



FEDERAL ELECTION COMMISSION  
WASHINGTON DC 20463

THIS IS THE BEGINNING OF MUR # 4702

DATE FILMED 1/16/98 CAMERA NO. 2

CAMERAMAN EEJ

93043860500

## REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: APR 7 1997

ANALYST: Jacques P. Andre' Jr.

- I. COMMITTEE: D.C. Republican Committee Federal Campaign  
Committee (C00191288)  
Roger Moffatt, Treasurer  
(August 29, 1995 to Present)  
Robert Thomas Richards, Treasurer  
(Pre-January 1, 1995-August 28, 1995)  
600 Pennsylvania Ave., SE #300  
Washington, DC 20003
- II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(A)(iii) & (iv)  
11 CFR §104.5(c)(1)(iii) & (2)(i)

## III. BACKGROUND:

**Chronic Late Filing of Reports**

The D.C. Republican Committee Federal Campaign Committee ("the Committee") has failed to file three (3) Reports of Receipts and Disbursements in a timely manner for the 1995-1996 election cycle (see attached chart). The reports were filed between thirteen (13) and fifty-seven (57) calendar days late.

On August 29, 1995, the Commission received a letter from Julie Finley, Chairman of the Committee, describing why the 1995 Mid-Year Report was late. She explained that the Committee Treasurer had relocated to Richmond, Virginia; the Executive Director had been in the hospital; and the Committee experienced problems with their database (Attachment 4).

On March 11, 1996 a Chronic Late Filer Notice was sent to the Committee for failing to file the 1995 Mid-Year and the 1995 Year End Reports in a timely manner (Attachment 9). The notice advised the Committee that any additional late filing of reports may result in legal enforcement action.

Subsequent to the sending of the Chronic Late Filer Notice, the Committee failed to timely file the 1996 30 Day Post-General Report.

98043860561

## LATE FILING HISTORY

<u>REPORT TYPE</u>	<u>PRIOR NOTICE</u>	<u>DATE DUE</u>	<u>NON-FILER NOTICE</u>	<u>DATE FILED</u>
1995 Mid-Year (1/1/95-6/30/95)	7/07/95 (Attachment 2)	7/31/95	8/17/95 (Attachment 3)	9/26/95 (Attachment 5)
1995 Year End (7/1/95-12/31/95)	12/29/95 (Attachment 6)	1/31/96	2/23/96 (Attachment 8)	2/22/96* (Attachment 7)
1996 30 Day Post-General (10/17/96-11/25/96)	12/29/95 (Attachment 6) 9/30/96 (Attachment 6) 11/08/96 (Attachment 6)	12/05/96	None	12/18/96 (Attachment 10)

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\* The Report was added to the Commission's database after the Non-Filer Notice was sent.

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	# OF COVERAGE DATES PAGES TYPE OF FILER	MICROFILM LOCATION
D C REPUBLICAN COMMITTEE FEDERAL CAMPAIGN COMMITTEE				ID #C00191288 PARTY QUALIFIED	
CONNECTED ORGANIZATION: NONE					
1995	MISCELLANEOUS REPORT TO FEC			29AUG95	2 95FEC/996/0989
	STATEMENT OF ORGANIZATION - AMENDMENT			5SEP95	2 95FEC/996/2905
	MID-YEAR REPORT	22,829	19,629	1JAN95 -30JUN95	10 95FEC/998/4782
	NOTICE OF FAILURE TO FILE			1JAN95 -30JUN95	2 95FEC/994/2855
	YEAR-END	10,165	12,876	1JUL95 -31DEC95	9 96FEC/031/3733
	NOTICE OF FAILURE TO FILE			1JUL95 -31DEC95	2 96FEC/032/0987
1996	MISCELLANEOUS NOTICE FROM FEC			11MAR96	2 96FEC/033/3218
	APRIL QUARTERLY	15,030	7,311	1JAN96 -31MAR96	5 96FEC/043/0859
	JULY QUARTERLY	6,064	10,955	1APR96 -30JUN96	6 96FEC/064/2398
	OCTOBER QUARTERLY	23,985	10,479	1JUL96 -30SEP96	13 96FEC/094/0312
	OCTOBER QUARTERLY - AMENDMENT	23,985	10,479	1JUL96 -30SEP96	8 96FEC/159/4861
	OCTOBER QUARTERLY - AMENDMENT	23,985	10,479	1JUL96 -30SEP96	9 96FEC/163/1205
	REQUEST FOR ADDITIONAL INFORMATION			1JUL96 -30SEP96	2 96FEC/128/1837
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL96 -30SEP96	3 96FEC/161/3629
	PRE-GENERAL	2,055	5,430	1OCT96 -16OCT96	8 96FEC/118/4857
	POST-GENERAL	699	12,413	17OCT96 -25NOV96	7 96FEC/162/2970
	YEAR-END	95	472	26NOV96 -31DEC96	5 97FEC/176/3205
	REQUEST FOR ADDITIONAL INFORMATION			26NOV96 -31DEC96	2 97FEC/192/3826
	TOTAL	80,922	79,565		97 TOTAL PAGES

All reports have been reviewed

Cash on Hand as of 12/31/96: \$1,957.63

Debts and obligations owed to the committee as of 12/31/96: \$0

Debts and obligations owed by the committee as of 12/31/96: \$15,291.19

# 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.

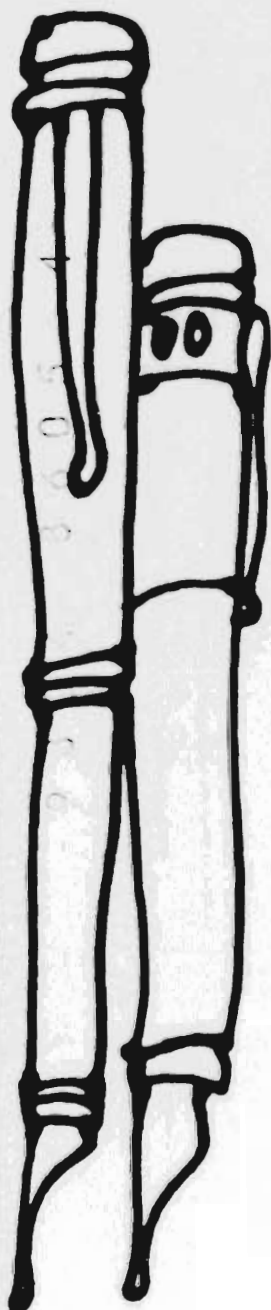
**COMPLIANCE**

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







## 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

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
MAIL ROOM

AUG 29 9 23 AM '95

**District of Columbia  
Republican Committee**Julie Finley  
Chairman

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,

5039904782

# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee  
(Summary Page)

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
MAIL ROOM

Attachment 5  
Page 1 of 2

SEP 26 10 09 AM '95

USE FEC MAILING LABEL  
OR  
TYPE OR PRINT

1. NAME OF COMMITTEE (in full)  
**DC 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**

2. FEC IDENTIFICATION NUMBER  
**C00-191-278**

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

## 4. TYPE OF REPORT

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

### Monthly Report Due On:

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

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

(b) Is this Report an Amendment?

☐ YES ☒ NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
3. Covering Period	<u>1/1/95</u> through <u>6/30/95</u>		
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 18)		\$ 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. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		\$ 0	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-219-3430
10. Debts 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  
**ROGER L. MOFFATT**

Signature of Treasurer  
*Roger L. Moffatt*

Date  
**9/15/95**

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 3X  
(revised 8/93)



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

9-26-95

☐ First Class Mail

POSTMARKED

☐ Registered/Certified Mail

POSTMARKED

☐ 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

JmW  
PREPARER

9-26-95  
DATE PREPARED

20043860538

# YEAR-END REPORT NOTICE

## FEDERAL ELECTION COMMISSION

PARTIES AND PACS .

December 29, 1995

**WHO MUST FILE,**  
Party committees and PACs (nonconnected committees and separate segregated funds) must file a Year-End Report on January 31, 1996.

### REPORT CONTENT AND DATES

#### I. Semiannual Filers

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Year-End	07/01/95 - 12/31/95	01/31/96	01/31/96

Semiannual filers must disclose financial activity that occurred from July 1 through December 31, 1995, on their Year-End Report.

#### II. Monthly Filers

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Year-End	12/01/95 - 12/31/95	01/31/96	01/31/96

Monthly filers must disclose financial activity from December 1 through December 31, 1995, on their Year-End Report.

### CHANGE IN FILING FREQUENCY

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

### LABEL

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

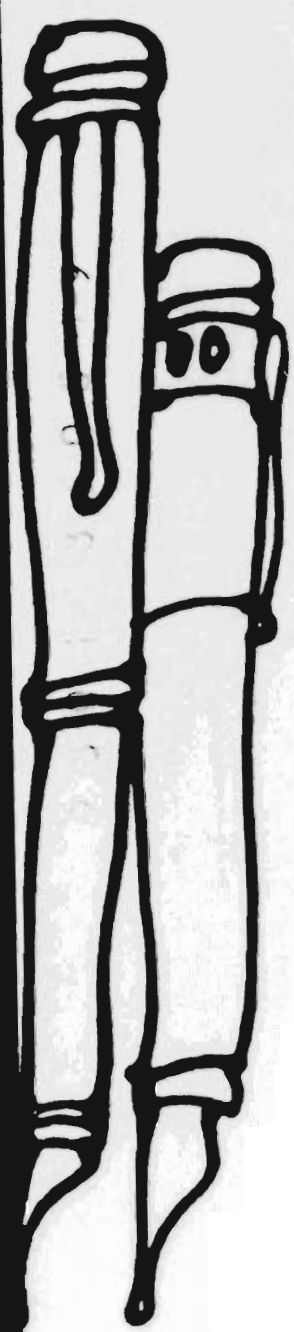
### COMPLIANCE

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.

(over)



**PARTIES AND PACS**

**YEAR-END**

**1996 FILING SCHEDULE**

**I. Quarterly Filers**

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
April	01/01/96 - 03/31/96	04/15/96	04/15/96
July	04/01/96 - 06/30/96	07/15/96	07/15/96
October	07/01/96 - 09/30/96	10/15/96	10/15/96
Pre-General	10/01/96 - 10/16/96	10/21/96	10/24/96
-----24 Hour Reports***-----			
Post-General	10/17/96 - 11/25/96	12/05/96	12/05/96
Year-End	11/26/96 - 12/31/96	01/31/97	01/31/97

**II. Monthly Filers**

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
February	01/01/96 - 01/31/96	02/20/96	02/20/96
March	02/01/96 - 02/29/96	03/20/96	03/20/96
April	03/01/96 - 03/31/96	04/20/96	04/20/96
May	04/01/96 - 04/30/96	05/20/96	05/20/96
June	05/01/96 - 05/31/96	06/20/96	06/20/96
July	06/01/96 - 06/30/96	07/20/96	07/20/96
August	07/01/96 - 07/31/96	08/20/96	08/20/96
September	08/01/96 - 08/31/96	09/20/96	09/20/96
October	09/01/96 - 09/30/96	10/20/96	10/20/96
Pre-General	10/01/96 - 10/16/96	10/21/96	10/24/96
-----24 Hour Reports***-----			
Post-General	10/17/96 - 11/25/96	12/05/96	12/05/96
Year-End	11/26/96 - 12/31/96	01/31/97	01/31/97

\*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.

\*\*\*PACs that make independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours before the election must file 24 Hour Reports. Party committees may not make independent expenditures.

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

# GENERAL ELECTION REPORT NOTICE

## FEDERAL ELECTION COMMISSION

PARTIES AND PACS

September 30, 1996

### I. ALL MONTHLY FILERS

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

### II. QUARTERLY FILERS THAT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 16

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

### III. QUARTERLY FILERS THAT DO NOT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 16\*\*\*

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Post-General	10/01/96 - 11/25/96	12/05/96	12/05/96

#### WHO MUST FILE

Party committees and PACs must follow the above charts in order to determine whether they must file a report 12 days before the general election on November 5 (the Pre-General Report). All Party committees and PACs, regardless of financial activity, must file a report 30 days after the general election (the Post-General Election Report).

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

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

(over)

**PARTIES AND PACS**

**PRE/POST GENERAL ELECTION**

**24 HOUR REPORT ON INDEPENDENT EXPENDITURES**

Any PAC that makes independent expenditures aggregating \$1,000 or more during the period beginning October 17 and ending November 3 must report them within 24 hours.

**LABEL**

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

**COMPLIANCE**

Treasurers of political committees are responsible for filing all reports on time. Failure to do so is subject to enforcement action. Committees filing illegible reports or using non-FEC forms (except for FEC approved computer generated forms) will be required to refile.

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



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**GENERAL ELECTION**

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**REPORT NOTICE**

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**FEDERAL ELECTION COMMISSION**

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**REMINDER**

**REMINDER**

**REMINDER**

November 8, 1996

All party committees and PACs (nonconnected committees and separate segregated funds) must file a Post-General Election Report. Reports sent by registered or certified mail must be postmarked by the mailing date (December 5, 1996); otherwise, they must be received by the filing date (December 5, 1996). FEC Form 3X is enclosed.

2 8 0 4 8 6 0 5 / 3

# REPORT RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee  
(Summary Page)

Attachment 7  
Page 1 of 2

USE PRE-PAID MAILING LABEL  
OR  
TYPE OR PRINT

FEB 22 11 46 AM '95

1. NAME OF COMMITTEE (in full)  
**DC REPUBLICAN COMMITTEE**

ADDRESS (number and street) ☐ Check if different than previously reported  
**440 FIRST STREET, NW STE. 301**

CITY, STATE and ZIP CODE  
**WASHINGTON, DC 20001**

2. FEC IDENTIFICATION NUMBER  
**C00-191-278**

3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on \_\_\_\_\_ (date).

## 4. TYPE OF REPORT

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

- Monthly Report Due On:
- |                                      |                                       |                                      |
|--------------------------------------|---------------------------------------|--------------------------------------|
| <input type="checkbox"/> February 20 | <input type="checkbox"/> June 20      | <input type="checkbox"/> October 20  |
| <input type="checkbox"/> March 20    | <input type="checkbox"/> July 20      | <input type="checkbox"/> November 20 |
| <input type="checkbox"/> April 20    | <input type="checkbox"/> August 20    | <input type="checkbox"/> December 20 |
| <input type="checkbox"/> May 20      | <input type="checkbox"/> September 20 | <input type="checkbox"/> 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 \_\_\_\_\_

☐ Termination Report

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

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5	Covering Period <u>07/01/95</u> through <u>12/31/95</u>		
6	(a) Cash on Hand January 1, 19____		\$ 600.23
	(b) Cash on Hand at Beginning of Reporting Period	\$ 3,801.03	
	(c) Total Receipts (from Line 18)	\$ 10,165.91	\$ 32,995.87
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 13,966.94	\$ 33,596.10
7	Total Disbursements (from Line 30)	\$ 12,876.00	\$ 32,505.16
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 1,090.94	\$ 1,090.94
9	Debts and Obligations Owed TO the Committee (itemize all on Schedule C and/or Schedule D)	\$ 0.00	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-219-3420
10	Debts and Obligations Owed BY the Committee (itemize all on Schedule C and/or Schedule D)	\$ 0.00	

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  
**ROGER L. JEFFATT**

Signature of Treasurer  
*Roger L. Jeffatt*

Date  
12/19/95

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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**Federal Election Commission**  
**ENVELOPE REPLACEMENT PAGE**  
**FOR INCOMING DOCUMENTS**

Attachment 7  
Page 2 of 2

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

☒ Hand Delivered

DATE OF RECEIPT

*2/22/96*

☐ First Class Mail

POSTMARKED

☐ Registered/Certified Mail

POSTMARKED

☐ 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

*E.S.*  
PREPARER

*2/22/96*  
DATE PREPARED



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-7

February 23, 1996

Roger Moffatt, Treasurer  
D C Republican Committee  
Federal Campaign Committee  
440 First Street NW, Third Floor  
Washington, DC 20001

Identification Number: C00191288

Reference: Year End Report (7/1/95-12/31/95)

Dear Mr. Moffatt:

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 Secretary of the Senate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR §§108.2, 108.3, 108.4).

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

If you have any questions, please contact 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



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MS-L

MAR 11 1996

Roger Moffatt, Treasurer  
D.C. Republican Committee  
Federal Campaign Committee  
440 First Street, NW, 3rd Floor  
Washington, DC 20001

Identification Number: C00191288

Reference: 1995-1996 Election Cycle Reports

Dear Mr. Moffatt:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may have violated 2 U.S.C. 5434(a), by failing to timely file Reports of Receipts and Disbursements. The following is a list of the reports in question.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
1995 Mid-Year (1/1/95-6/30/95)	7/31/95	9/26/95
1995 Year End (7/1/95-12/31/95)	1/31/96	2/22/96

Timely filing is a specific requirement of the Federal Election Campaign Act ("the Act") and is essential to fulfilling the public disclosure concept embodied in that law. The Commission views failure to timely file reports as a serious violation of the Act. This communication is to advise you that, notwithstanding any matters which may be pending before the Commission, any additional report which is not submitted in a timely manner by your committee may result in the Commission initiating legal enforcement or audit action.

You may submit a letter of explanation in response to this notification. If, however, you have any questions, please feel free to contact J.P. Andre' on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Lisa J. Stolaruk  
Chief, Party/Non-Party Branch  
Reports Analysis Division



## REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee  
(Summary Page)RECEIVED: Attachment 10  
FEDERAL ELECTION COMMISSION  
MAIL ROOM  
Page 1 of 2

DEC 18 12 27 PM '96

1. NAME OF COMMITTEE (in full)  
DISTRICT OF COLUMBIA REPUBLICAN COMMITTEE

ADDRESS (number and street) ☐ Check if different than previously reported  
666 PENNSYLVANIA AVENUE, S.E.

CITY, STATE and ZIP CODE  
WASHINGTON, D.C. 20003

2. FEC IDENTIFICATION NUMBER  
C-0011-371

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

## 4. TYPE OF REPORT

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

Monthly Report Due On:

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

☐ Twelfth day report preceding \_\_\_\_\_ (Type of Election)  
 election on \_\_\_\_\_ in the State of \_\_\_\_\_

☒ Thirtieth day report following the General Election on

Nov 5, 1996 in the State of NATION

(b) Is this Report an Amendment?

☐ YES☒ NO

## SUMMARY

5. Covering Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
<u>OCTOBER 17, 1996 through NOVEMBER 25, 1996</u>		
6. (a) Cash on Hand January 1, 19 <u>96</u>		\$ <u>1,090.94</u>
(b) Cash on Hand at Beginning of Reporting Period	\$ <u>14,048.70</u>	
(c) Total Receipts (from Line 18)	\$ <u>699.76</u>	\$ <u>47,834.15</u>
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Line 6(a) and 6(c) for Column B)	\$ <u>14,748.46</u>	\$ <u>48,925.09</u>
7. Total Disbursements (from Line 30)	\$ <u>12,413.48</u>	\$ <u>46,590.11</u>
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ <u>2,334.98</u>	\$ <u>2,334.98</u>
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ <u>NONE</u>	For further information contact: Federal Election Commission 900 E Street, NW Washington, DC 20003 Toll Free 800-424-6530 Local 202-219-3420
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ <u>NONE</u>	

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

Type or Print Name of Treasurer

ROGER L. MUFFATT

Signature of Treasurer

Roger L. Muffatt 12/05/96

Date

DECEMBER 5, 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.

FEC FORM 3X

(revised 8/93)

**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

12-4-96

☐

Registered/Certified Mail

POSTMARKED

☐

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

SES

PREPARED

12-18-96

DATE PREPARED

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

Nov 16 3 42 PM '97

**FIRST GENERAL COUNSEL'S REPORT**

**SENSITIVE**

RAD REFERRAL: 97NF-07  
DATE ACTIVATED: 10/27/97

STAFF MEMBER: J. Michael Lehmann

SOURCE: INTERNALLY GENERATED

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

RELEVANT STATUTES: 2 U.S.C. § 434(a)(4)(A)(iii) and (iv)  
11 CFR § 104.5(c)(1)(iii) and (2)(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 on April 7, 1997. The basis for the referral is the failure of D.C. Republican Committee Federal Campaign Committee and Roger Moffatt, as treasurer, ("Respondents") to timely file three disclosure reports during the 1995-1996 election cycle. Specifically, Respondents failed to timely file 1995 Mid-Year and Year End Reports, as well as their 1996 30 Day Post-General Election Report.

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## II. FACTUAL AND LEGAL ANALYSIS

Based on the attached Factual and Legal Analysis, ~~see~~ Attachment 1, this Office recommends the Commission find reason to believe Respondents violated 2 U.S.C.

§ 434(a)(4)(A)(iii) and (iv).

## III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

20043860561

#### IV. RECOMMENDATIONS


1. Open a MUR.
2. Find reason to believe that D.C. Republican Committee Federal Campaign Committee and Roger Moffatt, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii) and (iv) and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the attached Factual and Legal Analysis and conciliation agreement, and the appropriate letter.

Lawrence M. Noble  
General Counsel

Date

11/18/97

BY:

  
Lois G. Lerner  
Associate General Counsel

#### Attachments:

1. Factual and Legal Analysis
2. Proposed Conciliation Agreement



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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

)  
)  
) RAD Referral  
) #97NF-07  
)

MUR 4702

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 21, 1997, the Commission decided by a vote of 5-0 to take the following actions in RAD Referral #97NF-07:

1. Open a MUR.
2. Find reason to believe that D.C. Republican Committee Federal Campaign Committee and Roger Moffatt, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii) and (iv) and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the Factual and Legal Analysis and conciliation agreement, and the appropriate letter, as recommended in the General Counsel's Report dated November 18, 1997.

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

Attest:

11-21-97  
Date

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

Received in the Secretariat: Tues., Nov. 18, 1997 3:42 p.m.  
Circulated to the Commission: Wed., Nov. 19, 1997 11:00 a.m.  
Deadline for vote: Mon., Nov. 24, 1997 4:00 p.m.

lrd

28043860583



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 25, 1997

Roger Moffatt, Treasurer  
D.C. Republican Committee Federal Campaign Committee  
600 Pennsylvania Ave., SE  
Suite 300  
Washington, DC 20003

RE: MUR 4702

Dear Mr. Moffatt:

On November 21, 1997, the Federal Election Commission found that there is reason to believe D.C. Republican Committee Federal Campaign Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii) & (iv), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath. In the absence of additional information, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

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

If you are interested in expediting the resolution of this matter by pursuing preprobable cause conciliation, and if you agree with the provisions of the enclosed agreement, please sign and return the agreement, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

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.

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Roger Moffatt  
Page 2

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 Michael Lehmann, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

*Joan D. Aikens*

Joan D. Aikens  
Vice Chairman

Enclosures  
Factual and Legal Analysis  
Procedures  
Designation of Counsel Form  
Conciliation Agreement

20043860585

**FEDERAL ELECTION COMMISSION**  
**FACTUAL AND LEGAL ANALYSIS**

RESPONDENT: D.C. Republican Committee Federal Campaign MUR 4702  
Committee and Roger Moffatt, as treasurer

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

The Federal Election Campaign Act of 1971, as amended, ("the Act") requires treasurers of political committees other than authorized committees of a candidate to file periodic reports of receipts and disbursements. 2 U.S.C. § 434(a)(1). In a non-election year, such committees must file a report covering the period beginning January 1 and ending June 30 -- which shall be filed no later than July 31 -- and a report covering the period beginning July 1 and ending December 31 -- which shall be filed no later than January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(A)(iv). In any calendar year in which a regularly scheduled election is held, political committees other than authorized committees of candidates shall file a post-general election report no later than the 30th day after the general election, which shall be complete as of the 20th day after such election. 2 U.S.C. § 434(a)(4)(A)(iii).

BEFORE THE FEDERAL ELECTION COMMISSION

11 21 '97

**SENSITIVE**

In the Matter of )  
 ) MUR 4702  
D.C. Republican Committee Federal )  
Campaign Committee and Roger Moffatt, )  
as treasurer )

**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND**

On November 21, 1997, the Commission found reason to believe that D.C. Republican Committee Federal Campaign Committee and Roger Moffatt, as treasurer, ("Respondents") violated 2 U.S.C. § 434(a)(4)(A)(iii) and (iv), and entered into conciliation prior to finding probable cause to believe. The agreement approved by the Commission contained an admission of the violation and a civil penalty. Attached for the Commission's approval is a conciliation agreement which has been signed by Roger Moffatt, treasurer of D.C. Republican Committee Federal Campaign Committee.

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II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with D.C. Republican Committee Federal Campaign Committee and Roger Moffatt, as treasurer
2. Close the file.
3. Approve the appropriate letter.

Lawrence M. Noble  
General Counsel

Dec 22, 1997  
Date

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

## Attachments

1. Conciliation Agreement
2. Photocopy of civil penalty check

Staff Assigned: J. Michael Lehmann

28043860538

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
D.C. Republican Committee Federal ) MUR 4702  
Campaign Committee and Roger Moffatt, )  
as treasurer. )

CERTIFICATION

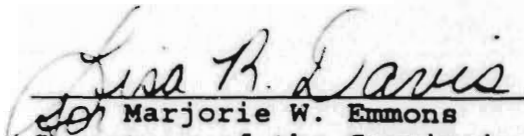
I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on December 30, 1997, the Commission decided by a vote of 5-0 to take the following actions in MUR 4702:

1. Accept the conciliation agreement with D.C. Republican Committee Federal Campaign Committee and Roger Moffatt, as treasurer, as recommended in the General Counsel's Report dated December 22, 1997.
2. Close the file.
3. Approve the appropriate letter, as recommended in the General Counsel's Report dated December 22, 1997.

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

Attest:

12-30-97  
Date

  
for Marjorie W. Emmons  
Secretary of the Commission

Received in the Secretariat: Tues., Dec. 23, 1997 11:11 a.m.  
Circulated to the Commission: Tues., Dec. 23, 1997 4:00 p.m.  
Deadline for vote: Tues., Dec. 30, 1997 4:00 p.m.

lrd



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

January 7, 1998

Roger Moffatt, Treasurer  
D.C. Republican Committee Federal Campaign Committee  
600 Pennsylvania Ave., SE  
Suite 300  
Washington, DC 20003

RE: MUR 4702

Dear Mr. Moffatt:

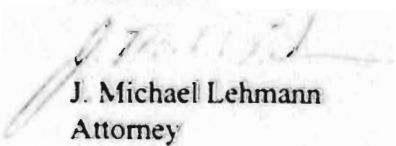
On December 30, 1997, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your behalf in settlement of violations of 2 U.S.C. § 434(a)(4)(A)(iii) and (iv), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Accordingly, the file has been closed in this matter.

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

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

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact me at (202) 219-3690.

Sincerely,

  
J. Michael Lehmann  
Attorney

Enclosure  
Conciliation Agreement

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of )  
 ) MUR 4702  
D.C. Republican Committee Federal )  
Campaign Committee and Roger Moffatt, )  
as treasurer )

DEC 15 10 51 AM '97

**CONCILIATION AGREEMENT**

This matter was initiated by the Federal Election Commission ("Commission") pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that D.C. Republican Committee Federal Campaign Committee and Roger Moffatt, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii) and (iv).

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

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

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

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

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

1. D.C. Republican Committee Federal Campaign Committee is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Respondent Roger Moffatt is the treasurer of D.C. Republican Committee Federal Campaign Committee.

3. The Federal Election Campaign Act of 1971, as amended, ("the Act") requires treasurers of political committees other than authorized committees of a candidate to file periodic reports of receipts and disbursements. 2 U.S.C. § 434(a)(1).

4. In a year in which a regularly scheduled election is not held, political committees other than authorized committees of a candidate must file a report covering the period beginning January 1 and ending June 30 -- which shall be filed no later than July 31 -- and a report covering the period beginning July 1 and ending December 31 -- which shall be filed no later than January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(A)(iv).

5. In any calendar year in which a regularly scheduled election is held, such political committees shall file a post-general election report no later than the 30th day after the general election, which shall be complete as of the 20th day after such election. 2 U.S.C. § 434(a)(4)(A)(iii).

6. Pursuant to the Act, Respondents were required to file a Mid-Year Report by July 31, 1995. 2 U.S.C. § 434(a)(4)(A)(iv). They filed their Mid-Year Report on September 26, 57 days after the required date. That report disclosed receipts totaling \$22,829.96 and disbursements totaling \$19,629.16 during the applicable period.

7. Pursuant to the Act, Respondents were required to file a Year End Report by January 31, 1996. 2 U.S.C. § 434(a)(4)(A)(iv). They filed their Year End Report on February 22, 22 days after the required date. That report disclosed receipts totaling \$10,165.91 and disbursements totaling \$12,876.00 during the applicable period.

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8. Pursuant to the Act, Respondents were required to file a 30 Day Post-General Election Report on December 5, 1996. 2 U.S.C. § 434(a)(4)(A)(iii). Respondents filed their 30 Day Post-General Election on December 18, 13 days after the required date. That report disclosed receipts totaling \$699.76 and disbursements totaling \$12,413.48 during the applicable period.

V. Respondents failed to timely file their 1995 Mid-Year and Year End Reports, in violation of 2 U.S.C. § 434(a)(4)(A)(iv), and their 1996 30 Day Post-General Election Report, in violation of 2 U.S.C. § 434(a)(4)(A)(iii).

VI. Respondents will pay a civil penalty to the Commission in the amount of seventeen hundred dollars (\$1,700.00) 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 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

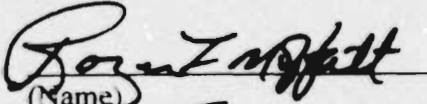
BY:

  
Lois G. Lerner  
Associate General Counsel

Date

1/7/98

FOR RESPONDENTS:

  
(Name)  
(Position) Treasurer

Date

December 5, 1997

28047860594

THIS IS THE END OF MUR # 4702

20043860595



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 4702

DATE FILMED 1/16/98 CAMERA NO. 2

CAMERAMAN EES

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