

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: December 29, 1998

ANALYST: Kenneth Davis

- I. COMMITTEE: Ohio Right to Life Society PAC
(C00097196)
Robert Knodel, Treasurer
8 E. Broad Street
Columbus, OH 43215
- 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 July Quarterly Report

The Ohio Right to Life Society PAC ("the Committee") failed to timely file the 1998 July Quarterly Report of Receipts and Disbursements covering the period from April 16, 1998 to June 30, 1998. On December 29, 1997 and June 19, 1998, Prior Notices were sent to the Committee informing it that the 1998 July Quarterly Report was due on July 15, 1998 (Attachment 2). A Non-Filer Notice* was sent to the Committee via mailgram on August 7, 1998 (Attachment 3).

The Reports Analysis Division ("RAD") analyst attempted to contact Robert Knodel, treasurer of the Committee on August 31, 1998. Rebecca, a Committee representative, stated that Mr. Knodel was not in the office. The RAD analyst informed the representative that the July Quarterly Report was late and if the Committee failed to file the report in a week, it could result in legal action. She said she would inform Mr. Knodel (Attachment 4). On September 2,

* The Non-Filer Notice should have referenced coverage dates of April 16, 1998, to June 30, 1998. The Committee filed a 12 Day Pre-Primary (4/1/98-4/15/98) Report on April 23, 1998; therefore, a July Quarterly Report covering April 16, 1998 to June 30, 1998 was required to be filed.

4390-163-40-66
99-04-391-0637

1998, Mr. Knodel contacted the RAD analyst. He understood that the report was late and stated that he would send the report by Federal Express later in the day (Attachment 5). On September 8, 1998, Mr. Knodel contacted the RAD analyst. Mr. Knodel apologized for not sending the report and stated that he would send the report later in the day (Attachment 6). On September 9, 1998, Mr. Knodel contacted the RAD analyst. Mr. Knodel stated that the report would definitely be sent later in the day (Attachment 7).

The Committee filed a report on September 10, 1998 covering the July Quarterly reporting period (Attachment 8).

99 "04" 391 "0638

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

Attachment 1

DATE 12/29/1998

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	IMAGE LOCATION
						TYPE OF FILER
OHIO RIGHT TO LIFE SOCIETY PAC				ID #C00097196	NON-PARTY QUALIFIED	
CONNECTED ORGANIZATION: RIGHT TO LIFE SOCIETY INC; OHIO						
	1997 MID-YEAR REPORT	3,322	1,525	1JAN97 -30JUN97	3	97FEC/230/4866
	YEAR-END	241	480	1JUL97 -31DEC97	4	98FEC/268/1027
1998	24 HOUR CONTRIBUTION NOTICE			29OCT98	3	98FEC/388/4638
	24 HOUR CONTRIBUTION NOTICE			30OCT98	2	98FEC/389/1729
	APRIL QUARTERLY	290	12	1JAN98 -31MAR98	3	98FEC/305/1959
	PRE-PRIMARY	147	250	1APR98 -15APR98	4	98FEC/305/1955
	JULY QUARTERLY	17,247	3,035	16APR98 -30JUN98	6	98FEC/352/3628
	NOTICE OF FAILURE TO FILE			1APR98 -30JUN98	2	98FEC/344/0654
	OCTOBER QUARTERLY	34,475	17,776	1JUL98 -30SEP98	6	98FEC/367/2041
	PRE-GENERAL	1,665	4	1OCT98 -14OCT98	3	98FEC/380/2677
	POST-GENERAL	44,595	51,719	15OCT98 -23NOV98	10	98FEC/411/0389
	TOTAL	101,982	0	74,801	0	46 TOTAL PAGES

All reports listed have been reviewed, with the exception of the 1998 30 Day Post-General Report.

Cash on hand as of 11/23/98: \$31,278.53

Debts and Obligations owed to the Committee as of 11/23/98: \$0.00

Debts and Obligations owed by the Committee as of 11/23/98: \$6764.00

99.04.391.0639

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. MAILING DATE**	FILING DATE
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
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

Attachment 2

Page 2 of 4

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.

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

June 19, 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 July.

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
July Quarterly	04/01/98 - 06/30/98	07/15/98	07/15/98

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**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.

99 "04" 391 "0643

**WESTERN
UNION**

WESTERN UNION COMMERCIAL SERVICES

CONFIRMATION OF MAILGRAM

TO: ROBERT KNODEL

OHIO RIGHT TO LIFE SOCIETY PAC

8 E BROAD ST

COLUMBUS OH 43215

FEDERAL ELECTION COMMISSION

SHAWN WERTH

999 E ST. NW.

WASHINGTON DC 204630001

AUGUST 7, 1993

IDENTIFICATION NUMBER: C00097196

REFERENCE: JULY QUARTERLY (04/01/1993 - 06/30/1998)

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 KENNETH DAVIS ON OUR TOLL FREE NUMBER (800)424-9530. OUR LOCAL NUMBER IS (202)694-1130.

SINCERELY,

JOHN D. GISSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

TELECON

ANALYST:	Kenneth Davis, Jr.
COMMITTEE:	Ohio Right to Life PAC
CONVERSATION WITH:	Rebecca

DATE:	August 31, 1998
SUBJECT(S):	Failure to File Report

Rebecca, a PAC representative, stated that Mr. Knodel was not in the office. I informed her that the July Quarterly Report was late and if the PAC failed to file the report in a week, it could result in legal action. She said she would inform Mr. Knodel.

TELECON

ANALYST:	Kenneth Davis, Jr.
COMMITTEE:	Ohio Right to Life PAC
CONVERSATION WITH:	Robert Knodel

DATE:	September 2, 1998
SUBJECT(S):	Failure to File Report

He said he understood that the report was late and he would send the report by Federal Express today.

99 "04" 391 "0646

TELECON

ANALYST:	Kenneth Davis, Jr.
COMMITTEE:	Ohio Right to Life PAC
CONVERSATION WITH:	Robert Knodel

DATE:	September 8, 1998
SUBJECT(S):	Failure to File Report

Mr. Knodel apologized for not sending the report last week and stated that he would send the report later today.

99.04.391.0647

TELECON

ANALYST:	Kenneth Davis, Jr.
COMMITTEE:	Ohio Right to Life PAC
CONVERSATION WITH:	Robert Knodel

DATE:	September 9, 1998
SUBJECT(S):	Failure to File Report

Mr. Knodel stated that the report would definitely be sent later in the day

99.04.391.0648

REPORT OF RECEIPTS AND DISBURSEMENTS

Attachment 8

For Other Than An Authorized Committee
(Summary Page)RECEIVED
FEDERAL ELECTION
COMMISSION

SEP 10 9 31 AM '98

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. C00097196 030498 P 236
ROBERT KNODEL
OHIO RIGHT TO LIFE SOCIETY PAC
8 E BROAD ST
COLUMBUS OH 43215

2. FEC IDENTIFICATION NUMBER
C00097196
3. ☒ This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

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

Monthly Report Due On:

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

☐ 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**

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	4/16/98 through 6/30/98		
6. (a) Cash on Hand January 1, 1998			\$ 5,656.36
(b) Cash on Hand at Beginning of Reporting Period		\$ 5,831.36	
(c) Total Receipts (from Line 19)		\$ 17,247.23	\$ 17,684.23
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 23,078.59	\$ 23,340.59
7. Total Disbursements (from Line 30)		\$ 3,035.93	\$ 3,297.93
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 20,042.66	\$ 20,042.66
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		\$	
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			
Signature of Treasurer		Date	

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 9/93)