

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

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FEDERAL ELECTION COMMISSION  
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**FIRST GENERAL COUNSEL'S REPORT**

**SENSITIVE**

**RAD REFERRAL:** 96NF-06  
**DATE ACTIVATED:** December 19, 1996

**STAFF MEMBER:** Clinett Short  
Tracey Ligon

**SOURCE:** INTERNALLY GENERATED

**RESPONDENTS:** The Nevada State Republican Central Committee  
and Ronald F. Ryan, as Treasurer

**RELEVANT STATUTE:** 2 U.S.C. § 432(a)  
2 U.S.C. § 433(c)  
2 U.S.C. § 434(a) (4) (B)

**INTERNAL REPORTS CHECKED:** Disclosure Reports

**FEDERAL AGENCIES CHECKED:** None

**I. GENERATION OF MATTER**

The Reports Analysis Division ("RAD") referred the Nevada State Republican Central Committee and Robert F. Ryan, as treasurer ("Committee"), to the Office of the General Counsel on November 6, 1996. The basis of the RAD referral is the failure of the Committee to timely file fifteen reports in violation of 2 U.S.C. § 434(a)(4)(B). The following reports were all filed late: 1995 February Monthly Report, 1995 March Monthly Report, 1995 April Monthly Report, 1995 May Monthly Report, 1995 June Monthly Report, 1995 July Monthly Report, 1995 August Monthly Report, 1995 September Monthly Report, 1995 October Monthly Report, 1995

During the course of reviewing the referral of this matter, this Office discovered that the Committee made expenditures and received contributions during periods in which the treasurer position was vacant in violation of 2 U.S.C. § 432(a). This Office also discovered that respondents failed to submit an amended statement of organization in a timely manner reflecting that a change in treasurers occurred in violation of 2 U.S.C. § 433(c).

Based on the Factual and Legal Analysis, see Attachment 1, this Office recommends that the Commission find reason to believe the respondents violated 2 U.S.C. §§ 432(a), 433(c), and 434(a)(4)(B).

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

PAGES 3 THROUGH 12 CONTAIN CONCILIATION INFORMATION,  
THEREFORE, THEY HAVE BEEN REMOVED

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99-04-391-2001

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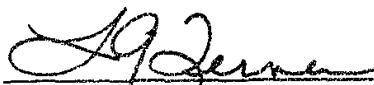
#### IV. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe the Nevada State Republican Central Committee and Ronald F. Ryan, as treasurer, violated 2 U.S.C. § 432 (a).
3. Find reason to believe the Nevada State Republican Central Committee and Ronald F. Ryan, as treasurer, violated 2 U.S.C. § 433 (c).
4. Find reason to believe the Nevada State Republican Central Committee and Ronald F. Ryan, as treasurer, violated 2 U.S.C. § 434 (a) (4) (B).

5. Enter into conciliation prior to a finding of probable cause to believe.
6. Approve the attached Factual and Legal Analysis.
7. Approve the attached Conciliation Agreement.
8. Approve the appropriate letter.

Lawrence M. Noble  
General Counsel

4/15/97  
Date

BY:   
Lois G. Lerner  
Associate General Counsel

Attachments:

1. Factual and Legal Analysis
2. Proposed Conciliation Agreement

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