlooked when filing the 48 hour reports and the bookkeeping procedures have been rectified to prevent oversights in future reporting." Attachment 1, page 18. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that the Mike Easley for Senate Committee and John R. McArthur, as treasurer, violated 2 U.S.C. § 434(a)(6)(A).

1. In fact, the Commission sent a "Prior Notice" dated April 2, 1990, which informed the Committee of the requirement that it file reports for "last-minute" contributions within 48 hours of receipt. Attachment 1, page 6.

2104034241

**III. Discussion of Conciliation Agreement and
Proposed Civil Penalty**

III. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that the Mike Easley for Senate Committee and John R. McArthur, as treasurer, violated 2 U.S.C. § 434(a)(6)(A), and enter into pre-probable cause conciliation with the Respondents.
3. Approve the appropriate letter and attached Factual and Legal Analysis and proposed conciliation agreement.

Lawrence M. Noble
General Counsel

Date

10/19/90

BY:

Lois G. Lerner

Associate General Counsel

Attachments:

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

91040834942



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/DELORES HARRIS *DM*
COMMISSION SECRETARY

DATE: OCTOBER 24, 1990

SUBJECT: RAD REFERRAL 90L-37 - 1st GENERAL COUNSEL'S REPORT
DATED OCTOBER 19, 1990.

The above-captioned document was circulated to the
Commission on Monday, October 22, 1990 at 4:00 p.m..

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

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner Josefiak	_____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Thomas	XXX _____

This matter will be placed on the meeting agenda
for TUESDAY, OCTOBER 30, 1990.

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

21040834943

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Mike Easley for Senate Committee)
and John R. McArthur, as treasurer)

RAD Referral
90L-37

(MUR
3156)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on October 30, 1990, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions with respect to RAD Referral 90L-37:

1. Open a MUR.
2. Find reason to believe that the Mike Easley for Senate Committee and John R. McArthur, as treasurer, violated 2 U.S.C. § 434(a)(6)(A), and enter into pre-probable cause conciliation with the Respondents.
3. Approve the appropriate letter, Factual and Legal Analysis, and proposed conciliation agreement as recommended in the General Counsel's report dated October 19, 1990.

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

Attest:

10-31-90
Date

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

91040334944



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 15, 1990

John R. McArthur, Treasurer
Mike Easley for Senate Committee
P.O. Box 26416
Raleigh, NC 27611

RE: MUR 3156
Mike Easley for Senate
Committee and
John R. McArthur, as
treasurer

Dear Mr. McArthur:

On October 30, 1990, the Federal Election Commission found that there is reason to believe Mike Easley for Senate Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(6)(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 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.

2104034945

John R. McArthur, Treasurer
Page 2

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

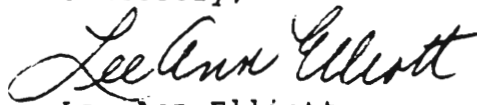
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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

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

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact 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

91040334246

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 3156

RESPONDENTS: Mike Easley for Senate Committee
and John R. McArthur, as treasurer

21040334247
The Federal Election Campaign Act of 1971, (the "Act") provides that the principal campaign committee of a candidate shall, within 48 hours of receipt, notify the Clerk, the Secretary, or the Commission, and the Secretary of State, as appropriate, in writing, of any contribution of \$1,000 or more received by an authorized committee of such candidate after the 20th day, but more than 48 hours before, any election. 2 U.S.C. § 434(a)(6)(A). This notification requirement is in addition to all other reporting requirements under the Act. 2 U.S.C. § 434(a)(6)(B).

Michael Easley participated as a candidate in North Carolina's primary election, held on May 8, 1990. In order to comply with the Act's reporting requirements for that election, the candidate's committee was required to report, within 48 hours of receipt, each contribution of \$1,000 or more received from April 19, 1990 through May 5, 1990.

When reviewing the Committee's 12 Day Pre-Runoff Report, the Reports Analysis Division ("RAD") determined that between April 27, 1990 and May 4, 1990, the Committee received fourteen (14) contributions of \$1,000 or more, totaling \$33,000 which had

not been reported within 48 hours of receipt. These contributions are as follows:

<u>Contribution</u>	<u>Date</u>	<u>Amount</u>
R. J. Bedard	5/4/90	\$1,000
Yvonne Craig-Aldrich	5/4/90	\$1,000
Kenneth C. Aldrich	5/4/90	\$1,000
American Postal Workers Union AFL-CIO PAC	5/4/90	\$2,000
National Council of Senior Citizens PAC	4/27/90	\$5,000
Michael F. Easley (personal loan)	5/4/90	\$15,000
Christoper Scott	5/4/90	\$1,000
John Bode	5/4/90	\$1,000
Carolyn Beard	5/4/90	\$1,000
James F. Howard, Jr.	5/4/90	\$1,000
James D. Howard	5/4/90	\$1,000
James Stem	5/4/90	\$1,000
Suan Skinner	5/4/90	\$1,000
Sylvia B. Campbell	5/4/90	\$1,000

On June 26, 1990, RAD informed the Committee of its apparent failure to file notices for these contributions. In its response the Committee stated "these contributions were overlooked when filing the 48 hour reports and the bookkeeping procedures have been rectified to prevent oversights in future reporting." Therefore, there is reason to believe that the Mike Easley for Senate Committee and John R. McArthur, as treasurer, violated 2 U.S.C. § 434(a)(6)(A).

91040834948



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

December 12, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John R. McArthur, Treasurer
Mike Easley for Senate Committee
P.O. Box 26416
Raleigh, NC 27611

RE: MUR 3156
Mike Easley for Senate
Committee and
John R. McArthur, as
treasurer

Dear Mr. McArthur:

On November 15, 1990, you were notified that the Federal Election Commission determined to enter into negotiations directed toward reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. On that same date you were sent a conciliation agreement offered by the Commission in settlement of this matter.

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

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
Lisa E. Klein
Assistant General Counsel

91040334249

06-C 8998

MIKE EASLEY FOR SENATE COMMITTEE

POST OFFICE BOX 26416
RALEIGH, NORTH CAROLINA 27611

December 14, 1990

Mr. Noriega E. James
Federal Elections Commission
Washington, D.C. 20463

Re: MUR 3156

Dear Mr. James:

As indicated to you by phone this week, the Easley for Senate Committee desires to proceed with informal conciliation in order to resolve this matter concerning the Committee's inadvertent omission of "last minute" filings in the 1990 North Carolina Senate race.

The Committee has at all times labored in good faith to comply fully with all applicable financial reporting requirements, including the "last minute" filings. We wish for you and the Commission to be aware of our circumstances as described below, which we believe justify waiver of any penalty.

1. The Committee diligently sought to file all "last minute" contributions in a timely fashion pursuant to 2 U.S.C. Sec. 434(a)(6)(A). For the primary cycle the Committee reported in a timely manner thirty-eight "last minute" contributions totaling \$41,500. Five contributions, however, were inadvertently overlooked.
2. The FEC has determined that the Committee needed to make "last minute" filings for twelve other contributions. Eleven of these twelve "contributors" were guarantors on a loan obtained by the Committee. Because these guarantors had actually contributed no money, we simply did not understand that they should be treated as contributors. The twelfth contribution was a personal loan from the candidate on May 4, 1990. The Committee paid the candidate back within less than a week. We also did not realize that the candidate's loan required a "last minute" filing.

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF LEGAL COUNSEL
90 DEC 17 PM 3:09
DEC 17 AM 10:24

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Page 2
Mr. Noriega E. James
December 14, 1990

3. All "last minute" contributions were included in the Committee's regular FEC report dated July 15, 1990.
4. The 1990 Senate election is the first and only election for the Committee. The Committee's treasurer has served on a part-time, voluntary basis.
5. The Committee currently has less than \$100.00 cash on hand and has a current campaign debt of approximately \$86,117.35. Since the campaign was unsuccessful, raising funds to pay this debt is very difficult.
6. The Committee currently exists solely to pay campaign debts. The Committee does not plan to be involved in any other federal elections and will terminate once debts are paid.

In preparing this response, we also reviewed our records on "last minute" contributions for the runoff cycle. The Committee had made twenty-six "last minute" filings for contributions totalling \$60,000. However, the Committee inadvertently omitted thirteen other "last minute" contributions. All "last minute" contributions were included in the Committee's regular report dated October 15, 1990.

For the reasons stated above, we respectfully request that the Commission waive any penalty in this matter.

We appreciate the opportunity to explain these facts to you. If you have any questions, or need more information, please let one of us know. We look forward to hearing from you.

Sincerely,

Mac McCorkle

Mac McCorkle
Campaign Manager

John McArthur

John McArthur
Treasurer

/jcs

21040334951

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 27 December 1990

ANALYST: Pat Sheppard

I. COMMITTEE: Mike Easley for Senate Committee
(C00239806)
John R. McArthur, Treasurer
P.O. Box 26416
Raleigh, NC 27611

II. RELEVANT STATUTE: 2 U.S.C. §434(a)(6)
11 CFR §104.5(f)

III. BACKGROUND:

Failure to File Forty-Eight Hour Notifications

The Mike Easley for Senate Committee ("the Committee") has failed to file the required Forty-Eight (48) Hour Notifications ("48-Hour Notices") for fourteen (14) contributions totaling \$28,000 received prior to the 1990 Runoff Election.

The candidate was involved in the 1990 Runoff Election held on June 5, 1990. Prior Notice was sent to the Committee on April 2, 1990 (Attachment 2). The Notice includes a section titled "Last Minute Contributions." This section reads "Committees must also file special notices on contributions of \$1,000 or more, received during the periods: May 17 through June 2, 1990. The notices must reach the appropriate federal and state offices within 48 hours of the committee's receipt."

Schedule A of the 1990 July Quarterly Report indicates that the Committee failed to file fourteen (14) 48-Hour Notices for contributions received during the aforementioned period (Attachment 3). The following is a list of the contributions for which no 48-Hour Notices were filed:

<u>Contributor Name</u>	<u>Date</u>	<u>Amount</u>
John Q. Beard	05/31/90	\$1,000
Roxanne Parsons	05/30/90	\$1,000
Nell Goodwin Benson	06/01/90	\$1,000

91040334952

MIKE EASLEY FOR SENATE COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

<u>Contributor Name</u>	<u>Date</u>	<u>Amount</u>
Thomas G. O'Hara	05/31/90	\$1,000
Jay R. Pritzker	05/31/90	\$1,000
A. Steve Pierce	06/01/90	\$1,000
	06/01/90	\$1,000
William M. Harrison Jr.	05/31/90	\$1,000
William K. Woltz	05/31/90	\$1,000
AFGE Political Action Committee	06/01/90	\$3,000
Carpenters' Legislative	05/30/90	\$2,000
Improvement Committee PAC	05/31/90	\$5,000
Committee on Letter Carriers		
Political Education	05/31/90	\$5,000
Firefighters Interested in		
Registration and Education PAC	05/31/90	\$1,000
United Steelworkers of America PAC	05/31/90	\$5,000

On October 3, 1990, a Request for Additional Information ("RFAI") was sent to the Committee (Attachment 4). The RFAI noted on an informational basis that the Committee may have failed to file one or more of the required 48-Hour Notices for "last minute" contributions of \$1,000 or more. The notice requested the Committee to review their procedures for checking contributions received during the aforementioned time period. In addition, the notice stated that although the Commission may take legal steps, any response would be taken into consideration.

To date, the Committee has failed to respond.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

91040334953

FEDERAL ELECTION COMMISSION
1989-1990
CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

Attachment # 1

Page 1 of 1

CANDIDATE/COMMITTEE/DOCUMENT	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
	OFFICE SOUGHT/	PARTY	PRIMARY	GENERAL			
TYPE OF FILER							

EASLEY, MICHAEL F	SENATE	DEMOCRATIC PARTY			NORTH CAROLINA	1990 ELECTION	ID# S0NC00095
1. STATEMENT OF CANDIDATE							
1989 STATEMENT OF CANDIDATE					30OCT89	4	89SEN/009/2884
1990 STATEMENT OF CANDIDATE - AMENDMENT					6FEB90	3	90SEN/005/3736
2. PRINCIPAL CAMPAIGN COMMITTEE							
MIKE EASLEY FOR SENATE COMMITTEE					ID #C000239806 SENATE		
1989 STATEMENT OF ORGANIZATION					4DEC89	4	89SEN/010/0356
YEAR-END		100,112		23,692	1JUL89 -31DEC89	24	90SEN/005/3741 *
YEAR-END - AMENDMENT		-		-	1JUL89 -31DEC89	41	90SEN/006/3064 *
REQUEST FOR ADDITIONAL INFORMATION					1JUL89 -31DEC89	2	90FEC/630/3672
1990 STATEMENT OF ORGANIZATION - AMENDMENT					6FEB90	2	90SEN/005/3739
48 HOUR CONTRIBUTION NOTICE					30APR90	4	90SEN/009/1054
48 HOUR CONTRIBUTION NOTICE					7MAY90	4	90SEN/009/11527
48 HOUR CONTRIBUTION NOTICE					7MAY90	4	90SEN/009/1531
48 HOUR CONTRIBUTION NOTICE					29MAY90	4	90SEN/010/0593
48 HOUR CONTRIBUTION NOTICE					31MAY90	4	90SEN/010/0794
48 HOUR CONTRIBUTION NOTICE					1JUN90	4	90SEN/010/0853
APRIL QUARTERLY		186,356		108,410	1JAN90 -31MAR90	40	90SEN/008/1926 *
APRIL QUARTERLY - AMENDMENT		186,356		108,410	1JAN90 -31MAR90	5	90SEN/009/0006 *
APRIL QUARTERLY - AMENDMENT		-		-	1JAN90 -31MAR90	4	90SEN/009/3082 *
1ST LETTER INFORMATIONAL NOTICE					1JAN90 -31MAR90	3	90FEC/639/2751
PRE-PRIMARY		62,677		124,972	1APR90 -18APR90	19	90SEN/009/0579 *
PRE-PRIMARY - AMENDMENT		-		-	1APR90 -18APR90	9	90SEN/010/1122 *
REQUEST FOR ADDITIONAL INFORMATION					1APR90 -18APR90	2	90FEC/641/1203
PRE-RUN-OFF		167,642		229,913	19APR90 -16MAY90	43	90SEN/009/3795 *
PRE-RUN-OFF - AMENDMENT		-		-	19APR90 -16MAY90	7	90SEN/010/2102 *
REQUEST FOR ADDITIONAL INFORMATION					19APR90 -16MAY90	4	90FEC/644/1286
REQUEST FOR ADDITIONAL INFORMATION 2ND					19APR90 -16MAY90	5	90FEC/649/2542
JULY QUARTERLY		148,326		160,132	17MAY90 -30JUN90	40	90SEN/014/4019 *
NOTICE OF FAILURE TO FILE					17MAY90 -30JUN90	1	90FEC/651/3019
REQUEST FOR ADDITIONAL INFORMATION					17MAY90 -30JUN90	2	90FEC/657/4651
REQUEST FOR ADDITIONAL INFORMATION 2ND					17MAY90 -30JUN90	3	90FEC/669/2606
OCTOBER QUARTERLY		17,530		20,945	10JUL90 -30SEP90	25	90SEN/021/3924
TOTAL		682,643	0	668,064	0	309	TOTAL PAGES
3. AUTHORIZED COMMITTEES							
COMMITTEE TO ELECT MIKE EASLEY					ID #C000242891 SENATE		
1990 STATEMENT OF ORGANIZATION					15MAR90	4	90SEN/006/2308
						4	TOTAL PAGES
						4	AUTH TOT PAGES
4. JOINT FUNDRAISING COMMITTEES AUTHORIZED BY THE CAMPAIGN							

* All of these reports have been reviewed.
Cash on Hand as of 9/30/90 - \$14,579.41
Debts owed by the Committee as of 9/30/90 - \$94,117.36

REPORT NOTICE

FEDERAL ELECTION COMMISSION

NORTH CAROLINA

April 2, 1990

FOR COMMITTEES ONLY INVOLVED IN THE PRIMARY (05/08/90):

REPORT	REPORTING PERIOD1/	REG./CERT. MAILING DATE2/	FILING DATE
PRE-PRIMARY	04/01/90- 04/18/90	04/23/90	04/26/90
JULY QUARTERLY	04/19/90- 06/30/90	07/15/90	07/15/90

**FOR COMMITTEES INVOLVED IN BOTH THE PRIMARY (05/08) AND
RUN-OFF (06/05):**

REPORT	REPORTING PERIOD1/	REG./CERT. MAILING DATE2/	FILING DATE
PRE-PRIMARY	04/01/90- 04/18/90	04/23/90	04/26/90
PRE-RUN-OFF	04/19/90- 05/16/90	05/21/90	05/24/90
JULY QUARTERLY	05/17/90- 06/30/90	07/15/90	07/15/90

WHO MUST FILE

PRINCIPAL CAMPAIGN COMMITTEES OF CONGRESSIONAL "CANDIDATES" who seek nomination in the May 8, 1990, North Carolina Primary and, if held, the June 5, 1990, Run-off.

WHAT MUST BE REPORTED

All financial activity that occurred during the reporting period (or before, if not previously reported).

REPORTING FORMS

Candidate committees use Form 3 (enclosed). If the campaign has more than one authorized committee, the principal campaign committee must also file a consolidated report on Form 32.

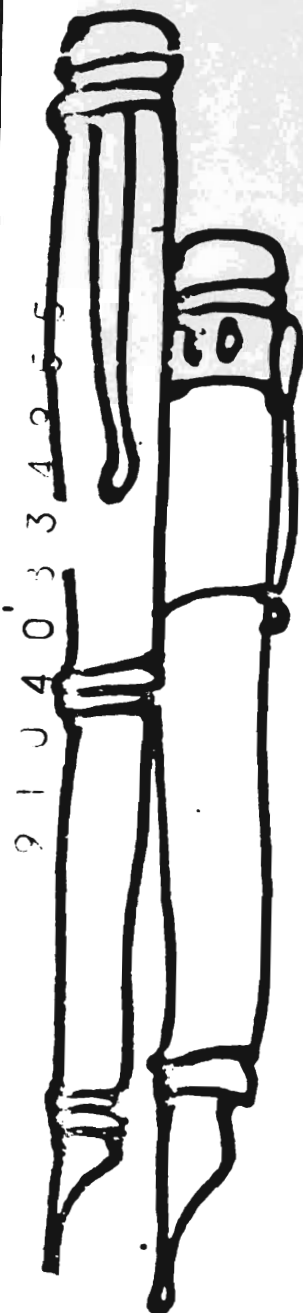
WHERE TO FILE

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

1/The period begins with the close of the last report filed by the committee. If the committee has filed no previous reports, the period begins with the date of the committee's first activity.

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

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



NORTE CAROLINA

LABEL

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

LAST-MINUTE CONTRIBUTIONS

Committees must also file special notices on contributions of \$1,000 or more, received during the following periods:

- o For candidates involved in the Primary: 04/19/90 through 05/05/90
- o For candidates involved in the Run-off: 05/17/90 through 06/02/90

The notice must reach the appropriate federal and state offices within 48 hours of the committee's receipt.

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.

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FEC REPORT FOR PERIOD 05/17/90 TO 06/30/90
SCHEDULE A--ITEMIZED RECEIPTS
INDIVIDUAL CONTRIBUTORS

NAME OF COMMITTEE: Easley for Senate Committee

NAME AND ADDRESS	OCCUPATION & EMPLOYER	DATE	AMOUNT	ELECTION
Charles T. Lane PO Box 353 Rocky Mount, NC 27801	Attorney Poyner & Spruill	06/01/90	500.00	\$90

* TOTAL YEAR TO DATE: 1000.00 *

Bryan E. Lodder 705 Bruton Place, North Greensboro, NC 27410	President Guilford Mills, Inc.	05/21/90	500.00	\$90
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* TOTAL YEAR TO DATE: 500.00 *

Robert C. Eubanks Jr. PO Box 1360 Chapel Hill, NC 27515	Investment Analyst Self	06/06/90	1000.00	\$90
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* TOTAL YEAR TO DATE: 1000.00 *

Tomokazu Adachi 107 Manchester Place Greensboro, NC 27410	Executive Officer Japan Tech, Inc.	05/21/90	500.00	\$90
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* TOTAL YEAR TO DATE: 500.00 *

Richard J. Rose 1631 Western Avenue Rocky Mount, NC 27806	Attorney Self	05/24/90	100.00	\$90
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* TOTAL YEAR TO DATE: 350.00 *

J. Edwin Clement 101 Farhead Drive Greenville, NC 27836	Physician Self	06/05/90	200.00	\$90
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* TOTAL YEAR TO DATE: 1450.00 *

John N. Fakatsias 162 N. Graham Hopedale Road Burlington, NC 27215	Restaurateur Self	05/90	300.00	\$90
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* TOTAL YEAR TO DATE: 300.00 *

John G. Beard 4811 Oak Park Road Faleigh, NC 27612	Attorney Maupin, Taylor & E.	05/31/90	1000.00	\$90
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* TOTAL YEAR TO DATE: 2000.00 *

900014033

FEC REPORT FOR PERIOD 05/17/90 TO 06/30/90
 SCHEDULE A - ITEMIZED RECEIPTS
 INDIVIDUAL CONTRIBUTORS

NAME OF COMMITTEE: Easley for Senate Committee

NAME AND ADDRESS	OCCUPATION & EMPLOYER	DATE	AMOUNT	ELECTION
Linwood Newton PO Box 2174 Wilmington, NC 28402	Insurance Agent Crabtree/Newton Inc	05/21/90	100.00	\$90
* TOTAL YEAR TO DATE: 100.00 *				
Norman C. Post, Jr. 2018 Shannon Drive Sanford, NC 27330	Attorney Stanton Perkinson & Co	05/21/90	250.00	\$90
* TOTAL YEAR TO DATE: 750.00 *				
H. J. Brody The Plaza Greenville, NC 27658	Retail Executive Self	05/30/90	200.00	\$90
* TOTAL YEAR TO DATE: 750.00 *				
Colon Willoughby 2700 Peachtree Street Raleigh, NC 27608	District Attorney State of N.C.	05/31/90	250.00	\$90
* TOTAL YEAR TO DATE: 250.00 *				
Charles L. Browning PO Box 788 Franklin, NC 28737	Owner Browning Photograph	06/06/90 05/28/90	500.00 166.90	\$90 \$90 IN KIND
* TOTAL YEAR TO DATE: 1166.90 *				
John S. Moore, II 1318 Sonata Street Greenville, NC 27636		05/28/90	520.00	\$90
* TOTAL YEAR TO DATE: 520.00 *				
Eloanne Parsons PO Box 1400 Clinton, NC 28328	Homemaker	05/30/90	2000.00	\$90 IN KIND
* TOTAL YEAR TO DATE: 2000.00 *				
Donald Cudd Box 219 Marina, TX 79364		05/29/90	100.00	\$90
* TOTAL YEAR TO DATE: 350.00 *				

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FEC REPORT FOR PERIOD 05/17/90 TO 06/30/90
 SCHEDULE A--ITEMIZED RECEIPTS
 INDIVIDUAL CONTRIBUTORS

NAME OF COMMITTEE: Easley for Senate Committee

NAME AND ADDRESS	OCCUPATION & EMPLOYER	DATE	AMOUNT	ELECTION
John F. Kincheloe 3505 Westridge Circle Drive Rocky Mount, NC 27804	Owner Bullock Furniture	05/23/90	200.00	\$90
* TOTAL YEAR TO DATE: 250.00 *				

Gray Woodard Brantley 1507 Lafayette Ave. Rocky Mount, NC 27803	Homemaker	06/01/90	100.00	\$90
* TOTAL YEAR TO DATE: 250.00 *				

W. G. Robbins, II PO Box 1886 Rocky Mount, NC 27801		06/01/90	100.00	\$90
* TOTAL YEAR TO DATE: 300.00 *				

R. Stephen Camp 210 Calibre Chase Drive #307 Raleigh, NC 27609	Attorney Maupin, Taylor & El	05/31/90	250.00	\$90
* TOTAL YEAR TO DATE: 350.00 *				

Michael Aldridge 92 Tucker Hoe Dr. Greenville, NC 27035		05/28/90	500.00	\$90
* TOTAL YEAR TO DATE: 550.00 *				

William F. Jordan 2904 Skye Drive Fayetteville, NC 28303	Physician Self	05/21/90 05/21/90	750.00 1000.00	\$90 \$90
* TOTAL YEAR TO DATE: 2000.00 *				

Nell Goodwin Benson 2004 Lakeview Drive Raleigh, NC 27609	Homemaker	05/21/90	2000.00	\$90
* TOTAL YEAR TO DATE: 2000.00 *				

Harry E. Stewart 1411 St. Mary's Street Raleigh, NC 27606	Investor Self	05/25/90	1000.00	\$90
* TOTAL YEAR TO DATE: 2300.00 *				

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FEC REPORT FOR PERIOD 05/17/90 TO 06/30/90
 SCHEDULE A--ITEMIZED RECEIPTS
 INDIVIDUAL CONTRIBUTORS

NAME OF COMMITTEE: Esley for Senate Committee

NAME AND ADDRESS	OCCUPATION & EMPLOYER	DATE	AMOUNT	ELECTION
Malet Claire Madfrey 741 Smallwood Drive Wedgewood Apts 63 Raleigh, NC 27605	Retired	05/31/90	200.00	\$90

* TOTAL YEAR TO DATE: 200.00 *

Trena D. Parker
113 Forest Hills Drive
Black Mountain, NC 28711

05/31/90 75.00 \$90

* TOTAL YEAR TO DATE: 275.00 *

Cirson Bain
PO Box 7383
Greensboro, NC 27407

05/21/90 100.00 \$90

* TOTAL YEAR TO DATE: 125.00 *

Jon M. Kates
12 Ramsgate Court
Greensboro, NC 27403

Textiles Sales 05/29/90 100.00 \$90
Guilford Mills, Inc

* TOTAL YEAR TO DATE: 1350.00 *

James H.M. Thorp
45 Mockingbird Lane
Rocky Mount, NC 27806

Physician 05/21/90 100.00 \$90
Nash Ob/Gyn Assoc. 06/16/90 200.00 \$90

* TOTAL YEAR TO DATE: 800.00 *

Thomas G. O'Hara
8616 Bacon Road
McLean, VA 22102

05/31/90 1000.00 \$90

* TOTAL YEAR TO DATE: 2000.00 *

William Charles Farris
PO Box 1467
Greenville, NC 27836

Attorney 05/21/90 500.00 \$90
Farris & Farris, P

* TOTAL YEAR TO DATE: 1000.00 *

David J. Whichard, II
PO Box 1467
Greenville, NC 27836

Owner 05/28/90 1000.00 \$90
Daily Reflection

* TOTAL YEAR TO DATE: 2000.00 *

FEC REPORT FOR PERIOD 05/17/90 TO 06/30/90
 SCHEDULE A--ITEMIZED RECEIPTS
 INDIVIDUAL CONTRIBUTORS

NAME OF COMMITTEE: Esley for Senate Committee

NAME AND ADDRESS	OCCUPATION & EMPLOYER	DATE	AMOUNT	ELECTION
Trone Lindsey Lapham PO Box 2203 Asheville, NC 28902	Management Highland Lake Conf	05/31/90	200.00	\$90
* TOTAL YEAR TO DATE: 450.00 *				

Peter L. Smith 640 Park Avenue New York, NY 10021	Investment Banker Lazard Freres & Co	06/06/90	1000.00	\$90
* TOTAL YEAR TO DATE: 2000.00 *				

Andrew Hyatt Route 1, Box 524-5 Staley, NC 27355	Quality Controller Guilford Mills, Inc	05/21/90	50.00	\$90
* TOTAL YEAR TO DATE: 300.00 *				

Michael W. Burke 7102 Sherwin Road Greensboro, NC 27610		05/21/90	100.00	\$90
* TOTAL YEAR TO DATE: 350.00 *				

Kenneth Rosenzweig 1212 Ave. of the Americas 5th Floor New York, NY 10036	Jeweler Self	05/28/90	250.00	\$90
* TOTAL YEAR TO DATE: 500.00 *				

Martin D. Payson 10 Farlock Drive Great Neck, NY 11024	Vice Chrmn/Gen. Co Time Warner Inc.	06/06/90	500.00	\$90
* TOTAL YEAR TO DATE: 1000.00 *				

Jay R. Pritzker 1720 N. Clark Chicago, IL 60616		05/31/90	1000.00	\$90
* TOTAL YEAR TO DATE: 1500.00 *				

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FEC REPORT FOR PERIOD 05/17/90 TO 06/30/90
 SCHEDULE A--ITEMIZED RECEIPTS
 INDIVIDUAL CONTRIBUTORS

NAME OF COMMITTEE: Esasley for Senate Committee

NAME AND ADDRESS	OCCUPATION & EMPLOYER	DATE	AMOUNT	ELECTION
Eugene M. O'Hara 6 Broadmoor Drive Rumson, NJ 07760	Sr. Vice President The Prudential	05/30/90	\$500.00	\$90

* TOTAL YEAR TO DATE: \$500.00 *

A. Steve Pierce
PO Box 1487
Kernersville, NC 27285

06/01/90 1000.00 \$90
 06/01/90 1000.00 \$90

* TOTAL YEAR TO DATE: 2000.00 *

Charles Albert Waller
1575 O'Connell Ridge Road
Greenville, NC 27858

06/01/90 250.00 \$90

* TOTAL YEAR TO DATE: 250.00 *

James C. Harvell, Jr.
Greenville, NC

06/01/90 250.00 \$90

* TOTAL YEAR TO DATE: 250.00 *

Tom H. Matthews
101 Wildwood Avenue
Rocky Mount, NC 27802

06/01/90 250.00 \$90

* TOTAL YEAR TO DATE: 250.00 *

William M. Harrison, Jr.
PO box 1768
Durham, NC 27702

Self

05/31/90 1000.00 \$90

* TOTAL YEAR TO DATE: 1000.00 *

William K. Woltz
282 S. Park Avenue
Mount Airy, NC 27030

05/31/90 1000.00 \$90

* TOTAL YEAR TO DATE: 1000.00 *

Joseph K. Dowley
1775 Pennsylvania Avenue, NW
Washington, DC 20006

Dowley, Ballantine

05/31/90 300.00 \$90

* TOTAL YEAR TO DATE: 300.00 *

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FEC REPORT FOR PERIOD 05/1/90 TO 06/30/90
 SCHEDULE A - ITEMIZED RECEIPTS
 OTHER POLITICAL COMMITTEES

NAME OF COMMITTEE: Easley for Senate Committee

COMMITTEE	DATE	AMOUNT	ELECTION
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AFCE Political Action Committee
 80 F Street, NW
 Washington, DC 20001

05/30/90	2000.00	S90
06/01/90	8000.00	S90

* TOTAL YEAR TO DATE: 8000.00 *

Air Line Pilots Association PAC
 1635 Massachusetts Ave., NW
 Washington, DC 20036

05/24/90	5000.00	S90
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* TOTAL YEAR TO DATE: 5000.00 *

Amalgamated Transit Union COPE
 5025 Wisconsin Avenue, NW
 Washington, DC 20016

06/05/90	1500.00	S90
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* TOTAL YEAR TO DATE: 1500.00 *

American International Group Employee PAC
 70 Pine Street
 New York, NY 10270

05/24/90	2000.00	P90
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* TOTAL YEAR TO DATE: 2000.00 *

American Medical PAC
 1101 Vermont Avenue, NW
 Washington, DC 20005

05/25/90	2500.00	S90
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* TOTAL YEAR TO DATE: 2500.00 *

Branch Banking and Trust Company PAC
 212 W. Nash Street
 Wilmington, NC 28403

05/05/90	250.00	S90
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* TOTAL YEAR TO DATE: 250.00 *

Brotherhood of Locomotive Engineers
 1276 Ontario Street
 Cleveland, OH 44115

06/05/90	500.00	S90
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* TOTAL YEAR TO DATE: 500.00 *

Carpenters' Legislative Improvement Committee PAC
 101 Constitution Avenue, NW
 Washington, DC 20001

05/31/90	5000.00	S90
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* TOTAL YEAR TO DATE: 5000.00 *

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FEC REPORT FOR PERIOD 05/17/90 TO 06/30/90
 SCHEDULE A--ITEMIZED RECEIPTS
 OTHER POLITICAL COMMITTEES

NAME OF COMMITTEE: Easley for Senate Committee

COMMITTEE	DATE	AMOUNT	ELECTION
Citizens Savings Financial Corporation 494 Brickell Avenue Miami, FL 33131	05/31/90	500.00	\$90

* TOTAL YEAR TO DATE: 500.00 *

Colon Willoughby for District Attorney PO Box 2455 Raleigh, NC 27602	06/04/90	100.00	\$90
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* TOTAL YEAR TO DATE: 300.00 *

Committee on Letter Carriers Political Education 100 Indiana Avenue, NW Washington, DC 20001	05/31/90	5000.00	\$90
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* TOTAL YEAR TO DATE: 10000.00 *

Committee to Keep John Kennedy PO Box 20824 Raleigh, NC 27619	05/18/90	50.00	\$90
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* TOTAL YEAR TO DATE: 150.00 *

Communications Workers of America PAC 1925 K Street, NW Washington, DC 20006	05/21/90	5000.00	\$90
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* TOTAL YEAR TO DATE: 10000.00 *

DRIVE Political Fund 25 Indiana Avenue, NW Washington, DC 20001	05/13/90	5000.00	\$90
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* TOTAL YEAR TO DATE: 10000.00 *

Firefighters Interested in Registration and Education PAC 1725 New York Ave, NW Washington, DC 20006	05/31/90	1000.00	\$90
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* TOTAL YEAR TO DATE: 2000.00 *

First Union Employees Good Government "F" Fund PAC One First Union Plaza Charlotte, NC 28248	06/19/90	3000.00	\$90
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* TOTAL YEAR TO DATE: 5000.00 *

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FEC REPORT FOR PERIOD 05/17/90 TO 06/30/90
SCHEDULE A--ITEMIZED RECEIPTS
OTHER POLITICAL COMMITTEES

NAME OF COMMITTEE:asley for Senate Committee

COMMITTEE	DATE	AMOUNT	ELECTION
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SEIU COPE Fund PAC
1311 L Street, NW
Washington, DC 20005

05/28/90 1000.00 S90

* TOTAL YEAR TO DATE: 1000.00 *

Transport Workers Union Political Contributors Committee
80 West End Avenue
New York, NY 10023

06/05/90 500.00 S90

* TOTAL YEAR TO DATE: 1500.00 *

Transportation Political Education League
16600 Detroit Avenue
Cleveland, OH 44107

05/21/90 2500.00 S90

* TOTAL YEAR TO DATE: 5000.00 *

U.A. Political Education Committee
PO Box 60398
Raleigh, NC 27629

05/21/90 5000.00 S90

* TOTAL YEAR TO DATE: 8000.00 *

UAW V CAP PAC
7124 Ambassador Road
Baltimore, MD 21207

05/25/90 5000.00 S90

* TOTAL YEAR TO DATE: 10000.00 *

United Steelworkers of America PAC
Five Gateway Center
Pittsburgh, PA 15222

05/31/90 5000.00 S90

* TOTAL YEAR TO DATE: 10000.00 *

SUMMARY OF OTHER POLITICAL COMMITTEES CONTRIBUTIONS: 05/17/90 TO 06/30/90

*** TOTAL CONTRIBUTIONS FOR REPORT PERIOD: 27500.00

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FEDERAL ELECTION COMMISSION
WASHINGTON DC 20461

RG-2

JUL 3 1990

John R. McArthur, Treasurer
Mike Easley for Senate Committee
P.O. Box 26416
Raleigh, NC 27611

Identification Number: C00239806

Reference: July Quarterly Report (5/17/90-6/30/90)

Dear Mr. McArthur:

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

-Line 17, Column A, of the Detailed Summary Page discloses \$159,532.54 in operating expenditures. The total on the last page of Schedule B supporting this Line equals \$157,339.23; however, the sum of all entries itemized equals \$159,532.54. Please explain this discrepancy and amend your report(s).

-Please provide a Schedule A to support the in-kind contribution from Bill Staton, Deborah Smith and Ron Perkinson reported on Schedule B for Line 17 of the Detailed Summary Page. All in-kind contributions from individuals, which in the aggregate exceed \$200, should be itemized on Schedule A and Schedule B and included on Lines 11(a) and 17 of the Detailed Summary Page.

-Schedule A of your report indicates that your committee may have failed to file one or more of the required 48 hour notices regarding "last minute" contributions received by your committee after the close of books for the 12 Day Pre-Runoff report. A principal campaign committee must notify the Commission, in writing, within 48 hours of any contribution of \$1,000 or more received between two and twenty days before an election. These contributions are then reported on the next report required to be filed by the committee. To ensure that the Commission is notified of last minute contributions of \$1,000 or more to your campaign, it is recommended that you review your procedures for checking contributions received during the aforementioned time

period. Although the Commission may take legal action, any response you wish to make concerning this matter will be taken into consideration. (11 CFR §104.5(f))

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Secretary of the Senate, 232 Hart Senate Office Building, Washington, DC 20510 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

Pat Sheppard

Pat Sheppard
Senior Reports Analyst
Reports Analysis Division

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91 JAN 15 PM 1:35

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD Referral 90L-63
MUR 3156
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: Mike Easley for Senate Committee
and John R. McArthur, as
treasurer

RELEVANT STATUTES: 2 U.S.C. § 434(a)(6)(A)
11 C.F.R. § 104.5(f)

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred the Mike Easley for Senate Committee (the "Committee"), and John R. McArthur, as treasurer, to the Office of the General Counsel for failing to report within 48 hours the receipt of fourteen (14) contributions for \$1,000 or more, totaling \$28,000, which were received after the 20th day, but more than 48 hours before an election. 2 U.S.C. § 434(a)(6)(A).

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, (the "Act") provides that the principal campaign committee of a candidate shall, within 48 hours of receipt, notify the Clerk, the Secretary, or the Commission, and the Secretary of State, as appropriate, in writing, of any contribution of \$1,000 or more received by an authorized committee of such candidate after the

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20th day, but more than 48 hours before, any election. 2 U.S.C. § 434(a)(6)(A). This notification requirement is in addition to all other reporting requirements under the Act. 2 U.S.C. § 434(a)(6)(B).

Michael Easley participated as a candidate in North Carolina's runoff election, held on June 5, 1990. In order to comply with the Act's reporting requirements for that election, the candidate's committee was required to report, within 48 hours of receipt, each contribution of \$1,000 or more received from May 17, 1990 through June 2, 1990.¹ When reviewing the Committee's 1990 July Quarterly Report, RAD determined that between May 30, 1990 and June 1, 1990, the Committee received fourteen (14) contributions of \$1,000 or more, totaling \$28,000 which had not been reported within 48 hours of receipt.

Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that the Mike Easley for Senate Committee and John R. McArthur, as treasurer, violated 2 U.S.C. § 434(a)(6)(A).

III. MERGER WITH MUR 3156

In MUR 3156, the Commission found reason to believe that Mike Easley for Senate Committee and John R. McArthur, as treasurer violated 2 U.S.C. § 434(a)(6)(A) by failing to report

1. In fact, the Commission sent a "Prior Notice" dated April 2, 1990, which informed the Committee of the requirement that it file reports for "last-minute" contributions within 48 hours of receipt. Attachment 1, page 6.

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within 48 hours the receipt of \$33,000 in contributions of \$1,000 or more, which were received after the 20th day, but more than 48 hours before an election. The Commission then voted to enter into conciliation with the Committee prior to a finding of probable cause to believe. The Committee was sent a proposed conciliation agreement which provided for an admission of the violation.

On December 17, 1990, Mr. McArthur responded to the Commission's reason to believe findings and proposed conciliation agreement. In the response, Mr. McArthur confirms the Committee's desire to resolve the matter through preprobable cause conciliation. He also acknowledges that in reviewing the Committee's records, it appears the Committee failed to file all requisite 48 hour notices in regards to the runoff election held in North Carolina on June 5, 1990. In a recent conversation with a staff member of this Office, Mr. McArthur requested that any MUR opened with regard to the runoff election be combined with MUR 3156.

Accordingly, this Office recommends that these matters be merged and that the Commission offer to enter into conciliation with respondents prior to a finding of probable cause to believe.

IV. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

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V. RECOMMENDATIONS

1. Open a MUR in RAD Referral 90L-63.
2. Merge MUR 3156 with the new MUR.
3. Find reason to believe that Mike Easley for Senate Committee and John R. McArthur, as treasurer, violated 2 U.S.C.

§ 434(a)(6)(A) with regard to the 1990 runoff election.

4. Enter into conciliation with Mike Easley for Senate Committee and John R. McArthur, as treasurer, prior to a finding of probable cause to believe.

5. Approve the attached conciliation agreement and the appropriate letter.

Lawrence M. Noble
General Counsel

Date 1/14/91 BY:

[Signature]
Lois G. Lerner
Associate General Counsel

Attachments

1. Referral Materials
2. Factual and Legal Analysis
3. Respondents' Response in MUR 3156
4. Proposed Conciliation Agreement

91040334972

BEFORE THE FEDERAL ELECTION COMMISSION

(MUR-
3215)

In the Matter of)
Mike Easley for Senate Committee) RAD Referral 90L-63
and John R. McArthur, as treasurer.) and MUR 3156

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 17, 1991, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 90L-63 and MUR 3156:

1. Open a MUR in RAD Referral 90L-63.
2. Merge MUR 3156 with the new MUR.
3. Find reason to believe that Mike Easley for Senate Committee and John R. McArthur, as treasurer, violated 2 U.S.C. § 434(a) (6)(A) with regard to the 1990 runoff election.
4. Enter into conciliation with Mike Easley for Senate Committee and John R. McArthur, as treasurer, prior to a finding of probable cause to believe.

(continued)

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Federal Election Commission
Certification for RAD Referral
90L-63 and MUR 3156
Thursday, January 17, 1991

Page 2

5. Approve the conciliation agreement and the appropriate letter, as recommended in the General Counsel's Report dated January 14, 1991.

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

Attest:

1-18-91

Date

Hilda Arnold
for Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Tues., January 15, 1991 1:35 p.m.
Circulated to the Commission: Tues., January 15, 1991 4:00 p.m.
Deadline for vote: Thurs., January 17, 1991 4:00 p.m.

dh

91040334974



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 24, 1991

John R. McArthur, Treasurer
Mike Easley for Senate Committee
P.O. Box 26416
Raleigh, NC 27611

RE: MUR 3215
Mike Easley for Senate
Committee and
John R. McArthur, as
treasurer

Dear Mr. McArthur:

On January 17, 1991, the Federal Election Commission found that there is reason to believe Mike Easley for Senate Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(6)(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 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.

On January 17, 1991, the Commission also determined to merge this matter with MUR 3156. Both matters will now be known as MUR 3215. 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. This agreement supersedes the proposed conciliation agreement sent to you on November 15, 1990.

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Mr. John R. McArthur, treasurer
Page 2

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

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

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

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

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

Sincerely,


John Warren McGarry
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Conciliation Agreement

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FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

MUR: 3215

RESPONDENTS: Mike Easley for Senate Committee
and John R. McArthur, as treasurer

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The Federal Election Campaign Act of 1971, (the "Act") provides that the principal campaign committee of a candidate shall, within 48 hours of receipt, notify the Clerk, the Secretary, or the Commission, and the Secretary of State, as appropriate, in writing, of any contribution of \$1,000 or more received by an authorized committee of such candidate after the 20th day, but more than 48 hours before, any election. 2 U.S.C. § 434(a)(6)(A). This notification requirement is in addition to all other reporting requirements under the Act. 2 U.S.C. § 434(a)(6)(B).

Michael Easley participated as a candidate in North Carolina's runoff election, held on June 5, 1990. In order to comply with the Act's reporting requirements for that election, the candidate's committee was required to report, within 48 hours of receipt, each contribution of \$1,000 or more received from May 17, 1990 through June 2, 1990.¹ When reviewing the Committee's 1990 July Quarterly Report, the

1. In fact, the Commission sent a "Prior Notice" dated April 2, 1990, which informed the Committee of the requirement that it file reports for "last-minute" contributions within 48 hours of receipt. Attachment 1, page 6.

Reports Analysis Division ("RAD") determined that between May 30, 1990 and June 1, 1990, the Committee received fourteen (14) contributions of \$1,000 or more, totaling \$28,000, which had not been reported within 48 hours of receipt. These contributions are as follows:

CONTRIBUTOR	DATE	AMOUNT
John Q. Beard	05/31/90	\$1,000
Roxanne Parsons	05/30/90	\$1,000
Nell Goodwin Benson	06/01/90	\$1,000
Thomas G. O'Hara	05/31/90	\$1,000
Jay R. Pritzker	05/31/90	\$1,000
A. Steve Pierce	06/01/90 06/01/90	\$1,000 \$1,000
William M. Harrison Jr.	05/31/90	\$1,000
William K. Woltz	05/31/90	\$1,000
AFGE Political Action Committee	06/01/90	\$3,000
Carpenters' Legislative Improvement Committee PAC	05/31/90	\$5,000
Committee on Letter Carriers Political Education	05/31/90	\$5,000
Firefighters Interested in Registration and Education PAC	05/31/90	\$1,000
United Steelworkers of America PAC	05/31/90	\$5,000

Accordingly, the Commission found reason to believe that the Mike Easley for Senate Committee and John R. McArthur, as treasurer, violated 2 U.S.C. § 434(a)(6)(A).

In MUR 3156, the Commission found reason to believe that Mike Easley for Senate Committee and John R. McArthur, as treasurer violated 2 U.S.C. § 434(a)(6)(A) by failing to report

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within 48 hours the receipt of \$33,000 in contributions of \$1,000 or more, which were received after the 20th day, but more than 48 hours before an election.

On January 17, 1990, at Respondents' request, the Commission voted to merge MUR 3156 with MUR 3215.

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FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20461

February 21, 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John R. McArthur, Treasurer
Mike Easley for Senate Committee
P.O. Box 26416
Raleigh, NC 27611

RE: MUR 3215
Mike Easley for Senate
Committee and
John R. McArthur, as
treasurer

Dear Mr. McArthur:

On January 24, 1991, you were notified that the Federal Election Commission determined to enter into negotiations directed toward reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. On that same date you were sent a conciliation agreement offered by the Commission in settlement of this matter.

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

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

Sincerely,

Lawrence M. Noble
General Counsel


BY: Lisa E. Klein
Assistant General Counsel

91040834280

CC-C 0176

MIKE EASLEY FOR SENATE COMMITTEE

POST OFFICE BOX 26416
RALEIGH, NORTH CAROLINA 27611

MUR 3215

February 20, 1991

Mr. Noriega E. James
Federal Elections Commission
Washington, D.C. 20463

Re: MUR 3156

Dear Mr. James:

We are writing in response to Chairman McGarry's letter dated January 24, 1991. As we stated in our December 14, 1990 letter to you, we are interested in pursuing pre-probable cause conciliation in this matter regarding the Easley Committee's inadvertent omission of "last minute" filings in the 1990 North Carolina Senate race.

If you have any questions, or need more information, please let us know. We look forward to hearing from you.

Sincerely,

Mac McCorkle

Mac McCorkle
Campaign Manager
(919) 828-0564

John R. McArthur
John McArthur
Treasurer
(919) 899-3026

/jcs

P. O. Box 109
RALEIGH, NORTH CAROLINA 27602

06-C 0431
RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

91 MAR 19 AM 10:36

March 18, 1991

BY FEDERAL EXPRESS

Mr. Noriega James
Federal Election Commission
Washington, DC 20463

Re: **MUR 3215**

Dear Noriega:

Enclosed please find an executed Conciliation Agreement for the above-captioned matter.

Thank you.

Very truly yours,


John R. McArthur

336/0554

Enclosure

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FEDERAL ELECTION COMMISSION
91 MAR 19 PM 4:43

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RECEIVED
FEDERAL ELECTION COMMISSION

91 APR -3 PM 4:44

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Mike Easley for Senate Committee and
John R. McArthur, as treasurer

)
)
)
)

MUR 3215

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by John R. McArthur, the treasurer of Mike Easley for Senate Committee.

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II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Mike Easley for Senate Committee and John R. McArthur, as treasurer.
2. Close the file.
3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

Date

4/8/91

BY:

Lois G. Lerner
Associate General Counsel

Staff Assigned: Noriega E. James

91040334284

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Mike Easley for Senate Committee) MUR 3215
and John R. McArthur, as)
treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 11, 1991, the Commission decided by a vote of 6-0 to take the following actions in MUR 3215:

1. Accept the conciliation agreement with Mike Easley for Senate Committee and John R. McArthur, as treasurer, as recommended in the General Counsel's Report dated April 8, 1991.
2. Close the file.
3. Approve the appropriate letter, as recommended in the General Counsel's Report dated April 8, 1991.

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

Attest:

4-12-91
Date

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

Received in the Secretariat: Mon., April 8, 1991 4:44 p.m.
Circulated to the Commission: Tues., April 9, 1991 11:00 a.m.
Deadline for vote: Thurs., April 11, 1991 11:00 a.m.

dr

91040334235

Closed



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

April 16, 1991

CLOSED

John R. McArthur, Treasurer
Mike Easley for Senate Committee
P.O. Box 26416
Raleigh, NC 27611

RE: MUR 3215
Mike Easley for Senate
Committee and
John R. McArthur, as
treasurer

Dear Mr. McArthur:

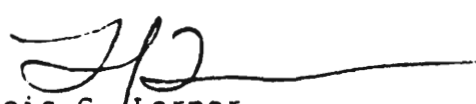
On April 11, 1991, the Federal Election Commission accepted the signed conciliation agreement submitted on your behalf in settlement of a violation of 2 U.S.C. § 434(a)(6)(A), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter.

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) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

91040334936

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Mike Easley for Senate Committee and) MUR 3215
John R. McArthur, as treasurer)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Mike Easley for Senate Committee and John R. McArthur, as treasurer, "Respondents" violated 2 U.S.C. § 434(a)(6)(A).

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

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

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

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

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

1. The Mike Easley for Senate Committee is a political committee within the meaning of 2 U.S.C. § 431(4).

2. John R. McArthur is the treasurer of the Mike Easley for Senate Committee.

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3. Pursuant to 2 U.S.C. § 434(a)(1), each treasurer of a political committee shall file reports of receipts and disbursements in accordance with the provisions of 2 U.S.C. § 434. Pursuant to 2 U.S.C. § 434(a)(6)(A), the candidate's principal campaign committee must notify the Clerk, the Secretary, or the Commission of any contributions of \$1,000 or more received after the 20th day, but more than 48 hours before an election. This notification must be made within 48 hours of receipt, and the contribution must also be itemized in the committee's next scheduled report. 2 U.S.C. § 434(a)(6)(B).

4. The Candidate was involved in North Carolina's Primary Election, held on May 8, 1990, and the Runoff Election held on June 5, 1990.

5. In order to comply with 2 U.S.C. § 434(a)(6)(A), the Respondents were required to file notices for all contributions of \$1,000 or more received from April 19, through May 5, 1990, and from May 17, through June 2, 1990.

6. Respondents received fourteen (14) contributions of \$1,000 or more, totaling \$33,000, between April 27, and May 4, 1990, and received fourteen (14) contributions of \$1,000 or more, totaling \$28,000, between May 30, and June 1, 1990.

V. Respondents failed to file notices, within 48 hours of receipt, for \$61,000 in contributions of \$1,000 or more, received after the 20th day but more than 48 hours before the Primary and Runoff Elections, and thereby violated 2 U.S.C. § 434(a)(6)(A).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Two Thousand Dollars (\$2,000), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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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 60 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

4/16/91
Date

FOR THE RESPONDENTS:


John R. McArthur
Treasurer

March 18, 1991
Date

91040334989



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3215

DATE FILMED 4/24/91 CAMERA NO. 4

CAMERAMAN AS

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FEDERAL ELECTION COMMISSION

WASHINGTON, D C 20463

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 3215.

7/3/91

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LAW OFFICES OF
PARKER, POE, ADAMS & BERNSTEIN
P.O. BOX 389
ONE EXCHANGE PLAZA
RALEIGH, NORTH CAROLINA 27602-0389
TELEPHONE 919-828-0564 FACSIMILE 919-834-4564

POPE McCORKLE III
ASSOCIATE

CLOSED

June 18, 1991

CHARLOTTE OFFICE
2800 CHARLOTTE PLAZA
CHARLOTTE, NORTH CAROLINA 28244
TELEPHONE: 704-378-9000
FACSIMILE: 704-334-4708

RESEARCH TRIANGLE PARK OFFICE
P.O. BOX 13039
RESEARCH TRIANGLE PARK, N.C. 27709
TELEPHONE: 919-544-4500
FACSIMILE: 919-544-2788

SOUTHPARK OFFICE
4201 CONGRESS ST. SUITE 14B
CHARLOTTE, NORTH CAROLINA 28209
TELEPHONE 704-556-9800
FACSIMILE 704-556-9801

FILE NUMBER

DIRECT DIAL

Mr. Noreiga James
Federal Election Commission
Washington, D.C. 20463

Re: MUR 3215

Dear Mr. James:

Enclosed please find a check for \$2,000 from the Mike Easley Senate Committee for payment in and resolution of MUR 3215. As we discussed last week, I am sending this check to you on Tuesday the 17th because I was out-of-town on the 16th.

Thank you for your patience and assistance.

Sincerely yours,

Pope McCorkle III
Pope McCorkle, III

PMC/jcs

[James:MAC3]

91 JUN 21 AM 10:55

91 JUN 19 PM 2:46

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 20, 1991

TWO WAY MEMORANDUM

TO: Fabrae Brunson
OGC, Docket

FROM: Philomena Brooks *PPB*
Accounting Technician

SUBJECT: Account Determination for Funds Received

We recently received a check from Mike Easley
Campaign Committee check number 1500, dated June 18, 1991, and in the amount of \$ 2,000.00.
Attached is a copy of the check and any correspondence that
was forwarded. Please indicate below the account into which
it should be deposited, and the MUR number and name.

TO: Philomena Brooks
Accounting Technician

FROM: Fabrae Brunson *FB*
OGC, Docket

In reference to the above check in the amount of
\$ 2,000, the MUR number is 3215 and in the name of
Mike Easley for Congress Cntr.. The account into
which it should be deposited is indicated below:

- ☐ Budget Clearing Account (OGC), 95F3875.16
- ☒ Civil Penalties Account, 95-1099.160
- ☐ Other: _____

Fabrae D. Brunson
Signature

6/21/91
Date

21040851415

21040851416

1500

MIKE EASLEY CAMPAIGN COMMITTEE

P. O. BOX 26416
RALEIGH, NC 27611-6416

PAY
TO THE
ORDER OF

The Federal Election Commission

June 16, 1991

65-822
531

\$ *2,000*

Two thousand dollars

DOLLARS

**UNITED
CAROLINA
BANK**

MAIN OFFICE
RALEIGH, NC 27612

FOR

cash only

Mac McNamee, Campaign Manager

⑈00001500⑈ ⑆053108221⑆ 0600036731⑈