

MAR 21 2001

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

2001 MAR 21 P 1: 21

FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

RAD REFERRAL: 00NF-12
DATE ACTIVATED: 12/13/00

EXPIRATION OF STATUTE OF
LIMITATIONS: 04/15/05

STAFF MEMBERS: Lawrence Calvert
Elizabeth Williams

SOURCE: - INTERNALLY GENERATED

RESPONDENTS: Dallas County Republican Party
Jill Mellinger, as treasurer

RELEVANT STATUTE: 2 U.S.C. § 434(a)(4)(A)(i)

INTERNAL REPORTS CHECKED: Disclosure Reports
Referral Material

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

On August 8, 2000, the Reports Analysis Division ("RAD") referred the Dallas County Republican Party ("the Committee") and Jill Mellinger, as treasurer (collectively, "the Respondent's"), to the Office of the General Counsel based on the Respondent's failure to timely file its 2000 April Quarterly Report (2/24/00-3/31/00) of Receipts and Disbursements.

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II. FACTUAL AND LEGAL ANALYSIS

Based on the Factual and Legal Analysis, see Attachment 1, this Office recommends that 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

2025 RELEASE UNDER E.O. 14176

IV. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe Dallas County Republican Party and Jill Mellinger, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and enter into a conciliation agreement prior to a finding of probable cause to believe.
3. Approve the attached Factual and Legal Analysis and Conciliation Agreement, and the appropriate letter.

Lois G. Lerner
Acting General Counsel

3/21/01
Date

BY: Abigail A. Shaine
Abigail A. Shaine
Acting Associate General Counsel

Attachments:

1. Factual and Legal Analysis
2. Proposed Conciliation Agreement



FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *RA*
DATE: March 21, 2001
SUBJECT: RAD Ref. 00NF-12 - First General Counsel's Report

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

Open Session _____

Closed Session _____

CIRCULATIONS

DISTRIBUTION

SENSITIVE
NON-SENSITIVE

COMPLIANCE

72 Hour TALLY VOTE

Open/Closed Letters

24 Hour TALLY VOTE

MUR

DSP

24 Hour NO OBJECTION

STATUS SHEETS

INFORMATION

Enforcement

Litigation

PFESP

96 Hour TALLY VOTE

RATING SHEETS

AUDIT MATTERS

LITIGATION

ADVISORY OPINIONS

REGULATIONS

OTHER

21-04-405-2715