

FEDERAL ELECTION COMMISSION

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

JUL 30 9 30 AM '99

FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

RAD REFERRAL: 99L-02
DATE ACTIVATED: 6-24-99

STAFF MEMBERS: Eugene H. Bull
Cynthia M. Nixon

SOURCE: INTERNALLY GENERATED

RESPONDENTS: Ryan for Congress Committee, and
Larry E. Everhart as treasurer

RELEVANT STATUTES: 2 U.S.C. § 434(a)(6)(A)
11 C.F.R. § 104.5(f)

INTERNAL REPORTS CHECKED: Disclosure Reports
Referral Material

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Office of the General Counsel received a referral from the Reports Analysis Division ("RAD") on June 4, 1999. The basis for the referral is the failure of Ryan for Congress Committee and Larry Everhart, as treasurer ("Respondents") to file twenty 48-Hour notifications for contributions totaling \$34,500.00. Paul D. Ryan won the 1998 General Election in the First Congressional District in the State of Wisconsin with 57.1 percent of the vote.

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. § 434(a)(6)(A).

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

IV. RECOMMENDATIONS


1. Open a MUR.
2. Find reason to believe that Ryan for Congress Committee and Larry E. Everhart, as treasurer violated 2 U.S.C. § 434(a)(6)(A), and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the attached Factual and Legal Analysis.

4. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

Date 7/29/99

BY:


Lois G. Lerner
Associate General Counsel

Attachments:

1. Factual and Legal Analysis
2. Proposed Conciliation Agreement