

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

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FEDERAL ELECTION
COMMISSION
SECRETARIAT

2000 AUG -4 P 4: 59

FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

RAD REFERRAL: 99NF-21
DATE ACTIVATED: 7/10/00

EXPIRATION OF STATUTE OF
LIMITATIONS: 10/22/03
STAFF MEMBER: YEMI GIWA

SOURCE: INTERNALLY GENERATED

RESPONDENTS: Golding 98 Congress
William L. Golding, Treasurer

RELEVANT STATUTE(S): 2 USC §434(a)(2)(A)(i)
11 CFR §104.5(a)(1)(i)

INTERNAL REPORTS CHECKED: Disclosure Reports
Referral Materials

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred Golding 98 Congress ("the Committee") and William L. Golding, as treasurer (collectively "Respondents"), to the Office of General Counsel on September 8, 1999. The basis of the RAD referral is the failure of the Committee to file its 1998 12 Day Pre-General Report. To date, the committee has not filed the report.

II. FACTUAL AND LEGAL ANALYSIS

21 04 405 3100

Based on the Factual and Legal Analysis (see Attachment 1) this Office recommends the Commission find reason to believe the respondents violated 2 USC §434(a)(2)(A)(i).

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

21.04.405.3101

IV. RECOMMENDATIONS

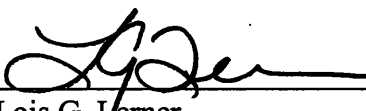
1. Open a MUR.
2. Find reason to believe Golding 98 Congress and William L. Golding, as treasurer, violated 2 USC §434(a)(2)(A)(i), and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the attached Factual and Legal Analysis and conciliation agreement, and the appropriate letter.

Lawrence M. Noble
General Counsel

Date

8/3/00

BY:


Lois G. Lerner
Associate General Counsel

Attachments:

1. Factual and Legal Analysis
2. Proposed agreement

21-04-405-3102



FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel **KCS**

DATE: August 4, 2000

SUBJECT: RAD 99NF-21- 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 ☐

21-04-405-3103



FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

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

DATE: AUGUST 10, 2000

SUBJECT: RAD Ref #99NF-21 - First General Counsel's Report
dated August 3, 2000.

The above-captioned document was circulated to the Commission
on Monday, August 07, 2000.

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

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

This matter will be placed on the meeting agenda for Tuesday,

August 22, 2000. Please notify us who will represent your Division before the
Commission on this matter.

2000 AUG 10 10 31 AM