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

JUN 10 3 37 PM '99

**FIRST GENERAL COUNSEL'S REPORT**

**SENSITIVE**

RAD REFERRAL: 99NF-07  
DATE ACTIVATED: MAY 28, 1999

STAFF MEMBERS: Ruth Heilizer  
Deborah L. Rice

SOURCE: INTERNALLY GENERATED

RESPONDENTS: Iowa Democratic Party and Mary Maloney, as treasurer

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

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

**I. GENERATION OF MATTER**

On April 26, 1999, the Reports Analysis Division referred the Iowa Democratic Party and Mary Maloney, as treasurer ("the Committee") to the Office of the General Counsel based on the Committee's failure to timely file the 1998 30 Day Post-General Report.

**II. FACTUAL AND LEGAL ANALYSIS**

Based on the Factual and Legal Analysis, this Office recommends that the Commission find reason to believe the Committee violated 2 U.S.C. § 434(a)(4)(A)(iii). Attachment 1.

**III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY**


#### IV. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe Iowa Democratic Party and Mary Maloney, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii), 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

6/10/99  
Date

BY:   
Lois G. Lerner  
Associate General Counsel

Attachments:

1. Factual and Legal Analysis
2. Proposed Conciliation Agreement

6/10/99



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE  
GENERAL COUNSEL

FROM: MARY W. DOVE/VENESHE FEREBEE-VINES  
COMMISSION SECRETARY

DATE: JUNE 15, 1999

SUBJECT: RAD Referral #99NF-07 - First General Counsel's Report  
dated June 10, 1999.

VW

The above-captioned document was circulated to the Commission  
on Thursday, June 10, 1999.

Objection(s) have been received from the Commissioner(s) as  
indicated by the name(s) checked below:

Commissioner Elliott	—
Commissioner Mason	—
Commissioner McDonald	<u>XXX</u>
Commissioner Sandstrom	—
Commissioner Thomas	<u>XXX</u>
Commissioner Wold	—

This matter will be placed on the meeting agenda for


Tuesday, June 22, 1999. Please notify us who will represent your Division  
before the Commission on this matter.



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

**CORRECTED MEMORANDUM**

TO: Lawrence M. Noble  
General Counsel

FROM: Mary W. Dove/Lisa R. Davis   
Commission Secretary

DATE: June 16, 1999

SUBJECT: RAD Referral #99NF-07 - First General Counsel's Report  
dated June 10, 1999.

The above-captioned document was circulated to the Commission  
on **Thursday, June 10, 1999.**

Objection(s) have been received from the Commissioner(s) as  
indicated by the name(s) checked below:

Commissioner Elliott	<b><u>XXX</u></b>
Commissioner Mason	—
Commissioner McDonald	<b><u>XXX</u></b>
Commissioner Sandstrom	—
Commissioner Thomas	—
Commissioner Wold	—

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**Tuesday, June 22, 1999.**

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matter.