



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2503

DATE FILMED 3/30/88 CAMERA NO. 4

CAMERAMAN GLC

88040390457



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

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

8540690458

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

93040690459

83040670460

C00119370 .

National Congressional Club

87MF-123

NATIONAL CONGRESSIONAL CLUB

(Attachments 38a - 38e)

88040590461

8 3 0 4 0 6 9 0 4 6 2

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-86)DATE 5MAY87
PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
NATIONAL CONGRESSIONAL CLUB				NON-PARTY QUALIFIED		ID #C00119370
CONNECTED ORGANIZATION:	JESSE HELMS LEGAL DEFENSE FUND			JOINT FUNDRAISING		
1985	STATEMENT OF ORGANIZATION - AMENDMENT			11MAR85	3	85FEC/368/0233
	STATEMENT OF ORGANIZATION - AMENDMENT			11MAR85	3	85FEC/368/0236
	COMP ADJUST AMEND	1,391,274	1,394,589	1JAN85 -31MAR85	103	86FEC/427/0939
	MID-YEAR REPORT	-	-	1JAN85 -30JUN85	238	85FEC/383/4054
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN85 -30JUN85	5	85FEC/388/3508
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN85 -30JUN85	9	85FEC/391/4440
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN85 -30JUN85	34	86FEC/404/3588
	MID-YEAR REPORT - AMENDMENT	1,740,000	2,183,260	1JAN85 -30JUN85	5	86FEC/406/0897
	REQUEST FOR ADDITIONAL INFORMATION			1JAN85 -30JUN85	2	86FEC/401/4710
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN85 -30JUN85	3	86FEC/403/5389
	COMP ADJUST AMEND	1,160,923	1,180,550	1APR85 -30JUN85	111	86FEC/427/0827
	COMP ADJUST AMEND	1,222,604	1,211,731	1JUL85 -30SEP85	98	86FEC/427/0728
	YEAR-END	2,915,398	2,927,985	1JUL85 -31DEC85	434	86FEC/402/0233
	YEAR-END - AMENDMENT	-	-	1JUL85 -31DEC85	4	86FEC/416/1144
	REQUEST FOR ADDITIONAL INFORMATION			1JUL85 -31DEC85	2	86FEC/413/2509
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL85 -31DEC85	3	86FEC/415/4935
	COMP ADJUST AMEND	1,259,126	1,252,744	1OCT85 -31DEC85	125	86FEC/427/0602
1986	STATEMENT OF ORGANIZATION - AMENDMENT			30JAN86	3	86FEC/397/3658
	MISCELLANEOUS REPORT			13FEB86 TO FEC	2	86FEC/402/4411
	STATEMENT OF ORGANIZATION - AMENDMENT			18MAR86	3	86FEC/405/2562
	MISCELLANEOUS REPORT			29SEP86 TO FEC	2	86FEC/432/2239
	APRIL QUARTERLY	1,418,189	1,415,280	1JAN86 -31MAR86	306	86FEC/412/2979
	1'ST LETTER INFORMATIONAL NOTICE			1JAN86 -31MAR86	1	86FEC/417/4391
	COMP ADJUST AMEND	1,325,981	1,325,507	1JAN86 -31MAR86	169	86FEC/427/0432
	COMP ADJUST AMEND	-	-	1APR86 - 7MAY86	131	86FEC/427/0300
	COMP ADJUST AMEND	711,796	709,818	1APR86 -15MAY86	157	86FEC/428/2930
	JULY QUARTERLY	1,007,879	1,027,602	1APR86 -30JUN86	260	86FEC/424/1863
	JULY QUARTERLY - AMENDMENT	-	-	1APR86 -30JUN86	5	86FEC/430/4748
	REQUEST FOR ADDITIONAL INFORMATION			1APR86 -30JUN86	1	86FEC/430/4512
	OCTOBER QUARTERLY	593,579	593,654	1JUL86 -30SEP86	236	86FEC/438/2811
	POST-GENERAL	350,346	348,978	1OCT86 -24NOV86	204	86FEC/450/2694
	YEAR-END	267,786	269,709	25NOV86 -31DEC86	162	87FEC/460/2304
	YEAR-END - AMENDMENT	-	-	25NOV86 -31DEC86	2	87FEC/464/0801
	REQUEST FOR ADDITIONAL INFORMATION			25NOV86 -31DEC86	1	87FEC/462/3798
TOTAL		15,364,881	0 15,841,407	0	2827	TOTAL PAGES

All reports have been reviewed except the comprehensive adjustments.
Ending cash-on-hand as of 12/31/86: \$3,047
Outstanding debts owed by the committee as of 12/31/86: \$508,180
Outstanding debts owed to the committee as of 12/31/86: \$ 66,035

REPORT OF RECEIPTS AND DISBURSEMENTS

For a Political Committee Other Than an Authorized Committee

(Summary Page)

RECEIVED BY THE FEC

08 DEC 8 04:22

1. Name of Committee (in Full) National Congressional Club Address (Number and Street) 3825 Barrett Drive City, State and ZIP Code Raleigh, NC 27609 <input type="checkbox"/> Check here if address is different than previously reported.	4. TYPE OF REPORT (Check appropriate boxes) (a) <input type="checkbox"/> April 15 Quarterly Report <input type="checkbox"/> October 15 Quarterly Report <input type="checkbox"/> July 15 Quarterly Report <input type="checkbox"/> January 31 Year End Report <input type="checkbox"/> July 31 Mid Year Report (Non-Election Year Only) <input type="checkbox"/> Monthly Report for _____ <input type="checkbox"/> Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____ <input checked="" type="checkbox"/> Thirtieth day report following the General Election on <u>11/4/86</u> in the State of <u>NC</u> <input type="checkbox"/> Termination Report (b) Is this Report an Amendment? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. FEC Identification Number 000119370	
3. <input type="checkbox"/> This committee qualified as a multicandidate committee during this Reporting Period on _____	

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>10/1/86</u> through <u>11/24/86</u>			
6. (a) Cash on hand January 1, 86			\$ 20,489.88
(b) Cash on Hand at Beginning of Reporting Period		\$ 3,601.54	
(c) Total Receipts (from Line 1B)		\$ 350,346.19	\$ 3,369,994.75
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 353,947.73	\$ 3,390,484.63
7. Total Disbursements (from Line 2B)		\$ 348,978.16	\$ 3,385,515.06
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 4,969.57	\$ 4,969.57
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)		\$ 81,070.76	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		\$ 339,827.98	

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

Carter Wynn
 Type and Print Name of Treasurer
Carter Wynn
 SIGNATURE OF TREASURER

12/14/86
 Date

For further information contact
 Federal Election Commission
 600 E Street, N.W.
 Washington, D.C. 20543
 Toll Free 800-424-9595
 Local 202-556-9400

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing the report to the penalties of 2 U.S.C. § 437c.

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

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FEC FORM 3X (3/80)

**DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 280)**

Attachment 38c

The National Congressional Club/Joint Fundraiser REPRESENTATIVE		From: 10/1/86	To: 11/25/86	
		COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS				
11. CONTRIBUTIONS (other than loans) FROM:				
(a) Individuals/Persons Other Than Political Committees	268,496.72	2,867,915.64		11(a)
(Shows Entry Unfurnished 0 165,252.58)				
(b) Political Party Committees		2,250.00		11(b)
(c) Other Political Committees	268,496.72	2,870,165.64		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	53,170.50	434,193.65		12
13. ALL LOANS RECEIVED				13
14. LOAN REPAYMENTS RECEIVED				14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	28,678.97	65,335.75		15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES				16
17. OTHER RECEIPTS (Dividends, Interest, etc.)		299.71		17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	350,346.19	3,369,894.75		18
II. DISBURSEMENTS				
19. OPERATING EXPENDITURES	231,308.03	2,549,806.35		19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	57,277.50	711,731.98		20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	28,026.01	53,108.33		21
22. INDEPENDENT EXPENDITURES (see Schedule E)				22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 1441 (d)(1) (See Schedule F))				23
24. LOAN REPAYMENTS MADE				24
25. LOANS MADE		825.00		25
26. REFUNDS OF CONTRIBUTIONS TO				
(a) Individuals/Persons Other Than Political Committees	2,837.63	11,701.69		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))	2,837.63	11,701.69		26(d)
27. OTHER DISBURSEMENTS	29,528.99	58,341.71		27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	348,978.16	3,385,515.06		28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES				
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	268,496.72	2,870,165.64		29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)	2,837.63	11,701.69		30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	265,659.09	2,858,463.95		31
32. TOTAL OPERATING EXPENDITURES from Line 19	231,308.03	2,549,806.35		32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	28,678.97	65,335.75		33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	202,629.06	2,484,470.60		34

SCHEDULE B

ITEMIZED DISBURSEMENTS

Attachment 38d

Use separate schedule for each category of the Detailed Summary Page

PAGE 1 OF 5
FOR LINE NUMBER 21

Any information copied 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 political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

The National Congressional Club

A. Full Name, Mailing Address and ZIP Code Moye for Congress Box 700 Washington, NC 27889	Purpose of Disbursement Political contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/8/86	Amount of Each Disbursement This Period 1,000.00
B. Full Name, Mailing Address and ZIP Code Bill Cobey for Congress PO Box 1986 Apex, NC 27502	Purpose of Disbursement Political Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/17/86	Amount of Each Disbursement This Period 2,500.00
C. Full Name, Mailing Address and ZIP Code Jackie McGregor/McGregor for Congress PO Box 1380 Battle Creek, Michigan 49061	Purpose of Disbursement Political Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/23/86	Amount of Each Disbursement This Period 250.00
D. Full Name, Mailing Address and ZIP Code Burst for Congress PO Drawer 1621 Jacksonville, NC 28541-1621	Purpose of Disbursement Political Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/23/86	Amount of Each Disbursement This Period 500.00
E. Full Name, Mailing Address and ZIP Code Patchett for Congress PO Box 813 Marion, Illinois 62959	Purpose of Disbursement Political Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/28/86	Amount of Each Disbursement This Period 250.00
F. Full Name, Mailing Address and ZIP Code Bob Caffner for Congress 606 South Elm Greenville, Ill 62246	Purpose of Disbursement Political Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/28/86	Amount of Each Disbursement This Period 250.00
G. Full Name, Mailing Address and ZIP Code Hutchinson for Senate 723 West Markham St. Little Rock, Ark 72201	Purpose of Disbursement Political Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/29/86	Amount of Each Disbursement This Period 500.00
H. Full Name, Mailing Address and ZIP Code Moye for Congress PO Box 700 Washington, NC 27889	Purpose of Disbursement Political Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/31/86	Amount of Each Disbursement This Period 1,000.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

The National
Congressional Club

1000

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

Contents Merchandise

Do not open until after the election and forwarding to appropriate authorities

CERTIFIED

P 076 764 436

MAIL

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

FIRST GENERAL COUNSEL'S REPORT

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

SOURCE OF MUR: INTERNALLY GENERATED

83040690467

National Congressional Club and Carter Wrenn, as
treasurer

83040570468

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

α 3 0 4 0 6 9 0 4 6 9

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:

<u>Committee</u>	<u>Date Filed</u>	<u>Pre-Election Activity</u>
------------------	-------------------	------------------------------

88040690470

disclosed activity indicating a 12-Day Pre-Election Report should have been filed:

Committee

Date Filed^{1/}

Pre-Election Activity

83040690471

^{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.

33040590472

National
Congressional
Club

12-5-86
(43 days late)

\$1,000 in contributions
to one candidate

38040690473

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

COMMITTEE

Date Filed^{4/}

Pre-Election Activity

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

and their treasurers violated 2 U.S.C. § 434(a)(4)(A)(ii). This Office recommends that the Commission decline to open a Matter Under Review in 87NF-114 (Massachusetts Freeze Voter). See footnote 2.

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):

93040690474

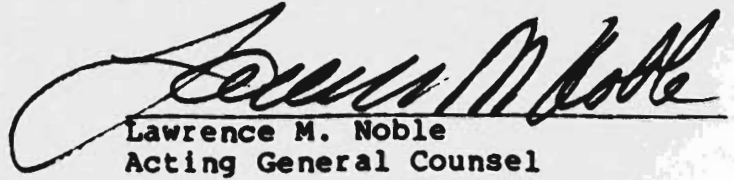
33040540475

National Congressional Club and Carter Wrenn, as treasurer

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

- 3.

6/10/87
Date


Lawrence M. Noble
Acting General Counsel

Attachments

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

88040590476

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

83040590477

(continued)

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

Page 2

88040640478

National Congressional Club and Carter Wrenn, as
treasurer

(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):

(continued)

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

Page 4

88040670430

(continued)

Federal Election Commission
Certification for RAD Ref.'s 87NF-86
through 87NF-134
Jul

Page 5

38040640481

National Congressional Club and Carter Wrenn, as treasurer

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.

3

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

Attest:

6-16-87

Date

Marjorie W. Emmons

Marjorie 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

28040690482



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 29, 1987

**Carter Wrenn, Treasurer
National Congressional Club
P. O. BOX 18848
Raleigh, N.C. 27619**

**RE: MUR 2503
National Congressional Club
and Carter Wrenn, as treasurer**

Dear Mr. Wrenn:

On June 15, 1987, the Federal Election Commission found that there is reason to believe National Congressional 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 Sandra Dunham, 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

2 3 0 4 0 5 7 0 4 8 4

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: **National Congressional Club**
 and Carter Wrenn, as treasurer

MUR: 2503

38040590485
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 December 5, 1986. Accordingly, the committee and its treasurer have violated 2 U.S.C. § 434(a)(4)(A)(ii).



THE NATIONAL CONGRESSIONAL CLUB

P.O. Box 18848
RALEIGH, N. C. 27619
919-782-5700

RECEIVED AT THE FEC

CC# 3826

87 JUL 6 PM 2:50

July 2, 1987

Federal Election Commission
999 E Street, N. W.
Washington, D.C. 20463

Re: The National Congressional Club FEC # C00119370
Mur 2503

Dear Sir:

In response to your letter dated June 29, 1987 stating that the National Congressional Club has violated 2 U.S.C. S434 (a)(4)(A)(ii), I offer the following explanation:

It was just an oversight, an honest mistake on the part of our bookkeeper, and was certainly not done intentionally.

As you stated in your letter, we did report the contribution in the post general election report as well as all of the other transactions that normally would have been reported in the pre-general election report.

Please advise if we need to proceed any further.

Sincerely,


Carter Wrenn
Treasurer

87 JUL 6 PM 3:39

RECEIVED
GENERAL INVESTIGATIVE
DIVISION



THE NATIONAL CONGRESSIONAL CLUB

P.O. Box 18848
RALEIGH, N. C. 27619
919-782-5700

RECEIVED AT THE FEC

CCC#3868

87 JUL 10 AM: 44

July 8, 1987

Federal Election Commission
999 E Street, N. W.
Washington, D.C. 20463

Re: The National Congressional Club FEC # C00119370
Mur 2503

Dear Ms. Dunham:

As per our telephone conversation this morning, I am revising our letter of July 2, 1987 to state that we are interested in pursuing pre-probable cause conciliation.

In response to your letter dated June 29, 1987 stating that the National Congressional Club has violated 2 U.S.C. S434 (a)(4)(A)(ii), I offer the following explanation:


It was just an oversight, an honest mistake on the part of our bookkeeper, and was certainly not done intentionally. She just failed to spot the one check.

As you stated in your letter, we did report the contribution in the post general election report as well as all of the other transactions that normally would have been reported in the pre-general election report.

Please advise if we need to proceed any further.

Thank you for your co-operation.

Sincerely,


Carter Wrenn
Treasurer

87 JUL 10 P 2:39

RECEIVED
GENERAL
FEDERAL ELECTION COMMISSION

88040690487



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 11, 1987

MEMORANDUM

TO: LAWRENCE M. NOBLE
ACTING GENERAL COUNSEL

ATTENTION: SANDRA DUNHAM

FROM: OSCELYN A. ANDERSON *aa*
COMPLIANCE CLERK
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

SUBJECT: MUR 2503

Please review the attached Requests for Additional Information which are to be sent to the National Congressional Club for the amended 1980 Year End, amended 1981 Year End and amended 1985 October Quarterly Reports. If no response or an inadequate response is received, Second Notices will be sent.

Any comments which you may have must be forwarded to RAD in writing by 11:00 a.m. on Thursday, August 13, 1987.

If comments are not received in writing by the above date and time, the RFAI notices will be sent.

If you have any questions, please contact Oscelyn A. Anderson at 376-2490. Thank you.

COMMENTS:

Attachment



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

Carter Wrenn, Treasurer
National Congressional Club
(Jefferson Marketing, Inc.)
3825 Barrett Drive
P.O. Box 18848
Raleigh, NC 27619

Identification Number: C00119370

Reference: Amended October Quarterly Report (7/1/85-9/30/85,
dated 8/14/86)

Dear Mr. Wrenn:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule D supporting Line 9 of the Summary Page discloses an outstanding balance at the close of this reporting period of \$150,113.69 owed to your committee by the Jesse Helms Senatorial Committee. FEC calculations, however, show this amount to be \$146,328.25. Please amend your report to correct this discrepancy.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

Brian J. Hancock
Reports Analyst
Reports Analysis Division



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Carter Wrenn, Treasurer
National Congressional Club
(Jefferson Marketing, Inc.)
3825 Barrett Drive
P.O. Box 18848
Raleigh, NC 27619

Identification Number: C00119370

Reference: Amended Year End Report (1/1/81-12/31/81, dated
8/14/86)

Dear Mr. Wrenn:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please amend your report by providing the address and purpose for each disbursement itemized on Schedule B supporting Line 19.

-Schedule D supporting Line 10 of the Summary Page of your report shows an outstanding debt of \$4,485.26 to Hardison Corporation. However, your report also shows the outstanding balance at the beginning of this period being paid, without any new amount being incurred this period. Please amend your report to correct this discrepancy.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

Brian J. Hancock
Reports Analyst
Reports Analysis Division

00490



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Carter Wrenn, Treasurer
National Congressional Club
(Jefferson Marketing, Inc.)
3825 Barrett Drive
P.O. Box 18848
Raleigh, NC 27619

Identification Number: C00119370

Reference: Amended Year End Report (1/1/80-12/31/80, dated
8/14/86)

Dear Mr. Wrenn:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please amend your report by providing the address and purpose for each disbursement itemized on Schedule B supporting Line 19.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

Brian J. Hancock
Reports Analyst
Reports Analysis Division

SENSITIVE

07 AUG 18 9:28

CONFIDENTIAL

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
National Congressional Club and) MUR 2503
Carter Wrenn, as treasurer)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On June 15, 1987, the Commission found reason to believe that the National Congressional Club and Carter Wrenn, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii) by failing to file the 1986 Pre-Election Report in a timely manner. When the National Congressional Club filed its 1986 Post-Election Report it disclosed a \$1,000 contribution made between October 1, 1986 and October 15, 1986. This contribution necessitated the filing of a Pre-Election Report. All of the information which should have been included in the Pre-Election Report was contained in the Post-Election Report filed on December 5, 1986. By letter dated July 8, 1987, respondents requested to settle this matter prior to a finding of probable cause to believe (Attachment 1).

II. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

33040590492

1/ The National Congressional Club filed a Post-Election Report which covered all receipts and disbursements from 10/1/86 through 11/23/86. The following is a breakdown for the activity from 10/1/86 through 10/15/86:

<u>Receipts</u>		<u>Disbursements</u>	
Itemized receipts	- \$ 37,825.50	Operating Expenditures	- \$ 96,724.15
Unitemized receipts (prorated)	- \$ 55,084.19	Transfers	- \$ 24,769.50
Transfers	- \$ 24,320.50	Contribution to federal	- \$ 1,000.00
Expenditures	- \$ 16,778.97	Refunds	- \$ 2,837.63
		Other disbursements-	
TOTAL	<u>\$134,009.16</u>		\$ 308.80
		TOTAL	<u>\$125,640.08</u>

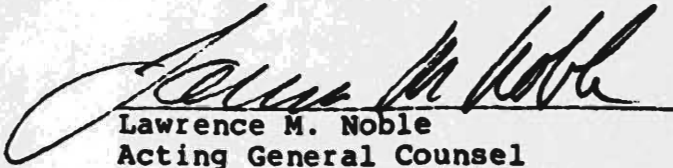
2/ Begin with \$100 for each report disclosing receipts or disbursements between \$10,000 and \$20,000. Add \$100 for every additional \$10,000 in receipts or disbursements.

III. RECOMMENDATIONS

1. Enter into conciliation with National Congressional Club and Carter Wrenn, as treasurer, prior to a finding of probable cause to believe.
2. Approve the attached proposed conciliation agreement and letter.

Date

8/11/87


Lawrence M. Noble
Acting General Counsel

Attachments

1. Request for conciliation
2. Proposed agreement and letter

33040570494



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

MEMORANDUM TO: LAWRENCE M. NOBLE
ACTING GENERAL COUNSEL

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

DATE: AUGUST 21, 1987

SUBJECT: OBJECTIONS TO MUR 2503 - General Counsel's Report
Signed August 17, 1987

The above-captioned document was circulated to the Commission on Tuesday, August 18, 1987 at 4:00 P.M.

Objections have been received from the Commissioners as indicated by the name(s) checked:

Commissioner Aikens	<u>X</u>
Commissioner Elliott	<u></u>
Commissioner Josefiak	<u>X</u>
Commissioner McDonald	<u></u>
Commissioner McGarry	<u></u>
Commissioner Thomas	<u></u>

This matter will be placed on the Executive Session agenda for Wednesday, September 9, 1987.

Please notify us who will represent your Division before the Commission on this matter.

88040590495

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
National Congressional Club and) MUR 2503
Carter Wrenn, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of September 9, 1987, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 2503:

1. Enter into conciliation with National Congressional Club and Carter Wrenn, as treasurer, prior to a finding of probable cause to believe.
2. Approve the proposed conciliation agreement and letter attached to the General Counsel's report dated August 11, 1987, subject to amendment of the agreement by reduction of the civil penalty to One Thousand Dollars.

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

Attest:

9-10-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 15, 1987

Carter Wrenn, Treasurer
National Congressional Club
P.O. Box 18848
Raleigh, NC 27619

RE: MUR 2503
National Congressional
Club and Carter Wrenn,
as treasurer

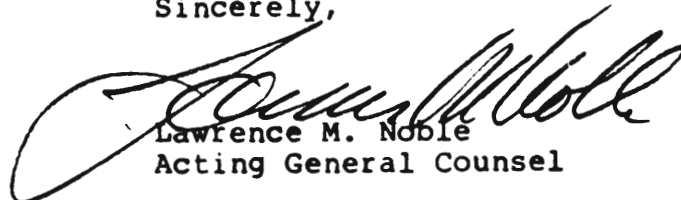
Dear Mr. Wrenn:

On June 15, 1987, the Federal Election Commission found reason to believe that the National Congressional Club violated 2 U.S.C. § 434(a)(4)(A)(ii). At your request, on , 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 Sandra Dunham, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,


Lawrence M. Noble
Acting General Counsel

Enclosure
Conciliation Agreement

93040690497



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 17, 1987

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

ATTENTION: SANDRA DUNHAM

FROM: OSCELYN A. ANDERSON *aa*
COMPLIANCE CLERK
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

SUBJECT: MUR 2503

Please review the attached Request for Additional Information which is to be sent to the National Congressional Club for the Mid-Year Report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have must be forwarded to RAD in writing by 1:00 p.m. on Thursday, November 19, 1987.

If comments are not received in writing by the above date and time, the RFAI notice will be sent.

If you have any questions, please contact Oscelyn A. Anderson at 376-2490. Thank you.

COMMENTS:

Attachment



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

**Carter Wrenn, Treasurer
National Congressional Club
P.O. Box 18848
Raleigh, NC 27619**

Identification Number: C00119370

Reference: 1987 Mid-Year Report (1/1/87-6/30/87)

Dear Mr. Wrenn:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please clarify all expenditures made for "Advertising/research". If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, they should be disclosed on Schedule B or E for Line 21 or 22 and include the amount, name, address and office sought by each candidate. 11 CFR 104.3(b) and 106.1.

-Your report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule B, supporting Line 19 of the Detailed Summary Page. (2 U.S.C. §434(b)(5)) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty (60) days or more. 11 CFR 104.11.

If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2).

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR 104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

83040570499

3 3 0 4 0 5 9 0 5 0 0

Please provide clarification regarding administrative expenses incurred by your committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission regulations. Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year.

-The debt schedule (Schedule D) discloses \$19,933.71 in payments this period to Fiscal Operations Services Corporation; however, there are \$19,152.10 in payments reflected on the disbursement schedule (Schedule B). Please amend your report to clarify this apparent discrepancy.

-The identification of each contributor, including the person's occupation and name of employer, must be provided if the person has contributed in excess of \$200 in the aggregate during the calendar year. Please amend Schedule A supporting Line 11(a)(i) for each entry lacking a contributor's occupation and name of employer.

Note: If your committee has made at least one effort per solicitation, either by a written request or by an oral request documented in writing to obtain this information from the contributor, your committee may have exercised "best efforts." If you believe that your committee satisfies the "best efforts" provision, you should provide a copy of your solicitation or an explanation of the method(s) used to obtain contribution information. Clarification regarding "best efforts" should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. 11 CFR 104.3(a)(4)(i) and 104.7.

-On Schedule A supporting Line 11(a)(i) of the Detailed Summary Page, your report disclosed contributions from individuals that omit the names and mailing addresses. Please amend your report by supplying the information. 11 CFR 104.3(a)(4)(i).

-Schedule A of your report discloses aggregate year-to-date totals for contributions received from individuals which appear to be incorrect (see attachments). Please amend your report to correct this discrepancy or provide clarification regarding these receipts.

-The Commission notes the refunds of the excessive amounts received by contributors, but it appears that you have incorrectly deducted the excessive amounts

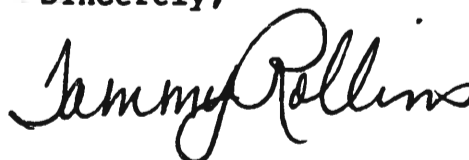
from the aggregate year-to-date totals. Please amend your report to reflect the excessive amounts in the aggregate year-to-date totals. In addition, the disbursement of the amounts in excess should be disclosed on a supporting Schedule B for Line 26(a) of the Detailed Summary Page.

Although the Commission may take further legal steps concerning the acceptance of excessive contributions from individuals, the prompt action by your committee will be taken into consideration.

-Your committee's report includes computerized supporting schedules. Pursuant to 11 CFR 104.2(d), computer produced schedules may be used contingent upon prior approval of the Commission. Please submit a separate request (including an example of the proposed format) for consideration. Until your format has been approved, FEC supporting schedules should be used.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,



Tammy Rollins
Reports Analyst
Reports Analysis Division

88040390501

LINE NUMBER 11A

NAME OF COMMITTEE IN FULL THE NATIONAL CONGRESSIONAL CLUB Fundraising representative for the Jesse Helms Legal Defense Fund Joint Fundraiser

NAME, MAILING ADDRESS NAME OF EMPLOYER OCCUPATION AMT. OF RCPT. THIS PERIOD

AGGREGATE YTD DATE

Mrs Filene Clotworthy 01/27/87 \$25.00
3733 Winter Cir 02/16/87 \$20.00
Knoxville TN-37920

\$240.90

Mrs Adele A. Clute Ret 01/27/87 \$500.00
417 College Ave 02/24/87 \$25.00
Palo Alto CA 94306 03/30/87 \$100.00

\$1,600.00

Mr William B. Cotterly Jr Cotterly-West Co 02/16/87 \$250.00
247 Mulfield St
Los Angeles CA 90020

\$125.00

Mrs Ruth Cockrell Housewife 02/16/87 \$100.00
417 W Acce Rd Sg 3C 02/26/87 \$50.00
West Sacramento CA 95691

\$150.00

Miss Barbara Coggins HJ Memorial Home For Disable 03/06/87 \$35.00
1275 Acce Ave Apt FF 2 RN
North Plarfield NJ 07060

\$260.00

Mr William B. Cole Unit Machine Fixer 01/28/87 \$70.00
1303 N Corterrial St
High Point NC 27262

\$149.00

Mr George A. Coleman Dealer 02/16/87 \$150.00
Walnut St
Concord PA 17042

\$75.00

Mr Joseph L. Collins Retires 01/27/87 \$280.00
Rt 11 Box 504 02/23/87 \$25.00
Vicksburg MS 39180

\$407.90

LINE NUMBER 17A

NAME OF COMMITTEE IN FULL
THE NATIONAL CONGRESSIONAL CLUBFundraising Representative for the
Jesse Helms Legal Defense Fund Joint
Fundraiser

NAME, MAILING ADDRESS

NAME OF EMPLOYER
OCCUPATIONAMT. OF DCPT.
THIS PERIOD

AGGREGATE YTD DATE

02/16/87 \$150.00

Dr. Vood W. Nyce
600 Shocco Ln
Las Vegas.

Surgeon

NV 29106

\$75.00

02/13/87 \$40.00

Mr. R. B. Jacobs II
11405 Pair St
Prisco

Consulting Engineer

IL 61073

\$230.00

01/12/87 \$20.00

Mr. R. E. Jaccaser

01/27/87 \$10.00

Rt 1

02/23/87 \$10.00

Broken Bow

NE 68922

03/13/87 \$10.00

04/03/87 \$10.00

\$195.00

02/13/87 \$250.00

Mrs. Elizabeth L. Janney
8903 Seelice Dr
Dayton

OH 45419

\$125.00

01/02/87 \$100.00

Mr. Marlan E. Jessner
21 Armstrong Avenue
Elioben

Retired

NH 03585

02/02/87 \$100.00

\$215.00

01/12/87 \$153.12

Mr. Carl E. Jodet
467 Torcer Ct
Marco Island

FL 33637

\$76.56

01/27/87 \$40.00

Mrs. F. Roy Jensch
405 Lichen St
PurfreestercHom
Housewife

NC 27855

\$196.50



THE NATIONAL CONGRESSIONAL CLUB
P.O. Box 18848 • RALEIGH, N.C. 27619 • 919-782-5700

6044909
RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

87 DEC -7 PM 12: 09

December 3, 1987

Mrs. Sandra Dunham
Federal Election Commission
999 E Street, N.W.
Washington, D. C. 20463

RE: MUR 2503

Dear Mrs. Dunham:

Per our conversation, attached is a signed conciliation agreement and a check.

Thank you for your cooperation.

Best regards.

Yours truly,

Carter Wrenn
Treasurer

CW:e
Enclosure

cc: Mr. Thomas Farr

87 DEC -8 AM 9: 16
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2503 (or any other)
NAME OF COUNSEL: Mr Thomas FARR
ADDRESS: PO Box 19764
3201 Glenwood Ave
RALEIGH, NC 27619
TELEPHONE: 919-781-6800

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

11-24-87
Date

Carter Wynn
Signature

RESPONDENT'S NAME:

ADDRESS:

HOME PHONE:

BUSINESS PHONE:

Carter Wynn
National Congressional Club
PO Box 18848
Raleigh NC 27619
919-782-5700

88040690500

THE NATIONAL CONGRESSIONAL CLUB
P. O. BOX 18848
RALEIGH, N. C. 27619

No 21101

66-30
531

December 3 19 87

PAY TO THE ORDER OF Federal Election Commission \$ 750.00

Seven hundred fifty and 00/100----- DOLLARS

FIRST CITIZENS BANK
First Citizens Bank & Trust Company
Raleigh, N.C. 27602

Cathy Allen

⑈00021101⑈ ⑆053100300⑆0861122499⑈

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW. IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

THE NATIONAL CONGRESSIONAL CLUB

DATE	DESCRIPTION	AMOUNT
12/3/87	settlement of MUR 2503	\$750.00

MEMORANDUM

TO: DEBRA A. TRIMIEW

TO: CECILIA LIEBER

FROM: CECILIA LIEBER

FROM: ~~DEBRA A. TRIMIEW~~

Michele Brissard

CHECK NO. 21101 { A COPY OF WHICH IS ATTACHED } RELATING TO

MUR 2503 AND NAME National Congressional Club and
(Eunham)
Carter Wrenn as treasurer

WAS RECEIVED ON 12/8/87. PLEASE INDICATE THE ACCOUNT INTO

WHICH IT SHOULD BE DEPOSITED:

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

SIGNATURE Michele Brissard DATE 12/8/87

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF CLERK
87 DEC -8 AM 9:16

60044909

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

National Congressional Club and)
Carter Wrenn, as treasurer)

MUR 2503

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Carter Wrenn, the treasurer of the National Congressional Club.


The attached agreement contains no changes from the agreement approved by the Commission on November 12, 1987. A check for the civil penalty has also been received.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with the National Congressional Club and Carter Wrenn, as treasurer.
2. Close the file.
3. Approve the attached letter.

Date

12/17/87


Lawrence M. Noble
General Counsel

Attachments

1. Conciliation Agreement
2. Photocopy of civil penalty check
3. Letter to Respondent

87 DEC 17 PM 4:18

RECEIVED
FEDERAL ELECTION COMMISSION

33040690507

Received in the Office of Commission Secretary: Thurs., 12-17-87, 4:18
Circulated on 48 hour tally basis: Fri., 12-18-87, 12:00
Deadline for vote: Tues., 01-05-88, 4:00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 6, 1988

Carter Wrenn, Treasurer
National Congressional Club
P.O. Box 18848
Raleigh, NC 27619

RE: MUR 2503
National Congressional
Club and Carter Wrenn,

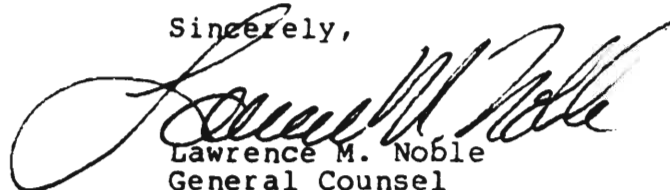
Dear Mr. Wrenn:

On December 31 1987, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on National Congressional Club's behalf 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. 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 Sandra Dunham, the staff member assigned to this matter at (202) 376-8200.

Sincerely,


Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

88040590509

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

National Congressional Club and
Carter Wrenn, as treasurer

)
)
)
)

MUR 2503

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 National Congressional Club and Carter Wrenn, as treasurer ("Respondents") 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 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 enter voluntarily into this agreement with the Commission.

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

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

2. Respondent, Carter Wrenn, is the treasurer of National Congressional Club.

88040690510

3. Respondents filed a 1986 Post-Election Report that disclosed a contribution made to a federal candidate between October 1, 1986 and October 15, 1986.

4. Thus, Respondents were required to file a Pre-Election Report by October 23, 1986.

5. Respondents did not file a report disclosing this contribution until it filed its 1986 Post-Election Report on December 5, 1986.

V. Respondents failed to file their 1986 Pre-Election Report in a timely manner, in violation of 2 U.S.C.

§ 434(a)(4)(A)(ii).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Seven Hundred and Fifty Dollars (\$750.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. 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.

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

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

X. 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
General Counsel

Date

1/6/88

FOR THE RESPONDENTS:


Carter Wrenn
Treasurer

Date

12-2-87

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2503

DATE FILMED 3/30/88 CAMERA NO. 4

CAMERAMAN GPC

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