

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: August 24, 1998

ANALYST: Richard M. Ng

- I. COMMITTEE: Crowell & Moring PAC
(C00199869)
Karen Hastie Williams, Treasurer
1001 Pennsylvania Avenue, NW
Washington, DC 20004
- II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(A)(i)
11 CFR §104.5(c)(1)(i)(A)
- III. BACKGROUND:

Failure to Timely File the 1998 April Quarterly Report

The Crowell & Moring PAC ("the Committee") failed to timely file the 1998 April Quarterly Report of Receipts and Disbursements covering the period from January 1, 1998 to March 31, 1998. On December 29, 1997 and March 20, 1998, Prior Notices were sent to the Committee informing it that the 1998 April Quarterly Report was due on April 15, 1998 (Attachment 2). A Non-Filer Notice was sent to the Committee via mailgram on May 7, 1998 (Attachment 3).

The Reports Analysis Division ("RAD") analyst attempted to contact Karen Hastie Williams, treasurer of the Committee, on June 1, 2, and 3, 1998. Upon reaching an answering machine for the Committee, the RAD analyst left a message each day informing the treasurer that failure to file a report covering activity conducted between January 1, 1998 and March 31, 1998, could result in legal action. The analyst stressed the importance of filing the late report as soon as possible (Attachment 4).

On June 8, 1998, the RAD analyst attempted to contact Ms. Williams again, and spoke with Ms. Williams' secretary. The secretary informed the analyst that Ms. Williams was out of the country and inquired if there was anything she could do. The RAD analyst explained the Committee's failure to file the 1998 April Quarterly Report and the importance of filing the report as soon as possible. The secretary said she could prepare the report (Attachment 5).

On July 13, 1998, the RAD analyst attempted to contact Ms. Williams again. Upon reaching an answering machine, the RAD analyst left a message informing the treasurer that the 1998 April Quarterly Report had not been received at the Commission and it was very important to file this report as soon as possible (Attachment 6).

On July 13, 1998, Ms. Williams contacted the RAD analyst and indicated she was out of the country during the reporting deadline. Ms. Williams also indicated that she did not receive any prior messages from the RAD analyst about filing the 1998 April Quarterly Report and would have acted appropriately if she had received the messages. Ms. Williams indicated she was having secretarial problems at that time and would file the 1998 April Quarterly Report on July 15, 1998 (Attachment 7).

The Committee filed the 1998 April Quarterly Report on July 15, 1998 (Attachment 8).

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	8 OF	IMAGE
				COVERED DATES	PAGES LOCATION
					TYPE OF FILER

CROWELL & MORING PAC				ID #C00199069	NON-PARTY QUALIFIED
CONNECTED ORGANIZATION: NONE					
1997	MID-YEAR REPORT	8,875	17,375	1JAN97 - 30JUN97	18 97FEC/223/1729
	MID-YEAR REPORT - AMENDMENT	8,875	17,375	1JAN97 - 30JUN97	22 97FEC/259/3989
	REQUEST FOR ADDITIONAL INFORMATION			1JAN97 - 30JUN97	3 97FEC/259/2690
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN97 - 30JUN97	4 97FEC/259/2175
	YEAR-END	4,200	4,750	1JUL97 - 31DEC97	9 98FEC/269/2700
1998	APRIL QUARTERLY	7,000	6,250	1JAN98 - 31MAR98	8 98FEC/326/4999
	NOTICE OF FAILURE TO FILE			1JAN98 - 31MAR98	2 98FEC/303/4228
	JULY QUARTERLY	5,250	5,250	26PR98 - 30JUN98	7 98FEC/326/5007
	TOTAL	25,325	0 33,625	0	73 TOTAL PAGES

All Reports have been reviewed
Cash-on-Hand Balance as of 6/30/98 \$3,580.99
Outstanding Debts owed to the Committee \$0.00
Outstanding Debts owed by the Committee \$0.00

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 29, 1997

WHO MUST FILE

Party committees and PACs (Nonconnected Committees and Separate Segregated Funds) must file a Year-End Report on January 31, 1998.

I. Semi-annual Filers

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

II. Monthly Filers

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

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.

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.

*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)

1998 FILING SCHEDULE

I. QUARTERLY FILERS

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
April Quarterly	01/01/98 - 03/31/98	04/15/98	04/15/98
July Quarterly	04/01/98 - 06/30/98	07/15/98	07/15/98
October Quarterly	07/01/98 - 09/30/98	10/15/98	10/15/98
Pre-General	10/01/98 - 10/14/98	10/19/98	10/22/98
Post-General	10/15/98 - 11/23/98	12/03/98	12/03/98
Year-End	11/24/98 - 12/31/98	01/31/99	01/31/99

II. MONTHLY FILERS

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
February	01/01/98 - 01/31/98	02/20/98	02/20/98
March	02/01/98 - 02/28/98	03/20/98	03/20/98
April	03/01/98 - 03/31/98	04/20/98	04/20/98
May	04/01/98 - 04/30/98	05/20/98	05/20/98
June	05/01/98 - 05/31/98	06/20/98	06/20/98
July	06/01/98 - 06/30/98	07/20/98	07/20/98
August	07/01/98 - 07/31/98	08/20/98	08/20/98
September	08/01/98 - 08/31/98	09/20/98	09/20/98
October	09/01/98 - 09/30/98	10/20/98	10/20/98
Pre-General	10/01/98 - 10/14/98	10/19/98	10/22/98
Post-General	10/15/98 - 11/23/98	12/03/98	12/03/98
Year-End	11/24/98 - 12/31/98	01/31/99	01/31/99

24 HOUR REPORT ON INDEPENDENT EXPENDITURES

Any PAC that makes independent expenditures in connection with an election may have to file a 24 hour report. This reporting requirement is 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.

*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

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

March 20, 1998

WHO MUST FILE

All Party Committees and PACs (Nonconnected Committees and Separate Segregated Funds) filing on a quarterly basis must file a Quarterly Report in April.

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
April Quarterly	01/01/98 - 03/31/98	04/15/98	04/15/98

24 HOUR REPORT ON INDEPENDENT EXPENDITURES

Any PAC or Party Committee that makes independent expenditures in connection with an election may have to file a 24 hour report. This reporting requirement is 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.

PRE-ELECTION REPORTING

Committees which make contributions or expenditures (including independent expenditures) in connection with an election must also file a Pre-Election Report, if the activity was not previously reported. See the January 1998 Record.

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)

PARTIES AND PACS

April Quarterly

CHANGE IN FILING FREQUENCY

Committees wishing to change their reporting schedule (for example, from quarterly 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.

ELECTRONIC FILING

Political committees have the option of filing their reports electronically. If you are interested in this option, review the enclosed handout entitled "Electronic Filing of Disclosure Reports," and call the Data Division at (800) 424-9530 or (202) 694-1250.

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.

**WESTERN
UNION****WESTERN UNION COMMERCIAL SERVICES****CONFIRMATION OF MAILGRAM****TO: KAREN HASTIE WILLIAMS****CROWELL & MORING PAC****1001 PENNSYLVANIA AVE NW****WASHINGTON DC 20004-2593****FEDERAL ELECTION COMMISSION****SHAWN WERTH****999 E ST. NW.****WASHINGTON DC 204630001****MAY 7, 1993****IDENTIFICATION NUMBER: C00199869****REFERENCE: APRIL QUARTERLY (01/01/1998 - 03/31/1998)****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. 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 RICHARD M. NG ON OUR TOLL FREE NUMBER (800)424-9530. OUR LOCAL NUMBER IS (202)694-1130.

SINCERELY,

JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

MEMORANDUM OF TELECON

DATE: June 1, 2, and 3, 1998
ANALYST: Richard M. Ng
COMMITTEE: Crowell & Moring PAC (C'00199869)

I called the Committee and left a message for Karen Hastie Williams indicating the 1998 April Quarterly Report has not been filed. I explained the importance of filing this report as soon as possible to avoid legal action.

99-04-391-0168

MEMORANDUM OF TELECON

DATE: June 8, 1998
ANALYST: Richard M. Ng
COMMITTEE: Crowell & Moring PAC (C00199869)

I called the Committee trying to reach Karen Hastie Williams. Ms. Williams' secretary informed me that Karen was out of the country and if there was anything she could do. I informed the secretary that the Committee has not filed the 1998 April Quarterly Report and that it should be filed as soon as possible. She said she could prepare the report.

19980608 16:40:56

MEMORANDUM OF TELECON

DATE: July 13, 1998
ANALYST: Richard M. Ng
COMMITTEE: Crowell & Moring PAC (C00199869)

I called the Committee and left a message for Karen Hastie Williams indicating the 1998 April Quarterly Report has not been filed. I encouraged the Committee to send in the report as soon as possible.

MEMORANDUM OF TELECON

DATE: July 13, 1998
ANALYST: Richard M. Ng
COMMITTEE: Crowell & Moring PAC (C00199869)

Karen Hastie Williams, treasurer of the Committee, returned my call referencing the 1998 April Quarterly Report. Ms. Williams said she was out of the country and never received my messages requesting the April Quarterly Report and would have sent in the report immediately if she received the messages. Ms. Williams indicated she was having secretarial problems at that time and will send the April Quarterly Report along with the July Quarterly Report on July 15, 1998.

CROWELL & MORING LLP

1001 PENNSYLVANIA AVENUE, N.W.

WASHINGTON, D.C. 20004-2595

(202) 624-2500

FACSIMILE (202) 628-5118

RECEIVED
FEDERAL ELECTION
COMMISSION MAIL ROOM

Jul 15 5 01 PM '98

KAREN HASTIE WILLIAMS
(202) 624-2680
kwilliams@crowmor.comSUITE 1200
2010 NASH STREET
IRVINE, CALIFORNIA 92614
(714) 843-8400
FACSIMILE (714) 843-8414
100 FLEET STREET
LONDON EC4A 3HD
44-171-413-0011
FACSIMILE 44-171-413-0333

July 15, 1998

Federal Election Commission
999 E Street, NW
Washington, D. C. 20463-001Re : Crowell & Moring PAC-CO0199869
April 15, 1998 Quarterly Report

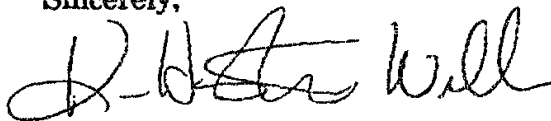
Dear Sir:

Enclosed please find the April 15th Quarterly filing for the Crowell & Moring PAC.

In the process of changing secretaries it appears that the draft that I prepared was misplaced. I regret any inconvenience that this late filing may cause to you and the staff of the Commission.

Thank you for your cooperation.

Sincerely,

Karen Hastie Williams
Treasurer

Enclosure

2025 JUL 15 10 10 AM '98

REPORT OF RECEIPTS AND DISBURSEMENTSFor Other Than An Authorized Committee
(Summary Page)RECEIVED
FEDERAL ELECTION
COMMISSION MAIL ROOM

Jul 15 5 00 PM '98

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) Crowell & Moring PAC Attn: Karen Hastie Williams		2. FEC IDENTIFICATION NUMBER C00199869
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 1001 Pennsylvania Ave., N.W., Ste. 1100		
CITY, STATE and ZIP CODE Washington, D. C. 20004-2595		
3. <input 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 21

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

election on _____ in the State of _____

☐ 30-Day Post-Election Report following the General Electi

on _____ in the State of _____

(b) Is this Report an Amendment?

☐ YES☒ NO**SUMMARY**

5. Covering Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
Jan. 1, 1998 through March 31, 1998		
6. (a) Cash on Hand January 1, 1998		\$ 2,030.99
(b) Cash on Hand at Beginning of Reporting Period	\$ 2,030.99	
(c) Total Receipts (from Line 19)	\$ 7,800.00	\$ 7,800.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 9,830.99	\$ 9,830.99
7. Total Disbursements (from Line 30)	\$ 6,250.00	\$ 6,250.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 3,580.99	\$ 3,580.99
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 202-694-1100
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
Karen Hastie Williams

Signature of Treasurer



Date

7/15/98

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437f.

FEC FORM