



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 4234

DATE FILMED 12-10-95 CAMERA NO. 2

CAMERAMAN JMN

95043701252

REPORTS ANALYSIS REFERRAL**TO****OFFICE OF GENERAL COUNSEL****DATE:** March 2, 1995**ANALYST:** STEPHEN COHEN

I. COMMITTEE: West Virginia State Democratic Executive Committee (C00162578)
Marie Prezioso, Treasurer
405 Capitol Street - Suite 501
Charleston, WV 25301

II. RELEVANT STATUTE: 2 U.S.C. §434(b) & (a)(4)(A)(i) and (iii)
11 CFR §104.3 (a)(1)
11 CFR §104.5(c)(1)(i)(A) and (iii)(A)

III. BACKGROUND:

A. Cash Discrepancy between the Amended 1994 April and July Quarterly Reports

The West Virginia State Democratic Executive Committee ("the Committee") disclosed an ending cash balance of \$71,146.62 on the Amended 1994 April Quarterly Report and a beginning cash balance of \$9,108.23 on the 1994 July Quarterly Report resulting in a cash discrepancy equal to \$62,038.39.

On March 8, 1994, the Committee's Executive Director, Carrie Webster, called the Reports Analysis Division "RAD" analyst concerning numerous reporting issues. In addition, Ms. Webster informed the analyst that there may be a \$50,000.00 cash discrepancy between the Committee's reported January 1994 beginning cash balance and the actual cash balance reported by the Committee's bank statements. The analyst informed Ms. Webster that the Committee needed to report its actual cash balance on its next report, and attempt to find the reason for the cash discrepancy. Once the problem was discovered, all reports affected by the correction to the cash discrepancy needed to be amended and filed with the Commission (Attachment 2).

The analyst received a conference call on May 3, 1994, from Ms. Webster and Steve Leich, lawyer for the Committee. Ms. Webster stated that the Committee had an ending cash discrepancy on its 1994 April Quarterly Report of

950437012553

approximately \$50,000.00 (reported - \$70,000.00 vs actual - \$20,000.00). The analyst informed Ms. Webster and Mr. Leich that the Committee needed to reflect its actual cash balance on its next report, and then conduct an internal audit of Committee records to ascertain the reason for the discrepancy. The analyst stated that the Commission should be made aware of the internal audit's progress and results (Attachment 3).

Ms. Webster called the analyst on July 12, 1994, to discuss the Committee's cash discrepancy. Ms. Webster asked the analyst's opinion regarding possible reasons for the discrepancy. The analyst stated to Ms. Webster that it was difficult for the Commission to determine all possible problems because the Commission only had access to the Committee's reports. The analyst advised Ms. Webster that the Committee should compare its cash balances on its financial disclosure reports with its bank statements (reconciliation). Ms. Webster stated that the Committee does not reconcile its bank statements with its account. The analyst strongly recommended that an internal audit start with a comprehensive reconciliation of the Committee's bank statements (Attachment 4).

On July 14, 1994, Ms. Webster called the analyst to discuss the progress of the internal audit. Ms. Webster stated that she had not been successful in finding causes for the cash discrepancy, and she discussed numerous areas where the cash discrepancy possibly occurred.

Ms. Webster informed the analyst that she was leaving the Committee in a couple weeks to attend law school. Ms. Webster stated that, upon her departure, the Committee treasurer, Marie Prezioso, would take over the books. The analyst recommended to Ms. Webster that she inform her successor of both the Committee's cash discrepancy and the progress of the internal audit (Attachment 5).

On July 17, 1994, the Committee filed an Amended 1994 April Quarterly Report which disclosed an ending cash balance of \$71,146.62 (Attachment 6). The Committee also filed its 1994 July Quarterly Report which disclosed a beginning cash balance of \$9,108.23 (Attachment 7).

Attached to the aforementioned reports was a letter from the Committee's legal counsel, Steven F. White. Mr. White stated that the Committee recognized the cash discrepancy between the Committee's April and July Quarterly Reports. In addition, Mr. White informed the Commission that the beginning cash balance for the 1994 July Quarterly Report "reconciles with the Committee's most recent bank statement." According to Mr. White's letter, the Committee "is in the

95043701254

process of conducting an internal audit" and that "amended reports will be filed with your Commission upon completion of the internal audit" (Attachment 8).

On August 3, 1994, the analyst sent a Request for Additional Information ("RFAI") to the Committee concerning the cash discrepancy disclosed between the Amended 1994 April and July Quarterly Reports. The Committee was asked to clarify the cash discrepancy and to amend any reports affected by corrections to the Committee's cash balance (Attachment 9).

On August 7, 1994, the Committee filed an Amended 1994 July Quarterly Report. Attached to the amendment was a letter from Ms. Webster informing the Commission that she had attempted to identify possible errors in the Committee's reports which would explain the cash discrepancy. Ms. Webster stated that she was leaving the Committee and did not have enough time to conduct a comprehensive review of the Committee's reports (Attachment 10).

The Committee was sent a Second Letter on August 25, 1994, for failure to adequately respond to the August 3rd RFAI (Attachment 11).

On September 7, 1994, Mr. George Carenbauer called and introduced himself as the new State Chairman. He informed the analyst that the Committee recognized the cash discrepancy and that all available personnel were working on the internal audit (Attachment 12).

The analyst called the Committee on September 28, 1994, and asked to speak to Mr. Carenbauer. Ms. McCormick, the new Executive Director, informed the analyst that Mr. Carenbauer was not available but that she was happy to answer any questions. The analyst inquired about the progress of the internal audit and Ms. McCormick stated that personnel were working extensively on locating the cash discrepancy. The analyst asked Ms. McCormick to have Mr. Carenbauer call the analyst back (Attachment 13).

As of this date, the Committee has not corrected the cash discrepancy.

B. Failure to Timely File the 1994 October Quarterly and 30 Day Post General Reports

The Committee failed to timely file the 1994 October Quarterly and 30 Day Post General Reports. On September 21, 1994, the Committee was notified that the 1994 October Quarterly Report was due on October 15, 1994 (Attachment 14). Additionally, the Committee was notified on October 3, 1994 that the 30 Day Post General Report was due on December 8, 1994 (Attachment 15).

95043701255

On November 4, 1994, a Non-Filer Notice was sent to the Committee for failure to file the 1994 October Quarterly Report (Attachment 16).

On November 25, 1994, the analyst called the Committee and left a message for Mr. Carenbauer concerning the non-filing of the 1994 October Quarterly Report. The analyst also asked for Mr. Carenbauer to return his call as soon as possible (Attachment 17).

Mr. Carenbauer called the analyst on November 28, 1994, to discuss the October Quarterly Report. Mr. Carenbauer stated that the Committee was attempting to reconcile its cash figures before filing its report. The analyst informed Mr. Carenbauer that the Committee's first priority was to file an October Quarterly Report with the Commission reflecting activity for the period July 1, 1994 through September 30, 1994. After filing the report, the Committee could then focus on resolving the cash discrepancy. The analyst stressed to Mr. Carenbauer that the report needed to be filed with the Commission by December 4, 1994 (Attachment 18).

On December 8, 1994, the Committee filed the 1994 October Quarterly Report of Receipts and Disbursements (Attachment 19).

A Non-filer Notice was sent to the Committee on January 4, 1995 for failing to file the 1994 30 Day Post General Report (Attachment 20).

The analyst spoke with Ms. McCormick on February 2, 1995 regarding the Committee's non-filing of a 30 Day Post General Report and a 1994 Year End Report. Ms. McCormick was advised that the reports needed to be filed with the Commission by the 3rd of February. Ms. McCormick stated that the reports would be sent certified mail on February 3, 1995 (Attachment 21).

The Commission received the Committee's 30 Day Post General Report of Receipts and Disbursements on February 7, 1995 (Attachment 22).

05043701256

ELECTION COMMISSION
 1993-1994
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

ATTACHMENT 1
 DATE 11/19/95

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
					TYPE OF FILER	
WEST VIRGINIA STATE DEMOCRATIC EXECUTIVE COMMITTEE				ID #C00162578	PARTY QUALIFIED	
CONNECTED ORGANIZATION: WEST VIRGINIA DEMOCRATIC PARTY						
1993	APRIL QUARTERLY	26,779	24,643	1JAN93 - 31MAR93	33	93FEC/836/0537
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN93 - 31MAR93	8	94FEC/887/0920
	REQUEST FOR ADDITIONAL INFORMATION			1JAN93 - 31MAR93	3	94FEC/884/2846
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN93 - 31MAR93	4	94FEC/886/4640
	JULY QUARTERLY	9,096	16,269	1APR93 - 30JUN93	23	93FEC/848/1814
	JULY QUARTERLY - AMENDMENT	9,096	16,269	1APR93 - 30JUN93	3	93FEC/863/5022
	REQUEST FOR ADDITIONAL INFORMATION			1APR93 - 30JUN93	2	94FEC/884/2844
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR93 - 30JUN93	2	94FEC/886/4638
	OCTOBER QUARTERLY	43,543	20,801	1JUL93 - 30SEP93	28	93FEC/863/5025
	OCTOBER QUARTERLY - AMENDMENT	43,543	20,876	1JUL93 - 30SEP93	5	94FEC/873/1400
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL93 - 30SEP93	5	94FEC/887/0521
	OCTOBER QUARTERLY - AMENDMENT	43,543	20,876	1JUL93 - 30SEP93	5	94FEC/887/0526
	REQUEST FOR ADDITIONAL INFORMATION			1JUL93 - 30SEP93	3	94FEC/884/2849
	REQUEST FOR ADDITIONAL INFORMATION			1JUL93 - 30SEP93	3	94FEC/884/2852
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL93 - 30SEP93	3	94FEC/886/4632
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL93 - 30SEP93	3	94FEC/886/4635
	YEAR-END	27,351	44,854	1OCT93 - 31DEC93	30	94FEC/873/1370
	YEAR-END - AMENDMENT	-	-	1OCT93 - 31DEC93	3	94FEC/894/0072
	REQUEST FOR ADDITIONAL INFORMATION			1OCT93 - 31DEC93	2	94FEC/886/4139
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT93 - 31DEC93	3	94FEC/889/1406
1994	APRIL QUARTERLY	31,758	33,876	1JAN94 - 31MAR94	28	94FEC/894/0044
	APRIL QUARTERLY - AMENDMENT	31,758	33,876	1JAN94 - 31MAR94	5	94FEC/904/1100
	APRIL QUARTERLY - AMENDMENT	31,758	33,876	1JAN94 - 31MAR94	4	94FEC/909/3556
	REQUEST FOR ADDITIONAL INFORMATION			1JAN94 - 31MAR94	3	94FEC/890/2656
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN94 - 31MAR94	4	94FEC/901/3044
	JULY QUARTERLY	11,847	16,211	1APR94 - 30JUN94	21	94FEC/909/3535
	JULY QUARTERLY - AMENDMENT	-	-	1APR94 - 30JUN94	4	94FEC/915/4645
	REQUEST FOR ADDITIONAL INFORMATION			1APR94 - 30JUN94	2	94FEC/915/3837
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR94 - 30JUN94	3	94FEC/919/3594
	OCTOBER QUARTERLY	15,637	15,175	1JUL94 - 30SEP94	19	94FEC/949/0863
	NOTICE OF FAILURE TO FILE			1JUL94 - 30SEP94	2	94FEC/943/0721
	REQUEST FOR ADDITIONAL INFORMATION			1JUL94 - 30SEP94	3	95FEC/967/4163
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL94 - 30SEP94	4	95FEC/967/2763
	POST-GENERAL	69,164	29,988	1OCT94 - 26NOV94	24	95FEC/965/0370
	NOTICE OF FAILURE TO FILE			1OCT94 - 26NOV94	2	95FEC/955/0759
	YEAR-END	17,945	4,507	30NOV94 - 31DEC94	12	95FEC/965/0858
1995	MISCELLANEOUS NOTICE FROM FEC			1JAN95	2	95FEC/955/2666
TOTAL		153,860	0 204,399 0	309 TOTAL PAGES		

All reports have been reviewed except the 1994 30 Day Post-General and Year End Reports.

Ending cash-on-hand as of 12/31/94: \$56,096

Outstanding debts owed by the committee as of 12/31/94: \$21,183

TELECON

ANALYST: Stephen Cohen

CONVERSATION WITH: Carrie Webster, Executive Director
PH# (304) 342-8121

COMMITTEE: West Virginia State Democratic Executive Committee
(C00162578)

DATE: March 8, 1994

SUBJECT(S): Committee's Cash Discrepancy

The Committee's Executive Director, Carrie Webster, called the Commission concerning numerous reporting issues. In addition, Ms. Webster informed the analyst that there may be a discrepancy between the Committee's beginning cash balance disclosed on its 1994 April Quarterly Report and the cash balance reflected on the Committee's bank statements. The analyst asked Ms. Webster the extent of the discrepancy. Ms. Webster was not entirely certain of the amount, but suspected it was around \$50,000.00.

In response to Ms. Webster, the analyst stated that the Committee needed to report its actual cash balance on its next report, and attempt to find the reason for the cash discrepancy. Once the problem(s) were discovered, all reports affected by the correction to the cash discrepancy needed to be amended and filed with the Commission. The analyst strongly recommended that, while attempting to find the cause(s) of the cash discrepancy, Ms. Webster use the Commission as a resource.

95043701258

TELECON

ANALYST: Stephen Cohen

CONVERSATION WITH: Carrie Webster, Executive Director and Steve Leich,
Committee Lawyer - PH# (304) 342-8121

COMMITTEE: West Virginia State Democratic Executive Committee
(C00162578)

DATE: May 3, 1994

SUBJECT(S): Committee's Cash Discrepancy

25043701259

The analyst received a conference call from Carrie Webster, Executive Director, and Steve Leich, lawyer for the Committee. Ms. Webster stated that the Committee had a cash discrepancy of around \$50,000.00 (reported - \$70,000.00 vs actual - \$20,000.00). The analyst informed Ms. Webster and Mr. Leich that the Committee needed to report the actual cash on hand balance. The Committee would then need to conduct an internal audit in order to discover the cause(s) for the discrepancy. Once the Committee found the problem(s), amendments of all reports affected by the correction would need to be filed with the Commission.

Ms. Webster and the analyst discussed possibilities for the discrepancy. Ms. Webster stated that she would be conducting the internal audit and wished to resolve the issue before she left the Committee in August.

The analyst stressed that the Commission was a resource that the Committee should use during the audit process.

TELECON

ANALYST: Stephen Cohen

CONVERSATION WITH: Carrie Webster, Executive Director
PH# (304) 342-8121

COMMITTEE: West Virginia State Democratic Executive Committee
(C00162578)

DATE: July 12, 1994

SUBJECT(S): Committee's Cash Discrepancy

Ms. Webster called the analyst to discuss possible discrepancies with the Committee's reports. Ms. Webster asked the analyst's opinion regarding possible reasons for the cash discrepancy. The analyst stated to Ms. Webster that it was difficult for the Commission to determine all possible problems because the Commission only had access to the Committee's reports. The analyst suggested to Ms. Webster that the Committee compare its cash balances on its financial disclosure reports with its bank statements (reconciliation). Ms. Webster stated that the Committee does not reconcile its bank statements with its account. The analyst strongly recommended that an internal audit start with a comprehensive reconciliation of the Committee's bank statements.

95043701260

TELECON

ANALYST: Stephen Cohen

CONVERSATION WITH: Carrie Webster, Executive Director
PH# (304) 342-8121

COMMITTEE: West Virginia State Democratic Executive Committee
(C00162578)

DATE: July 14, 1994

SUBJECT(S): Committee's Cash Discrepancy

Ms. Webster called the analyst to discuss the progress of the internal audit. Ms. Webster stated that she had not been successful in finding reasons for the cash discrepancy, and she discussed numerous areas where the cash discrepancy possibly occurred.

Ms. Webster informed the analyst that she was leaving the Committee in a couple weeks to attend law school. Ms. Webster stated that, upon her departure, the Committee treasurer, Marie Prezioso, would take over the books. The analyst recommended to Ms. Webster that she inform all her successors of both the Committee's cash discrepancy and the progress of the internal audit.

95043701261

REPORT OF COMMITTEE FOR OTHER THAN AN AUTHORIZED CANDIDATE
(Summary Page)

RECEIVED
FEDERAL ELECTION
COMMISSION

1. NAME OF COMMITTEE (in full)

WV State Democratic Exec. Committee

Address (number and street) ☐ Check if different than previously reported

405 Capitol St., Suite 501

CITY, STATE and ZIP CODE

Charleston, WV 26301

2. FEC IDENTIFICATION NUMBER

C001145753

☐ This committee qualified as a multi-candidate committee DURING THIS Reporting Period on (date)

4. TYPE OF REPORT

(a) ☒ April 15 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year End Report

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

☐ Termination Report

Monthly Report Due On

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

☐ Twelfth day report preceding election on _____ in the State of _____

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

(b) Is this Report an Amendment?

☒ YES ☐ NO

07/13/94
01/15/94

SUMMARY

5 Covering Period 1-1-94 through 3-31-94

6 (a) Cash on Hand January 1, 19____

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 19)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)

7 Total Disbursements (from Line 30)

8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

9 Debts and Obligations Owed TO the Committee (itemize all on Schedule C and/or Schedule D)

10 Debts and Obligations Owed BY the Committee (itemize all on Schedule C and/or Schedule D)

COLUMN A
This Period

COLUMN B
Calendar Year to Date

		\$73,264.56
		\$73,264.56
		\$31,758.15
		\$105,022.71
		\$33,876.09
		\$71,146.62
		\$22,304.49

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

Signature of Print Name of Treasurer

Marie Prezioso

For further information, contact:
Federal Election Commission
900 F Street, N.E.
Washington, D.C. 20543
Telephone: (202) 453-3437
TDD: (202) 453-3437

FEC FORM 278

REPORT OF RECEIPTS AND DISBURSEMENTS

For Cover Than An Authorized Committee
(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION

JUL 17 8 14 AM '94

1. NAME OF COMMITTEE (FEC)

WV Democratic State Exec. Comm.

ADDRESS (Number and Street) ☐ Check if different than previously reported

405 Capitol Street, Suite 501

CITY, STATE and ZIP CODE

Charleston, WV 25301

2. IDENTIFICATION NUMBER

C00162578

☐ This committee has qualified as a multicandidate committee (see FEC FORM 100)

4. TYPE OF REPORT

☐ April 15 Quarterly Report

☒ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year End Report

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

☐ Termination Report

Monthly Report Due On

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

☐ Twelfth day report preceding _____ (Type of Election)

election on _____ in the State of _____

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

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

SUMMARY

5. Covering Period 4-1-94 through 6-30-94

6. (a) Cash on Hand January 1, 1994

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 30)

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

9. Debts and Obligations Owed TO the Committee (Itemize as on Schedule C and/or Schedule D)

10. Debts and Obligations Owed BY the Committee (Itemize as on Schedule C and/or Schedule D)

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

Type or Print Name of Treasurer

Signature of Treasurer

Date

7-14-94

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

FEC FORM 3X

(Revised 8/93)

LAW OFFICES
GOODWIN & GOODWIN
 P. O. BOX 2107
 1000 ONE VALLEY SQUARE
 CHARLESTON, WEST VIRGINIA 25302-2107
 304/340-7000
 TELESCOPE 304/340-0000

RECEIVED
 FEDERAL ELECTION
 COMMISSION
 ADMINISTRATION

JUL 17 8 24 AM '94

501 THIRD STREET
 PARKERSBURG, WEST VIRGINIA 26101
 304/420 2000

P. O. BOX 200
 500 CHURCH STREET
 PARKERSBURG, WEST VIRGINIA 26101
 304/470 0001

REPLY TO
 Charleston

July 13, 1994

Mr. Stephen Cohen
 Federal Election Commission
 999 E. Street, N.W.
 Washington, DC 20463

Dear Mr. Cohen:

I am writing this letter in my capacity as legal counsel to the West Virginia State Democratic Executive Committee (the "Committee"). The Committee's Federal Election Committee Report for the period 4/1/94 - 6/30/94 is enclosed. The Committee's federal account (# 02-2433-8) beginning balance as of April 1, 1994 reflected on the report is \$9,108.23. This amount reconciles with the Committee's most recent bank statement, but does not match the ending balance as reflected on the first quarter report filed by the Committee.

As you have been advised, the Committee's prior bank statements and prior cash balances reported to the Federal Election Committee do not agree. The Committee is in the process of conducting an internal audit so as to ascertain the reason for the discrepancy. It is anticipated that amended reports will be filed with your Commission upon completion of the internal audit.

We would be pleased to discuss this matter further with you at your convenience. Please let me know if you have questions or need further clarification on this matter.

Yours truly,



Steven F. White

SFW/bjr
 cc: George E. Carenbauer, Esquire

95043701264
 94403535



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Marie Prezioso, Treasurer
West Virginia State Democratic
Executive Committee
405 Capitol Street, Suite 501
Charleston, WV 25301

AUG 3 1994

Identification Number: C00162578

Reference: July Quarterly Report (4/1/94-6/30/94)

Dear Ms. Prezioso:

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:

-The beginning cash balance of this report should equal the ending balance of your Amended April Quarterly Report (1/1/94-3/31/94 dated 7/17/94). Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

A handwritten signature in cursive script that reads "Stephen Cohen".

Stephen Cohen
Reports Analyst
Reports Analysis Division

95043701205

WEST VIRGINIA STATE
DEMOCRATIC EXECUTIVE COMMITTEE

406 CAPITOL STREET • SUITE 801
CHARLESTON, WEST VIRGINIA 25301
PHONE (304) 342-8121

CHARLES S. CHUCK SMITH
CHAIR

July 31, 1994

Mr. Stephen Cohen
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Dear Stephen:

Enclosed is an amendment to the West Virginia Democratic State Executive Committee's 2nd quarterly report for 1994, which includes an itemized "memo entry" for DNC activity. An amendment to our 1994 1st quarter report was also enclosed with the original report filed on July 15. It includes the names of contributors which should have been itemized in the original report. Please note that payment to Trainer, Wright and Paterno was improperly reported on the same report. This has been amended as well.

I have attempted to identify possible errors in former reports. However, I ran short on time and was unable to review them in a comprehensive manner. The matter has been referred to the new state chair and treasurer, George Carenbauer and Marie Prezioso respectively, and they have been briefed about the situation. Please contact George for further discussion.

I fully intend to confer with the Committee on the above matter and will be available to assist them when needed. Thank you for your assistance in working on these reports. You have been extremely helpful in trying to identify problems and provide guidance. I really have appreciated it and enjoyed working with you.

Sincerely,

Carrie Webster

Carrie Webster
Executive Director

Enclosure

99 54 0 43 79 71 05 14 26 4 65



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

RQ-3

August 25, 1994

Marie Prezioso, Treasurer
West Virginia State Democratic
Executive Committee
405 Capitol Street, Suite 501
Charleston, WV 25301

Identification Number: C00162578

Reference: July Quarterly Report (4/1/94-6/30/94)

Dear Ms. Prezioso:

This letter is to inform you that as of August 24, 1994, the Commission has not received your response to our request for additional information, dated August 3, 1994. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

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

If you should have any questions regarding this matter, please contact Stephen Cohen on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,

A handwritten signature in cursive script, reading "John D. Gibson", is written over a rectangular stamp area.

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

95043701267

TELECON

ANALYST: Stephen Cohen

CONVERSATION WITH: George Carenbauer, State Chair
PH# (304) 342-8121

COMMITTEE: West Virginia State Democratic Executive Committee
(C00162578)

DATE: September 7, 1994

SUBJECT(S): Committee's Cash Discrepancy

Mr. George Carenbauer introduced himself as the new State Chairman. He informed the analyst that the Committee recognized the cash discrepancy and that all available personnel were working on the internal audit.

9504370128

TELECON

ANALYST: Stephen Cohen

CONVERSATION WITH: Debbie McCormick, Executive Director
PH# (304) 342-8121

COMMITTEE: West Virginia State Democratic Executive Committee
(C00162578)

DATE: September 28, 1994

SUBJECT(S): Committee's Cash Discrepancy

The analyst called the Committee and asked to speak to Mr. Carenbauer. Ms. McCormick, the new Executive Director, informed the analyst that Mr. Carenbauer was not available but that she was happy to answer any questions. The analyst inquired about the progress of the internal audit and Ms. McCormick stated that personnel were working extensively on locating the cash discrepancy. The analyst asked Ms. McCormick to have Mr. Carenbauer call the analyst back.

95043701269

QUARTERLY

ATTACHMENT 14
PAGE 1 of 2

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

September 21, 1994

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
October Quarterly	07 01 94 - 09 30 94	10/15/94	10/15/94

WHO MUST FILE

Party committees and PACs (nonconnected committees and separate segregated funds) filing on a quarterly basis must file a Quarterly Report in October.

PRE-ELECTION REPORTING

Committees which make contributions or expenditures (including independent expenditures) in connection with an election must also file a Pre-Election Report, if the activity was not previously reported. See the January 1994 Record.

LAST-MINUTE INDEPENDENT EXPENDITURES

Any PAC that makes independent expenditures in connection with an election may have to file a 24 hour report. This reporting requirement will be triggered if the committee makes independent expenditures aggregating \$1,000 or more after the 10th day, but more than 24 hours, before the election day.

CHANGE IN FILING FREQUENCY

Committees wishing to change their reporting schedule (for example, from quarterly to monthly) must notify the Commission in writing when they file their next report due under their current reporting schedule. Committees may change their filing frequencies no more than once per calendar year.

LABEL

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

*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.

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

over

95043701270

PARTIES AND PACS

OCTOBER QUARTERLY

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.

95043701271

FOR INFORMATION, Call: 800/424-9530 or 202/219-3420

GENERAL ELECTION REPORT NOTICE

ATTACHMENT 15
PAGE 1 of 2

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

October 3, 1994

I. ALL MONTHLY FILERS

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Pre-General	10/01/94 - 10/19/94	10/24/94	10/27/94
Post-General	10/20/94 - 11/28/94	12/08/94	12/08/94

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

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Pre-General	10/01/94 - 10/19/94	10/24/94	10/27/94
Post-General	10/20/94 - 11/28/94	12/08/94	12/08/94

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

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Post-General	10/01/94 - 11/28/94	12/08/94	12/08/94

WHO MUST FILE

Party committees and PACs must follow the above charts in order to determine whether they must file the Pre-General Election Report. All Party committees and PACs, regardless of financial activity, must file the Post-General Election Report.

*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.

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

***Committees that made general election contributions or expenditures before October 1 and that did not previously report them must also follow the Chart II reporting requirements.

(over)

95043701272

PARTIES AND PACS

GENERAL ELECTION

LAST-MINUTE INDEPENDENT EXPENDITURES

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

LABEL

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

COMPLIANCE

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

FOR INFORMATION, Call: 800/424-9530 or 202/219-3420

95043701273



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20543

EQ-7

November 4, 1994

Marie Prezioso, Treasurer
West Virginia State Democratic
Executive Committee
405 Capitol Street, Suite 901
Charleston, WV 25301

Identification Number: C00162578

Reference: October Quarterly Report (7/1/94-9/30/94)

Dear Ms. Prezioso:

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

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

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

If you have any questions, please contact Stephen Cohen or our toll-free number (800) 424-9530. Our local number is (202) 219-3580.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

95043701274
94032430721

TELECON

ANALYST: Stephen Cohen

CONVERSATION WITH: George Carenbauer, State Chair
PH# (304) 342-8121

COMMITTEE: West Virginia State Democratic Executive Committee
(C00162578)

DATE: November 25, 1994

SUBJECT(S): Late Filing of 1994 October Quarterly Report

The analyst called the Committee and left a message for Mr. Carenbauer regarding the non-filing of the 1994 October Quarterly Report. The analyst asked that Mr. Carenbauer call the Commission as soon as possible.

95043701275

TELECON

ANALYST: Stephen Cohen

CONVERSATION WITH: George Carenbauer, State Chair
PH# (304) 342-8121

COMMITTEE: West Virginia State Democratic Executive Committee
(C00162578)

DATE: November 28, 1994

SUBJECT(S): Late Filing of 1994 October Quarterly Report

Mr. Carenbauer called the analyst to discuss the status of the October Quarterly Report. Mr. Carenbauer stated that the Committee had not filed the report because of difficulties in reconciling the cash figures. The analyst informed Mr. Carenbauer that the Committee's first priority was to file an October Quarterly Report with the Commission reflecting activity for the period July 1, 1994 through September 30, 1994. After filing the report, the Committee could then focus on correcting the cash discrepancy. It was stressed to Mr. Carenbauer that the report be filed with the Commission by December 4, 1994, with an explanatory cover letter.

In addition, the filing criteria were discussed for the Pre-General Report, and Mr. Carenbauer stated that the Committee did not have to file a Pre-General Report.

95043701276

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL
OR
TYPE ON PRINT

1. NAME OF COMMITTEE (in full)
West Virginia State Democratic Executive Committee
Address (number and street) ☐ Check if different than previously reported
405 Capital Street, Suite 501
CITY, STATE and ZIP CODE
Charleston West Virginia 25301

Dec 8 11 27 AM '94

2. FEC IDENTIFICATION NUMBER
C001162578
3. ☐ This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

4. TYPE OF REPORT

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

Monthly Report Due On:

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

- ☐ Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____
☐ Thirtieth day report following the General Election on
_____ in the State of _____

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

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	<u>7-1-94 through 9-30-94</u>		
6. (a) Cash on Hand January 1, 19__			\$
(b) Cash on Hand at Beginning of Reporting Period		\$ <u>780.73</u>	
(c) Total Receipts (from Line 19)		\$ <u>15,637.73</u>	\$
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ <u>16,418.46</u>	\$
7. Total Disbursements (from Line 30)		\$ <u>13,175.31</u>	\$
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ <u>3,243.15</u>	\$
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		\$	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-6530 Local 202-219-3420
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)		\$ <u>21,183.26</u>	

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

Type or Print Name of Treasurer

Signature of Treasurer

Mark A. Pizz

Date

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

FEC FORM 3X

(revised 9/93)

0 95 4 04 33 7 4 9 1 8 8 8 5



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

RQ-7

January 4, 1995

Mardie Prezioso, Treasurer
West Virginia State Democratic
Executive Committee
405 Capitol Street, Ste. 501
Charleston, WV 25301

Identification Number: C00162578

Reference: 30 Day Post-General Report (10/1/94-11/28/94)

Dear Ms. Prezioso:

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

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

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

If you have any questions, please contact Stephen Cohen on our toll-free number (800) 424-9530. Our local number is (202) 219-3580.

Sincerely,

A handwritten signature in cursive script, appearing to read "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division

TELECON

ANALYST: Stephen Cohen

CONVERSATION WITH: Debbie McCormick, Executive Director
PH# (304) 342-8121

COMMITTEE: West Virginia State Democratic Executive Committee
(C00162578)

DATE: February 2, 1995

SUBJECT(S): Late Filing of 1994 30 Day Post General Report

The analyst called Ms. McCormick to discuss non-filing of the 30 Day Post General and Year End Reports. Ms. McCormick was advised that the 30 Day Post General Report needed to be filed with the Commission by February 3, 1995. The analyst suggested sending the reports certified mail. Ms. McCormick replied that both reports would be filed with the Commission by February 3, 1995.

95043701279

REPORT OF RECEIPTS AND DISBURSEMENT

ATTACHMENT 22
1995 30 DAY POST GENERAL REPORTFor Other Than An Authorized Committee
(Summary Page)

Feb 19 14 1995

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full)

West Virginia State Democratic Executive Committee

ADDRESS (number and street)

Check if different than previously reported

105 Canal Street, Suite 201

CITY, STATE and ZIP CODE

Charleston WV 25301

2. FEC IDENTIFICATION NUMBER

000162578

3. ☐ This committee has qualified as a multicandidate committee. (see FEC FORM 104)

4. TYPE OF REPORT

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

Monthly Report Due On:

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

(Type of Election)

election on _____ in the State of _____

☐ Thirtieth day report following the General Election on

_____ in the State of _____

(b) Is this Report an Amendment?

☐ YES☒ NO

SUMMARY

5. Covering Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
10-1-94 through 11-28-94		
6. (a) Cash on Hand January 1, 1994		\$
(b) Cash on Hand at Beginning of Reporting Period	\$ 3243.15	
(c) Total Receipts (from Line 10)	\$ 69,314.98	\$
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 72,608.13	\$
7. Total Disbursements (from Line 20)	\$ 29,988.90	\$
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 42,619.23	\$
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 21,183.26	

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

Type or Print Name of Treasurer

MARIE PEZIOSO

Signature of Treasurer

Marie Pezioso

Date

1/31/95

For further information contact:
Federal Election Commission
800 E Street, NW
Washington, DC 20463
Toll Free 800-424-6860
Local 202-510-6420

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

--	--	--	--	--	--	--	--	--	--

FEC FORM 3X

(revised 8/93)

9 59 5403379061520 8070

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

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

JUN 28 9 36 AM '95

FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

RAD Referral: 95L-6
Date Activated: 6/1/95
Staff: Eugene Bull

SOURCE: INTERNALLY GENERATED

RESPONDENTS: West Virginia State Democratic Executive Committee
and Marie Prezioso, as treasurer

RELEVANT STATUTES: 2 U.S.C. § 434(a)(4)(A)(i)
2 U.S.C. § 434(a)(4)(A)(iii)
2 U.S.C. § 434(b)(1)
2 U.S.C. § 434(b)(2)
2 U.S.C. § 434(b)(4)

INTERNAL REPORTS CHECKED: Disclosure Reports
Referral Materials

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Office of the General Counsel received a referral from the Reports Analysis Division ("RAD") on March 2, 1995. Attachment 1. The basis of the attached referral is the failure of the West Virginia State Democratic Executive Committee (the "Committee") to correct a cash discrepancy of \$62,038.39 between the ending cash balance of the amended 1994 April Quarterly Report and the beginning cash balance of the July Quarterly Report. In addition, the Committee failed to file timely the 1994 October Quarterly and 30 Day Post General Reports. It should also be noted that as of this date, the cash discrepancy between the April and July Quarterly Reports is still unresolved.

95043701201

II. FACTUAL AND LEGAL ANALYSIS

Based on the Factual and Legal Analysis, see Attachment 2, this office recommends the Commission find reason to believe the Respondents violated 2 U.S.C. §§ 434(a)(4)(a)(i), (iii); and 2 U.S.C. § 434(b).

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

This Office also recommends that the Commission offer to enter into conciliation with the Respondents prior to a finding of probable cause to believe. Attached for the Commission's approval is a proposed conciliation agreement.

95043701232

950437012B3

III. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that West Virginia State Democratic Executive Committee and Marie Prezioso, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (iii); and 2 U.S.C. § 434(b) and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the attached Factual and Legal Analysis, conciliation agreement, and the appropriate letter.

Lawrence M. Noble
General Counsel

Date

6/27/95

BY:


Lois G. Lerner
Associate General Counsel

Attachments:

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

95043701204



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20461

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/BONNIE J. ROSS 
COMMISSION SECRETARY

DATE: JUNE 29, 1995

SUBJECT: RAD REFERRAL #95L-6 - FIRST GENERAL COUNSEL'S REPORT
DATED JUNE 27, 1995.

The above-captioned document was circulated to the
Commission on Wednesday, June 28, 1994 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	<u>XXX</u>
Commissioner McDonald	<u>XXX</u>
Commissioner McGarry	_____
Commissioner Potter	_____
Commissioner Thomas	_____

This matter will be placed on the meeting agenda
for Tuesday, July 18, 1995.

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

95043701205

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
West Virginia State Democratic)
Executive Committee and)
Marie Prezioso, as treasurer)

RAD Referral #95L-6

(MUR 4234)

CORRECTED CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on July 18, 1995, do hereby certify that the Commission decided by a vote of 4-1 to take the following actions with respect to RAD Referral #95L-6:

1. Open a MUR.
2. Find reason to believe that West Virginia State Democratic Executive Committee and Marie Prezioso, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (iii); and 2 U.S.C. § 434(b) and enter into conciliation prior to a finding of probable cause to believe.

(continued)

95043701236

3. Approve the Factual and Legal Analysis, conciliation agreement, and the appropriate letter as recommended in the General Counsel's June 27, 1995 report

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

Attest:

7-31-95

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

95043701237



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

July 20, 1995

West Virginia State Democratic
Executive Committee
Marie Prezioso, Treasurer
405 Capital Street, Ste. 501
Charleston, WV 25301

RE: MUR 4234
West Virginia State Democratic
Executive Committee and
Marie Prezioso, as Treasurer

Dear Ms. Prezioso:

On July 18, 1995, the Federal Election Commission found that there is reason to believe that West Virginia State Democratic Executive Committee and you, as treasurer, violated 2 U.S.C. §§ 434a(4)(A)(i), 434a(4)(A)(iii) and 434(b), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

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 additional information, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

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

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

95043701238

Marie Prizioso, Treasurer
Page 2

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

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

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

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Eugene Bull, the staff member assigned to this matter, at (202) 219-3400.

Sincerely,

Danny L. McDonald
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Conciliation Agreement

95043701239

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 4234

RESPONDENTS: West Virginia Democratic Executive Committee
Marie Prezioso, as treasurer

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2).

The Federal Election Campaign Act of 1971 (the "Act"), as amended, requires treasurers of political committees to file periodic reports of receipts and disbursements. 2 U.S.C. § 434(a)(1). Political committees may chose to file reports either on a monthly or a quarterly basis. 2 U.S.C. § 434(a)(4)(A).

In any calendar year in which a regularly scheduled general election is held, committees that choose to file on a quarterly basis shall file quarterly reports no later than the 15th day after the last day of each calendar quarter. 2 U.S.C.

§ 434(a)(4)(A)(i). Such committees shall also file a post-general election report, which shall be filed no later than the 30th day after the general election and which shall be complete as of the 20th day after such general election. 2 U.S.C.

§ 434(a)(4)(A)(iii).

The West Virginia State Democratic Executive Committee and Marie Prezioso, as treasurer, is a political committee not

95043701290

authorized by any candidate, which has elected to file reports on a quarterly basis.

Pursuant to 2 U.S.C. §§ 434(b)(1) and (2), each report shall disclose the total amount of cash on hand at the beginning of the reporting period; and the total amount of all receipts for the reporting period and the calendar year, including the total amount of receipts in certain enumerated categories as set forth in 2 U.S.C. §§ 434(b)(2)(A) through (K). Additionally, 2 U.S.C. § 434(b)(4) requires that the total amount of all disbursements, including the total amount of disbursements in certain enumerated categories set forth in 2 U.S.C. §§ 434(b)(4)(A) through (I), be disclosed in the quarterly report.

The committee disclosed an ending cash balance of \$72,146.62 on the Amended 1994 April Quarterly report and a beginning cash balance of \$9,108.23 on the 1994 July Quarterly report, resulting in a cash discrepancy equal to \$62,038.39. Despite representations, beginning in March of 1994, by various committee staff that the source of the discrepancy was being investigated, as of this date, the Committee has not corrected the cash discrepancy.

Pursuant to 2 U.S.C. §§ 434(a)(4)(A)(i) and (iii), the due date for the Committee's 1994 October Quarterly report was October 15, 1994 and the due date for the Committee's Post General Report was December 8, 1994. On December 8, 1994, the Committee filed the October Quarterly report, 54 days late. The Commission later received the Committee's 30 Day Post General Report of Receipts and Disbursements on February 7, 1995, 61 days late.

05043701291

Based on the foregoing, there is reason to believe that the West Virginia Democratic Executive Committee and Marie Prezioso violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (iii); and 2 U.S.C. § 434(b).

95043701292

LAW OFFICES
GOODWIN & GOODWIN
 P. O. BOX 2007
 1500 ONE VALLEY SQUARE
 CHARLESTON, WEST VIRGINIA 25302-2007
 304/244-7000
 TELESCOPIER 304/244-0000

201 THIRD STREET
 PARKERSBURG, WEST VIRGINIA 26101
 304/460-2500

P. O. BOX 2007
 1500 ONE VALLEY SQUARE
 CHARLESTON, WEST VIRGINIA 25302-2007
 304/244-7000

REPLY TO:

Charleston

August 10, 1995

VIA TELECOPY (202) 219-3923
Federal Election Commission
 Attn: Mr. Eugene Bull
 Washington, DC 20463

Re: MUR 4234
 West Virginia State Democratic
 Executive Committee and Marie
 Prezioso, as Treasurer

Gentlemen:

Enclosed is a Statement of Designation of Counsel with respect to the above matter. This is to request a twenty (20) day extension with respect to our response to your July 20, 1995 letter addressed to the West Virginia State Democratic Executive Committee. Such request is based upon the following:

1. Offices of the West Virginia State Democratic Executive Committee were closed periodically during the summer and as a consequence the July 20, 1995 letter was not opened for several days; and
2. The party having personal knowledge of the location of records necessary to respond to your letter is presently out of the area and will be unavailable until the week of August 14th.

We appreciate your consideration of our request for an extension and await your response.

Yours truly,



Steven F. White

SFW/bjr

95043701293

REPORT OF DESIGNATION OF COUNSELNR 4234NAME OF COUNSEL: STEVEN F WHITEADDRESS: 1500 One Valley Square
Charleston, WV 25301TELEPHONE: (304) 346-7000

Aug 11 8 10 AM '95

RECEIVED
WEST VIRGINIA
LEGISLATURE
CLERK
JUL 28 1995

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

August 10, 1995
DateMarie A. Papp Treasurer
Benny E. Lamberson Chairman
SignatureRESPONDENT'S NAME: West Virginia State Democratic Executive CommitteeADDRESS: 405 Capitol Street
Suite 501.Charleston WV 25301HOME PHONE: (304)BUSINESS PHONE: (304) 342-8121

95043701204



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 15, 1995

VIA FACSIMILE AND FIRST CLASS MAIL

Steven F. White, Esq.
Goodwin & Goodwin
P. O. Box 2107
1500 One Valley Square
Charleston, West Virginia 25328-2107

Re: MUR 4234
West Virginia State Democratic
Executive Committee, and
Marie Prezioso, as treasurer

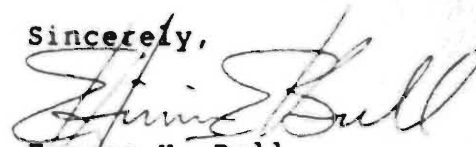
Dear Mr. White:

This is a response to your letter of July 31, 1995, requesting a 20 day extension to respond to the Commission's reason to believe finding. After considering the circumstances presented in your letter, the Office of General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on Wednesday, August 30, 1995.

As noted in our July 20, 1995 letter to you, pre-probable cause conciliation negotiations are limited to 30 days. Consequently, please indicate at the time of your response whether you are interested in conciliating this matter prior to a finding of probable cause.

If you have any questions, I can be reached at (202) 219-3690.

Sincerely,



Eugene H. Bull
Law Clerk

95043701295

LAW OFFICES
GOODWIN & GOODWIN
P. O. BOX 4107
1500 ONE VALLEY SQUARE
CHARLESTON, WEST VIRGINIA 25326-2107
304/346-7000
TELECOPIER 304/344-9992

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

Sep 6 11 23 AM '95

201 THIRD STREET
FARMERSBURG, WEST VIRGINIA 26041
304/485-2346

P.O. BOX 349
500 CHURCH STREET
REPLBY, WEST VIRGINIA 26071
304/378-5611

REPLY TO:

Charleston

August 29, 1995

VIA TELECOPY (202) 219-3923
Federal Election Commission
Attn: Mr. Eugene Bull
Washington, DC 20463

Re: MUR 4234
West Virginia State Democratic
Executive Committee and Marie
Prezioso, as Treasurer

Gentlemen:

This is in response to your letter of July 20, 1995 to the West Virginia State Democratic Executive Committee (the "Committee"). By letter dated August 15, 1995 the Committee's response time was extended until Wednesday, August 30, 1995.

Your letter cited a cash discrepancy equal to \$62,038.39. The Committee has made an extended good faith effort to ascertain the reason for the discrepancy. The Committee's efforts have been hampered by the fact that there have been numerous personnel changes during the relevant time period. Nonetheless, the Committee has made substantial progress in this area.

It appears that most of the discrepancy, approximately \$40,000, relates to legitimate expenditures made from a separate federal transfer account that were inadvertently not reported. Copies of these checks are enclosed. It appears that most of the remaining discrepancy may be attributable to mathematical errors. The Committee is continuing its efforts to gather documentation and will agree to amend disclosure reports as necessary.

The Committee's 1994 October Quarterly Report and 30 Day Post General Reports were not timely filed due to the fact that both the Committee's State Chair and Executive Director changed in July,

05043701296

GOODWIN & GOODWIN

Federal Election Commission
Attn: Mr. Eugene Bull
August 29, 1995
Page Two

1994. The party was without any staff for a month, and the new Executive Director was hampered by the fact that her successor had moved out of town and was unavailable to assist in the preparation of the FEC reports or determining the discrepancy. In addition, the first report was due October 15, 1994 the date of the Committee's annual fundraising dinner for 1500 people, which had been scheduled long before the employment of the new Executive Director and which required extensive effort on her part. Further, the Committee was implementing a new computerized accounting system which would enable it in the future to maintain a precise record of all transactions.

Because of these personnel changes and other demands, the Committee was in communication with Mr. Stephen Cohen of the Commission and explained that it was having difficulty in preparing the reports on a timely basis and desired to file accurately when it did so. The Committee also explained that it was interested in finding the discrepancy and was making efforts to do so. Indeed, the Committee hoped to resolve the discrepancy so that the reports it filed would be based on an accurate cash on hand balance, and was reluctant to file reports that were based on erroneous information.

Yours truly,



Steven F. White

SFW/bjr
Enclosures

95043701297

2 6 8

VICTORY 92 DNC FEDERAL 1 YR +
TRANSFER ACCOUNT
405 CAPITAL ST SUITE 501
CHARLESTON WV 25301-1727

PAY TO THE ORDER OF DENISE SMITH
FIVE HUNDRED SEVENTY THREE AND 67/100
\$573 67/100

11/13 '92

FOR: Christophe K. Saunders
Payroll Till 11/5/92

119

VICTORY 92 DNC FEDERAL 1 YR +
TRANSFER ACCOUNT
405 CAPITAL ST SUITE 501
CHARLESTON WV 25301-1727

PAY TO THE ORDER OF Chris Saunders
ONE HUNDRED TWENTY ONE AND 66/100
\$121 66/100

11/12 '92

117

VICTORY 92 DNC FEDERAL 1 YR +
TRANSFER ACCOUNT
405 CAPITAL ST SUITE 501
CHARLESTON WV 25301-1727

PAY TO THE ORDER OF UPS
NINE AND 10/100
\$9 10/100

11/2 '92

116

Christophe K. Saunders

VICTORY 92 DNC FEDERAL 1 YR +
TRANSFER ACCOUNT
405 CAPITAL ST SUITE 501
CHARLESTON WV 25301-1727

PAY TO THE ORDER OF Mardell
THREE HUNDRED AND NO/100
\$300 00/100

11/13 '92

113

Christophe K. Saunders

VICTORY 92 DMC FEDERAL 1 YR +
 TRANSFER ACCOUNT
 405 CAPITAL ST. SUITE 501
 CHARLESTON, WV 25301-1721

MY TO THE ORDER OF
 WUDSC - Victory 92 0244881 \$21,500.00
 Twenty one thousand and no/100
 11/2

112

VICTORY 92 DMC FEDERAL 1 YR +
 TRANSFER ACCOUNT
 405 CAPITAL ST. SUITE 501
 CHARLESTON, WV 25301-1721

MY TO THE ORDER OF
 Chris Sowards
 Four hundred and no/100
 11/27 '92 \$400.00

122

VICTORY 92 DMC FEDERAL 1 YR +
 TRANSFER ACCOUNT
 405 CAPITAL ST. SUITE 501
 CHARLESTON, WV 25301-1721

MY TO THE ORDER OF
 Chris Sowards
 \$44,400.00
 11/27 '92 \$84.57/c

121

VICTORY 92 DMC FEDERAL 1 YR +
 TRANSFER ACCOUNT
 405 CAPITAL ST. SUITE 501
 CHARLESTON, WV 25301-1721

MY TO THE ORDER OF
 Adata
 Thirty Seven Thousand five hundred
 10/27 '92 \$37,500.00

111

602102210570

OCT 24 9 26 AM '95

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
West Virginia State Democratic) MUR 4234
Executive Committee and)
Marie Prezioso, as treasurer)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a revised conciliation agreement submitted on behalf of the West Virginia State Democratic Committee ("the Committee") and Marie Prezioso, as treasurer; (together "the Respondents"). Attachment 1. It has been signed by George Carenbauer, as Chair of the Committee. For the reasons discussed below, this Office recommends that the Commission accept the revised agreement and close the file in this matter. A check for twenty-five hundred dollars (\$2500), representing the first installment on the civil penalty, has been received. Attachment 5.

II. Discussion of Pre-Probable Cause Conciliation

1. The payment terms provide for \$2500 due at the time Respondents return a signed conciliation agreement and thereafter, beginning 30 days after the effective date of the conciliation

95043701300

95043701301

For the reasons stated above and in the interest of settling this matter, this Office recommends that the Commission accept the revised conciliation agreement signed by the Respondents and close the file in this matter.

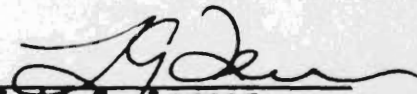
III. RECOMMENDATIONS

1. Accept the attached conciliation agreement with the West Virginia State Democratic Executive Committee and Marie Prezioso, as treasurer.
2. Approve the appropriate letter.
3. Close the file.

Lawrence M. Noble
General Counsel

10/23/95
Date

BY:


Lois G. Lerner
Associate General Counsel

Attachments

1. Conciliation Agreement
2. Response dated August 29, 1995
3. The Committee's August 1995 bank statement
4. Letter to Respondents' counsel
5. Check for first installment on civil penalty

Staff Assigned: Eugene Bull

95043701302

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
West Virginia State Democratic) MUR 4234
Executive Committee and)
Marie Prezioso, as treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 27, 1995, the Commission decided by a vote of 5-0 to take the following actions in MUR 4234:

1. Accept the conciliation agreement with the West Virginia State Democratic Executive Committee and Marie Prezioso, as treasurer, as recommended in the General Counsel's Report dated October 23, 1995.
2. Approve the appropriate letter, as recommended in the General Counsel's Report dated October 23, 1995.
3. Close the file.

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

Attest:

10-27-95
Date

Deborah Hardy
for Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Tues., Oct. 24, 1995 9:26 a.m.
Circulated to the Commission: Tues., Oct. 24, 1995 4:00 p.m.
Deadline for vote: Fri., Oct. 27, 1995 4:00 p.m.

lrd

95043701303



FEDERAL ELECTION COMMISSION
Washington, DC 20463

November 9, 1995

Steven F. White, Esq.
Goodwin & Goodwin
P. O. Box 2107
1500 One Valley Square
Charleston, WV 25328-2107

RE: MUR 4234
West Virginia State Democratic
Executive Committee and
Marie Prezioso, as treasurer

Dear Mr. White:

On October 27, 1995, the Federal Election Commission accepted the signed conciliation agreement and the initial payment of the civil penalty submitted on your client's behalf in settlement of violations of 2 U.S.C. §§ 434(a)(4)(A)(i), 434(a)(4)(A)(iii), and 434(b), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Accordingly, the file has been closed in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

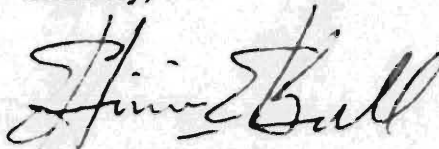
Information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

95043701304

Steven F. White, Esq.
Page 2

Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that the next installment of the civil penalty is due within 30 days of the conciliation agreement's effective date. If you have any questions, please contact me at (202) 219-3400.

Sincerely,

A handwritten signature in cursive script, appearing to read "Eugene H. Bull".

Eugene H. Bull
Law Clerk

Enclosure
Conciliation Agreement

95043701305

BENIGN THE FEDERAL ELECTION COMMISSION

In the Matter of)
West Virginia State Democratic) MUR 4234
Executive Committee and)
Marie Presioso, 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 West Virginia State Democratic Executive Committee and Marie Presioso, as treasurer, ("Respondents") violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (iii); 2 U.S.C. § 434(b).

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

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

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

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

SEP 27 11 57 AM '95
RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

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

1. West Virginia State Democratic Executive Committee is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Marie Prezioso is the treasurer of West Virginia State Democratic Executive Committee.

3. In a calendar year in which a regularly scheduled general election is held, political committees that elect to file quarterly reports shall file their reports no later than the 15th day after the last day of each calendar quarter. 2 U.S.C. § 434(a)(4)(A)(i). Such political committees shall also file a pre-general election report no later than the 12th day before any election in which the committee makes a contribution to or expenditure on behalf of a candidate, and which shall be complete as of the 20th day before the election. 2 U.S.C. § 434(a)(4)(A)(ii).

Such political committees also shall file a post-general election report, to be filed no later than the 30th day after the general election and to be completed as of the 20th day after a general election. 2 U.S.C. § 434(a)(4)(A)(iii).

4. Respondents have elected to file quarterly reports with the Commission.

5. Pursuant to 2 U.S.C. § 434(a)(4)(A)(i), the due date for Respondents' 1994 October Quarterly report was October 15, 1994. On December 8, 1994, Respondents filed the October Quarterly report, 54 days late, disclosing receipts totaling \$15,637.73 and disbursements totaling \$13,175.31 for the time period covered by the report.

6. Pursuant to 2 U.S.C. § 434(a)(4)(A)(iii) the due date for Respondents' 30 Day Post General Report was December 8, 1994.

95043701307

Respondents filed the 30 Day Post General Report of Receipts and Disbursements on February 7, 1995, 61 days late, disclosing receipts totaling \$69,364.98 and disbursements totaling \$29,988.08 for the time period covered by the report.

7. Pursuant to 2 U.S.C. §§ 434(b)(1) and (2), each report shall disclose the total amount of cash on hand at the beginning of the reporting period, and the total amount of all receipts for the reporting period and the calendar year, including the total amount of receipts in certain enumerated categories as set forth in 2 U.S.C. §§ 434(b)(2)(A) through (K). Additionally, 2 U.S.C. § 434(b)(4) requires that the total amount of all disbursements, including the total amount of disbursements in certain enumerated categories set forth in 2 U.S.C. §§ 434(b)(4)(A) through (I), be disclosed in the quarterly report.

8. Respondents disclosed an ending cash balance of \$72,146.62 on the Amended 1994 April Quarterly report and a beginning cash balance of \$9,108.23 on the 1994 July Quarterly report, resulting in a cash discrepancy equal to \$62,038.39. As of the time of this agreement, Respondents have not corrected the cash discrepancy.

V.

1. Respondents failed to report accurately all receipts and disbursements in violation of 2 U.S.C. § 434(b), resulting in a cash discrepancy between the ending cash balance on the Amended 1994 April Quarterly Report and the beginning cash balance on the 1994 July Quarterly Report.

2. Respondents failed to file timely their 1994 October Quarterly Report in violation of 2 U.S.C. § 434(a)(4)(A)(i).

95043701308

3. Respondents failed to file timely their 1994 30 Day Post General Report in violation of 2 U.S.C. § 434(a)(4)(A)(iii).

VI.

1. Respondents will pay a civil penalty to the Federal Election Commission in the amount of ten thousand dollars (\$10,000) pursuant to 2 U.S.C. § 437g(a)(5)(A), such penalty to be paid as follows:

A. One initial payment of \$2500, due at the time the conciliation agreement is returned with Respondent's signature;

B. Thereafter, beginning 30 days after the effective date of the conciliation agreement, 3 consecutive monthly installment payments of \$2500 each.

C. In the event that any installment payment is not received by the commission by the fifth day after which it becomes due, the Commission may, at its discretion, accelerate the remaining payments and cause the entire amount to become due upon ten days written notice to the respondents. Failure by the Commission to accelerate the payments with regard to any overdue installment shall not be construed as a waiver of its right to do so with regard to future overdue installments.

2. Respondents shall provide an explanation of the \$62,038.39 cash discrepancy described in Paragraph IV.8 and amend their disclosure reports as necessary at the end of the ongoing Commission audit.

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

95043701309

relief in the United States District Court for the District of Columbia.

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

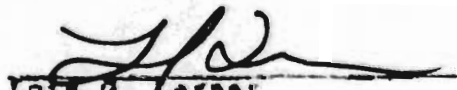
IX. Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

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

FOR THE COMMISSION:

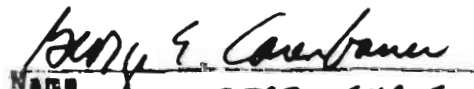
Lawrence M. Noble
General Counsel

BY:


Lois G. Lerner
Associate General Counsel

11/8/95
Date

FOR THE RESPONDENTS:


Name
Position STATE CHAIR

SEPTEMBER 22, 1995
Date

95043701310

WV STATE DEMOCRATIC EXECUTIVE COMMITTEE

FEDERAL ACCOUNT
405 CAPITOL STREET SUITE 501
CHARLESTON, WEST VIRGINIA 25301
(304) 342-8121

BANK ONE
CHARLESTON, WEST VIRGINIA

5033

69-36/519

9/22/95

PAY
TO THE
ORDER OF

Federal Election Commission

\$ **2,500.00

Two Thousand Five Hundred and 00/100*****

DOLLARS

Federal Election Commission
999 E Street, NW
Washington DC 20463


AUTHORIZED SIGNATURE

MEMO

1st of 4 monthly payments

⑈005033⑈ ⑆051900366⑆ 02⑈2433⑈8⑈

9 5 0 4 3 7 0 1 3 1 1

WV STATE DEMOCRATIC EXECUTIVE COMMITTEE

FEDERAL ACCOUNT
405 CAPITOL STREET SUITE 501
CHARLESTON, WEST VIRGINIA 25301
(304) 342-8121

BANK ONE
CHARLESTON, WEST VIRGINIA

5061

69-36/519

10/22/95

PAY
TO THE
ORDER OF

Federal Election Commission

Two Thousand Five Hundred and 00/100*****

500.00
RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
OCT 23 2 40 PM '95

Benny E. Carver
AUTHORIZED SIGNATURE

MEMO

2nd of 4 monthly payments

⑈005061⑈ ⑆051900366⑆ 02-2433-8⑈

95043701312



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 4234

DATE FILMED 12-12-95 CAMERA NO. 2

CAMERAMAN JMN

05043701313