



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 4769

DATE FILMED 9/3/98 CAMERA NO. 2

CAMERAMAN EEJ

90043074864

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: APR 17 1997

ANALYST: Melissa Hurd

- I. COMMITTEE: Thurston County Democratic Central Committee
(C00323402)
Judith L. Williams, Treasurer¹
P.O. Box 164
Olympia, WA 98507
- II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(A)(i)
11 CFR §104.5 (c)(1)(i)(A)
- III. BACKGROUND:

Failure to File the 1996 Year End Report

The Thurston County Democratic Central Committee ("the Committee") failed to file the 1996 Year End Report of Receipts and Disbursements covering the period from December 1, 1996 to December 31, 1996. The Committee was first notified of the filing date for the 1996 Year End Report when the Prior Notice for the 1995 Year End Report was mailed to the Committee on December 29, 1995 (Attachment 2). On December 30, 1996, a Prior Notice was mailed to the Committee reminding it that the filing date for the 1996 Year End Report would be January 31, 1997 (Attachment 3).

On February 24, 1997, a Non-Filer Notice was sent to the Committee by mailgram for failure to file the 1996 Year End Report (Attachment 4).

On March 21, 1997, the Reports Analysis Division ("RAD") Analyst called the Committee and left a message on an answering machine for Judith Williams.

¹ In a phone conversation on March 21, 1997, the analyst was informed that the Committee's new treasurer is Karin Baldwin. The Committee has yet to file an amended Statement of Organization notifying the Commission of the change in treasurer.

Ms. Williams returned the phone call and stated that a new treasurer had been established, and an amended Statement of Organization letter sent to the Commission. She provided the name and telephone number of the current treasurer (Attachment 5).

On March 24, 1997, Karin Baldwin returned the RAD analyst's phone call. The RAD analyst asked Ms. Baldwin when the Committee would be filing the report with the Commission. Ms. Baldwin stated that she was attempting to review previous problems with the Committee's reports, but anticipated having the report filed by March 26, 1997 (Attachment 6).

On March 25, 1997, Karin Baldwin called the RAD analyst and left a message stating that she had various questions concerning the previous reports. On March 26, 1997, the RAD analyst called the Committee again and spoke with Ms. Baldwin. Ms. Baldwin said she was having a difficult time understanding the filing system of the previous treasurer and it was taking her longer than anticipated to file the report. She would send it to the Commission as soon as it was finished (Attachment 7).

As of the date of this referral, the 1996 Year End Report has not been received by the Commission.

93043899866

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	# OF COVERAGE DATES	PAGES	MICROFILM LOCATION TYPE OF FILER
THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE						ID #C00323402 PARTY QUALIFIED
CONNECTED ORGANIZATION:	WASHINGTON STATE DEMOCRATIC PARTY					
	1996 STATEMENT OF ORGANIZATION			27SEP96	2	96FEC/082/2643
	REQUEST FOR ADDITIONAL INFORMATION			9OCT96	2	96FEC/084/2047
	STATEMENT OF ORGANIZATION - AMENDMENT			22OCT96	4	96FEC/110/2183
	APRIL QUARTERLY	4,222	6,703	1JAN96 -31MAR96	6	96FEC/104/2997
	REQUEST FOR ADDITIONAL INFORMATION			1JAN96 -31MAR96	3	97FEC/167/0384
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN96 -31MAR96	3	97FEC/181/2401
	JULY QUARTERLY	10,134	12,950	1APR96 -30JUN96	6	96FEC/104/3009
	REQUEST FOR ADDITIONAL INFORMATION			1APR96 -30JUN96	3	97FEC/167/0381
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR96 -30JUN96	3	97FEC/181/2404
	OCTOBER QUARTERLY	32,671	28,132	1JUL96 -30SEP96	6	96FEC/104/3003
	REQUEST FOR ADDITIONAL INFORMATION			1JUL96 -30SEP96	3	97FEC/167/0378
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL96 -30SEP96	3	97FEC/181/2407
	PRE-GENERAL	2,173	8,990	1OCT96 -16OCT96	6	96FEC/120/1904
	PRE-GENERAL - AMENDMENT	2,173	8,990	1OCT96 -16OCT96	6	96FEC/152/2161
	REQUEST FOR ADDITIONAL INFORMATION			1OCT96 -16OCT96	3	97FEC/167/0375
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT96 -16OCT96	3	97FEC/181/2410
	REQUEST FOR ADDITIONAL INFORMATION			1OCT96 -16OCT96	5	97FEC/194/3083
	POST-GENERAL	2,983	5,728	17OCT96 -30NOV96	5	96FEC/152/2156
	REQUEST FOR ADDITIONAL INFORMATION			17OCT96 -30NOV96	2	97FEC/167/0373
	REQUEST FOR ADDITIONAL INFORMATION 2ND			17OCT96 -30NOV96	3	97FEC/181/2413
	NOTICE OF FAILURE TO FILE			1DEC96 -31DEC96	2	97FEC/187/0835
	TOTAL	52,183	0 62,503 0		79	TOTAL PAGES

All reports have been reviewed.

Debts and obligations owed to the committee as of 11/30/96: \$ 0.00

Debts and obligations owed by the committee as of 11/30/96: \$ 319.60

Cash on hand as of 11/30/96: \$ 1748.16

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.

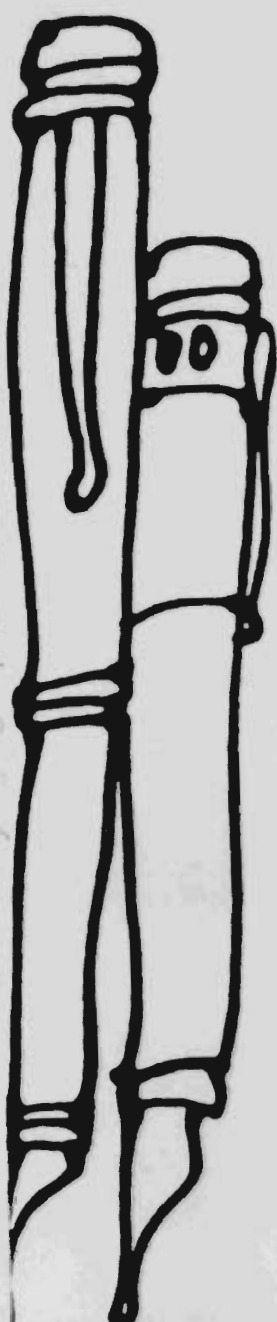
COMPLIANCE

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-PEC 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

98043694869

YEAR-END REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 30, 1996

QUARTERLY AND MONTHLY FILERS

REPORT	REPORTING PERIOD*	REG./CERT.	FILING
		MAILING DATE**	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.

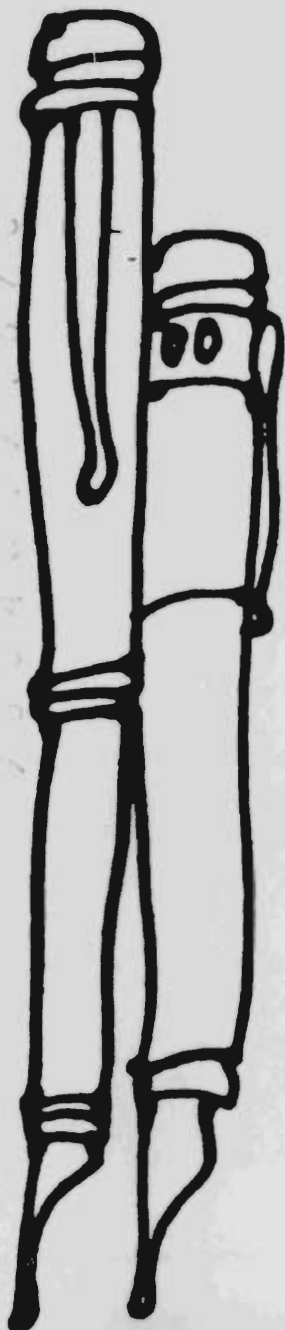
COMPLIANCE

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

FEB 24 1997

**WESTERN
UNION**

ELECTRONIC MAIL SERVICES

CONFIRMATION OF MAILGRAM TO: THURSTON COUNTY DEMOCRATIC CENTRAL COMMI
JUDITH L WILLIAMS
PO BOX 164
OLYMPIA WA 98507-0164

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

IDENTIFICATION NUMBER: C00323402

REFERENCE: YEAR-END (12/01/96 - 12/31/1996)

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 APPROPRIATE 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 LETTER OF EXPLANATION WILL BE TAKEN INTO CONSIDERATION.

IF YOU HAVE ANY QUESTIONS REGARDING THIS MATTER, PLEASE CONTACT MELISSA HURD 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

TELECON

ANALYST: Melissa Hurd

CONVERSATION WITH: Judith L. Williams

COMMITTEE: Thurston County Democratic Central Committee

DATE: March 21, 1997

SUBJECTS(S): Failure to Timely File Report

On March 21, 1997, the Reports Analysis Division ("RAD") analyst called the Committee and left a message on an answering machine. Judith L. Williams returned the analyst's phone call and stated that she was no longer the treasurer for the Committee, and she had sent a letter to the Commission stating this change. She stated that the new treasurer is Karin Baldwin, and she should be contacted regarding all outstanding matters.

98043691873

TELECON

ANALYST: Melissa Hurd

CONVERSATION WITH: Karin Baldwin

COMMITTEE: Thurston County Democratic Central Committee

DATE: March 24, 1997

SUBJECTS(S): Failure to Timely File Report

On March 24, 1997, the Reports Analysis Division ("RAD") analyst called the Committee and spoke with Karin Baldwin, the Committee's new treasurer. The RAD analyst asked Ms. Baldwin when the Committee intended to file the 1996 Year End Report with the Commission. Ms. Baldwin stated that she was having trouble understanding the previous treasurer's filing system, but was confident that she would be able to file the referenced report by March 26, 1997.

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TELECON

ANALYST: Melissa Hurd

CONVERSATION WITH: Karin Baldwin

COMMITTEE: Thurston County Democratic Central Committee

DATE: March 26, 1997

SUBJECTS(S): Failure to Timely File Report

On March 26, 1997, Ms. Baldwin called the RAD analyst with various questions regarding previously filed reports. She stated that she would be unable to file the report by that day, but would file it before the end of the next week. The RAD analyst reminded Ms. Baldwin that it was necessary to file an amended Statement of Organization regarding the change in treasurer

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FEDERAL ELECTION COMMISSION

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

FIRST GENERAL COUNSEL'S REPORT

RAD REFERRAL: 97NF-14,
98NF-04
DATE ACTIVATED: May 21, 1998

STAFF MEMBER: John Velasquez

SOURCE: INTERNALLY GENERATED

RESPONDENTS: Thurston County Democratic Central
Committee and Sandra M. Groves, as Treasurer¹

RELEVANT STATUTES: 2 U.S.C. § 433(c)
2 U.S.C. § 434(a)(4)(A)(i)
2 U.S.C. § 434(a)(4)(A)(iv)

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred the Thurston County Democratic Central Committee ("the Committee"), and Sandra M. Groves, as treasurer, to the Office of the General Counsel on March 26, 1998 (RAD Referral 98NF-04) and April 17, 1997 (RAD Referral 97NF-14). The basis for these RAD referrals is the failure of the Committee to file timely the 1996 Year-End report and the 1997 Mid-Year report.

¹ Judith L. Williams was registered as the treasurer from 9/22/96 to 12/19/97.

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. § 433(c), and 2 U.S.C. §§ 434(a)(4)(A)(i) and (iv).

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

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IV. RECOMMENDATIONS

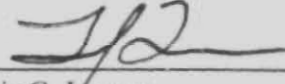
1. Open two MURs, one to address 97NF-14 and one for 98NF-04.
2. Find reason to believe the Thurston County Democratic Central Committee and Sandra M. Groves, as treasurer, violated 2 U.S.C. § 433(c).
3. Find reason to believe the Thurston County Democratic Central Committee and Sandra M. Groves, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i).
4. Find reason to believe the Thurston County Democratic Central Committee and Sandra M. Groves, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv).
5. Enter into conciliation prior to a finding of probable cause to believe.
6. Approve, with respect to the two MURs, the attached Factual and Legal Analysis and conciliation agreement, and the appropriate letter.

Lawrence M. Noble
General Counsel

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Date

6/25/98

BY:


Lois G. Lerner
Associate General Counsel

Attachments:

1. Factual and Legal Analysis
2. Proposed agreement



FEDERAL ELECTION COMMISSION

Washington, DC 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/VENESHE FEREBEE-VINES
COMMISSION SECRETARY

DATE: JUNE 30, 1998

SUBJECT: RAD Referral 97NF - 14 & 98NF-04 - First General Counsel's Report
dated June 25, 1998.

V7W

The above-captioned document was circulated to the Commission
on Friday, June 26, 1998.

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	<u>XXX</u>

This matter will be placed on the meeting agenda for
Tuesday, July 14, 1998.

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

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Thurston County Democratic Central
Committee and Sandra M. Groves, as
Treasurer.

)
)
) RAD Referrals
) #97NF-14 & #98NF-04
) MUR 4769 MUR 4770

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election
Commission, do hereby certify that on July 1, 1998, the
Commission decided by a vote of 5-0 to take the following
actions in RAD Referrals #97NF-14 & #98NF-04:

1. Open two MURs, one to address #97NF-14 and
one for #98NF-04.
2. Find reason to believe the Thurston County
Democratic Central Committee and Sandra M.
Groves, as treasurer, violated 2 U.S.C.
§ 433(c).
3. Find reason to believe the Thurston County
Democratic Central Committee and Sandra M.
Groves, as treasurer, violated 2 U.S.C.
§ 434(a)(4)(A)(i).
4. Find reason to believe the Thurston County
Democratic Central Committee and Sandra M.
Groves, as treasurer, violated 2 U.S.C.
§ 434(a)(4)(A)(iv).

(continued)

5. Enter into conciliation prior to a finding of probable cause to believe.
6. Approve, with respect to the two MURs, the Factual and Legal Analysis and conciliation agreement, and the appropriate letter, as recommended in the General Counsel's Report dated June 25, 1998.

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

Attest:

7-1-98
Date

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

Received in the Secretariat:	Fri., June 26, 1998	9:19 a.m.
Circulated to the Commission:	Fri., June 26, 1998	12:00 p.m.
Deadline for vote:	Wed., July 01, 1998	4:00 p.m.
Received Objection:	Tues., June 30, 1998	12:44 p.m.
Placed on Agenda for:	Tues., July 14, 1998	
Objection Withdrawn:	Tues., June 30, 1998	4:23 p.m.
Withdrawn from Agenda		

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5. Enter into conciliation prior to a finding of probable cause to believe.
6. Approve, with respect to the two MURs, the Factual and Legal Analysis and conciliation agreement, and the appropriate letter, as recommended in the General Counsel's Report dated June 25, 1998.

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

Attest:

7-1-98

Date

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

Received in the Secretariat:	Fri., June 26, 1998	9:19 a.m.
Circulated to the Commission:	Fri., June 26, 1998	12:00 p.m.
Deadline for vote:	Wed., July 01, 1998	4:00 p.m.
Received Objection:	Tues., June 30, 1998	12:44 p.m.
Placed on Agenda for:	Tues., July 14, 1998	
Objection Withdrawn:	Tues., June 30, 1998	4:23 p.m.
Withdrawn from Agenda		

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 9, 1998

Thurston County Democratic
Central Committee and
Sandra M. Groves, as treasurer
P.O. Box 164
Olympia, WA 98507

RE: MURs 4769 and 4770

Dear Ms. Groves:

On July 1, 1998, the Federal Election Commission found that there is reason to believe the Thurston County Democratic Central Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 433(c) and 2 U.S.C. §§ 434(a)(4)(A)(i) and (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.

Thurston County Democratic
Central Committee and
Sandra M. Groves, as treasurer
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 John Velasquez, 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

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FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Thurston County Democratic
Central Committee and
Sandra M. Groves, as treasurer

MUR: 4769
MUR: 4770

These matters were 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 that all political committees file a Statement of Organization, which contains information including the name and address of the political committee's treasurer at the time a political committee registers with the commission. 2 U.S.C. § 433(a). All changes to the contents of the Statement of Organization, including a change of treasurer, must be reported to the Commission no later than ten days after the change is made. 2 U.S.C. § 433(c).

In addition, the Act requires that all political committees, other than authorized committees of a candidate, that elect to file quarterly reports shall file quarterly reports in a calendar year in which a regularly scheduled general election is held, which shall be filed no later than the 15th day after the last day of each calendar quarter: except that the report for the quarter ending on December 31 of such calendar year shall be filed no later than January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(A)(i). The Act further requires that in any other calendar year, a report be filed 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 Thurston County Democratic Central Committee ("the Committee") is a political committee that is not an authorized committee of a candidate. The Committee elected to file its reports with the Commission on a quarterly basis.

It appears the Committee failed to file an amended Statement of Organization within ten days of a change of treasurer in violation of 2 U.S.C. § 433(c). On March 21, 1997, an analyst from the Commission's Reports Analysis Division ("RAD") called the Committee's registered treasurer, Judith L. Williams, and left a message informing her that the Committee failed to file timely its 1996 Year-End report. Later that day, Ms. Williams returned the RAD analyst's call and told the analyst that she was no longer the treasurer and that the new treasurer was Karin Baldwin.³ On March 24, the RAD analyst called Ms. Baldwin to ask about the 1996 Year-End report. Ms. Baldwin replied that she did not understand the previous treasurer's filing system but planned to file the report by March 26, 1997. Two days later, on March 26, Ms. Baldwin called the RAD analyst and explained that she would not be able to file the report that day but would try to complete it by the following week. At that time, the RAD analyst "reminded Ms. Baldwin that it was necessary to file an amended Statement of Organization regarding the change in treasurer." On December 24, 1997, two hundred and seventy-three (273) days after the Commission was informed that Ms. Baldwin was acting as the Committee's treasurer, the Commission received a letter from Sandra M. Groves indicating that she had been appointed treasurer of the Committee. Karin Baldwin was never registered as treasurer of the Committee.

³ During the March 21 phone call, Ms. Williams mentioned that she sent a letter to the Commission indicating that she was no longer the Committee's treasurer. There is no record of the Commission ever receiving a letter from Ms. Williams indicating a change of treasurer.

Respondents also failed to file timely the 1996 Year-End report and 1997 Mid-Year report. Respondents were required to file the Year-End report no later than January 31, 1997, and the Mid-Year report no later than July 31, 1997. The 1996 Year-End report, which disclosed \$55.99 in receipts and \$894.05 in disbursements, was not filed until January 6, 1998, 340 days late. The 1997 Mid-Year report, which disclosed \$18,132.02 in receipts and \$14,019.74 in disbursements, was not filed until January 6, 1998, 159 days late.

Prior notices were mailed on December 29, 1995 and December 30, 1996, informing the Committee that its 1996 Year End report was due on January 31, 1997. Moreover, a telegram was sent to the Committee on February 24, 1997, and phone calls were made on March 21 and 24, 1997, notifying the Committee that it failed to file the 1996 Year-End report.

Prior notices were mailed on December 30, 1996 and July 7, 1997, informing the Committee that its 1997 Mid-Year report was due on July 31, 1997. In addition, a telegram was sent to the Committee on August 19, 1997, indicating that the Committee failed to file its 1997 Mid-Year report. Finally, a phone call was made on December 24, 1997, further informing the Committee that it failed to file both the 1996 Year-End and 1997 Mid-Year reports.

Although the Committee was given prior notice of when to file the reports, it continued to submit reports after their due date. Moreover, the Committee did not submit an amended Statement of Organization indicating a change of treasurer. Therefore, there is reason to believe respondents violated 2 U.S.C. § 433(c), and 2 U.S.C. §§ 434(a)(4)(A)(i) and (iv).

Thurston County Democratic Central Committee

P.O. Box 164
Olympia, Washington 98507

July 23, 1998

Federal Election Commission
999 E. Street NW
Washington, D.C. 20463

Re: MUR 4769 and MUR 4770

Dear Commission:

Enclosed is the signed original Conciliation Agreement between the FEC and the Thurston County Democratic Central Committee, and check number 5415 in the amount of \$2,900.00.

The Executive Board of the Committee met last night in an emergency session to review the allegations in the above-mentioned cause numbers. It was decided by the Board to sign the Conciliation Agreement, pay the \$2,900.00 civil penalty and move on with business within the Committee.

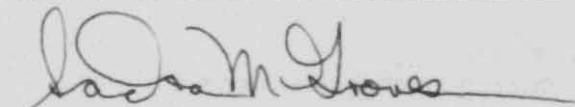
The Board also asks that by signing this Agreement that the present Treasurer, Sandra M. Groves, be personally indemnified from this penalty, as she was not a member or officer of the Committee at the time of the allegations. Ms. Groves has prepared an Affidavit to this effect which is attached to this letter. In order to clear up this matter expediently, the Board has decided to take this action, and will decide whether to pursue action against those responsible for the missed filing of reports.

The Executive Board would like to receive a signed copy of this Conciliation Agreement for their records from the FEC. Please forward the same to the above address at your earliest convenience.

The Board sincerely hopes this matter is now ended and that the Committee is now in compliance with the past report filings. If you have any further questions or comments, please do not hesitate to contact us.

Sincerely,

THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE



By: Sandra M. Groves, Treasurer

cc: File

JUL 20 12 34 PM '98

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR: 4769
Thurston County Democratic) MUR: 4770
Central Committee and)
Sandra M. Groves, as Treasurer) RESPONSE OF SANDRA M. GROVES

AFFIDAVIT OF SANDRA M. GROVES,
as Treasurer of the Thurston County Democratic Central Committee

I, SANDRA M. GROVES, declare as follows:

1. I am the current Treasurer of the Thurston County Democratic Central Committee. I was elected at a general meeting on September 22, 1997, and began my duties in October, 1997.
2. It is my understanding that the Treasurer prior to my service was Karen Baldwin.
3. I volunteered to serve in the office of the Treasurer when Ms. Baldwin left the position, and it was left unfilled for several months.
4. When I took over the position, I found that there were quite a few items not attended to by Ms. Baldwin and possibly by her predecessor, Ms. Judith Williams. Those items included the filing of Federal Election Reports for the year ending of 1996 and the first one-half of 1997.
5. When I became aware of this, I spoke with the Controller of the State Democratic Party in Seattle and was informed by her that she thought we did not need to file Federal Election Reports, as that was taken care of through the State Party Office since we do not contribute money to federal candidates. She also suggested that I verify this information with the FEC.
6. I contacted the Federal Election Commission and spoke with Don Averett, Senior Reports Analyst, Reports Analysis Division. He explained that the year end report for 1996 and the first half of 1997 were not filed and I would need to do so. I then asked him to send me the forms so I could clear up the matter as soon as possible. (A copy of my letter, dated December 19, 1997, to the FEC is attached to this Affidavit).

7. I received the proper forms and the instruction booklets in the mail within a few days and promptly began re-creating the 1996 records as best I could from what I had to work with, and file the report with the FEC.

8. After many hours of work, I completed the 1996 year end report, and began on the report covering the first half of 1997. With this completed, I mailed via certified mail, both reports where received and signed for by a representative of the FEC.

9. Since that date, I have filed all quarterly reports required on time and have been diligently trying to keep the records in a way that this problem will not reoccur.

10. I recently mailed via certified mail, the April-June, 1998, report which should have been received by the FEC by now.

11. The Thurston County Democratic Central Committee is a small county organization which does not presently participate in contributions to Federal Elections. The party has a U.S. Post Office Mail Box which a volunteer picks up the mail from usually weekly, but during the last two weeks we have been doing a major fundraising event and the mail has not been the highest priority. Therefore, I received the paperwork in this matter today, July 22, 1998. The postmark on the envelope was July 10th. Therefore, this left me less than 24 hours to react, and respond the allegations contained therein. The paperwork was not even mailed to the Committee by Certified Mail.

12. I am a volunteer for the local organization and therefore I am requesting that I personally be indemnified from the matter. I cannot speak for the Committee as I was not an officer at the time of the allegations, but I am sure they would be willing to work out some sort of settlement, reduction of fine, or continuance since we have had only the last one-half day to respond. Due to the summer months and the fundraiser event we have worked on for the last two weeks, it has been impossible to gather together an Executive Board meeting to address their response to the allegations and civil penalty.

13. I do not believe that I should be named personally as a Respondent in this matter, for the above reasons and those that follow in this Affidavit:

RESPONSE TO FACUTAL AND LEGAL ANALYSIS

Paragraphs 1-3 on Page 1: These paragraphs are mostly general information and factual analysis which I do not have any response to.

Paragraph 2 on Page 2: I have no knowledge of whether an amended Statement of Organization was filed when Ms. Baldwin took over as Treasurer. I have never met, nor have I had any contact with Judith L. Williams, and therefore have no knowledge of her serving as Treasurer within the organization. I have no knowledge of any of the events within this paragraph, except the fact that I sent a letter in December to the FEC indicating that I had been appointed as Treasurer.

Paragraph 1 on Page 3: I did not have prior knowledge that the year end report for 1996 and the mid-year report for 1997 was not filed, until I spoke with Mr. Averett of the FEC, on the telephone in December. I did file those reports as alleged in this paragraph, in order to alleviate this matter and to clear up the missing report filings. My role in this matter was strictly to clean up the inaccurate bookkeeping of Ms. Baldwin.

Paragraph 2 on Page 3: I have absolutely no knowledge of any prior notices being mailed informing the Committee of the late filing of the year end report for 1996. Further, I have no knowledge of any telegrams or phone calls between the Committee and the FEC between February 24, 1997, and March 24, 1997. If those calls and telegram were made to Ms. Baldwin, she did not pass them on the Committee to my knowledge.

Paragraph 3 on Page 3: I have absolutely no knowledge of any prior notices being mailed informing the Committee of the late filing of the mid-year report for 1997. Further, I have no knowledge of any telegrams or phone calls between the Committee and the FEC on or about August 19, 1997.

Paragraph 4 on Page 3: These allegations are a repetition of the above allegations of which I have no prior knowledge.

This is the end of my Affidavit.

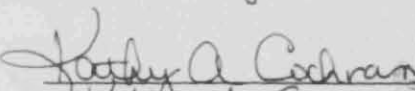
I declare under penalty of perjury in the State of Washington, that the foregoing is true and correct.

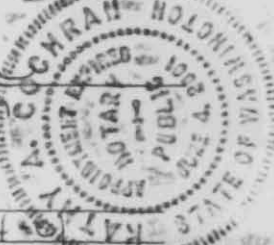

SANDRA M. GROVES
Treasurer

STATE OF WASHINGTON)
) ss.
COUNTY OF THURSTON

On this day personally appeared before me SANDRA M. GROVES, to me known to be the individual described herein and who executed the within and foregoing instrument, and acknowledged that she signed the same as her free and voluntary act and deed, for the uses and purposes therein mentioned.

Subscribed and sworn before me this 23rd day of July, 1998.


Kathy A. Cochran
NOTARY PUBLIC in and for
the State of Washington.
Residing at Lacey
My commission expires 6-4-00



Thurston County Democratic Central Committee

P.O. Box 164
Olympia, Washington 98507

COPY

December 19, 1997

Federal Election Commission
999 E Street NW
Washington, D.C.

Re: Filing of Return

Dear Sirs:

I have been appointed as the local Treasurer for the Thurston County Democratic Central Committee organization. I am following in the footsteps of a Treasurer who kept very un-detailed records. Thus, I am having considerable difficulty in reconstructing the past year of financial transactions to bring them up to date.

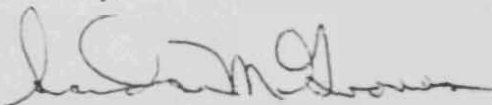
Our FEC Identification Number is: C 00323402. The last copy of a filed FEC Report I have on file is dated 10/14/96.

There have been no contributions to federal candidates. Therefore, I am being told that there is no need to file a FEC report.

Please check your records and verify if this information is correct and contact me with a confirmation of the same. If need be, please advise me as to what steps I need to take in order to bring our organization current. I very much want to sort all of this out and start fresh.

I appreciate any help you can extend to me.

Sincerely,



Sandra M. Groves
Treasurer

Daytime phone (360) 357-2852

THURSTON COUNTY DEMOCRATIC
CENTRAL COMMITTEE
P O BOX 164 (360)956-0235
OLYMPIA, WA 98507



5415

98-8102/3251

7/23/98

PAY TO THE
ORDER OF

Federal Election Commission \$290000
Two thousand nine hundred and 00/100

DOLLARS



WASHINGTON STATE
EMPLOYEES CREDIT UNION

400 East Union Olympia, WA 98501

FOR

impartially

[Signature]

1:3251810281: 897512225790 5415

9 3 0 4 3 3 2 1 8 9 2



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JUL 28 12 34 PM '98

July 28, 1998

TWO WAY MEMORANDUM

TO: OGC Docket
FROM: Rosa E. Swinton
Accounting Technician
SUBJECT: Account Determination for Funds Received

We recently received a check from **Thurston County Democratic**, check number **4515**, dated **July 23, 1998**, for the amount of , **2900.00**. 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
SUBJECT: Disposition of Funds Received

In reference to the above check in the amount of \$ 2900.00, the MUR/Case number is 4769/4770 and in the name of Thurston County Democratic Cmte Place this deposit in the account indicated below:

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

Kim C. Stevens
Signature

7-28-98
Date

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 4769
Thurston County Democratic) MUR 4770
Central Committee and)
Sandra M. Groves, as treasurer)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by the Thurston County Democratic Central Committee and Sandra M. Groves, as treasurer.

II. RECOMMENDATIONS


1. Accept the attached conciliation agreement with the Thurston County Democratic Central Committee and Sandra M. Groves, as treasurer.
2. Close the file as to the Thurston County Democratic Central Committee and Sandra M. Groves, as treasurer.
3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

Date

8/14/98

BY:


Lois G. Lerner
Associate General Counsel

1. Conciliation Agreement
2. Photocopy of civil penalty check

Staff Assigned: John Velasquez

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Thurston County Democratic Central) MURs 4769 & 4770
Committee and Sandra M. Groves, as)
treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 20, 1998, the Commission decided by a vote of 6-0 to take the following actions in MURs 4769 & 4770:

1. Accept the conciliation agreement with the Thurston County Democratic Central Committee and Sandra M. Groves, as treasurer, as recommended in the General Counsel's Report dated August 14, 1998.
2. Close the file as to the Thurston County Democratic Central Committee and Sandra M. Groves, as treasurer.
3. Approve the appropriate letter, as recommended in the General Counsel's Report dated August 14, 1998.

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

Attest:

8-21-98
Date

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

Received in the Secretariat: Mon., Aug. 17, 1998 1:03 p.m.
Circulated to the Commission: Mon., Aug. 17, 1998 4:00 p.m.
Deadline for vote: Thurs., Aug. 20, 1998 4:00 p.m.

lrd



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 26, 1998

Sandra M. Groves
Treasurer
Thurston County Democratic Central Committee
P.O. Box 164
Olympia, WA 98507

RE: MURs 4769 and 4770

Dear Ms. Groves:

On August 20, 1998, 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. § 433(c) and 2 U.S.C. §§ 434(a)(4)(A)(i) and (iv), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Accordingly, the file has been closed in this matter.

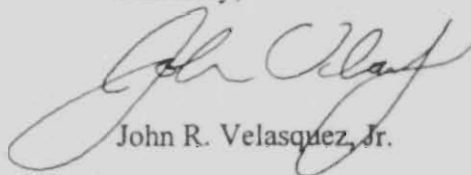
The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any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

Sandra M. Groves
Treasurer
Thurston County Democratic Central Committee
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,



John R. Velasquez, Jr.

Enclosure
Conciliation Agreement

9 6 0 4 3 3 9 4 8 9 7

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR: 4769
Thurston County Democratic) MUR: 4770
Central Committee and)
Sandra M. Groves, as treasurer)

CONCILIATION AGREEMENT

These matters were 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 the Thurston County Democratic Central Committee and Sandra M. Groves, as treasurer ("Respondents"), violated 2 U.S.C. § 433(c), and 2 U.S.C. §§ 434(a)(4)(A)(i) and (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 these proceedings, 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. The Thurston County Democratic Central Committee ("the Committee") is a political committee within the meaning of 2 U.S.C. § 431(4) and is not an authorized committee of any candidate.

2. Sandra M. Groves is the treasurer of the Thurston County Democratic Central Committee.

3. The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that all political committees file a Statement of Organization, which contains information including the name and address of the political committee's treasurer at the time a political committee registers with the commission. 2 U.S.C. § 433(a). All changes to the contents of the Statement of Organization, including a change of treasurer, must be reported to the Commission no later than ten days after the change is made. 2 U.S.C. § 433(c).

4. The Act additionally requires that all political committees other than authorized committees of a candidate, that elect to file quarterly reports shall file quarterly reports in a calendar year in which a regularly scheduled general election is held, which shall be filed no later than the 15th day after the last day of each calendar quarter: except that the report for the quarter ending on December 31 of such calendar year shall be filed no later than January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(A)(i). The Act further requires that in any other calendar year, a report be filed 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. The Committee elected to file its reports with the Commission on a quarterly basis.

6. Beginning on or before March 21, 1997, and continuing through a date later than March 31, 1997 but on or before December 19, 1997, Karin Baldwin was treasurer of the Committee. The Committee did not submit an amended Statement of Organization reporting Ms. Baldwin as a treasurer of the Committee.

7. Respondents failed to file timely the 1996 Year-End report and the 1997 Mid-Year report. Respondents were required to file the Year-End report no later than January 31 of the following calendar year, and the Mid-Year report no later than July 31 of the same year.

8. The 1996 Year-End report, which disclosed \$55.99 in receipts and \$894.05 in disbursements, was not filed until January 6, 1998, 340 days late.

9. The 1997 Mid-Year report, which disclosed \$18,132.02 in receipts and \$14,019.74 in disbursements, was not filed until January 6, 1998, 159 days late.

V. 1. Respondents failed to submit an amended Statement of Organization reflecting a change of treasurer in violation of 2 U.S.C. § 433(c).

2. Respondents failed to file timely the 1996 Year-End report and the 1997 Mid-Year report, in violation of 2 U.S.C. §§ 434(a)(4)(A)(i) and (iv).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of two thousand nine hundred dollars (\$2,900), 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.

9804369900

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 ^{by AAS} 8/27/98
Lois G. Lerner Date
Associate General Counsel

FOR THE RESPONDENT(S):

Pragya Koff (Chen) 7/22/98
Lois M. Jones 7/23/98
(Name) Treasurer Date
(Position)

980043694901



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 4769

DATE FILMED 9/3/98 CAMERA NO. 2

CAMERAMAN EEA

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