



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 4626

DATE FILMED 10-14-57 CAMERA NO. 2

CAMERAMAN Jim J

97043843520

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: DEC 19 1996

ANALYST: Tracy L. Tiell

- I. COMMITTEE: Friends of Jim Bunn
(C00286674)
Jim Hall, Treasurer
P.O. Box 5141
Salem, OR 97304
- II. RELEVANT STATUTE: 2 U.S.C. §434(a)(2)(A)(i)
11 CFR §104.5(a)(1)(i)
- III. BACKGROUND:

Failure to File the 1996 Twelve Day Pre-General Report by Election Day

The Friends of Jim Bunn ("the Committee") failed to file the 1996 Twelve Day Pre-General Report of Receipts and Disbursements covering the period from: October 1, 1996 to October 16, 1996 by Election Day, November 5, 1996. The Committee was notified on September 30, 1996 that the report was due on October 24, 1996 (Attachment 2). A Mailgram was sent on October 25, 1996 for failure to file the 1996 Twelve Day Pre-General Report (Attachment 3). The Mailgram informed the Committee that failure to file the report within four (4) business days might result in publication, audit or legal enforcement action. The Committee submitted Summary and Detailed Summary Pages without supporting schedules by certified mail on October 24, 1996 which were received on October 29, 1996 (Attachment 4). The name of the Committee was published for failure to file the complete 1996 Twelve Day Pre-General Report on November 1, 1996 (Attachment 5).

On November 19, 1996, a Reports Analysis Division ("RAD") analyst called the Committee to inquire about the 1996 Twelve Day Pre-General Report. The analyst informed Jim Hall, Treasurer of the Committee, that the Committee

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must file the supporting schedules of the Twelve Day Pre-General Report immediately to avoid enforcement action by the Office of General Counsel. Mr. Hall stated that the Committee had mailed press packages containing the report and that he did not realize the Commission had not received the full report. Mr. Hall said he would mail the Commission a copy of the full report (Attachment 6). The analyst tried to contact Jim Hall again on November 23, 1996 and was informed that Mr. Hall was out of the office for a few days. The analyst called again on December 4, 1996 and left a message on Jim Hall's voice mail. The message reiterated what was already said in the November 19 conversation. The analyst called again on December 5, 1996 and left a message with Mr. Hall's receptionist. The analyst told the receptionist to inform Mr. Hall that the matter pertaining to the Friends of Jim Bunn was being referred to the Office of General Counsel. Mr. Hall returned the December 5, 1996 call and stated he would send the complete report via Federal Express (Attachment 7).

On December 10, 1996, a complete (including supporting schedules) Twelve Day Pre-General Report was filed with the Commission (Attachment 8).

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FEDERAL ELECTION COMMISSION

DATE 19DEC96

1995-1996

Attachment 1, page 1 of 2

CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

PAGE 1

CANDIDATE/COMMITTEE/DOCUMENT	RECEIPTS		DISBURSEMENTS		# OF PAGES	MICROFILM LOCATION
	OFFICE SOUGHT/	PARTY	PRIMARY	GENERAL		
					COVERAGE DATES	TYPE OF FILER
BUNN, JAMES LEE	HOUSE 05	REPUBLICAN PARTY		OREGON	1996 ELECTION	ID# H40R05072
1. STATEMENT OF CANDIDATE						
1995 STATEMENT OF CANDIDATE					2JUN95	1 95HSE/575/0811
2. PRINCIPAL CAMPAIGN COMMITTEE						
FRIENDS OF JIM BUNN					ID #C00286674	HOUSE
1995 MID-YEAR REPORT			65,149	45,967	1JAN95 - 30JUN95	28 95HSE/583/0112
1'ST LETTER INFORMATIONAL NOTICE					1JAN95 - 30JUN95	5 95FEC/999/3702
YEAR-END			75,408	60,837	1JUL95 - 31DEC95	29 96HSE/592/0355
YEAR-END - AMENDMENT			75,408	60,837	1JUL95 - 31DEC95	32 96HSE/603/5346
REQUEST FOR ADDITIONAL INFORMATION					1JUL95 - 31DEC95	5 96FEC/033/4129
REQUEST FOR ADDITIONAL INFORMATION 2ND					1JUL95 - 31DEC95	6 96FEC/038/0253
1996 STATEMENT OF ORGANIZATION - AMENDMENT					29MAR96	2 96HSE/597/0406
MISCELLANEOUS REPORT TO FEC					5APR96	2 96HSE/597/1915
48 HOUR CONTRIBUTION NOTICE					7MAY96	3 96HSE/604/4046
48 HOUR CONTRIBUTION NOTICE					8MAY96	3 96HSE/604/4450
48 HOUR CONTRIBUTION NOTICE					13MAY96	3 96HSE/604/5248
48 HOUR CONTRIBUTION NOTICE					15MAY96	3 96HSE/605/0706
48 HOUR CONTRIBUTION NOTICE					17MAY96	3 96HSE/605/1963
48 HOUR CONTRIBUTION NOTICE					18OCT96	2 96FEC/097/4967
48 HOUR CONTRIBUTION NOTICE					21OCT96	2 96FEC/106/2187
48 HOUR CONTRIBUTION NOTICE					23OCT96	3 96FEC/109/3072
48 HOUR CONTRIBUTION NOTICE					24OCT96	2 96FEC/114/2675
48 HOUR CONTRIBUTION NOTICE					25OCT96	2 96FEC/119/1957
48 HOUR CONTRIBUTION NOTICE					29OCT96	4 96FEC/122/1159
48 HOUR CONTRIBUTION NOTICE					31OCT96	3 96FEC/124/2581
48 HOUR CONTRIBUTION NOTICE					1NOV96	3 96FEC/125/0548
APRIL QUARTERLY			17,990	29,643	1JAN96 - 31MAR96	12 96HSE/602/5341
PRE-PRIMARY			35,479	44,296	1APR96 - 1MAY96	16 96HSE/604/5396
1'ST LETTER INFORMATIONAL NOTICE					1APR96 - 1MAY96	2 96FEC/055/4853
JULY QUARTERLY			100,221	89,790	2MAY96 - 30JUN96	26 96HSE/615/4987
JULY QUARTERLY - AMENDMENT			100,221	89,790	2MAY96 - 30JUN96	4 96HSE/622/3069
REQUEST FOR ADDITIONAL INFORMATION					2MAY96 - 30JUN96	2 96FEC/076/3084
REQUEST FOR ADDITIONAL INFORMATION 2ND					2MAY96 - 30JUN96	3 96FEC/079/1169
OCTOBER QUARTERLY			102,760	88,979	1JUL96 - 30SEP96	24 96FEC/107/4693
PRE-GENERAL			57,105	77,370	1OCT96 - 16OCT96	3 96FEC/121/4575
PRE-GENERAL - AMENDMENT			57,105	77,370	1OCT96 - 16OCT96	17 96FEC/154/3747
NOTICE OF FAILURE TO FILE					1OCT96 - 16OCT96	2 96FEC/123/4003
POST-GENERAL			114,682	111,872	16OCT96 - 25NOV96	27 96FEC/155/0779
TOTAL			176,036	392,758	151,100	397,654
						283 TOTAL PAGES

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1995-1996

Attachment 1, page 2 of 2

CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

PAGE 2

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

3. AUTHORIZED COMMITTEES

4. JOINT FUNDRAISING COMMITTEES AUTHORIZED BY THE CAMPAIGN

All reports listed have been reviewed, with the exception of the following:

- October Quarterly Report (07/01/96-09/30/96)
- 12 Day Pre-General Report (10/01/96-10/16/96)
(original and amendment)
- 30 Day Post-General Report (10/16/96-11/25/96)

Ending cash on hand as of 11/25/96: \$ 2,810.14
Debts & Obligations owed to the Committee: \$ 0.00
Debts & Obligations owed by the Committee: \$14,421.84

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GENERAL ELECTION REPORT NOTICE

FEDERAL ELECTION COMMISSION

CONGRESSIONAL COMMITTEES

September 30, 1996

1996 GENERAL ELECTION CANDIDATE COMMITTEES

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Pre-General	10/01/96 - 10/16/96	10/21/96	10/24/96
	----48 Hour Notices----		
Post-General	10/17/96 - 11/25/96	12/05/96	12/05/96

WHO MUST FILE

All 1996 general election principal campaign committees of congressional candidates (including unopposed candidates) who seek election in the November 5, 1996, General Election must file the Pre- and Post-General Election Reports. If the campaign has an authorized committee(s), in addition to the principal campaign committee, the principal campaign committee must also file a consolidated report on Form 32 and attach the report(s) of the authorized committee(s).

48 HOUR NOTICES ON CONTRIBUTIONS

Notices are required if the committee receives contributions (including in-kind gifts or advances of goods or services; loans from the candidate or other non-bank sources; and guarantees or endorsements of loans to the candidate or committee) of \$1,000 or more, during the period October 17 through November 2.

The notices must reach the appropriate federal and state filing offices within 48 hours of the committee's receipt of the contribution(s). U.S. House candidates faxing 48-hour notices should transmit them to the FEC at 202/219-0174. Senate candidates should transmit them to the Secretary of the Senate at 202/224-1851. Note that 48-hour notices are the only FEC documents that may be faxed.

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 and, if applicable, before the individual became a candidate.

**Reports sent 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

RQ-7

(This is a copy of the text of a mailgram sent to the committee listed below on October 25, 1996.)

Jim Hall, Treasurer
Friends Of Jim Bunn
PO Box 5141
Salem, OR 97304

Identification Number: C00286674

Reference: 12 Day Pre-General Report (10/1/96-10/16/96)

It has come to the attention of the Federal Election Commission that you may have failed to file the 12 Day Pre-General Report of receipts and expenditures as required by the Federal Election Campaign Act, as amended. You were previously notified of the due date for this report. You will be allowed four (4) business days from the date of this notice to file the 12 Day Pre-General Report. The report should be filed with the Federal Election Commission, 999 E Street NW, Washington, DC 20463 for House candidates, or the Secretary of the Senate, 232 Hart Senate Office Building, Washington, DC 20510, for Senate candidates. A copy of the report should also be filed with the appropriate Secretary of State or equivalent state officer.

If you have filed the report timely by certified or registered mail, please notify us immediately, in writing, of the certified or registered number and the date that the report was sent. The failure to file this report may result in publication, audit or legal enforcement action.

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

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

REPORT OF RECEIPTS AND DISBURSEMENT

For An Authorized Committee
(Summary Page)RECEIVED
FEDERAL ELECTION
COMMISSION MAIL ROOMUSE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) <u>Friends of Jim Bunn</u>		Oct 29 11 20 AM '96 Attachment 4, page 1 of 3
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported. <u>P.O. Box 5141</u>		
CITY, STATE and ZIP CODE <u>Salem OR 97304</u>	STATE/DISTRICT <u>OR/05</u>	2. FEC IDENTIFICATION NUMBER <u>C00286674</u>
3. IS THIS REPORT AN AMENDMENT? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		

4. TYPE OF REPORT

- ☐ April 15 Quarterly Report ☒ 12-Day Pre-Election Report for the General (Type of Election)
election on Nov 5, 1996 in the State of Oregon
- ☐ July 15 Quarterly Report ☐ 30-Day Post-Election Report for the _____ (Type of Election)
election on _____ in the State of _____
- ☐ October 15 Quarterly Report ☐ Termination Report
- ☐ January 31 Year End Report
- ☐ July 31 Mid-Year Report (Non-election Year Only)

This report contains
activity for
☐ Primary Election ☒ General Election ☐ Special Election ☐ Runoff Election

SUMMARY

5. Covering Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
<u>Oct 1, 1996</u> through <u>Oct 16, 1996</u>		
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e))	55,105. ⁰⁰	287,286. ³⁶
(b) Total Contribution Refunds (from Line 20(d))		500. ⁰⁰
(c) Net Contributions (other than loans) (subtract Line 6(b) from 6(a))	55,105. ⁰⁰	286,786. ³⁶
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	77,370. ³⁵	307,581. ²⁷
(b) Total Offsets to Operating Expenditures (from Line 14)		4,270. ¹²
(c) Net Operating Expenditures (subtract Line 7(b) from 7(a))	77,370. ³⁵	303,311. ¹⁵
8. Cash on Hand at Close of Reporting Period (from Line 27)	11,344. ⁷²	
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)	17,820. ⁰⁰	

For further information
contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-219-3420

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

Jim Hall

Signature of Treasurer

Jim Hall

Date

Oct 24, 1996

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

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FEC FORM 3
(revised 4/87)

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DETAILED SUMMARY PAGE

of Receipts and Disbursements
(Page 2, FEC FORM 3)

Attachment 4, page 2 of 3

Name of Committee (in full) Friends of Jim Bunn		Report Covering the Period From 10/01/96 To 10/16/96	
I. RECEIPTS		COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			
(i) Itemized (use Schedule A)		13,250. ⁰⁰	
(ii) Unitemized		19,855. ⁰⁰	
(iii) Total of contributions from individuals		33,105. ⁰⁰	135,197. ³⁶
(b) Political Party Committees			
(c) Other Political Committees (such as PACs)		2,200. ⁰⁰	152,088. ⁴⁰
(d) The Candidate			
(e) TOTAL CONTRIBUTIONS (other than loans) (add 11(a)(iii), (b), (c) and (d))		55,105. ⁰⁰	287,286. ³⁶
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES			
13. LOANS:			
(a) Made or Guaranteed by the Candidate			20,000. ⁰⁰
(b) All Other Loans		2,000. ⁰⁰	2,000. ⁰⁰
(c) TOTAL LOANS (add 13(a) and (b))		2,000. ⁰⁰	22,000. ⁰⁰
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			4,270. ¹²
15. OTHER RECEIPTS (Dividends, Interest, etc.)			
16. TOTAL RECEIPTS (add 11(e), 12, 13(c), 14 and 15)		57,105. ⁰⁰	313,556. ⁴⁸
II. DISBURSEMENTS			
17. OPERATING EXPENDITURES		77,370. ³⁵	307,581. ¹⁷
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES			
19. LOAN REPAYMENTS:			
(a) Of Loans Made or Guaranteed by the Candidate			20,000. ⁰⁰
(b) Of All Other Loans			
(c) TOTAL LOAN REPAYMENTS (add 19(a) and (b))			20,000. ⁰⁰
20. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees			
(b) Political Party Committees			
(c) Other Political Committees (such as PACs)			500. ⁰⁰
(d) TOTAL CONTRIBUTION REFUNDS (add 20(a), (b) and (c))			500. ⁰⁰
21. OTHER DISBURSEMENTS			2,000. ⁰⁰
22. TOTAL DISBURSEMENTS (add 17, 18, 19(c), 20(d) and 21)		77,370. ³⁵	330,081. ¹⁷

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD	\$	31,610. ⁰⁷
24. TOTAL RECEIPTS THIS PERIOD (from Line 16)	\$	57,105. ⁰⁰
25. SUBTOTAL (add Line 23 and Line 24)	\$	88,715. ⁰⁷
26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22)	\$	77,370. ³⁵
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (subtract Line 26 from 25)	\$	11,344. ⁷²

Federal Election Commission
ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS

The Commission has added this page to the end of this filing to indicate how it was received.

☐

Hand Delivered

DATE OF RECEIPT

☐

First Class Mail

POSTMARKED

☒

Registered/Certified Mail

POSTMARKED

10/24/96

☐

No Postmark

☐

Postmark Illegible

☐

Received from the House Office of Records
and Registration

DATE OF RECEIPT

☐

Received from the Senate Office of Public
Records

DATE OF RECEIPT

☐

Other (Specify):

POSTMARKED

and/or DATE OF RECEIPT

Jm/11

PREPARER

10/29/96

DATE PREPARED

FEDERAL ELECTION COMMISSION



Press Office

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

Phone: 202-219-4155 Toll Free 800-424-9530

Attachment 5, page 1 of 2

FOR IMMEDIATE RELEASE:
NOVEMBER 1, 1996

CONTACT: KELLY HUFF
RON HARRIS
SHARON SNYDER
IAN STIRTON

CAMPAIGNS CITED FOR FAILURE TO FILE COMPLETE PRE-GENERAL REPORTS

WASHINGTON -- The Federal Election Commission today cited 34 campaign committees for failure to file the required Pre-General financial disclosure report.

As of 5 p.m., October 31, 1996, disclosure reports from the following committees had not been filed:

AL/01...WOMACK FOR CONGRESS...ROBERT D. STILL, TREAS...DON WOMACK...DEM
*AL/04...ROBERT T. (BOB) WILSON JR. FOR CONGRESS...CHARLES RANDALL WATTS, TREAS...
ROBERT T. WILSON, JR....DEM
CA/05...BOB DINSMORE FOR CONGRESS...BRIAN M. PROBST, TREAS...ROBERT SUNDERLAND
DINSMORE...REP
CA/15...DICK LANE FOR CONGRESS COMMITTEE...DICK LANE, TREAS...DICK LANE...DEM
*CA/15...FRIENDS OF VALLI SHARPE-GEISLER...BARBARA SHARPE, TREAS...VALLI
SHARPE-GEISLER...REFORM
CA/27...ELIZABETH MICHAEL FOR CONGRESS...JOAN HUGHES, TREAS...ELIZABETH
MICHAEL...LIBERAL
CA/43...KIMBROUGH FOR CONGRESS COMMITTEE...PAMELA SEED KIMBROUGH, TREAS...GUY
CAMPBELL KIMBROUGH...DEM
DE/00...DENNIS WILLIAMS FOR CONGRESS...MATTHEW T. LAPINSKI, TREAS...DENNIS EDWARD
WILLIAMS...DEM
FL/12...MIKE CANADY FOR CONGRESS COMMITTEE...ROBERT H. GRIZZARD, TREAS...MICHEL L.
CANADY...DEM
FL/21...LINCOLN DIAZ-BALART FOR CONGRESS COMMITTEE...AYUBAN TOMAS, CPA,
TREAS...LINCOLN DIAZ-BALART...REP
FL/23...CAMPAIGN TO ELECT ROBERT PAUL BROWN US HOUSE...PATRICIA M. BROWN, TREAS
...ROBERT PAUL BROWN...REP
ID/02...SEIDL FOR CONGRESS CAMPAIGN...MARSHA WOODS, TREAS...JOHN D. STEIDL...DEM
IL/03...NALEPA '96...CAROL BRIAN, TREAS...JAMES T. "JIM" NALEPA...REP
IL/07...CITIZENS FOR RANDY BOROW...JENNILYN J. WALTON, TREAS...RANDY BOROW...REP
IL/08...HULL FOR CONGRESS...JOYCE K. NORDHAUS, TREAS...ELIZABETH ANNE HULL...DEM
IN/05...DOUG CLARK FOR CONGRESS...DOUGLAS L. CLARK, TREAS...DOUGLAS L. CLARK...DEM
MD/08...COMMITTEE TO ELECT BARBARA ROBSON FOR U S CONGRESS...BOB COHN, TREAS...
BARBARA ROBSON...OTHER
*MN/04...VOLUNTEERS FOR VENTO...JOHN J. COSTELLO, TREAS...BRUCE F. VENTO...DPL
MO/01...CLAY CAMPAIGN COMMITTEE...PEARLIE I. EVANS, TREAS...WILLIAM L. CLAY, SR.
...DEM
MO/01...O'SULLIVAN FOR CONGRESS COMMITTEE...STEVEN G. REYNOLDS, CPA, TREAS...DAN
O'SULLIVAN...REP

-more-

NJ/05...BILL AUER FOR CONGRESS...ALFRED J. MURPHY, JR., TREAS...BILL AUER...DEM
 **NJ/11...EVANGEL/CONGRESS '96...CHRIS EVANGEL, TREAS...CHRIS EVANGEL...DEM
 NM/01...JACK UHRICH FOR CONGRESS...AREAN TESSLER, TREAS...JOHN A. UHRICH...GREEN
 *NY/19...PEOPLE FOR DIOGUARDI...SUSAN FITZPATRICK, TREAS...JOSEPH J.
 DIOGUARDI...CONSERVATIVE
 OH/18...ROBERT BURCH FOR CONGRESS COMMITTEE...MARILYN PIZZINI, TREAS...ROBERT L.
 BURCH...DEM
 ***OR/05...FRIENDS OF JIM BUNN...JIM HALL, TREAS...JAMES LEE BUNN...REP
 PA/12...CHOBY '96...WILLIAM (BILL) CHOBY, TREAS...WILLIAM CHOBY...REP
 *PA/14...RAVOTTI FOR CONGRESS COMMITTEE...THOMAS R. OXENREITER, TREAS...
 WILLIAM A. RAVOTTI...REP
 PR/00...COMITE AMIGOS DE CELESTE BENITEZ...SAMUEL T. CESPEDES, JR., TREAS...
 CELESTE BENITEZ...OTH
 TN/09...COMMITTEE FOR TRUTH AND JUSTICE...JOHNNY E. KELLY, TREAS...JOHNNY E.
 KELLY...IND
 ***TX/09...FRIENDS OF STEVE STOCKMAN...JOHN HART, TREAS...STEVE STOCKMAN...REP
 TX/15...FRIENDS OF TOM HAUGHEY...JIM CARPENTER, TREAS...THOMAS BRACE HAUGHEY...REP
 TX/23...COMMITTEE TO ELECT CHARLES P. JONES...LOURDES B. RODRIGUEZ, TREAS...
 CHARLES P. JONES...DEM
 VA/09...ROBERTS FOR CONGRESS CAMPAIGN...ELIZABETH L. ROBERTS, TREAS...THOMAS INGHAM
 "TOM" ROBERTS...OTHER

Reports were due October 24, 1996, and should have included financial activity for the period October 1, 1996, through October 16, 1996. If sent by certified or registered mail, the reports should have been postmarked by midnight October 21, 1996.

Committees were notified of their filing requirements on September 30, 1996. Those committees which did not file on the due date were notified on October 25, 1996, that reports had not been received and that their names would be published if they did not respond within four business days.

The Commission publishes only the names of those committees which have been designated by candidates as their principal campaign committees. Other political committees supporting Senate and House candidates (those which are not authorized units of a candidate's campaign) file either quarterly or monthly reports. Those committees are not published by the FEC.

Further Commission action against non-filers and late filers is decided on a case-by-case basis. Federal law gives the FEC broad authority to initiate enforcement actions, including the imposition of civil penalties (\$5,000 for "any violation" and \$10,000 for any "knowing and willful" violation.)

The next regularly scheduled disclosure report for congressional committees will be the 30 Day Post-General report due December 5, 1996. It will cover activity from October 17 through November 25.

- * Pre-General report has been filed, but it was received after the publication cutoff date.
- ** A Pre-General report was filed, but the report only disclosed financial activity through October 7, 1996.
- *** Summary and Detailed Summary Pages were submitted disclosing financial activity without supporting schedules

TELECON

DATE: November 19, 1996
NAME OF COMMITTEE: Friends of Jim Bunn
SUBJECT: Failure to file the Twelve Day Pre-General Report
FEC REP: Laurianne Proctor
COMMITTEE REP: Jim Hall

On November 19, 1996, I contacted Jim Hall in regards to the Friends of Jim Bunn and the failure to file the complete 12 Day Pre-General Report. Mr. Hall said that the committee had mailed press releases and that a report was left over when all of the mailings had been sent, but, the committee did not know which mailing did not contain the report. He claimed the committee had no knowledge that we had not received the full report. I told Mr. Hall that he needed to mail the report to us as soon as possible to avoid legal action. Mr. Hall said he would mail a copy of the report to the Commission.

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TELECON

DATE: December 5, 1996
NAME OF COMMITTEE: Friends of Jim Bunn
SUBJECT: Failure to file the Twelve Day Pre-General Report
FEC REP: Laurianne Proctor
COMMITTEE REP: Jim Hall

On December 5, 1996, I contacted Jim Hall in regards to the Friends of Jim Bunn and the failure to file the complete 12 Day Pre-General Report. Mr. Hall returned my call on the same day and stated that he had received my voice mail on the 4th but it had been too late to return my call. He asked if the matter had already been turned over to the Office of General Counsel. I told him that the paper work was being completed. Mr. Hall said that he had retrieved the report from storage and that he had it along with the 30 Day Post-General. I told him to mail the information to us immediately. Mr. Hall said he would send the report by Federal Express, Attention: Laurianne Proctor.

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BUNN

CONGRESS

RECEIVED
FEDERAL ELECTION
COMMISSION MAIL ROOM

DEC 10 9 28 AM '96

Attachment 8, page 1 of 5

December 6, 1996

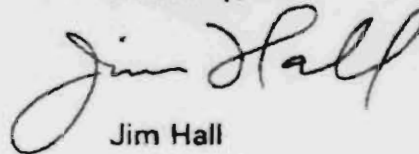
Ms. Laurie Ann Proctor, Reports Analysis
Federal Election Commission
999 E Street NW
Washington, DC 20463

RE: 12 Day Pre-Election (10/1/96-10/16/96)
Identification Number: C00286674

Enclosed please find a complete copy of the above referenced report including all schedules. The schedules were apparently omitted from the report when it was filed. I apologize for this inadvertent oversight and I thank you for your patience in this matter.

Please contact me if I can be of further assistance in this matter.

Sincerely,



Jim Hall
Treasurer

JBH:jh
Enclosures

REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee
(Summary Page)RECEIVED
FEDERAL ELECTION
COMMISSION MAIL ROOMUSE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) <u>Friends of Jim Bunn</u>		Dec 10 9 28 AM '96 Attachment 8, page 2 of 5
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported. <u>P.O. Box 5141</u>		
CITY, STATE and ZIP CODE <u>Salem OR 97304</u>	STATE/DISTRICT <u>OR/05</u>	2. FEC IDENTIFICATION NUMBER <u>C00286674</u>
3. IS THIS REPORT AN AMENDMENT? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		

4. TYPE OF REPORT

☐ April 15 Quarterly Report☒ 12-Day Pre-Election Report for the General

(Type of Election)

☐ July 15 Quarterly Reportelection on Nov 5, 1996 in the State of Oregon☐ October 15 Quarterly Report☐ 30-Day Post-Election Report for the

(Type of Election)

☐ January 31 Year End Report

election on _____ in the State of _____

☐ July 31 Mid-Year Report (Non-election Year Only)☐ Termination ReportThis report contains
activity for☐ Primary Election☒ General Election☐ Special Election☐ Runoff Election

SUMMARY

5. Covering Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
<u>Oct 1, 1996</u> through <u>Oct 16, 1996</u>		
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e))	55,105. ⁰⁰	287,286. ³⁶
(b) Total Contribution Refunds (from Line 20(d))		500. ⁰⁰
(c) Net Contributions (other than loans) (subtract Line 6(b) from 6(a))	55,105. ⁰⁰	286,786. ³⁶
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	77,370. ³⁵	307,581. ²⁷
(b) Total Offsets to Operating Expenditures (from Line 14)		4,270. ¹²
(c) Net Operating Expenditures (subtract Line 7(b) from 7(a))	77,370. ³⁵	303,311. ¹⁵
8. Cash on Hand at Close of Reporting Period (from Line 27)	11,344. ⁷²	
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)	17,820. ⁰⁶	

For further information
contact:
Federal Election Commission
800 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-219-3420

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

Jim Hall

Signature of Treasurer

Jim Hall

Date

Oct 24, 1996

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 5437g.

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FESAN111

FEC FORM 3
(revised 4/87)

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DETAILED SUMMARY PAGE

of Receipts and Disbursements
(Page 2, FEC FORM 3)

Attachment 8, page 3 of 5

Name of Committee (in full)

Friends of Jim Bunn

Report Covering the Period:

From: 10/01/96

To: 10/16/96

I. RECEIPTS

COLUMN A
Total This PeriodCOLUMN B
Calendar Year-To-Date

11. CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than Political Committees

(i) Itemized (use Schedule A) _____

(ii) Unitemized _____

(iii) Total of contributions from individuals _____

(b) Political Party Committees _____

(c) Other Political Committees (such as PACs) _____

(d) The Candidate _____

(e) TOTAL CONTRIBUTIONS (other than loans) (add 11(a)(i), (b), (c) and (d)) _____

13250.⁰⁰19855.⁰⁰33105.⁰⁰135,197.²⁴22000.⁰⁰152,088.⁴⁰55105.⁰⁰287,286.⁴⁰

12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES _____

13. LOANS:

(a) Made or Guaranteed by the Candidate _____

(b) All Other Loans _____

(c) TOTAL LOANS (add 13(a) and (b)) _____

20,000.⁰⁰2,000.⁰⁰22,000.⁰⁰

14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.) _____

4270.¹²

15. OTHER RECEIPTS (Dividends, Interest, etc.) _____

16. TOTAL RECEIPTS (add 11(e), 12, 13(c), 14 and 15) _____

57,105.⁰⁰313,550.⁴⁰

II. DISBURSEMENTS

17. OPERATING EXPENDITURES _____

77,370.³²307,581.²¹

18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES _____

19. LOAN REPAYMENTS:

(a) Of Loans Made or Guaranteed by the Candidate _____

(b) Of All Other Loans _____

(c) TOTAL LOAN REPAYMENTS (add 19(a) and (b)) _____

20,000.⁰⁰20,000.⁰⁰20,000.⁰⁰

20. REFUNDS OF CONTRIBUTIONS TO:

(a) Individuals/Persons Other Than Political Committees _____

(b) Political Party Committees _____

(c) Other Political Committees (such as PACs) _____

(d) TOTAL CONTRIBUTION REFUNDS (add 20(a), (b) and (c)) _____

500.⁰⁰500.⁰⁰

21. OTHER DISBURSEMENTS _____

2,000.⁰⁰

22. TOTAL DISBURSEMENTS (add 17, 18, 19(c), 20(d) and 21) _____

77,370.³²330,081.²¹

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD _____

\$ 31,610.⁰⁷

24. TOTAL RECEIPTS THIS PERIOD (from Line 16) _____

\$ 57,105.⁰⁰

25. SUBTOTAL (add Line 23 and Line 24) _____

\$ 88,715.⁰⁷

26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22) _____

\$ 77,370.³²

27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (subtract Line 26 from 25) _____

\$ 11,344.⁷²

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SCHEDULE A

SCHEDULE PAGE
ITEMIZED RECEIPTSUse separate schedule(s)
for each category of the
Detailed Summary Page

PAGE 4 OF 4

FOR LINE NUMBER

11(9)11

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

NAME OF COMMITTEE (in Full)

Friends of Jim Bunn

Attachment 8, page 4 of 5

A. Full Name, Mailing Address and ZIP Code Michael James 2539 NW Westover Rd Portland OR 97210 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Greenbrier Co. Occupation Manager Aggregate Year-to-Date > \$	Date (month, day, year) 10/15/96 1000.00	Amount of Each Receipt this Period 1,000.00
B. Full Name, Mailing Address and ZIP Code (SEE B. ABOVE) Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): PRIMARY DEBT	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year) 10/15/96 2000.00	Amount of Each Receipt this Period 1000.00
C. Full Name, Mailing Address and ZIP Code Nanci James 2539 NW Westover Rd Portland OR 97210 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Housewife Aggregate Year-to-Date > \$	Date (month, day, year) 10/15/96 1000.00	Amount of Each Receipt this Period 1000.00
D. Full Name, Mailing Address and ZIP Code (see C. Above) Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): Primary Debt	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year) 10/15/96 2000.00	Amount of Each Receipt this Period 1000.00
E. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year) 	Amount of Each Receipt this Period
F. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year) 	Amount of Each Receipt this Period
G. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year) 	Amount of Each Receipt this Period
SUBTOTAL of Receipts This Page (optional)			4,000.00
TOTAL This Period (last page this line number only)			13,250.00

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SAMPLE PAGE

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category of the
Detailed Summary PagePAGE 2 OF 2
FOR LINE NUMBER 17

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

NAME OF COMMITTEE (in Full)

Friends of Jim Bunn

Attachment 8, page 5 of 5

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Shelter Management, Inc P.O. Box 13427 Salem, OR 97309-1427	Rent Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/1/96	700.00
B. Full Name, Mailing Address and ZIP Code Stan Bunn 408 E. First ST Newberg, OR 97132	Consulting Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/2/96	3,922.86
C. Full Name, Mailing Address and ZIP Code U.S. Postal Service P.O. Box 5333 Salem, OR 97304	Postage Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/10/96 10/15/96 10/16/96	103.52 7.29 300.00
D. Full Name, Mailing Address and ZIP Code Withnell Dodge 2650 Commercial ST SE Salem OR 97302	Rent Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/1/96	350.00
E. Full Name, Mailing Address and ZIP Code Holly Stucker 748 Hawthorne AVE NE Salem, OR 97301	Mileage Reimb. Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/8/96	31.00
F. Full Name, Mailing Address and ZIP Code Holly Stucker 748 Hawthorne AVE NE Salem, OR 97301	Office Supplies Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/2/96 10/8/96	63.97 109.99
G. Full Name, Mailing Address and ZIP Code Holly Stucker 748 Hawthorne AVE NE Salem, OR 97301	Travel Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/2/96 10/8/96	94.96 61.00
H. Full Name, Mailing Address and ZIP Code Holly Stucker 748 Hawthorne AVE NE Salem, OR 97301	Supplies Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/2/96	12.82
I. Full Name, Mailing Address and ZIP Code Farmers Insurance Group P.O. Box 23966 TIGARD OR 97281-3966	Insurance Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/9/96	232.00

SUBTOTAL of Disbursements This Page (optional)

5,989.41

TOTAL This Period (last page this line number only)

76,213.93

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

FIRST GENERAL COUNSEL'S REPORT

10 4 2 1997
SENSITIVE

REFERRAL: 96NF-07
DATE ACTIVATED: 03/05/97

STAFF MEMBER: Nancy E. Bell

SOURCE: INTERNALLY GENERATED

RESPONDENTS: Friends of Jim Bunn and Jim Hall, as treasurer

RELEVANT STATUTES: 2 U.S.C. §434(a)(2)(A)(i)
11 C.F.R. §104.5(a)(1)(i)

INTERNAL REPORTS CHECKED: Disclosure Reports
Referral Material

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Office of General Counsel received a referral from the Reports Analysis Division ("RAD") on December 19, 1996. The basis of the attached referral is the failure of the Friends of Jim Bunn ("the Committee") and Jim Hall, as treasurer to file a disclosure report in 1996. Specifically, the Committee failed to file timely its 1996 Twelve Day Pre-General Report by Election Day, November 5, 1996.

II. FACTUAL AND LEGAL ANALYSIS

Based on the Factual and Legal Analysis, see Attachment 1, this Office recommends the Commission find reason to believe the Respondents violated 2 U.S.C. §434(a)(2)(A)(i).

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III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY


9 7 0 4 3 8 4 3 5 1 0

IV. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that Friends of Jim Bunn and Jim Hall, as treasurer, violated 2 U.S.C. §434(a)(2)(A)(i) 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

97043843511
Date 3/17/97

BY: 
Lois G. Lerner
Associate General Counsel

Attachments:

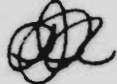
1. Proposed Factual and Legal Analysis
2. Proposed Conciliation Agreement



FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/BONNIE ROSS 
COMMISSION SECRETARY

DATE: MARCH 19, 1997

SUBJECT: RAD Referral #96NF-07 - First General Counsel's Report

The above-captioned document was circulated to the Commission
on Wednesday, March 19, 1997.

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

Commissioner Aikens	—
Commissioner Elliott	—
Commissioner McDonald	—
Commissioner McGarry	—
Commissioner Thomas	XXX

This matter will be placed on the meeting agenda for
Tuesday, March 25, 1997.

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

97043843542

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) RAD Referral
Friends of Jim Bunn and) 96NF-07
Jim Hall, as treasurer)

MUR 4626

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on March 25, 1997, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions with respect to RAD Referral 96NF-07:

1. Open a MUR.
2. Find reason to believe that Friends of Jim Bunn and Jim Hall, as treasurer, violated 2 U.S.C. § 434(a)(2)(A)(i) and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the Factual and Legal Analysis, Conciliation Agreement, and the appropriate letter as recommended in the General Counsel's March 17, 1997 report.

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

Attest:

3-25-97
Date

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

97043843543



FEDERAL ELECTION COMMISSION
Washington, DC 20463

March 28, 1997

Jim Hall, Treasurer
Friends of Jim Bunn
P.O. Box 5141
Salem, OR 97304

RE: MUR 4626
Friends of Jim Bunn
and Jim Hall, as Treasurer

Dear Mr. Hall:

On March 25, 1997, the Federal Election Commission found that there is reason to believe Friends of Jim Bunn ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(2)(A)(i), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

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.

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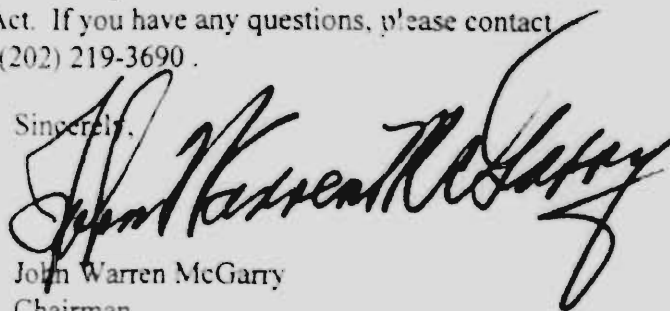
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 Nancy Bell, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,



John Warren McGarry
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Conciliation Agreement

cc: Candidate

97043843545

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Friends of Jim Bunn
and Jim Hall, as treasurer

MUR: 4626

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).

On September 30, 1996 the Friends of Jim Bunn ("the Committee") was notified that its 1996 Twelve Day Pre-General Report of Receipts and Disbursements covering the period of October 1, 1996 to October 16, 1996 was due on October 24, 1996. The Committee submitted Summary and Detailed Summary Pages without supporting schedules by certified mail on October 24, 1996 which were received on October 29, 1996. In the meantime, a Mailgram was sent on October 25, 1996 for failure to file the 1996 Twelve Day Pre-General Report.¹ The name of the Committee was published for failure to file the complete 1996 Twelve Day Pre-General Report on November 1, 1996.

On November 19, 1996, the Reports Analysis Division ("RAD") contacted the Committee concerning the 1996 Twelve Day Pre-General Report. A RAD analyst informed Jim Hall, treasurer of the Committee, that the Committee must immediately file the supporting

¹ The Mailgram informed the Committee that failure to file the report within four (4) business days might result in publication, audit or legal enforcement action.

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schedules of the Twelve Day Pre-General Report to avoid enforcement action by the Office of General Counsel.

In response, Mr. Hall stated the Committee had mailed press packages containing the report but he did not realize that the Commission had not received the full report. Mr. Hall then stated that he would mail the Commission a copy of the full report.

After numerous subsequent attempts by the RAD analyst to contact Mr. Hall, a complete (including supporting schedules) Twelve Day Pre-General Report was filed with the Commission on December 10, 1996.

A. APPLICABLE LAW AND ANALYSIS

The Federal Election Campaign Act of 1971, as amended, the "Act") requires treasurers of principal campaign committees of a candidate for the House of Representatives or the Senate, to file periodic reports of receipts and disbursements. 2 U.S.C. § 434 (a)(2).

In any calendar year in which there is a regularly scheduled election for which such candidate is seeking election or nomination for election, the principal campaign committee of a candidate shall file a pre-general report, which shall be filed no later than the 12 day before (or posted by registered or certified mail no later than the 15th day before) any election in which such candidate is seeking election, or nomination for election, and which shall be complete as of the 20th day before such election. 2 U.S.C. § 434(a)(2)(A)(i). Further, the report shall disclose all receipts and disbursements as of the 20th day before a primary or general election.

11 C.F.R. § 104.5(a)(1)(i)(B).

Friends of Jim Bunn is the principal campaign committee of congressional candidate James Lee Bunn. Jim Hall is the treasurer of Friends of Jim Bunn. Respondents failed to timely file the 1996 Twelve Day Pre-General Report.

Pursuant to 2 U.S.C. § 434(a)(2)(A)(i), the due date for the Committee's 1996 12 Day Pre-General Report was October 24, 1996. After the election, on December 10, 1996, the Committee filed the 1996 12 Day Pre-General Report, 47 days late, disclosing receipts totaling \$57,105.00 and disbursements totaling \$77,370.00.

Therefore, there is reason to believe that the Friends of Jim Bunn and Jim Hall, as treasurer, violated 2 U.S.C. §434(a)(2)(A)(i).

9794384358



FEDERAL ELECTION COMMISSION
Washington, DC 20463

April 15, 1997

Jim Hall, Treasurer
Friends of Jim Bunn
P.O. Box 5141
Salem, OR 97304

RE: MUR 4626
Friends of Jim Bunn
and Jim Hall, as Treasurer

Dear Mr. Hall:

On March 28, 1997, you were notified that the Federal Election Commission determined to enter into negotiations directed toward reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. On that same date you were sent a letter instructing you to submit any factual and legal materials that you believe are relevant to the Commission's consideration of this matter and a conciliation agreement offered by the Commission in settlement of this matter.

Please note that relevant factual and legal materials should be received by this office within 15 days of your receipt of our initial notification letter and conciliation negotiations entered into prior to a finding of probable cause to believe are limited to a maximum of 30 days. To date, you have responded to neither the Commission's findings in the March 28th notification letter nor to the proposed agreement. The 15 day period for your legal and factual response will expire in several days and the 30 day period for negotiations will expire soon thereafter.

Should you have any questions, please contact me at (202) 219-3690.

Sincerely,

A handwritten signature in cursive script, appearing to read "Nancy E. Bell", is written above the typed name.

Nancy E. Bell
Attorney

9704384359



FEDERAL ELECTION COMMISSION
Washington, DC 20463

April 29, 1997

Jim Hall, Treasurer
Friends of Jim Bunn
P.O. Box 5141
Salem, OR 97304

RE: MUR 4626
Friends of Jim Bunn
and Jim Hall, as Treasurer

Dear Mr. Hall:

On March 28, 1997, you were notified that the Federal Election Commission determined to enter into negotiations directed toward reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. On that same date you were sent a conciliation agreement offered by the Commission in settlement of this matter.

More recently, on April 15, 1997, you were sent a letter reminding of this Office's deadlines for the receipt of factual and legal materials and a response to the proposed agreement. To date, you have not responded to either correspondence.

Please note that conciliation negotiations entered into prior to a finding of probable cause to believe are limited to a maximum of 30 days. The 30 day period for negotiations will soon expire. Unless we receive a response from you within five days, this Office will consider these negotiations terminated and will proceed to the next stage of the enforcement process.

Should you have any questions, please contact me at (202) 219-3690.

Sincerely,

A handwritten signature in dark ink, appearing to read "Nancy E. Bell", is written above the typed name.

Nancy E. Bell
Attorney

9704734350



FEDERAL ELECTION COMMISSION
Washington, DC 20463

May 15, 1997

James B. Hall, Jr.
494 State St.
Salem, OR 97301-3620

RE: MUR 4626
Friends of Jim Bunn
and Jim Hall, as Treasurer

Dear Mr. Hall:

On March 28, 1997, you were notified that the Federal Election Commission determined to enter into negotiations directed toward reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. On that same date you were sent a conciliation agreement offered by the Commission in settlement of this matter. (see Enclosures)

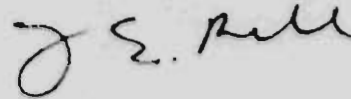
More recently, on April 15, 1997 and April 29, 1997 you were sent letters reminding of this Office's deadlines for the receipt of factual and legal materials and a response to the proposed agreement. (see Enclosures)

To date, this Office has not received any response from you.

Please note that conciliation negotiations entered into prior to a finding of probable cause to believe are limited to a maximum of 30 days. The 30 day period for negotiations has expired. Unless we receive a response from you within five days, this Office will consider these negotiations terminated and will proceed to the next state of the enforcement process.

Should you have any questions, please contact me at (202) 219-3690.

Sincerely,



Nancy E. Bell
Attorney

Enclosures

March 28, 1997 letter to Jim Hall transmitting Factual and Legal Analysis, Procedures,
Designation of Counsel Form, Conciliation Agreement

April 15, 1997 letter to Jim Hall

April 29, 1997 letter to Jim Hall

cc: Jim Bunn

97043843552

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION
COMMISSION
STAFF

JUN 9 1 32 PM '97

In the Matter of

Friends of Jim Bunn
and Jim Hall, as Treasurer

)
)
) MUR 4626
)
)

SENSITIVE

GENERAL COUNSEL'S REPORT

On March 25, 1997, the Commission found reason to believe that Friends of Jim Bunn and Jim Hall, as treasurer ("Committee") violated 2 U.S.C. § 434(a)(2)(A)(i). The Commission also approved a conciliation agreement for the Committee. The respondents were notified of the Commission's finding in a letter dated March 28, 1997 and were provided with the Factual and Legal Analysis, the proposed conciliation agreement, and a designation of counsel form at the same time. As no response was received from the Committee, this Office sent letters to the respondents on April 15, 1997 and April 29, 1997 reminding of the deadlines for the receipt of factual and legal materials and a response to the proposed agreement. All of the above correspondence was mailed to the addresses indicated on the respondents' Statement of Candidacy. Finally, on May 15, 1997, a letter, along with copies of the previous correspondence, was sent to the business address of Jim Hall, which was recently uncovered through online research by a member of this Office. On May 29, 1997 a member of this Office spoke with Mr. Hall. Mr. Hall stated that he had just returned to his office from a long absence, he had not received any of this Office's prior mailings, and he had only learned of this matter from the May 15, 1997 correspondence which he was currently looking at for the first time. He then asked for some time to read through the material and stated he would contact our Office during the next day or two. On June 4, 1997 a member of this Office contacted Mr. Hall and explained the

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necessity of a timely response from the Committee. Mr. Hall indicated that the Committee was interested in conciliation, and stated that he would submit a response by June 11, 1997.


Accordingly, this Office intends to extend pre-probable cause conciliation for 30 days. After receiving and reviewing written responses or conciliation proposals submitted by the Committee, this Office will attempt to draft an acceptable agreement and submit a report to the Commission for its consideration.

Lawrence M. Noble
General Counsel

Date

6/6/97

BY:


Lois G. Lerner
Associate General Counsel

Staff Assigned: Nancy E. Bell

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BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

JUN 19 11 25 AM '97

In the Matter of

Friends of Jim Bunn
and Jim Hall, as Treasurer

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) MUR 4626
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SENSITIVE

GENERAL COUNSEL'S REPORT

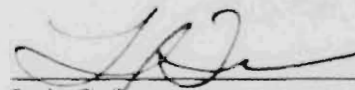
By General Counsel's Report dated June 6, 1997, this Office informed the Commission that, after numerous attempts to contact Respondents, it expected a response by June 11, 1997. To date, no response or other communication has been forthcoming from Respondents. Given that the time for preprobable cause has long since elapsed and efforts to obtain a response from the Respondents have failed, this Office intends to proceed to the next stage of the enforcement process.

Lawrence M. Noble
General Counsel

Date

6/18/97

BY:


Lois G. Lerner
Associate General Counsel

Staff Assigned: Nancy E. Bell

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FEDERAL ELECTION COMMISSION
Washington, DC 20463

RECEIVED
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SECRETARIAT

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SENSITIVE

July 1, 1997

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James B. Hall, Jr.
Suite 340
494 State Street
Salem, OR 97301-3620

RE: MUR 4626
Friends of Jim Bunn
and Jim Hall, as Treasurer

Dear Mr. Hall:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on March 25, 1997, the Federal Election Commission found reason to believe that Friends of Jim Bunn ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(2)(A)(i), and instituted an investigation in this matter.

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

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

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing

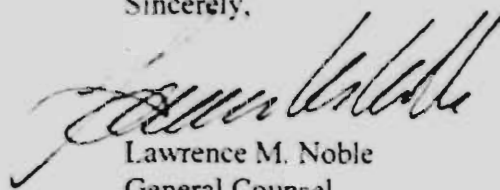
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five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Nancy Bell, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Friends of Jim Bunn
and Jim Hall, as
treasurer

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MUR 4626

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

This matter was generated from information ascertained by the Federal Election Commission ("Commission") in the normal course of carrying out its supervisory responsibilities. See, 2 U.S.C. § 437g(a) (2). The Commission found reason to believe that Friends of Jim Bunn and Jim Hall, as treasurer ("Respondents"), violated 2 U.S.C. § 434(a)(2)(A)(i). The Office of the General Counsel has conducted an investigation into this matter and is now prepared to recommend a finding of probable cause to believe.

II. ANALYSIS

The Federal Election Campaign Act of 1971, as amended, the ("Act") requires treasurers of principal campaign committees of a candidate for the House of Representatives or the Senate to file periodic reports of receipts and disbursements. 2 U.S.C. § 434(a)(2). In any calendar year in which there is a regularly scheduled election for which such candidate is seeking election or nomination for election, the principal campaign committee of a candidate shall file a pre-general report which shall be filed no later than the 12th day before (or posted by registered or certified mail no later than the 15th day before) any election in which such candidate is seeking election,

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or nomination for election, and which shall be complete as of the 20th day before such election.

2 U.S.C. § 434(a)(2)(A)(i). Further, the report shall disclose all receipts and disbursements as of the 20th day before a primary or general election.

11 C.F.R. § 104.5(a)(1)(i)(B).

The General Election for the Congress of the United States ("Election") was held on November 5, 1996. Representative James Lee Bunn, a candidate, was involved in a closely contested Election in Oregon's Fifth District. Pursuant to the Act, Respondents, the principal campaign committee for Jim Bunn and its treasurer, Jim Hall, were required to report to the Commission receipts and disbursements from October 1 to October 16, 1996, no later than October 24, 1996 (or posted by registered or certified mail no later than October 21, 1996).

On October 29, 1996, the Commission received, by certified mail (mailed by the Committee on October 24, 1996), Summary and Detailed Summary Pages without supporting schedules.

The requirement for filing the Twelve Day Pre-General Report is clear and unmistakable. Respondents failed to fulfill that requirement for the supporting schedules of the Report, which, only after the Election, disclosed itemized receipts of \$13,250.00 of a total of \$57,105.00 in receipts and itemized disbursements of \$76,213.93 of a total of \$77,370.00 in disbursements. Accordingly, the Office of the General Counsel recommends that the Commission find probable cause to believe that Friends of Jim Bunn, and Jim Hall, as treasurer, violated 2 U.S.C. § 434(a)(2)(A)(i) by failing to file their complete 1996 Twelve Day Pre-General Report.

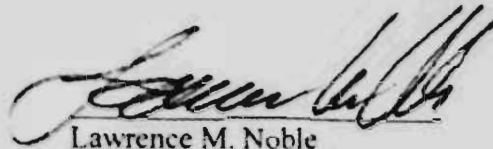
III. GENERAL COUNSEL'S RECOMMENDATION

Find probable cause to believe that Friends of Jim Bunn and Jim Hall, as Treasurer,

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violated 2 U.S.C. § 434(a)(2)(A)(i).

7/1/97
Date



Lawrence M. Noble
General Counsel

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JUN 28 4 23 PM '97

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Friends of Jim Bunn
and Jim Hall, as Treasurer

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MUR 4626

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On March 25, 1997, the Commission found reason to believe Friends of Jim Bunn and Jim Hall, as treasurer ("Respondents"), violated 2 U.S.C. § 434(a)(2)(A)(i). Underlying the Commission's determination was information that the Committee failed to file timely its 1996 Twelve Day Pre-General Report. The Commission entered into pre-probable cause conciliation at that time, but this Office terminated negotiations when respondents failed to respond to correspondence sent out by this Office and failed to submit any answer to a proposed agreement approved by the Commission. The Office of the General Counsel sent a Probable Cause Brief to the Committee via certified mail on July 1, 1997 which was received on July 7, 1997. This Office has not received any response to the brief by Respondents.

II. ANALYSIS

This Office's analysis of this matter is contained in the General Counsel's Brief dated July 1, 1997. Respondents have not submitted a responsive brief. Accordingly, this Office recommends that the Commission find probable cause to believe that Friends of Jim Bunn and Jim Hall, as treasurer, violated 2 U.S.C. § 434(a)(2)(A)(i).

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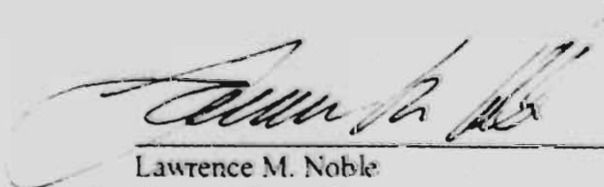
III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

IV. RECOMMENDATIONS

1. Find probable case to believe that Friends of Jim Bunn and Jim Hall, as treasurer violated 2 U.S.C. § 434(a)(2)(A)(i).
2. Approve the attached conciliation agreement and appropriate letter.

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Date

7/28/97


Lawrence M. Noble
General Counsel

Attachment:
Conciliation Agreement

Staff assigned: Nancy E. Bell

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Friends of Jim Bunn and Jim Hall,
as Treasurer.

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) MUR 4626
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CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 1, 1997, the Commission decided by a vote of 5-0 to take the following actions in MUR 4626:

1. Find probable cause to believe that Friends of Jim Bunn and Jim Hall, as treasurer, violated 2 U.S.C. § 434(a)(2)(A)(i).
2. Approve the conciliation agreement and appropriate letter, as recommended in the General Counsel's Report dated July 28, 1997.

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

Attest:

8-1-97
Date

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

Received in the Secretariat: Mon., July 28, 1997 4:23 p.m.
Circulated to the Commission: Tues., July 29, 1997 11:00 a.m.
Deadline for vote: Fri., Aug. 01, 1997 4:00 p.m.

bjr

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FEDERAL ELECTION COMMISSION
Washington, DC 20463

August 11, 1997

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James B. Hall, Jr.
Suite 340
494 State Street
Salem, OR 97301-3620

RE: MUR 4626
Friends of Jim Bunn
and Jim Hall, as Treasurer

Dear Mr. Hall:

On August 1, 1997, the Federal Election Commission found that there is probable cause to believe Friends of Jim Bunn ("the Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(2)(A)(i), a provision of the Federal Election Campaign Act of 1971, as amended, in connection with the Committee's failure to file timely its 1996 Twelve Day Pre-General Report by Election Day, November 5, 1996.

The Commission has a duty to attempt to correct such violations for a period of at least 30 days and no more than 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement after 30 days, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty.

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

If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory

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conciliation agreement, please contact Nancy Bell, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

LM Noble (LJ2)

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

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FEDERAL ELECTION COMMISSION
Washington, DC 20463

August 25, 1997

BY FACSIMILE

James B. Hall, Jr.
Suite 340
494 State Street
Salem, OR 97301-3620

RE: MUR 4626
Friends of Jim Bunn
and Jim Hall, as Treasurer

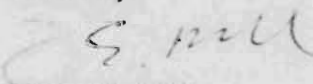
Dear Mr. Hall:

On August 11, 1997, this Office transmitted to you by certified mail a notification that the Commission had found probable cause to believe Friends of Jim Bunn and you, as treasurer, violated 2 U.S.C. § 434(a)(2)(A)(i). At the same time, this Office transmitted to you a proposed conciliation agreement approved by the Commission. The General Counsel's letter requested that if you agreed with the provisions of the enclosed agreement, you sign it and return it, along with a check for the civil penalty, within ten days.

Ten days have now elapsed and we have not heard from you. Accordingly, I wanted you to be aware that the Office of General Counsel does not anticipate pursuing conciliation in this matter longer than the 30 days required by statute. That period expires on September 13, 1997.

If you have any questions, or if you would like to discuss the proposed conciliation agreement, please call me at (202) 219-3690.

Sincerely,


Nancy E. Bell
Attorney

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

) MUR 4626

Friends of Jim Bunn and)

Jim Hall, as treasurer)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Jim Hall, treasurer for Friends of Jim Bunn.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with friends of Jim Bunn and Jim Hall, as treasurer.
2. Close the file.
3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

9/19/97
Date

BY: Lois G. Lerner by AAS
Lois G. Lerner
Associate General Counsel

Attachment

1. Conciliation Agreement

Staff Assigned: Nancy E. Bell

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
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Friends of Jim Bunn and) MUR 4626
Jim Hall, as treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 25, 1997, the Commission decided by a vote of 5-0 to take the following actions in MUR 4626:

1. Accept the conciliation agreement with the Friends of Jim Bunn and Jim Hall, as treasurer, as recommended in the General Counsel's Report dated September 19, 1997.
2. Close the file.
3. Approve the appropriate letter, as recommended in the General Counsel's Report dated September 19, 1997.

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

Attest:

9-25-97
Date

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

Received in the Secretariat: Fri., Sept. 19, 1997 3:54 p.m.
Circulated to the Commission: Mon., Sept. 22, 1997 11:00 a.m.
Deadline for vote: Thurs., Sept. 25, 1997 4:00 p.m.

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FEDERAL ELECTION COMMISSION
Washington, DC 20463

September 30, 1997

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James B. Hall, Jr.
Suite 340
494 State Street
Salem, OR 97301-3620

RE: MUR 4626
Friends of Jim Bunn
and Jim Hall, as Treasurer

Dear Mr. Hall:

On September 25, 1997, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your behalf in settlement of a violation of 2 U.S.C. § 434(a)(2)(A)(i), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). Accordingly, the file has been closed in this matter.

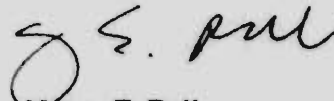
The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any 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.

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Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that 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) 219-3690.

Sincerely,



Nancy E. Bell
Attorney

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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MUR 4626

Friends of Jim Bunn and

)

Jim Hall, 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 probable cause to believe that the Friends of Jim Bunn and Jim Hall, as treasurer ("Respondents"), violated 2 U S C § 434(a)(2)(A)(i)

NOW, THEREFORE, the Commission and the Respondents, having duly entered into conciliation pursuant to 2 U S C § 437g(a)(4)(A)(i), do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding

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

III. Respondents enter voluntarily into this agreement with the Commission

IV. The pertinent facts in this matter are as follows

1. Friends of Jim Bunn was the principal campaign committee for Representative James Lee Bunn in his reelection bid in the 1996 General Election in Oregon's Fifth District

2. Friends of Jim Bunn is a principal campaign committee within the meaning of 2 U S C § 431(5)

3. Jim Hall is the treasurer of the Friends of Jim Bunn

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4 In a calendar year in which there is a regularly scheduled election for which a candidate is seeking election or nomination for election, the principal campaign committee of such candidate shall file a pre-general report no later than the 12th day before (or posted by registered or certified mail no later than the 15th 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)(2)(A)(i). This pre-general report shall disclose all receipts and disbursements as of the 20th day before a primary or general election. 11 C.F.R. § 104.5(a)(1)(i).

5 Pursuant to 2 U.S.C. § 434(a)(2)(A)(i), the Act required Respondents to file the 1996 12 Day Pre-General Report by October 24, 1996, two weeks prior to the Election. Respondents filed their 12 Day Pre-General Report on December 10, 1996, almost seven weeks after the Election, disclosing receipts totaling \$57,105.00 and disbursements totaling \$77,370.00 for the time period covered of which \$17,250.00 in receipts and \$76,213.93 in disbursements required itemization.

V Respondents failed to file timely their 1996 12 Day Pre-General Report in violation of 2 U.S.C. § 434(a)(2)(A)(i).

VI Respondents will pay a civil penalty to the Federal Election Commission in the amount of seventeen hundred dollars (\$1,700), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any

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requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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

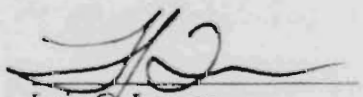
IX Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

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

FOR THE COMMISSION

Lawrence M. Noble
General Counsel

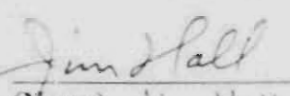
BY


Lois G. Lerner
Associate General Counsel

Date

9/28/97

FOR THE RESPONDENTS


(Name) Jim Hall
(Position) Treasurer

Date

9/17/97

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 4626

DATE FILMED 10-14-97 CAMERA NO. 2

CAMERAMAN JmN

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