

DEC 17 1999 **SENSITIVE**

BEFORE THE FEDERAL ELECTION COMMISSION

JAN 11 2000

In the Matter of

)

MURs 4389 and 4652

EXECUTIVE SESSION

James ("Jim") Toledano

)

GENERAL COUNSEL'S REPORT

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT
DEC 17 1999

I. ACTION RECOMMENDED

Authorize the Office of the General Counsel to file a civil suit for relief in U.S. District Court.

II. BACKGROUND

On August 17, 1999, the Commission found probable cause to believe that James Toledano violated 2 U.S.C. § 432(b). The finding was based on Mr. Toledano's failure to forward a \$10,000 contribution to the treasurer of the Orange County Democratic Central Committee as required by law.

[Redacted content]

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As the Commission has signaled a strong interest in pursuing Mr. Toledano for the Section 432(b) violation,

this Office recommends that the Commission authorize the General Counsel to file suit for relief in U.S. District Court.

III. RECOMMENDATIONS

1. Authorize the Office of the General Counsel to file a civil suit for relief in U.S. District Court against James Toledano.
2. Approve the appropriate letters.

Date

12/17/99

Lawrence M. Noble
General Counsel

Staff Assigned: Eugene H. Bull