



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 2, 2000

Ms. Judith Dornstein, Treasurer
Hollywood Women's Political Committee
1888 Century Park East
Suite 1100
Los Angeles, CA 90067

RE: MURs 4936 and 5038

Dear Ms. Dornstein:

On September 19, 2000, the Federal Election Commission found that there is reason to believe the Hollywood Women's Political Committee ("Committee") and you, as treasurer, violated 2 U.S.C. §§ 433(c) and 434, 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. These findings are in addition to the Commission's previous finding on October 15, 1999, that there is reason to believe the committee and you, as treasurer, violated 2 U.S.C. §§ 441a(a)(2)(B), 441b, 434(b)(4)(H)(ii) and 11 C.F.R. § 102.5(a)(2).

In an attempt to resolve these matters as expeditiously as possible, the Commission has directed us to inform you that if the committee amends its 1996 reports to reflect its contributions to the DNC Services Corporation/Democratic National Committee, and, further, files the missing information from reports which have not been filed, including the committee's change of address, within thirty (30) days of receipt of this letter, the Commission will strongly consider taking no further action and closing the file with respect to the Hollywood Women's Political Committee. This would require the committee to file only two reports to the Commission: one amended report for 1996, and a separate report for all missing 1999 and 2000 information, as well as change of address information.

In the alternative, 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.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

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.

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 enclosed a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Tara Meeker, the attorney assigned to this matter, at (202) 694-1650.

Sincerely,



Darryl R. Wold
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form

21-04-403-0172

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Hollywood Women's Political Committee MURs: 4936 and 5038
and Judith Dornstein, as treasurer

This matter was generated based on information ascertained by the Commission in the normal course of its supervisory responsibilities. *See* 2 U.S.C. § 437g(a)(2).

The Federal Election Campaign Act of 1971, as amended ("the Act"), states that any change in information previously submitted in a statement of organization shall be reported in accordance with section 432(g) no later than 10 days after the date of the change.

2 U.S.C. § 433(c). Furthermore, the Act requires that the treasurer of a political committee file periodic reports of receipts and disbursements, and the Act further dictates the contents of each report. 2 U.S.C. §§ 434(a)(1) and (b). Under 2 U.S.C. §§ 434(b)(2)(D) and (b)(4)(H)(ii), all reports filed with the Commission by a committee must disclose contributions from and to other political committees. 2 U.S.C. § 434(a)(1) through (a)(11) govern the reporting requirements under the Act and §434(b)(1) through (b)(8) govern the contents of these reports.

After undergoing several efforts to locate the treasurer of the HWPC, the Office of General Counsel ultimately discovered that the committee never received the reason to believe notification mailed in October 1999. Although the committee treasurer, Judith Dornstein, stated this was due to an out of date address on file for the committee, Ms. Dornstein herself filed disclosure reports as late as September 1999 using the same address. Not only did the HWPC neglect to file a revised statement of organization with the Commission within ten days of an address change as required by 2 U.S.C. § 433(c), but they still have not filed a revised statement.

21-04-403-0173

The HWPC has neither filed required periodic disclosure reports, as required under 2 U.S.C. § 434, nor has it responded to any requests from RAD. For example, the HWPC has failed to file its 1999 Year End Report and its 2000 April and July Quarterly Reports. The committee has received numerous failure to file notices from RAD, including ones dated May 10, 2000 (for the April 2000 Quarterly) and February 24, 2000 (for the 1999 Year-End). The committee has not filed recent disclosure reports even though the Commission has stated that they may not terminate. The last report filed by the HWPC was the 1999 Mid-Year Report containing all zeros and a request to terminate, which was denied. The last report filed by HWPC which indicated any activity was the 1998 July Quarterly.

Media accounts state that the HWPC is "disbanding," depict the HWPC as having "announced its disbandment" and describe the committee as having "folded its Armani tent on April 12 [1997]." See Elizabeth Johns, *Hollywood Women Quit Political Fundraising* (dated April 14, 1997) <<http://www.eonline.com/News/Items/0%2C1%2C962%2C00.html>>, Brandi Cohen and Talia Torres, *Ms. Streisand Goes to Washington* (visited June 7, 2000) <<http://www.theshredder.com/archive/BARBRA.html>> and L. Brent Bozell III, *Kiss-Kiss, Bye-Bye: The HWPC Gives Up* (dated April 22, 1997). <<http://www.parentstv.org/publications/lbbcolumns/col19970422.html>>, respectively.

The HWPC has refused to file reports with the Commission, although the Commission has denied its request to terminate. Staff has spoken with both the treasurer of the HWPC and its past Executive Director and obtained a new address in order to resend the reason to believe

notification.¹

Accordingly, there is reason to believe that the Hollywood Women's Political Committee and Judith Dornstein, as treasurer ("HWPC") violated 2 U.S.C. § 433(c) by failing to file an amended report to the Commission which would have included a change of address from that listed in the committee's statement of organization; and 2 U.S.C. § 434 for failing to file its 1999 Year End Report, 2000 April Quarterly Report and 2000 July Quarterly Report.

¹ Most recent communication with the former Executive Director consists of the committee's request for an extension of time to respond to the Commission's original reason to believe finding. The committee cites as its reason the process required to track down the related documents, which involves going into storage and through the personal files of its board members, since the HWPC "closed" in 1997. The committee's request has been granted and its response is due by close of business Friday, September 22, 2000.

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