



FEDERAL ELECTION COMMISSION

Washington, DC 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel *103*

DATE: March 22, 2000

SUBJECT: 99NF-17-First General Counsel's Report

The attached is submitted as an Agenda document for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

SENSITIVE ☒
NON-SENSITIVE ☐

72 Hour TALLY VOTE ☒
24 Hour TALLY VOTE ☐
24 Hour NO OBJECTION ☐
INFORMATION ☐

DISTRIBUTION

COMPLIANCE ☒

Open/Closed Letters ☐
MUR ☐
DSP ☐

STATUS SHEETS ☐
Enforcement ☐
Litigation ☐
PFESP ☐

RATING SHEETS ☐

AUDIT MATTERS ☐

LITIGATION ☐

ADVISORY OPINIONS ☐

REGULATIONS ☐

OTHER ☐

20-04-398-0888

MAR 22 2000

MAR 22 2000

SENSITIVE

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

FIRST GENERAL COUNSEL'S REPORT

**RAD REFERRAL: 99NF-17
DATE ACTIVATED: 3/17/00**

**EXPIRATION OF STATUTE OF
LIMITATIONS: 4/15/2003¹
STAFF MEMBER: Erica H. McMahon**

SOURCE: INTERNALLY GENERATED

**RESPONDENTS: Graphic Communications International Union Political Contributions
Committee and Gerald Deneau, as treasurer**

**RELEVANT STATUTE(S): 2 U.S.C. § 434(a)(4)(A)(i), (ii) & (iii)
11 C.F.R. § 104.5(c)(1)(i), (ii) & (iii)**

**INTERNAL REPORTS CHECKED: Disclosure Reports
Referral Material**

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

This matter was referred to the Office of General Counsel by the Reports Analysis Division ("RAD") on August 5, 1999. RAD referred Graphic Communications International Union Political Contributions Committee ("the Committee"), and Gerald Deneau, as treasurer ("Respondents"), for failure to timely file the 1998 April Quarterly Report; 1998 October

¹ The statute of limitations date for the earliest violative activity in this matter is April 15, 2003, which refers to the 1998 April Quarterly Report due date of April 15, 1998. The statute of limitations date for the most recent reporting violation is January 31, 2004, which refers to the 1998 Year-End Report due date of January 31, 1999.

6880-066-40-02

Quarterly Report; 1998, 12 Day Pre-General Report; 1998, 30 Day Post-General Report; and the 1998 Year-End Report.

II. FACTUAL AND LEGAL ANALYSIS

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

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

2025.04.23.10.02

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IV. **RECOMMENDATIONS**

1. Open a MUR.
2. Find reason to believe Graphic Communications International Union Political Contributions Committee and Gerald Deneau, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), (ii) and (iii), and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the attached Factual and Legal Analysis, conciliation agreement, and the appropriate letter.

Lawrence M. Noble
General Counsel

Date 3/21/00

BY:


Lois G. Lerner
Associate General Counsel

Attachments:

1. Factual and Legal Analysis
2. Proposed Conciliation Agreement