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Washington, D.C. 20463

2000 JUN -6 P 1:26

FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

RAD REFERRAL: 00NF-01
DATE ACTIVATED: 5/29/00

EXPIRATION OF STATUTE OF
LIMITATIONS: 7/13/03
STAFF MEMBER: DAVID H.
MORGENSTERN

SOURCE: INTERNALLY GENERATED

RESPONDENTS: Arab American Leadership Political Action Committee
James Joseph Zogby, as treasurer

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

INTERNAL REPORTS CHECKED: Disclosure Reports
Referral Material

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred the Arab American Leadership Political Action Committee ("the Committee") and James Joseph Zogby, as treasurer, to the Office of General Counsel on January 19, 2000. The basis of the RAD referral is the failure of the Committee to timely file its 1998 July Quarterly and 1998 Year End Reports of Receipts and Disbursements covering the periods from April 1, 1998 to June 30, 1998 and November 24, 1998 to December 31, 1998, respectively.

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)(4)(A)(i).

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

This Office also recommends that the Commission offer to enter into conciliation with the Respondents prior to a finding of probable cause to believe. Attached for the Commission's approval is a proposed conciliation agreement (Attachment 2).

2004-03-23

IV. RECOMMENDATIONS

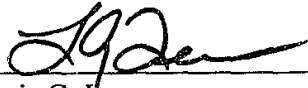
1. Open a MUR.
2. Find reason to believe the Arab American Leadership Political Action Committee and James Joseph Zogby, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the attached Factual and Legal Analysis and conciliation agreement, and the appropriate letter.

Lawrence M. Noble
General Counsel

Date

6/6/00

BY:


Lois G. Verner
Associate General Counsel

Attachments:

1. Factual and Legal Analysis
2. Proposed agreement



FEDERAL ELECTION COMMISSION

Washington, DC 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel *KCS*

DATE: June 6, 2000

SUBJECT: RAD 00NF-01 -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 ☐

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