



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 4755

DATE FILMED 8/14/98 CAMERA NO. 1

CAMERAMAN SES

98043624695

REPORTS ANALYSIS REFERRAL
TO
OFFICE OF GENERAL COUNSEL

DATE: March 4, 1998

ANALYST: Melissa Hurd

- I. COMMITTEE: Women's Alliance for Israel
(C00236596)
Helen Pollak, Treasurer
(April 21, 1997 - Present)
Polina S. Jaeger, Treasurer
(July 31, 1992 - April 20, 1997)
8306 Wilshire Boulevard #1579
Beverly Hills, CA 90211
- II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(A)(iv)
11 CFR §104.5(c)(2)(i)(A)

III. BACKGROUND:

Failure to Timely File the 1997 Mid-Year Report

The Women's Alliance for Israel ("the Committee") failed to timely file the 1997 Mid-Year Report of Receipts and Disbursements covering the period from January 1, 1997 through June 30, 1997. The Committee was notified on December 30, 1996 and July 7, 1997 that the report was due on July 31, 1997 (Attachment 2).

On August 19, 1997, a Non-Filer Notice was sent to the Committee via mailgram for failure to file the 1997 Mid-Year Report (Attachment 3).

* The Committee filed an amended Statement of Organization on April 21, 1997, notifying the Commission of its new treasurer and mailing address. The December 30, 1996 Prior Notice was sent to the former treasurer and address of record.

On September 15, 1997, the Reports Analysis Division ("RAD") Analyst tried to reach Ms. Pollak at the Committee's office, but was told to call again the following day as Ms. Pollak would be out of the office that day. On September 16, 1997, the analyst was given Ms. Pollak's home phone number by her secretary and left a message on an answering machine. Ms. Pollak contacted the analyst later that day and said that the Committee had sent the information to its accountant, but they were behind schedule, and would file the report as soon as it was finished (Attachment 4).

On January 30, 1998, the Committee's 1997 Mid-Year Report was filed via certified/registered mail (Attachment 5).

9 0 0 4 3 0 9 1 6 9 7

FEDERAL ELECTION COMMISSION
1997-1998
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

Attachment 1

DATE 3MAR98

PAGE 1 of 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
						TYPE OF FILER
WOMEN'S ALLIANCE FOR ISRAEL						
CONNECTED ORGANIZATION:	NONE					
1997 STATEMENT OF ORGANIZATION - AMENDMENT				21APR97	2	97FEC/197/3070
MID-YEAR REPORT	68,845	28,577		1JAN97 -30JUN97	21	98FEC/277/2074
NOTICE OF FAILURE TO FILE				1JAN97 -30JUN97	2	97FEC/236/0498
REQUEST FOR ADDITIONAL INFORMATION				1JAN97 -30JUN97	4	98FEC/284/3785
YEAR-END	37,112	34,916		1JUL97 -31DEC97	24	98FEC/277/2095
REQUEST FOR ADDITIONAL INFORMATION				1JUL97 -31DEC97	3	98FEC/284/3789
TOTAL	105,957	0	63,493	0	56	TOTAL PAGES

ID #C00236596 NON-PARTY QUALIFIED

All reports listed have been reviewed.

Ending cash on hand as of 12/31/97: \$73,645.68

Debts owed to/by the Committee: \$0.00

96043694690

YEAR-END REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 30, 1996

QUARTERLY AND MONTHLY FILERS

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Year-End	11/26/96 - 12/31/96	01/31/97	01/31/97

WHO MUST FILE

All party committees and PACs (nonconnected committees and separate segregated funds) must file a Year-End Report.

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 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

1997 REPORTING SCHEDULE
PARTIES AND PACS*

I. SEMIANNUAL FILERS**

REPORT	REPORTING PERIOD	REG./CERT. MAILING DATE***	FILING DATE
Mid-Year	01/01/97 - 06/30/97	07/31/97	07/31/97
Year-End	07/01/97 - 12/31/97	01/31/98	01/31/98

II. MONTHLY FILERS

REPORT	REPORTING PERIOD	REG./CERT. MAILING DATE***	FILING DATE
February	01/01/97 - 01/31/97	02/20/97	02/20/97
March	02/01/97 - 02/28/97	03/20/97	03/20/97
April	03/01/97 - 03/31/97	04/20/97	04/20/97
May	04/01/97 - 04/30/97	05/20/97	05/20/97
June	05/01/97 - 05/31/97	06/20/97	06/20/97
July	06/01/97 - 06/30/97	07/20/97	07/20/97
August	07/01/97 - 07/31/97	08/20/97	08/20/97
September	08/01/97 - 08/31/97	09/20/97	09/20/97
October	09/01/97 - 09/30/97	10/20/97	10/20/97
November	10/01/97 - 10/31/97	11/20/97	11/20/97
December	11/01/97 - 11/30/97	12/20/97	12/20/97
Year-End	12/01/97 - 12/31/97	01/31/98	01/31/98

*Committees that wish to change their filing status must notify the Commission in writing when they file their next report due under their current reporting schedule.

**Committees that filed quarterly reports in 1996 are only required to file semiannually in 1997.

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

FOR MORE INFORMATION CALL: 800/424-9530 OR 202/219-3420

960043094700

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

July 7, 1997

WHO MUST FILE

All Party Committees and PACs (Nonconnected Committees and Separate Segregated Funds) must file either a mid-year or monthly report in July.

I. Quarterly Filers

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Mid-Year	01/01/97 - 06/30/97	07/31/97	07/31/97

II. Monthly Filers

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
July Monthly	06/01/97 - 06/30/97	07/20/97	07/20/97

24 HOUR REPORT ON 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 day of the election.

LABEL

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

*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)

CHANGE IN FILING FREQUENCY

Committees wishing to change their reporting schedule (for example, from monthly to semiannual) 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.

ELECTRONIC FILING

For reports covering activity occurring in 1997 (and later), political committees have the option of filing electronically. If you are interested in this option, review the enclosed handout entitled "Electronic Filing Gets Underway at FEC," and call the Data Division at (800) 424-9530 or (202) 219-3730.

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.

9 8 0 4 3 6 2 4 7 0 2

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

AUG 19 1997

WESTERN
UNION

CONFIRMATION OF MAILGRAM TO: WOMEN'S ALLIANCE FOR ISRAEL
ELECTRONIC MAIL SERVICES
HELEN POLLAK
8306 WILSHIRE BLVD # 1579
BEVERLY HILLS CA 90211-2382

FEDERAL ELECTION COMMISSION
SHAWN WERTH
999 E ST. NW.
WASHINGTON DC 204630001

IDENTIFICATION NUMBER: C00236596

REFERENCE: MID-YEAR (01/01/1997 - 06/30/1997)

DEAR TREASURER:

IT HAS COME TO THE ATTENTION OF THE FEDERAL ELECTION COMMISSION THAT YOU MAY HAVE FAILED TO FILE THE ABOVE REFERENCED 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.

IT IS IMPORTANT THAT YOU FILE THIS REPORT IMMEDIATELY WITH THE FEDERAL ELECTION COMMISSION, 999 E STREET, N.W., WASHINGTON, D.C. 20463 (OR WITH THE SECRETARY OF THE SENATE). A COPY OF THE REPORT OR RELEVANT PORTIONS SHOULD ALSO BE FILED WITH THE SECRETARY OF STATE OR EQUIVALENT STATE OFFICER.

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 REGARDING THIS MATTER, PLEASE CONTACT JACQUES P. ANDRE, JR ON OUR TOLL FREE NUMBER (800)424-9530. OUR LOCAL NUMBER IS (202)219-3580.

SINCERELY,

JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

TELECON

ANALYST: Melissa Hurd
 CONVERSATION WITH: Helen Pollak
 COMMITTEE: Women's Alliance for Israel
 DATE: September 16, 1997
 SUBJECTS(S): Failure to Timely File Report

On September 15, 1997, the RAD analyst called the Committee and spoke with a secretary who stated that Ms. Pollak would be out of the office on that day. The secretary further stated that the analyst should try again the following day. After calling Ms. Pollak at the Committee's office on September 16, 1997, the analyst was given Ms. Pollak's home phone number and left a detailed message on a machine. Later that same day, Ms. Pollak returned the analyst's phone call and stated that the Committee's information for the 1997 Mid-Year Report had been given to their accountant, but they were running behind schedule. The Committee would be filing their 1997 Mid-Year Report as soon as it was finished.

98043321704

REPORT OF RECEIPTS AND DISBURSEMENTS

Attachment 5

For Other Than An Authorized Committee
(Summary Page)

Page 1 of 2

RECEIVED
FEDERAL ELECTION
COMMISSION MAIL ROOM

FEB 3 12 59 PM '98

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) WOMEN'S ALLIANCE FOR ISRAEL		2. FEC IDENTIFICATION NUMBER C 00236596
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 8306 WILSHIRE BLVD #1579		
CITY, STATE and ZIP CODE BEVERLY HILLS, CA 90211		
		3. <input checked="" type="checkbox"/> 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:

<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

☐ 12-Day Pre-Election Report for the _____
(Type of Election)

election on _____ in the State of _____

☐ 30-Day Post-Election 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
5. Covering Period	<u>1/1/97</u> through <u>6/30/97</u>		
6. (a) Cash on Hand January 1, 19____			\$ 31,181.43
(b) Cash on Hand at Beginning of Reporting Period		\$ 31,181.43	
(c) Total Receipts (from Line 19)		\$ 68,845.39	\$ 68,845.39
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 100,026.82	\$ 100,026.82
7. Total Disbursements (from Line 30)		\$ 28,577.08	\$ 28,577.08
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 71,449.74	\$ 71,449.74
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		\$	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9630 Local 202-219-3420
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)		\$	

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

HELEN POLLAK

Signature of Treasurer

Helen Pollak

Date

11/30/98

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 10/93)

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

☒ Registered/Certified Mail POSTMARKED
1-30-88

☐ 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:

☐ Electronic Filing

MVD

2-3-88

PREPARER

DATE PREPARED

(7/97)

98032772094

FEDERAL ELECTION COMMISSION

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

RECEIVED
FEDERAL ELECTION COMMISSION
JUN 3 4 25 PM '98
SECRET

FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

RAD REFERRAL: #98NF-02

DATE ACTIVATED: 5/21/98

STAFF MEMBER: Tamara K. Kapper

SOURCE: INTERNALLY GENERATED

RESPONDENTS: Women's Alliance for Israel and Helen Pollak, as treasurer

RELEVANT STATUTE: 2 U.S.C. § 434(a)(4)(A)(iv)

INTERNAL REPORTS CHECKED: Referral Material
Disclosure Reports

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Office of the General Counsel received a referral from the Reports Analysis Division ("RAD") on March 5, 1998. The basis of the referral is the failure of the Women's Alliance for Israel and Helen Pollak, as treasurer, ("Respondents") to file timely a 1997 Mid-Year Report.

II. FACTUAL AND LEGAL ANALYSIS

Based on the 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)(iv).

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

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IV. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe Women's Alliance for Israel and Helen Pollak, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(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

6/3/98
Date

BY: 
Lois G. Lerner
Associate General Counsel

Attachments:

1. Factual and Legal Analysis
2. Proposed Conciliation Agreement

98043694703

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Women's Alliance for Israel) RAD Referral
and Helen Pollak, as treasurer.) #98NF-02

MUR 4755

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 8, 1998, the Commission decided by a vote of 5-0 to take the following actions in RAD Referral #98NF-02:

1. Open a MUR.
2. Find reason to believe Women's Alliance for Israel and Helen Pollak, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(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 June 3, 1998.

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

Attest:

6/8/98
Date

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

Received in the Secretariat: Wed., June 03, 1998 4:25 p.m.
Circulated to the Commission: Thru., June 04, 1998 11:00 a.m.
Deadline for vote: Tues., June 09, 1998 4:00 p.m.

vfv

98043694709



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Helen Pollak, Treasurer
Women's Alliance for Israel
8306 Wilshire Boulevard #1579
Beverly Hills, CA 90211

RE: MUR 4755
Women's Alliance for Israel and
Helen Pollak, as treasurer

Dear Ms. Pollak:

On June 8, 1998, the Federal Election Commission found that there is reason to believe Women's Alliance for Israel ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv), 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.

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.

Ms. Pollak
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 Tamara Kapper, the staff member assigned to this matter, at (202) 694-1650.

Sincerely,

Joan D. Aikens

Joan D. Aikens
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Conciliation Agreement

98043094711

FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Women's Alliance for Israel
and Helen Pollak, as treasurer

MUR: 4755

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). Such committees may choose to file reports either on a monthly or quarterly basis. 2 U.S.C. § 434(a)(4). In a non-election year, such committees must also file a report covering the period beginning January 1 and ending June 30, which shall be filed no later than July 31. 2 U.S.C. § 434(a)(4)(A)(iv).

The Women's Alliance for Israel ("the Committee") is a political committee not authorized by any candidate, which has elected to file disclosure reports on a quarterly basis. Helen Pollak is the treasurer of the Committee.

Pursuant to 2 U.S.C. § 434(a)(4)(A)(iv), the due date for the Committee's 1997 Mid-Year Report was July 31, 1997. Respondents were notified on December 30, 1996, and on July 7, 1997, that the 1997 Mid-Year Report was due on July 31, 1997. On August 19, 1997

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Respondents were sent a mailgram non-filer notice instructing them to file the late report immediately, and informing them that the Commission might initiate an audit or legal enforcement action regarding the late report. On January 30, 1998, Respondents filed the 1997 Mid-Year Report, 183 days late, disclosing receipts totaling \$68,845 and disbursements totaling \$28,577.

Based on the foregoing, there is reason to believe the Women's Alliance for Israel and Helen Pollak, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv).

93043894713

PRESIDENT
Elaine Robinson

BOARD OF DIRECTORS

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VP Democratic Rep.
Nettie Becker
VP Republican Rep.
Lily Aronstein, Shelley Ventura Cohen, Ph.D.
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Vivian Alberts, Rita Sinder
Co-VP's Research
Leah Purwin D'Agostino
VP Congressional Liaison
Rosalie Zalis
VP Community Outreach
Sharon Fischer
VP Program
Danielle Nelson Erem
VP Israeli Community Liaison
Marlene Krestenberg, Judith Raphael
Co-VP's Education
Roberta Firestone, Carol Levin
Co-VP's Reception
Marion Hindin, Linda Lubitz
Co-VP's Hospitality
Helen Pollak
Treasurer
Sara Spivak
Director of Records
Phyllis Lent
Director, Accts. Receivable
Nancy Klemens
Recording Secretary
Helene Greenfield
Parliamentarian
Rosalind Pritikin
Legal Advisor
Carole Silver
Director of Development
Esther Berger
Professional Women's Chair
Leonore Hausner
Speaker's Chair
Alice Schoenfeld, Rena Slomovic
Founders Co-Chairs
Eleanor Botney
Benefactors Chair
Dvora Colker, Wilma Kurtzman
Assoc. Research Co-Chairs
Ronit Gura, Esther Liberman
Assoc. Outreach Co-Chairs
Arlene Elliott
Publicity Chair
Rivka Seiden, Carole Bolotin
Assoc. Hospitality Chair
Gabriella Bashner, Shirley Kabert
Assoc. Reception Co-Chairs
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Rita Sinder
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Women's Alliance For Israel

A POLITICAL ACTION COMMITTEE

Ms. Joan D. Aikens, Chairman
Federal Election Commission

Attention: Tamara Kapper

June 26, 1998

RE: MUR 4755

Women's Alliance For Israel &
Helen Pollak, as treasurer

Dear Tamara:

Thank you for your time when I called on Monday.

As I explained to you in our telephone conversation our Treasurer, Helen Pollak, is on vacation.

I was very embarrassed and disturbed to get your packet on Friday, June 19th, addressed to Helen, regarding our late filing of the June 30, 1997 FEC Report and the subsequent penalty. Following are the mitigating facts:

1. All of our reports have been timely and in order in the entire ten years of our existence.
2. All of our officers are volunteers who donate their time. Some are working professionals and some are homemakers.
3. Our immediate past Treasurer, Polina Jaeger, is a CPA by profession, working at Ernst & Young. For the past several years Polina prepared our FEC reports. Polina was promoted in her firm and was transferred to an office outside of the United States, where she is now living and working.
4. When our current Treasurer, Helen Pollak, took the job there was only time for one meeting with Polina before her move. Unfortunately because Polina was out of the country there was no time for mentoring.
5. Helen asked her accountant to prepare our FEC reports - but somehow, somewhere, the new accountant thought that the mid-year report would be done by the old accountant and therefore neither prepared it.

We profusely apologize for this human error and assume that it will never happen again.

PRESIDENT,
Elaine Robinson

BOARD OF DIRECTORS

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Exec. Vice President
Dr. Sandra L. Klasky
V.P. Democratic Rep.
Nettie Becker
V.P. Republican Rep.
Lily Artenstein, Shelley Ventura Cohen, Ph.D.
Co-V.P.'s Membership
Vivian Alberts, Rita Sinder
Co-V.P.'s Research
Leah Purwin D'Agostino
V.P. Congressional Liaison
Rosalie Zalts
V.P. Community Outreach
Sharon Fischer
V.P. Program
Danielle Nelson Erem
V.P. Israeli Community Liaison
Marlene Krestenberg, Judith Raphael
Co-V.P.'s Education
Roberta Firestone, Carol Levin
Co-V.P.'s Reception
Marion Hindin, Linda Lubitz
Co-V.P.'s Hospitality
Helen Pollak
Treasurer
Sarit Spiwak
Director of Records
Phyllis Lent
Director, Accts. Receivable
Nancy Klemens
Recording Secretary
Helene Greenfield
Parliamentarian
Rosalind Pritikin
Legal Advisor
Carole Silver
Director of Development
Esther Berger
Professional Women's Chair
Leonore Hausner
Speaker's Chair
Alice Schoenfeld, Rena Slomovic
Founders Co-Chairs
Eleanor Botney
Benefactors Chair
Dvora Colker, Wilma Kurtzman
Assoc. Research Co-Chairs
Ronit Gura, Esther Liberman
Assoc. Outreach Co-Chairs
Arlene Elliott
Publicity Chair
Rivka Seiden, Carole Bolotin
Assoc. Hospitality Chair
Gabriella Bashner, Shirley Kaberi
Assoc. Reception Co-Chairs
Evelyn Motzkin, M.D.
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Rita Sinder
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MEMBERS AT LARGE

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Arlene Rettig
Lois Rosen
Barbara Schechter
Pamela J. Smith
Toni Stone
Frankie Sugarman

ADVISORY BOARD

Diane Glazer
MeraLee Goldman
Deanie Levine
Joy Picas
Janet Salter
Fran Sherwood

Women's Alliance For Israel

A POLITICAL ACTION COMMITTEE

Because we have always filed timely since our establishment ten years ago and because of the mitigating facts listed above, we plead with you to waive this fee.

If you have any further questions or comments please call me at 818-784-0674 (my home) or fax me at 818-784-7957.

Sincerely,



Elaine Robinson
President



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 10, 1998

TWO WAY MEMORANDUM

TO: OGC Docket

FROM: Rosa E. Swinton *RES*
Accounting Technician

SUBJECT: Account Determination for Funds Received

We recently received a check from **The Women's Alliance for Israel PAC**, check number **1458**, dated **July 6, 1998**, for the amount of **1800.00**. A copy of the check and any correspondence is being forwarded. Please indicate below which account the funds should be deposited and give the MUR/Case number and name associated with the deposit.

=====

TO: Rosa E. Swinton
Accounting Technician

FROM: OGC Docket *RED*

SUBJECT: Disposition of Funds Received

In reference to the above check in the amount of \$ 1,800.00, the MUR/Case number is 4755 and in the name of The Women's Alliance for Israel PAC. Place this deposit in the account indicated below:

- ☒ Budget Clearing Account (OGC), 95F3875.16
- ☐ Civil Penalties Account, 95-1099.160
- ☐ Other: _____

Retha L. Higon
Signature

7-13-98
Date

1458

W.A.P.A.C.
The Women's Alliance For Israel
A Political Action Committee

90-39847 1222

PAY
TO THE
ORDER OF

July 6, 1978

- Federal Election Commission

\$1800-

DOLLARS

- Eighteen hundred and 00/100



FIRST CHARTER
BANK N.A.

240 Beverly Drive, Beverly Hills, CA 90210

FOR

Conciliator Agreement

Chas. Koh
Frank Pollak

⑈001458⑈ ⑆122239843⑆ 002 873362⑈

98043094717

BEFORE THE FEDERAL ELECTION COMMISSION

REC'D
FEDERAL ELECTION COMMISSION
JUL 16 10 07 AM '98

In the Matter of

)

)

MUR 4755

SENSITIVE

Women's Alliance for Israel and

)

Helen Pollak, as treasurer

)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Elaine Robinson,

President of Women's Alliance for Israel and Helen Pollak, as treasurer, ("Respondents").

Respondents' assertion that they have filed timely reports for the last ten years is not entirely accurate. In fact, during the 1994-1995 election cycle the Reports Analysis Division sent Respondents a late-filer notice on August 8, 1994 for failure to timely file their 1994 April Quarterly Report. However, Respondents' overall filing history has been respectable and, although this Office believes that Respondents' report was filed late because the new treasurer

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did not appreciate the necessity to file timely reports, Respondents now appear to recognize the importance of timeliness, and assert that "it will never happen again." *Id.*

II. RECOMMENDATIONS

1. Accept the attached proposed conciliation agreement with Women's Alliance for Israel and Helen Pollak, as treasurer.
2. Close the file.
3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

Date

7/15/98

BY:


Lois G. Lerner

Associate General Counsel

Attachments

1. Proposed Conciliation Agreement
2. Photocopy of civil penalty check.
3. Response dated 6/26/98

Staff Assigned: Tamara K. Kapper

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Women's Alliance for Israel and) MUR 4755
Helen Pollak, as treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 21, 1998, the Commission decided by a vote of 5-0 to take the following actions in MUR 4755:

1. Accept the conciliation agreement with Women's Alliance for Israel and Helen Pollak, as treasurer, as recommended in the General Counsel's Report dated July 15, 1998.
2. Close the file.
3. Approve the appropriate letter, as recommended in the General Counsel's Report dated July 15, 1998.

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

Attest:

7-22-98
Date

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

Received in the Secretariat: Thurs., July 16, 1998 10:07 a.m.
Circulated to the Commission: Thurs., July 16, 1998 11:00 a.m.
Deadline for vote: Tues., July 21, 1998 4:00 p.m.

lrd

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 3, 1998

Helen Pollak, Treasurer
Women's Alliance for Israel
8306 Wilshire Boulevard #1579
Beverly Hills, CA 90211

RE: MUR 4755
Women's Alliance for Israel and
Helen Pollak, as treasurer

Dear Ms. Pollak:

On July 21, 1998, the Federal Election Commission accepted the signed conciliation agreement and civil penalty that was submitted in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(iv), 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.

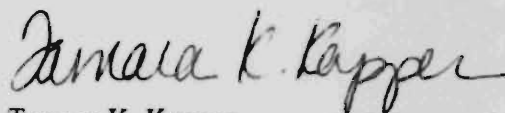
Information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

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Ms. Pollak, Treasurer
MUR 4755
Page 2

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) 694-1650.

Sincerely,



Tamara K. Kapper
Paralegal Specialist

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 4755
Women's Alliance for Israel)
and Helen Pollak, 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 reason to believe that Women's Alliance for Israel and Helen Pollak, as treasurer ("Respondents") violated 2 U.S.C. § 434(a)(4)(A)(iv).

NOW, THEREFORE, the Commission and the 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 the 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. Women's Alliance for Israel is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Helen Pollak is the treasurer of Women's Alliance for Israel.

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

4. In a non-election year, political committees must file a report covering the period beginning January 1 and ending June 30, which shall be filed no later than July 31. 2 U.S.C. § 434(a)(4)(A)(iv).

5. Respondents' 1997 Mid-Year Report was due on July 31, 1997. 2 U.S.C. § 434(a)(4)(A)(iv). Respondents filed their 1997 Mid-Year Report on January 30, 1998, 183 days late, disclosing receipts totaling \$68,845 and disbursements totaling \$28,577.

V. Respondents failed to file timely their 1997 Mid-Year Report in violation of 2 U.S.C. § 434(a)(4)(A)(iv).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of one thousand eight hundred dollars (\$1,800), 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.

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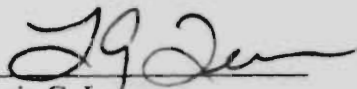
IX. Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

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:

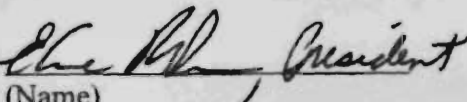
Lawrence M. Noble
General Counsel

BY:


Lois G. Lerner
Associate General Counsel

8/3/98
Date

FOR THE RESPONDENTS:


(Name)
(Position)

7/6/98
Date

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 4755

DATE FILMED 8/14/98 CAMERA NO. 1

CAMERAMAN SES

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