



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 4344

DATE FILMED 5-14-96 CAMERA NO. 4

CAMERAMAN JmH

96043734170

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: October 12, 1995ANALYST: Jacques P. Andre'

I. COMMITTEE:

D.C. Republican Committee Federal
Campaign Committee (C00191288)
Roger Moffatt, Treasurer
(8/29/95 - Present)
Robert Thomas Richards, Esq., Treasurer
(8/1/93 - 8/28/95)
440 First Street NW, #301
Washington, DC 20001

II. RELEVANT STATUTE:

2 U.S.C. §434(a)(4)(A)(iv)
11 CFR §104.5(c)(2)(i)(A)

III. BACKGROUND:

Failure to Timely File the 1995 Mid-Year Report

D.C. Republican Committee Federal Campaign Committee ("the Committee") has failed to file the 1995 Mid-Year Report of Receipts and Disbursements covering the period from January 1, 1995 to June 30, 1995. The Committee was notified on July 7, 1995 that the report was due on July 31, 1995 (Attachment 2). A Non-Filer Notice was sent to the Committee on August 17, 1995 (Attachment 3).

On August 21, 1995, the Committee sent a letter to the Commission stating the Mid-Year Report would have to be late due to the loss of the treasurer, hospitalization of the report preparer and database crash (Attachment 4).

On September 12, 1995, the Reports Analysis Division ("RAD") analyst called and left a message for the treasurer, Mr. Roger Moffatt. The analyst told Mr. Moffatt's office that the 1995 Mid-Year Report had not been received at the Commission. Later that day Julie Finley, Chairperson for the D.C. Republican Party, returned the analyst's call stating that they were having computer problems. The analyst left a further message emphasizing the urgency of filing the report as soon as possible (Attachment 5).

On September 26, 1995, the Committee filed the 1995 Mid-Year Report (Attachment 6).

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DATE 11OCT95

FEDERAL ELECTION COMMISSION
1993-1994

COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
						TYPE OF FILER
D C REPUBLICAN COMMITTEE FEDERAL CAMPAIGN COMMITTEE						
CONNECTED ORGANIZATION: NONE						
ID #C00191288 PARTY QUALIFIED						
1993	PILING FREQUENCY CHANGE NOTICE			1MAR93	3	93PEC/830/3727
	ACKNOWLEDGEMENT OF PILING FREQUENCY CHANGE			2MAR93	1	93PEC/330/3726
	STATEMENT OF ORGANIZATION - AMENDMENT			10AUG93	3	93PEC/856/1786
	MID-YEAR REPORT	46,376	40,789	1JAN93 - 30JUN93	20	93PEC/856/1789
	MID-YEAR REPORT - AMENDMENT	46,376	40,789	1JAN93 - 30JUN93	21	94PEC/888/3060
	1'ST LETTER INFORMATIONAL NOTICE			1JAN93 - 30JUN93	2	94PEC/886/5369
	1'ST LETTER INFORMATIONAL NOTICE			1JAN93 - 30JUN93	2	94PEC/306/2179
	YEAR-END	25,173	32,305	1JUL93 - 31DEC93	20	94PEC/878/4240
	YEAR-END - AMENDMENT	25,173	32,305	1JUL93 - 31DEC93	20	94PEC/887/1715
	YEAR-END - AMENDMENT	-	-	1JUL93 - 31DEC93	8	94PEC/887/1707
	REQUEST FOR ADDITIONAL INFORMATION			1JUL93 - 31DEC93	3	94PEC/886/4214
1994	APRIL QUARTERLY	14,611	14,025	1JAN94 - 31MAR94	19	94PEC/889/2021
	JULY QUARTERLY	4,536	5,610	1APR94 - 30JUN94	10	94PEC/907/1918
	JULY QUARTERLY - AMENDMENT	4,536	5,610	1APR94 - 30JUN94	6	94PEC/920/3634
	REQUEST FOR ADDITIONAL INFORMATION			1APR94 - 30JUN94	2	94PEC/920/0761
	PRE-PRIMARY	1,510	1,522	1JUL94 - 1SEP94	7	94PEC/920/3627
	OCTOBER QUARTERLY	8,660	8,038	1JUL94 - 1OCT94	12	94PEC/926/5033
	OCTOBER QUARTERLY - AMENDMENT	10,070	8,038	1JUL94 - 30SEP94	12	95PEC/968/1188
	REQUEST FOR ADDITIONAL INFORMATION			1JUL94 - 30SEP94	3	95PEC/971/1719
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL94 - 30SEP94	3	95PEC/975/3268
	1'ST LETTER INFORMATIONAL NOTICE			1JUL94 - 1OCT94	2	94PEC/944/3894
	PRE-GENERAL	2,165	2,175	2OCT94 - 28OCT94	5	94PEC/941/0884
	PRE-GENERAL - AMENDMENT	0	1,087	1OCT94 - 19OCT94	6	95PEC/968/1200
	REQUEST FOR ADDITIONAL INFORMATION			1OCT94 - 19OCT94	2	95PEC/971/1722
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT94 - 19OCT94	3	95PEC/975/3271
	1'ST LETTER INFORMATIONAL NOTICE			2OCT94 - 28OCT94	2	94PEC/944/3892
	POST-GENERAL	0	284	29OCT94 - 17NOV94	7	94PEC/946/3496
	POST-GENERAL - AMENDMENT	0	409	20OCT94 - 28NOV94	7	95PEC/968/1206
	1'ST LETTER INFORMATIONAL NOTICE			29OCT94 - 17NOV94	3	94PEC/954/1103
	YEAR-END	0	0	29NOV94 - 31DEC94	7	95PEC/961/1599
	REQUEST FOR ADDITIONAL INFORMATION			29NOV94 - 31DEC94	2	95PEC/967/1371
TOTAL		102,276	0 103,785	0	223	TOTAL PAGES

All Reports Have Been Reviewed.

Ending Cash-on-Hand as of 12/31/94: \$600

Debts and Obligations Owed to the Committee: \$0

Debts and Obligations Owed by the Committee: \$0

FEDERAL ELECTION COMMISSION
1993-1996
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 11OCT95

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
				TYPE OF FILER		
D C REPUBLICAN COMMITTEE FEDERAL CAMPAIGN COMMITTEE						
CONNECTED ORGANIZATION: NONE						
1995	MISCELLANEOUS REPORT TO FEC			29NOV95	2	95PEC/996/0989
	STATEMENT OF ORGANIZATION - AMENDMENT			5SEP95	2	95PEC/996/2905
	MID-YEAR REPORT	22,829	19,629	1JAN95 - 30JUN95	10	95PEC/998/4782
	NOTICE OF FAILURE TO FILE			1JAN95 - 30JUN95	2	95PEC/994/2855
	TOTAL	22,829	0	19,629	0	16 TOTAL PAGES

All Reports Have Been Reviewed.

Ending Cash-on-Hand as of 6/30/95: \$3801

Debts and Obligations Owed to the Committee as of 6/30/95: \$0

Debts and Obligations Owed by the Committee as of 6/30/95: \$0

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SEMI-ANNUAL REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

July 7, 1995

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Mid-Year	01/01/95 - 06/30/95	07/31/95	07/31/95

WHO MUST FILE

Party committees and PACs (nonconnected committees and separate segregated funds) which normally file on a quarterly basis must file a Mid-Year Report in July.

INDEPENDENT EXPENDITURES

Any PAC that makes independent expenditures in connection with a special 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 20th day, but more than 24 hours, before the election.

CHANGE IN FILING FREQUENCY

Committees wishing to change their reporting schedule (for example, from semiannual to monthly) must notify the Commission in writing when filing a 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.

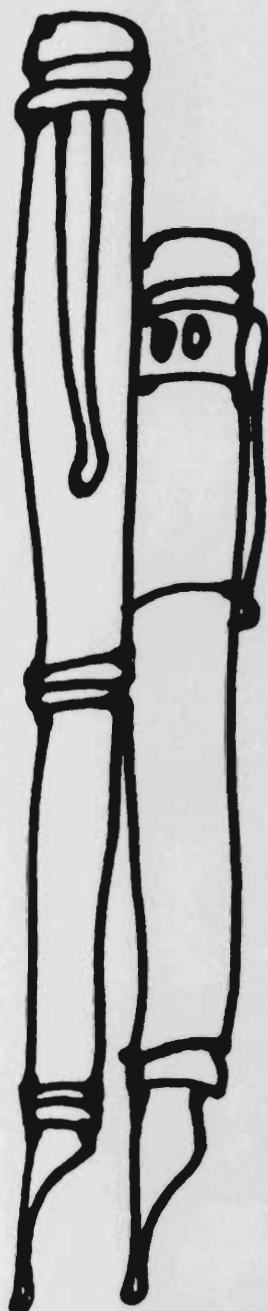
COMPLIANCE

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 (except for FEC approved computer generated forms) will be required to refile.

*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

**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: 800/424-9530 or 202/219-3420



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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-7

August 17, 1995

Robert Thomas Richards, Esq.
D.C. Republican Committee
Federal Campaign Committee
440 First Street N.W. Third Floor
Washington, DC 20001

Identification Number: C00191288

Reference: 1995 Mid-Year Report (1/1/95-6/30/95)

Dear Mr. Richards:

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 J.P. Andre' on our toll-free number (800) 424-9530. Our local number is (202) 219-3580.

Sincerely,

A handwritten signature in dark ink, appearing to read "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

9604334175



District of Columbia Republican Committee

Julie Finley
Chairman

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIN ROOM

AUG 23 9 23 AM '95

August 21, 1995

Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: 1995 Mid-Year Report (1/1/95-6/30/95) ID#C00191288

Dear Commissioners:

The report for the past period due you will have to be late. I beg your understanding.

The D.C. Republican Committee's Treasurer relocated to Richmond last month to serve with Governor Allen.

The D.C. Republican Committee's Executive Director, who normally prepares the reports, has been in the hospital for nearly two months.

Our database crashed in June and was sent off to be corrected by the Executive Director, who is in the hospital. The database is expected back soon.

Needless to say, and as if we didn't have a struggle to begin with (!), we are, presently, having some problems.

I hope you will respect our situation and permit us some breathing room.

Sincerely,

Julie Finley

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TELECON

ANALYST: JACQUES P. ANDRE', JR.
CONTACT: MR. ROGER MOFFATT'S OFFICE (SECRETARY)
COMMITTEE: D.C. REPUBLICAN COMMITTEE FEDERAL CAMPAIGN
COMMITTEE
DATE: SEPTEMBER 12, 1995
SUBJECT: 1995 MID-YEAR REPORT

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The analyst called at 9:34 a.m. and left message with the Treasurer's secretary to please have him return the analyst's call. At 10:27 a.m. Julie Finley, Chairperson of the Committee, returned the call. The analyst called Julie Finley and left a message that the 1995 Mid-Year Report was overdue and the FEC required the Report as soon as possible. Julie Finley returned earlier call at 1:10 p.m. and left message for the analyst that the Committee was having reporting problems with their computer. At 2:55 p.m. the analyst returned this call and left a message once again stating that it was important the Committee file the Report as soon as possible.

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

SEP 25 10 00 AM '95

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1 NAME OF COMMITTEE (in full)
THE REPUBLICAN COMMITTEE

ADDRESS (number and street) ☐ Check if different than previously reported
440 1ST STREET, NW Suite 301

CITY, STATE and ZIP CODE
WASHINGTON, DC 20001

3. FEC IDENTIFICATION NUMBER
600-191-278

2 ☐ This committee has qualified as a non-federally
committee (see FEC FORM 100)

4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year End Report

☒ July 31 M-1 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	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6	(a) Cash on Hand January 1, 19__		\$ 600.23
	(b) Cash on Hand at Beginning of Reporting Period	\$ 600.23	
	(c) Total Receipts (from Line 10)	\$ 22,829.96	\$ 22,829.96
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 23,430.19	\$ 23,430.19
7	Total Disbursements (from Line 20)	\$ 19,629.16	\$ 19,629.16
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 3,801.03	\$ 3,801.03
9	Debits and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 0	For further information contact: Federal Election Commission 600 E Street, NW Washington, DC 20420 Tel: 202-456-6000 Local: 202-219-3400
10	Debits and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 0	

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

Type or Print Name of Treasurer

BOGGS / WINEFAT

Signature of Treasurer

Date

9/15/95

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

FEC FORM 3X
(updated 6/95)

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FEDERAL ELECTION COMMISSION

999 E Street, N.W.
Washington, D.C. 20463

FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

RAD Referral

95NF-29

Date Activated: March 08, 1996

Staff Member: Jeffrey D. Long

SOURCE: INTERNALLY GENERATED

RESPONDENTS:

D.C. Republican Committee Federal Campaign Committee and
Roger Moffat, as treasurer

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Office of General Counsel received from the Reports Analysis Division referrals on April 7, May 3 and October 17, 1995, which have been grouped together to be considered in this report. The basis for the referrals is the respondents' failure to file reports of receipts and disbursements as required by the FECA. Specifically

96043/34179

the D.C. Republican Committee Federal Campaign Committee
failed to file 1995 Mid-Year Report. Subsequent to this Office receiving these RAD Referrals,

the D.C. Republican
Committee filed its Mid-Year Report on September 26, 1995.

II. FACTUAL AND LEGAL ANALYSIS

Based on the Factual and Legal Analyses, see Attachments 3-5, this Office recommends
that the Commission find reason to believe that:

the D.C. Republican
Committee Federal Campaign Committee and Roger Moffat, as treasurer, violated 2 U.S.C.
§ 434(a)(4)(A).

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

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IV. RECOMMENDATIONS

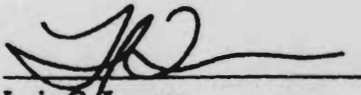
1. Open MUR for 95NF-29.
- 2.
- 3.
- 4.
5. Find reason to believe that the D.C. Republican Committee Federal Campaign Committee and Roger Moffat, as treasurer, violated 2 U.S.C. § 434(a)(4)(A), send an admonishment letter, and close the file.
6. Approve the attached proposed Factual and Legal Analyses and the appropriate letters.

Lawrence M. Noble
General Counsel

26043 / 34181
Date

4/11/96

BY:


Lois G. Lerner
Associate General Counsel

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- 3.

(continued)

Federal Election Commission
Certification for RAD Referral
#95NF-29

Page 2

April 18, 1996

4.

5. Find reason to believe that the D.C. Republican Committee Federal Campaign Committee and Roger Moffat, as treasurer, violated 2 U.S.C. § 434(a)(4)(A), send an admonishment letter, and close the file.
6. Approve the proposed Factual and Legal Analyses and the appropriate letters, as recommended in the General Counsel's Report dated April 15, 1996.

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

Attest:

4/18/96
Date

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

Received in the Secretariat: Mon., April 15, 1996 4:32 p.m.
Circulated to the Commission: Tues., April 16, 1996 11:00 a.m.
Deadline for vote: Fri., April 19, 1996 4:00 p.m.

bjr



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 24, 1996

Roger Moffat, Treasurer
D.C. Republican Committee
Federal Campaign Committee
440 First Street, N.W. #301
Washington, D.C. 20001

RE: MUR 4344
D.C. Republican Committee Federal
Campaign Committee and
Roger Moffat, as treasurer

Dear Mr. Moffat:

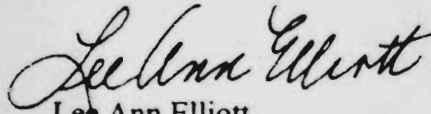
On April 18, 1996, the Federal Election Commission found reason to believe that the D.C. Republican Committee Federal Campaign Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act."). However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed its file. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

The Commission reminds you that failing to file timely the required reports of receipts and disbursements is a violation of 2 U.S.C. § 434. You should take steps to ensure that this activity does not occur in the future.

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.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,


Lee Ann Elliott
Chairman

Enclosure
Factual and Legal Analysis

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: D.C. Republican Committee
Federal Campaign Committee and
Roger Moffat, as treasurer

MUR: 4344

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, as amended ("the Act"), requires that all political committees other than authorized committees of a candidate shall file in any calendar year in which no regularly scheduled election is held, a report covering the period beginning January 1 and ending June 30, which shall be filed no later than July 31. 2 U.S.C. § 434(a)(4)(A)(iv).

According to its Statement of Organization filed with the Commission, the D.C. Republican Committee Federal Campaign Committee (DCRFC) is a Territorial committee of the Republican Party. Roger Moffat is the treasurer of record of the DCRFC.

Pursuant to 2 U.S.C. § 434(a)(4)(A)(iv), the DCRFC was required to file the 1995 Mid-Year Report no later than July 31, 1995. The DCRFC was notified on July 7 that the Mid-Year report was due on July 31, 1995. On August 17, 1995, the Commission sent to the DCRFC a non-filer notice for failing to file the report.

After telephone discussions with the Reports Analysis Division regarding their claims of difficulty in timely filing the report, the DCRFC filed the 1995 Mid-Year Report on September

26, 1995. That report, filed 57 days late, discloses \$22,829 in receipts and \$19,629 in disbursements. Therefore, there is reason to believe the D.C. Republican Committee Federal Campaign Committee and Roger Moffat, as treasurer, violated 2 U.S.C. § 434(a)(4)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 4344

DATE FILMED 5-14-96 CAMERA NO. 4

CAMERAMAN Jmk

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