



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

THIS IS THE BEGINNING OF MUR # 2467
DATE FILMED 12/3/87 CAMERA NO. 3
CAMERAMAN AS

87040565334

PUBLIC RECORD INDEX MUR 2467

1. Memo, 22 May 87, John D. Gibson (Reports Analysis Division) to Lawrence M. Noble (Acting General Counsel), subj: Referral of the 500 club, w/atch (RAD) Referral Pkg).
2. First General Counsel's Report, 10 Jun 87.
3. Certification of Commission Action, 16 Jun 87
4. Ltr, 29 Jun 87, Scott E. Thomas (chairman, FEC) to William A. Nitze (treasurer, 500 club), w/atch (Factual and Legal Analysis
5. Ltr, 3 Jul 87, Judy Winslow (Exec. Director, 500 club) to FEC, subj: Request for pre-probable cause conciliation)
6. General Counsel's Report, 24 Jul 87
7. Certification of Commission Action, 29 Jul 87
8. Ltr, 31 Jul 87, L.M. Noble to W.A. Nitze
9. General Counsel's Report, 1 Sep 87
10. Memo, 10 Sep 87, Marjorie W. Emmons/Joshua McFadden to L.M. Noble w/atch (Commissioner Thomas's vote sheet)
11. Certification of Commission Action, 10 Sep 87
12. Ltr, 16 Sep 87, L.M. Noble to W.A. Nitze, w/atch (executed conciliation agreement)

-End-

NOTE: In preparing its file for the public record, O.G.C. routinely removes those documents in which it perceives little or no public interest, and those documents, or portions thereof, which are exempt from disclosure under the Freedom of Information Act.

870406335



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

May 22, 1987

MEMORANDUM

TO: LAWRENCE M. NOBLE
ACTING GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: QUARTERLY FILERS (UNAUTHORIZED COMMITTEES) WHICH
FAILED TO FILE THE 1986 12 DAY PRE-GENERAL REPORT
BY ELECTION DAY

The attached list of unauthorized committees consists of forty-nine (49) quarterly filers which failed to file a 1986 12 Day Pre-General Report by Election Day, November 4, 1986. In accordance with Standard 3 of the RAD Review and Referral Procedures, further examination is required by your office.

Unlike the mandatory reporting requirement placed upon monthly filers, 2 U.S.C. §434(a)(4)(A)(ii) requires quarterly filers to submit 12 Day Pre-General Reports only if the committees make contributions to or expenditures on behalf of federal candidates involved in the general election. All unauthorized committees were sent prior notification regarding the pre- and post-general filing requirements on September 29, 1986 (Attachment 50).

The Party/Non-Party Branch conducted a thorough examination to identify quarterly filers disclosing contributions or expenditures between October 1 and October 15, 1986. The research revealed committees that submitted:

- a) 12 Day Pre-General Reports in an untimely manner;
- b) 30 Day Post-General Reports indicating that 12 Day Pre-General Reports should have been filed; and
- c) Year End Reports indicating that 12 Day Pre-General Reports should have been filed.

ATTACHMENT 1

87040565336

For your information, the pertinent supporting documentation on each committee has been arranged in alphabetical order. Statistics on all C indices only reflect activity through December 31, 1986. Any reports disclosing activity in 1987 have not been reviewed.

The following committees were previously referred either to your office or to the Audit Division for a possible 2. U.S.C. §438(b) audit.

(1)

(2)

(3)

(4)

(5)

(6)

If you have any questions, please contact Lisa J. Stolaruk at 376-2480.

Attachments

87040665337

C00191307

500 Club

87HF-06

87040365338

500 CLUB
(Attachments 1a - 1d)

8 7 0 4 0 5 6 5 3 3 9

8 7 0 4 0 6 5 3 4 0
FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-86)

DATE 28APR87
PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	0 02 PAGES	MICROFILM LOCATION
BOO CLUB						
CONNECTED ORGANIZATION:	NONE			NON-PARTY QUALIFIED		ID 0C00191307
1985	APRIL QUARTERLY	5,050	6,244	1JAN85 -31MAR85	7	85FEC/368/5434
	APRIL QUARTERLY - AMENDMENT	5,050	6,244	1JAN85 -31MAR85	3	85FEC/370/5168
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN85 -31MAR85	3	86FEC/398/5291
	REQUEST FOR ADDITIONAL INFORMATION			1JAN85 -31MAR85	2	85FEC/392/1483
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN85 -31MAR85	6	86FEC/394/6040
	1ST LETTER INFORMATIONAL NOTICE			1JAN85 -31MAR85	4	86FEC/395/2011
	JULY QUARTERLY	2,500	2,091	1APR85 -30JUN85	5	86FEC/377/1666
	JULY QUARTERLY - AMENDMENT	2,500	7,491	1APR85 -30JUN85	6	85FEC/387/3979
	JULY QUARTERLY - AMENDMENT	2,500	7,491	1APR85 -30JUN85	6	85FEC/393/4426
	REQUEST FOR ADDITIONAL INFORMATION			1APR85 -30JUN85	3	85FEC/392/1016
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR85 -30JUN85	1	86FEC/394/6046
	OCTOBER QUARTERLY	17,500	5,762	1JUL85 -30SEP85	9	85FEC/388/4375
	REQUEST FOR ADDITIONAL INFORMATION			1JUL85 -30SEP85	1	85FEC/392/1485
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL85 -30SEP85	1	86FEC/394/6047
	YEAR-END	7,000	16,269	1OCT85 -31DEC85	7	86FEC/394/3750
1986	STATEMENT OF ORGANIZATION - AMENDMENT			1OJAN86	2	86FEC/394/2854
	APRIL QUARTERLY	3,500	9,303	1JAN86 -31MAR86	6	86FEC/407/1218
	JULY QUARTERLY	9,000	6,971	1APR86 -30JUN86	9	86FEC/419/4378
	JULY QUARTERLY - AMENDMENT	9,000	6,971	1APR86 -30JUN86	10	86FEC/430/5040
	REQUEST FOR ADDITIONAL INFORMATION			1APR86 -30JUN86	2	86FEC/426/2926
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR86 -30JUN86	3	86FEC/429/2707
	OCTOBER QUARTERLY	11,500	8,878	1JUL86 -30SEP86	8	86FEC/433/1851
	POST-GENERAL	3,750	4,182	1OCT86 -24NOV86	7	87FEC/453/0662
	NOTICE OF FAILURE TO FILE			24NOV86	1	86FEC/452/1740
	YEAR-END	3,500	4,030	28NOV86 -31DEC86	6	87FEC/454/2023
	TOTAL	63,300	0 69,130	0	110	TOTAL PAGES

All reports have been reviewed.

Ending cash-on-hand as of 12/31/86: \$5,699

Outstanding debts owed by the committee as of 12/31/86: \$0

Attachment 1a

REPORT OF RECEIPTS AND DISBURSEMENTS

For a Political Committee Other Than an Authorized Committee

RECEIVED BY THE FEC

(Summary Page)

87 JAN 8 11 48 AM '87

ALIGN AREA

1 Name of Committee (in Part)

500 Club

Address (Number and Street)

Judy Winslow
11 Ridgebrook Rd.
Greenwich, CT 06830

City, State and ZIP Code

☐ Check here if address is different than previously reported

2 FEC Identification Number

C00191387

3 ☐ This committee qualified as a multicandidate committee during the Reporting Period on _____

4. TYPE OF REPORT (Check appropriate boxes)

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report☐ July 15 Quarterly Report ☐ January 31 Year End Report☐ July 31 Mid Year Report (Non-Election Year Only)☐ Monthly Report for _____☐ Twelfth day report preceding _____

(Type of Report)

election on _____ in the State of _____

☒ Thirtieth day report following the General Election

on _____ in the State of _____

☐ Termination Report

(b) Is this Report an Amendment?

☐ YES☐ NO

SUMMARY

5 Covering Period 10/1/86 through 11/24/866 (a) Cash on hand January 1, 19 86

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)

7 Total Disbursements (from Line 20)

8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

9 Debts and Obligations Owed TO The Committee

(Itemize all on Schedule C or Schedule D)

10 Debts and Obligations Owed BY the Committee

(Itemize all on Schedule C or Schedule D)

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

William A. Nizio, Treasurer

Type and print name of Treasurer

William A. Nizio
SIGNATURE OF TREASURER

Jan 5, 1987
DATE

For further information contact:

Foter & End Date Column as

1. Page 1 of 4, 3rd

Line 1, 1, 4, 5

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

FEC FORM 3a, 3b

**DETAILED SUMMARY PAGE
of Receipts and Disbursements
Page 2, FEC FORM 320**

Attachment 1c

Name of Committee (to Full)		Report covering the Period		
500 C1111C00191378		From: 10/1	To 11/26/86	
		COLUMN A Total Year Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS				
11. CONTRIBUTIONS (other than loans) FROM:				
(a) Individuals/Persons Other Than Political Committees		33750	27750	11(a)
(b) Political Party (Committees)				11(b)
(c) Other Political Committees				11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))				11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES				12
13. ALL LOANS RECEIVED				13
14. LOAN REPAYMENTS RECEIVED				14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)				15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES				16
17. OTHER RECEIPTS (Dividends, Interest, etc.)				17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)		3750	27750	18
II. DISBURSEMENTS				
19. OPERATING EXPENDITURES		2182.40	23836.14	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES				20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		2000	5500	21
22. INDEPENDENT EXPENDITURES (see Schedule E)				22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 6441 et al) (Use Schedule F)				23
24. LOAN REPAYMENTS MADE				24
25. LOANS MADE				25
26. REFUNDS OF CONTRIBUTIONS TO:				
(a) Individuals/Persons Other Than Political Committees				26(a)
(b) Political Party Committees				26(b)
(c) Other Political Committees				26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))				26(d)
27. OTHER DISBURSEMENTS				27
28. TOTAL DISBURSEMENTS (Add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)		4182.40	29236.14	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES				
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)		3750	27750	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)				30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)		3750	27750	31
32. TOTAL OPERATING EXPENDITURES from Line 19		2182.40	23836.14	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15				33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)		2182.40	23836.14	34

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SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 1 for
LINE NUMBER 91
(Use separate schedule for each
category of the Disbursed
Summary Page)

Any information carried from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes other than using the name and address of any person or committee to solicit contributions from such committees			
Name of Committee (in Full)			
500 Club C00191378			
A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Congressman Vin Weber House of Representatives	contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/6/86	\$1000
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Chavez for Senate c/o Bill Nitso 54 East 92nd St.	contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/16/86	500
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Louisiana Victory 1986 46 The Republican Party of La. 111 Massachusetts Avenue Suite 200, Wash. D.C. 20001	contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	0/16/86	500
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			\$2000

FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463
FIRST GENERAL COUNSEL'S REPORT

07 1111 11 P12:

RAD REFERRALS: 87NF-86-134
STAFF MEMBER: George F. Rishel

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D
RESPONDENTS: 500 Club and William A. Nitze, as treasurer

8 7 0 4 0 6 5 3 4 4

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

**INTERNAL REPORTS
CHECKED:** Referral Materials

**FEDERAL AGENCIES
CHECKED:** None

I. GENERATION OF MATTER

The Report Analysis Division ("RAD") referred the above-listed 49 committees to the Office of the General Counsel on May 22, 1987. The basis of the attached referrals is their failure to either file a 12-day Pre-Election Report or file such report in a timely fashion.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that for unauthorized committees filing quarterly, such committees shall file a Pre-Election Report before any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election. Such report shall be filed no later than the 12th day before (or posted by registered or certified mail no later than the 15th day before) such election and shall be complete as of the 20th day before the election. 2 U.S.C. § 434(a)(4)(A)(ii).

The 1986 Pre-Election Report for the 1986 General Election was due on October 23, 1986, complete as of October 15, 1986. Quarterly

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- 4 -

filers were notified on September 29, 1986, of the requirement for filing the Pre-Election Report.

The following committees filed a 12-Day Pre-Election Report, but did not file it in a timely fashion:

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The following committees filed a 1986 Post-General Report that disclosed activity indicating a 12-Day Pre-Election Report should have been filed:

<u>Committee</u>	<u>Date Filed</u> ^{1/}	<u>Pre-Election Activity</u>
500 Club	1-8-87 (77 days late)	\$1,000 in contributions to one candidate

^{1/} The date filed is that on which the Post-General Election Report was filed. The number of days late is that for the filing of the 12-Day Pre-Election Report. In some cases, the Post-General Election Report was filed after December 4, 1986. The late filings of such reports, however, were not included as a basis for these referrals. Therefore, no recommendations have been made with respect to the late filing of any Post-General Election Report.

87040565347

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The following committees filed a Year End Report disclosing activity indicating that 12-Day Pre-Election Report should have been filed:

Accordingly, with regard to 48 of these 49 committees, the Office of the General Counsel recommends that the Commission open Matter Under Review and find reason to believe these committees

III. RECOMMENDATIONS

1. Open Matters Under Review with respect to the following committees and find reason to believe the following committees and their treasurers violated 2 U.S.C. § 434(a)(4)(A)(ii):

500 Club and William A. Nitze, as treasurer


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-10 -

R 7 0 4 0 6 5 3 5 0

2. Approve and send the attached letters and factual and legal analyses to the respective committees listed in recommendation 1.
- 3.

6/10/57
Date


Lawrence M. Noble
Acting General Counsel

Attachments

1. Referral Materials
2. Letters and Factual and Legal Analyses (48)

87040365351

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

500 Club and William A. Nitze, as treasurer

**RAD Ref.'s
87NF-86
THROUGH
87NF-134**

97040565352

(continued)

Federal Election Commission
Certification for RAD Ref.'s 87NF-86
through 87NF-134
June 15, 1987

Page 2

97040565353

(continued)

Federal Election Commission
Certification for RAD Ref.'s 87NF-86
through 87NF-134
June 15, 1987

Page 3

CERTIFICATION

I. Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 15, 1987, the Commission decided by a vote of 6-0 to take the following actions in RAD Ref.'s 87NF-86 through 87NF-134:

1. Open Matters Under Review with respect to the following committees and find reason to believe the following committees and their treasurers violated 2 U.S.C. § 434(a)(4)(A)(ii):

500 Club and William A. Nitze, as treasurer

(continued)

Federal Election Commission
Certification for RAD Ref.'s 87NF-86
through 87NF-134
June 15, 1987

Page 4

87040565355

3

Federal Election Commission
Certification for RAD Ref.'s 87NF-86
through 87NF-134
June 15, 1987

Page 5

87040665356

3

Federal Election Commission
Certification for RAD Ref.'s 87NF-86
through 87NF-134
June 15, 1987

Page 6

2. Approve and send the letters and factual and legal analyses to the respective committees listed in recommendation 1.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry,
and Thomas voted affirmatively for the decision.

Attest:

6-16-87

Date

Margorie W. Emmons

Margorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary: Thurs., 6-11-87, 12:34
Circulated on 48 hour tally basis: Thurs., 6-11-87, 4:00
Deadline for vote: Mon., 6-15-87, 4:00

3



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 29, 1987

William A. Nitze, Treasurer
500 Club
c/o Judy Winslow
11 Ridgebrook Road
Greenwich, CT 06830

RE: MUR 2467
500 Club and William A. Nitze,
as treasurer

Dear Mr. Nitze:

On June 15, 1987, the Federal Election Commission found that there is reason to believe that the 500 Club ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii), a provision 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.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee and you, as treasurer. 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 any additional information demonstrating that no further action should be taken against the Committee and you, as treasurer, 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 will not ordinarily 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.

The investigation now being conducted will be 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 attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Shelley Garr, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,



Scott E. Thomas
Chairman

Enclosures

Factual and Legal Analysis
Procedures

Designation of Counsel Form

97040565359

4

**FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS**

RESPONDENTS: 500 Club and William A.
 Nitze, as treasurer

MUR: 2467

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The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that for unauthorized committees filing quarterly, such committees shall file a Pre-Election Report before any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election. Such report shall be filed no later than the 12th day before (or posted by registered or certified mail no later than the 15th day before) such election and which shall be complete as of the 20th day before the election. 2 U.S.C. § 434(a)(4)(A)(ii).

The 1986 Pre-Election Report for the 1986 General Election was due on October 23, 1986, and complete as of October 15, 1986. Quarterly filers were notified on September 29, 1986, of the requirement for filing the Pre-Election Report. The committee filed a 1986 Post-General Election Report that disclosed a \$1,000 contribution to one candidate between October 1, 1986, and October 15, 1986. Thus, the committee was required to file a 12-Day Pre-Election Report by October 23, 1986, and complete as of October 15, 1986. The Committee did not file a report disclosing this activity until it filed its 1986 Post-General Election Report on January 8, 1987. Accordingly, the committee and its treasurer have violated 2 U.S.C. § 434(a)(4)(A)(ii).

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RECEIVED AT THE FEC

87 JUL 1 AM: 38



EXECUTIVE COMMITTEE:
Edward L. Barlow
Mrs. Alexander P. Federbush
Mrs. Ronald S. Lauder
William A. Nitze
James G. Niven
Donald H. Noble
Catherine Price
Peter O. Price
Thomas L. Pulling
Nathan E. Saint-Amand
Stephen A. Schwarzman
Melville Straus
Mrs. Kenneth Walker

Ms Shelley Garr
Federal Election Commission
Washington DC 20463

July 3, 1987

RE: Letter of June 29, 1987
MUR 2467

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

Dear Ms Garr,

I would like to request pre-probable cause
conciliation.

I indeed was late in filing the pre-election
report. It was an oversight and I apologize.
I was unaware of the need to file a pre-election
report as I had been filing quarterly reports
before.

In the past Ms. Alva Smith of Reports Analysis
Division has been very helpful in answering
my questions. Also I spoke with Mr. Whitehead
of your department yesterday and he was also
helpful with my questions.

Please call me at 203 869-6612 so that I may
answer any questions or follow-up on whatever
you may need.

Sincerely,

Judy Winslow

Judy Winslow
Executive Director
500 Club
11 Ridgebrook Rd.
Greenwich, CT 06830
203 869-6612

37040565351

5

CONFIDENTIAL

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

500 Club and)

William A. Nitze, as treasurer)

MUR 2467

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On June 15, 1987, the Commission found reason to believe that the 500 Club and William A. Nitze, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii) by failing to file the 1986 12 Day Pre-General Election Report in a timely manner. By letter dated July 3, 1987, Judy Winslow, the Club's Executive Director, requested to settle this matter prior to a finding of probable cause to believe (Attachment 1).

1/ The Club filed a 1986 30 Day Post General Election Report which disclosed activity from October 1 through November 24, 1986. The receipt and disbursement figures listed here for the 12 Day Pre-General Report reflect the Club's activities from October 1, 1986 through October 15, 1986.

27 JUL 24 1987 14:03

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37040565363

III. RECOMMENDATION

1. Enter into conciliation with the 500 Club and William A. Nitze, as treasurer, prior to a finding of probable cause to believe.
2. Approve the attached proposed conciliation agreement and letter.

7/24/87
Date

Lawrence M. Noble (Lz)
Lawrence M. Noble
Acting General Counsel

Attachments:

- 1) Request for conciliation
- 2) Proposed agreement and letter

87040665364

Attachments to General
Counsel's Report

have been removed from this position in the Public Record File either because they duplicate documents located elsewhere in this file, or because they reflect exempt information.

For Attachment 1 see 5

2 8

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

500 Club and
William A. Nitze, as treasurer

)
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MUR 2467

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 29, 1987, the Commission decided by a vote of 6-0 to take the following actions in MUR 2467:

1. Enter into conciliation with the 500 Club and William A. Nitze, as treasurer, prior to a finding of probable cause to believe.
2. Approve the proposed conciliation agreement and letter, as recommended in the General Counsel's Report signed July 24, 1987.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

7-29-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Fri., 7-24-87, 4:03
Circulated on 48 hour tally basis: Mon., 7-27-87, 11:00
Deadline for vote: Wed., 7-29-87, 11:00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 31, 1987

William A. Nitze, Treasurer
500 Club
c/o Judy Winslow
11 Ridgebrook Road
Greenwich, CT 06830

RE: MUR 2467
500 Club and
William A. Nitze,
as treasurer

Dear Ms. Winslow:

On June 15, 1987, the Federal Election Commission found reason to believe that the 500 Club and William A. Nitze, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii), a provision of the Federal Election Campaign Act of 1971, as amended. At your request, on July 29, 1987, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Shelley Garr, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble (LJ)
Lawrence M. Noble
Acting General Counsel

Enclosure
Conciliation Agreement

8

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

87 SEP -1 PM 1:25

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

In the Matter of

500 Club

MUR 2467

William Nitze, as treasurer

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Judy Winslow, Executive Director of the 500 Club (Attachment I). The agreement contains no language changes from the agreement initially approved by the Commission.

II. RECOMMENDATIONS

1. Accept the conciliation agreement with 500 Club and William Nitze, as treasurer.
2. Close the file.
3. Approve the attached letter.

Date

9/1/87

Lawrence M. Noble
Acting General Counsel

Attachments

1. Response and conciliation agreement
2. Proposed letter

1/ The Club reported contributions totalling \$2,500 and one contribution of \$1000 during the reporting period for the 12 Day Report.

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Attachments to General
Counsel's Report

have been removed from this position in the Public Record File either because they duplicate documents located elsewhere in this file, or because they reflect exempt information.

For Attachment 1 see -

2 12

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FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

MEMORANDUM TO: LAWRENCE M. NOBLE
ACTING GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JOSHUA MCFADDEN *JM*

DATE: SEPTEMBER 10, 1987

SUBJECT: COMMENTS TO MUR 2467 - General Counsel's Report
Signed September 1, 1987

Attached is a copy of Commissioner Thomas's vote
sheet with comments regarding the above-captioned matter.

Attachment:
copy of vote sheet

BALLOT

SENSITIVE



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

DATE & TIME TRANSMITTED: Wednesday, Sept. 2, 1987, 11:00

COMMISSIONER: AIKENS, ELLIOTT, JOSEFIAR, McDONALD, McGARRY, ~~THOMAS~~

RETURN TO COMMISSION SECRETARY BY Wednesday, September 9, 1987, 4:00

SUBJECT: MUR 2467 - General Counsel's Report
Signed September 1, 1987

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
87 SEP -9 PM 4:22

- (✓) I approve the recommendation
() I object to the recommendation

COMMENTS:

Add "Dillon" on line 2 of VTR

DATE:

9/7/87

SIGNATURE

John E. Thomas

A DEFINITE VOTE IS REQUIRED. ALL BALLOTS MUST BE SIGNED AND DATED.

PLEASE RETURN ONLY THE BALLOT TO THE COMMISSION SECRETARY.

PLEASE RETURN BALLOT NO LATER THAN DATE AND TIME SHOWN ABOVE.

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10

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

500 Club

William Nitze, as treasurer

MUR 2467

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 9, 1987, the Commission decided by a vote of 5-0 to take the following actions in MUR 2467:

1. Accept the conciliation agreement with 500 Club and William Nitze, as treasurer, as recommended in the General Counsel's report signed September 1, 1987.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's report signed September 1, 1987.

Commissioners Aikens, Elliott, Josefiak, McGarry, and Thomas voted affirmatively for the decision;

Commissioner McDonald did not cast a vote.

Attest:

9-10-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary: Tues., 9-1-87, 1:25
Circulated on 48 hour tally basis: Wed., 9-2-87, 11:00
Extended Deadline for vote: Wed., 9-9-87, 4:00

11

87040665371



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 16, 1987

William A. Nitze, Treasurer
500 Club
c/o Judy Winslow
11 Ridgebrook Road
Greenwich, CT 06830

RE: MUR 2467
500 Club
William A. Nitze, as treasurer

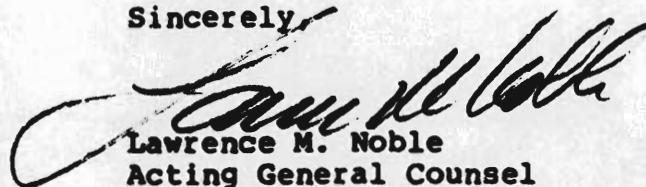
Dear Ms. Winslow:

On September 9, 1987, the Federal Election Commission accepted the signed conciliation agreement submitted on behalf of the 500 Club and William A. Nitze, as treasurer, in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(ii) a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to the 500 Club and William A. Nitze, as treasurer. This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Shelley Garr, the staff member assigned to this matter at (202) 376-8200.

Sincerely,


Lawrence M. Noble
Acting General Counsel

Enclosure
Conciliation Agreement

12

87040565372

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

500 Club and
William A. Nitze, as treasurer

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MUR 2467

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the 500 Club and William A. Nitze, as treasurer, violated 2 U.S.C. §434(a)(4)(A)(ii).

NOW, THEREFORE, the Commission and the Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enters voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent, 500 Club, is a political committee within the meaning of 2 U.S.C. § 431(4).

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2. Respondent, William A. Nitze, is the treasurer of the 500 Club.

3. Respondents were required to file its 1986 12 Day Pre-General Election Report by October 23, 1986. The report was filed on January 8, 1987, 77 days late.

V. Pursuant to 2 U.S.C. § 434(a)(4)(A)(ii), all political committees other than authorized committees of a candidate, are required to file, in a calendar year in which a regularly scheduled election is held, a pre-election report, which shall be filed no later than the 12th day before any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election and shall be complete as of the 20th day before the election.

VI. Respondents' failure to timely file the 1986 12 Day Pre-General Report is in violation of 2 U.S.C. § 434(a)(4)(A)(ii).

VII. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Three Hundred and Fifty Dollars (\$350.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any

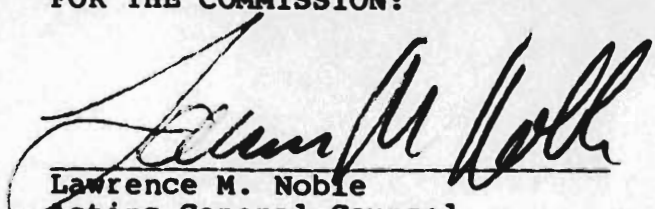
requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

IX. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

X. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

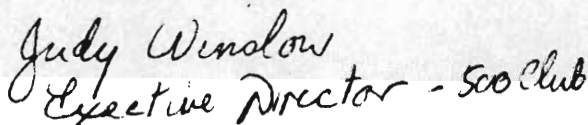
FOR THE COMMISSION:


Lawrence M. Noble
Acting General Counsel

Date

9/15/87

FOR THE RESPONDENTS:


Judy Winlow
Executive Director - 500 Club

(Name)
(Position)

Date

Aug 7, 1987

87040465375



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20543

THIS IS THE END OF MUR # 2467²

DATE FILMED 12/3/87 CAMERA NO. 3

CAMERAMAN AS

87040565376



FEDERAL ELECTION COMMISSION

WASHINGTON DC 20461

M12-28-87

THE FOLLOWING MATERIAL IS BEING ADDED TO THE
PUBLIC FILE OF CLOSED MUR 2467

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218

THE 500 CLUB

Sep 1-20 1987 1-172
210

PAY TO THE ORDER OF Federal Election Commission \$350.00

Three hundred fifty and 00/100 DOLLARS

THE BANK OF NEW YORK
706 MADISON AVENUE, NEW YORK, N.Y. 10021

J. L. Weber

⑈000218⑈ + ⑈021000018⑈ ⑈094862⑈

GCC#4445

MEMORANDUM

TO: DEBRA A. TRIMIEW TO: CECILIA LIEBER

FROM: CECILIA LIEBER FROM: DEBRA A. TRIMIEW

CHECK NO. 218 { A COPY OF WHICH IS ATTACHED } RELATING TO
 MUR 2467 AND NAME 500 Club
 (Garr)
 WAS RECIEVED ON 9/28/87. PLEASE INDICATE THE ACCOUNT INTO
 WHICH IT SHOULD BE DEPOSITED:

/	/	BUDGET CLEARING ACCOUNT	{ 95F3875.16 }
/	✓	CIVIL PENALTIES ACCOUNT	{ 95-1099.160 }
/	/	OTHER	

SIGNATURE Debra A. Trimiew DATE 9/30/87

87 SEP 28 AM 9:21

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

CCC# 4445



RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
87 SEP 28 AM 9:21

EXECUTIVE COMMITTEE
Edward L. Barlow
Mrs. Alexander P. Federbush
Mrs. Ronald S. Lauder
William A. Nitze
James G. Niven
Donald H. Noble
Catherine Price
Peter O. Price
Thomas L. Pulling
Nathan E. Saint-Amand
Stephen A. Schwarzman
Melville Straus
Mrs. Kenneth Walker

Dear Mr. Gorn,

I enclose a check for
\$350 for the Federal Election
Commission.

Thank you for your
help.

Sincerely,

Judy Winslow

Re. MUR 2467

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87 AUG 10 A9:37

EXECUTIVE COMMITTEE
Edward L. Barlow
Mrs. Alexander P. Federbush
Mrs. Ronald S. Lauder
William A. Nitze
James G. Niven
Donald H. Noble
Catherine Price
Peter O. Price
Thomas L. Pulling
Nathan E. Saint-Amand
Stephen A. Schwarzman
Melville Straus
Mrs. Kenneth Walker

Aug. 7, 1987

MUR 2467

87 AUG 10 A10:44

RECEIVED
OFFICE OF THE
COMMISSIONER

Ms. Shelley Garr
Federal Election Commission
Washington DC 20463

Dear Ms. Garr,

I received your letter of July 31, 1987 with
the Conciliation Agreement.

I would like to request a reconsideration of
the amount of the penalty. The report of
the post election form was delayed I sent
it to my Treasurer for his signature and he
must have thought that it was a part of the
year-end report and sent it Jan. 6, 1987 instead
of Oct. 24, 1987. This is our first mistake and
the contribution was only one for \$1000.

May I request a penalty of \$350.

Thank you.

Judy Winslow
Judy Winslow
Executive Director
11 Ridgebrook Road
Greenwich, CT 06830
203-869-6612

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[illegible]

07 AUG 10 4 9: 37