



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2533

DATE FILMED 3-1-93 CAMERA NO. 3

CAMERAMAN E.S.

93040932773

REPORTS ANALYSIS REFERRAL
TO
OFFICE OF GENERAL COUNSEL

DATE: July 17, 1987

ANALYST: Lisa Stolaruk

I. COMMITTEE: C.O.R.K. (C99003329)
Rick Woodrow, Treasurer
P.O. Box 5490
Everett, WA 98206-5490

II. RELEVANT STATUTE: 2 U.S.C. §434(b)(8)
11 CFR 104.3(d)

III. BACKGROUND:

Failure to Provide Supporting Schedules

C.O.R.K.'s 1986 October Quarterly, 30 Day Post-General, and Year End Reports disclosed \$112,891.29 in debts and obligations owed by the committee (Line 10 of the Summary Pages) (Attachments 2, 3 and 4). C.O.R.K. failed to provide Schedules C or D, as appropriate, to support these entries.

A Request for Additional Information ("RFAI") was sent to C.O.R.K. on April 1, 1987 (Attachment 5). The RFAI asked C.O.R.K. to provide a Schedule C or D to support each entry of \$112,891.29 disclosed on the Summary Pages of the reports. A Second Notice was sent to C.O.R.K. on April 23, 1987, for failure to respond to the RFAI (Attachment 6).

On May 26, 1987, the Reports Analysis Division analyst called Directory Assistance in Everett, Washington to try to get a phone number for Mr. Rick Woodrow, the treasurer of C.O.R.K. No number was listed (Attachment 7).

Noting a telephone number for another committee for which Mr. Woodrow is also treasurer (Life Amendment PAC), the analyst called Mr. Woodrow on June 23, 1987. In a phone conversation with the analyst, Mr. Woodrow said that he would make copies of the debt schedules and mail them to the Commission that same week (Attachment 8).

As of this date, no response has been received from C.O.R.K. regarding this problem.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS 7 (C) (85-86)

DATE 26MAY87
PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
CORK						
CONNECTED ORGANIZATION: LIFE AMENDMENT PAC, INC						
				NON-PARTY NON-QUALIFIED	ID #C99003329	
1985	MID-YEAR REPORT	0	0	1JAN85 -30JUN85	5	85FEC/386/4739
	YEAR-END	-	-	1JUL85 -31DEC85	5	86FEC/403/1186
1986	APRIL QUARTERLY	0	0	1JAN86 -31MAR86	5	86FEC/410/4422
	JULY QUARTERLY	0	0	1APR86 -30JUN86	5	86FEC/424/0827
	OCTOBER QUARTERLY	0	0	1JUL86 -30SEP86	3	86FEC/444/2195
	REQUEST FOR ADDITIONAL INFORMATION			1JUL86 -30SEP86	1	87FEC/464/1768
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL86 -30SEP86	2	87FEC/466/2130
	POST-GENERAL	0	0	1OCT86 -24NOV86	3	86FEC/445/3982
	REQUEST FOR ADDITIONAL INFORMATION			1OCT86 -24NOV86	1	87FEC/464/1769
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT86 -24NOV86	1	87FEC/466/2132
	YEAR-END	0	0	25NOV86 -31DEC86	3	87FEC/459/4625
	REQUEST FOR ADDITIONAL INFORMATION			25NOV86 -31DEC86	1	87FEC/464/1770
	REQUEST FOR ADDITIONAL INFORMATION 2ND			25NOV86 -31DEC86	1	87FEC/466/2133
	TOTAL	0	0	0	36	TOTAL PAGES

All reports have been reviewed.

Cash on hand as of 12/31/86: \$1204.28

Debts and Obligations Owed To the Committee: \$0

Debts and Obligations Owed By the Committee: \$112,891.29

C.O. R.14

P.O. Box 5490

Everett, WA. 98200-5430

Q 99003827

minutes during this Reporting Period on _____

0 500 1 000 1 500 2 000 2 500 3 000 3 500 4 000 4 500 5 000

19. Debts and Obligations Owed BY the Committee
(Itemize all on Schedule C or Schedule D)

Column A This Party	Column B Candidate Your Co-Party
	1304.28
1204.28	
5	5
5	5
5	5
5	5
5	5
5	
0/12, 891.29	

10

Federal Election Commission
Toll Free 800-424-9529
Local 202-693-6529

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

REPORT OF RECEIPTS AND DISBURSEMENTS For a Political Committee Other Than an Authorized Committee

(Summary Page)

ALIGN AREA 1. Name of Committee (in full) C.O.R.K. Address (Number and Street) P.O. Box 5490 City, State and ZIP Code Everett, WA. 98206-5490 <input type="checkbox"/> Check here if address is different than previously reported		ALIGN AREA 4. TYPE OF REPORT (check appropriate box) (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 annual report <input type="checkbox"/> July 31 fiscal year report (fiscal year ending 12/31) <input type="checkbox"/> Monthly report <input type="checkbox"/> Twelfth day report <input checked="" type="checkbox"/> Termination report (b) Is this Report an "interim report"? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
2. FEC Identification Number C 99 00 3329		on Nov 4, 1986	
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	10/1/86 through 11/24/86		
6. (a) Cash on hand January 1, 1984			1204.28
(b) Cash on hand at Beginning of Reporting Period		1204.28	
(c) Total Receipts (from Line 18)		0	0
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		0	0
7. Total Disbursements (from Line 28)		0	0
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		1204.28	
9. Debts and Obligations Owed TO The Committee (itemize all on Schedule C or Schedule D)		0	
10. Debts and Obligations Owed BY the Committee (itemize all on Schedule C or Schedule D)		1120.9129	

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

Signature of Treasurer
Ring Woodrow
 Type or Print Name of Treasurer
Ring Woodrow

SIGNATURE OF TREASURER

11/24/86

REPORT OF CANDIDATE FOR POLITICAL OFFICE

For a Political Committee (and for a Candidate for Election)

Summary Page

07/01/1987

1. Name of Committee (in Full)

C.O.R.K.

Address (Number and Street)

P.O. Box 5490

City, State and ZIP Code

Everett, WA. 98206-5490

Check if address is different than previously reported.

2. PSC Identification Number

C 99003329

3. This committee qualified as a multicandidate com-

mittee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate box)

- (a) ☐ First 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☒ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☐ Monthly Report for _____
☐ Twelfth day report preceding _____
 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 11/25/86 Through 12/15/86

6. (a) Cash on Hand January 1, 1987

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 10)

(d) Subtotal (add lines 6b) and 6c) for _____
 (lines 6a) and 6c) for Column A and

7. Total disbursements (from Line 10)

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

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)

Column A This Period	Column B Calendar Year-to-Date
	\$ 1204.28
\$ 1204.28	
\$ 0	\$ 0
\$ 0	\$ 0
\$ 0	\$ 0
\$ 1204.28	\$ 1204.28
\$ 0	
\$ 1204.28	

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

For further information, contact:

Federal Election Commission
 Toll Free 800-435-6889
 Local 202-693-6889

Type or Print Name of Treasurer

SIGNATURE OF TREASURER

Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. § 205.

All previous versions of PSC FORM 3 and PSC FORM 2a are obsolete and should no longer be used.

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PSC FORM 3X (2-86)

3704304594625



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

APR 1 1987

Rick Woodrow, Treasurer
C.O.R.K.
P.O. Box 5490
Everett, WA 98206-5490

Identification Number: C99003329

Reference: October Quarterly (7/1/86-9/30/86), 30 Day Post-
General (10/1/86-11/24/86) and Year End (11/25/86-
12/31/86) Reports

Dear Mr. Woodrow:

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 provide a Schedule C or D, as appropriate, to support the entry of \$112,891.29 reported on Line 10 of the Summary Page. Loans and debts must be continuously reported until they are either repaid or settled. 11 CFR 104.3(d).

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,

A handwritten signature in cursive script that reads "Joseph Rawson".

Joseph Rawson
Reports Analyst
Reports Analysis Division

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-3

April 23, 1987

Rick Woodrow, Treasurer
C.O.R.K.
P.O. Box 5490
Everett, WA 98206-5490

Identification Number: C99003329

Reference: October Quarterly (7/1/86-9/30/86), 30 Day Post-
General (10/1/86-11/24/86) and Year End (11/25/86-
12/31/86) Reports

Dear Mr. Woodrow:

This letter is to inform you that as of April 22, 1987, the Commission has not received your response to our request for additional information, dated April 1, 1987. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Joseph Rawson on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

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TELECON

ANALYST: Joseph Rawson

CONVERSATION WITH: Directory Assistance

COMMITTEE: C.O.R.K.

DATE: May 26, 1987

SUBJECT(S): Telephone Number for C.O.R.K.

Directory Assistance had no number listed for Rick Woodrow in Everett, Washington, where their Post Office Box is located.

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TELECON

ANALYST: Joseph Rawson

CONVERSATION WITH: Rick Woodrow

COMMITTEE: C.O.R.K.

DATE: June 23, 1987

SUBJECT(S): Missing Debt Schedules

Rick Woodrow said that he would make copies of the debt schedules and mail them to the Commission this week.

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SENSITIVE

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

FIRST GENERAL COUNSEL'S REPORT

RAD REFERRAL: 87L-28
STAFF MEMBER: Phillip L. Wise

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

RESPONDENTS: C.O.R.K. and Rick Woodrow, as treasurer

RELEVANT STATUTE: 2 U.S.C. § 434(b)(8)

INTERNAL REPORTS
CHECKED: Disclosure Reports

FEDERAL AGENCIES
CHECKED: None

I. GENERATION OF MATTER

C.O.R.K. and Rick Woodrow, as treasurer, were referred to the Office of the General Counsel by the Reports Analysis Division ("RAD") for failure to provide Schedules C or D, as appropriate, to support disclosed debts and obligations, in violation of 2 U.S.C. § 434(b)(8). Attachment 1.

II. FACTUAL AND LEGAL ANALYSIS

C.O.R.K.'s 1986 October Quarterly, 30 Day Post-General, and Year End Reports disclosed \$112,891.29 in debts and obligations owed by the Committee. Attachments 1(c), 1(d) and 1(e).

C.O.R.K. failed to provide Schedules C or D, as appropriate, to support these entries.

A Request for Additional Information ("RFAI") was sent to C.O.R.K. on April 1, 1987. The RFAI asked C.O.R.K. to provide a Schedule C or D to support each entry of \$112,891.29 disclosed on the Summary Pages of the reports. A Second Notice was sent to

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C.O.R.K. on April 23, 1987, for failure to respond to the RFAI. Attachments 1(f) and 1(g).

The analyst called Mr. Woodrow on June 23, 1987. In a phone conversation with the analyst, Mr. Woodrow said that he would make copies of the debt schedules and mail them to the Commission that same week. Attachment 1(i).

As of this date, no response has been received from C.O.R.K. regarding this problem.

Pursuant to 2 U.S.C. § 434(b)(8) each report under this section shall disclose the amount and nature of outstanding debts and obligations owed by or to such political committee; and where such debts and obligations are settled for less than their reported amount or value, a statement as to the circumstances and conditions under which such debts or obligations were extinguished and the consideration therefor.

C.O.R.K.'s failure to provide a Schedule C or D to support the amount and nature of outstanding debts and obligations is an apparent violation of 2 U.S.C. § 434(b)(8).

III. RECOMMENDATIONS

1. Open a MUR;
2. Find reason to believe that C.O.R.K. and Rick Woodrow, as treasurer, violated 2 U.S.C. § 434(b)(8);

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3. Approve and send the attached letter and Factual and Legal Analysis.

Date 8/24/87

Lawrence M. Noble (Z/S)
Lawrence M. Noble
Acting General Counsel

Attachments

1. Referral
2. Factual and Legal Analysis
3. Proposed letter to respondents

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
C.O.R.K. and Rick Woodrow, as treasurer)

~~RAD Ref. 87L-28~~

(MUR 2533)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 27, 1987, the Commission decided by a vote of 4-0 to take the following actions in RAD Ref. 87L-28:

1. Open a MUR.
2. Find reason to believe that C.O.R.K. and Rick Woodrow, as treasurer, violated 2 U.S.C. § 434(b)(8).
3. Approve and send the letter and Factual and legal Analysis, as recommended in the General Counsel's report signed August 24, 1987.

Commissioners Aikens, Elliott, McDonald, and McGarry voted affirmatively for the decision;
Commissioners Josefiak and Thomas did not cast a vote.

Attest:

8-27-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Mon., 8-24-87, 4:32
Circulated on 48 hour tally basis: Tues., 8-25-87, 11:00
Deadline for vote: Thurs., 8-27-87, 11:00

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 1, 1987

Rick Woodrow, Treasurer
C.O.R.K.
P.O. Box 5490
Everett, WA 98206-5490

RE: MUR 2533
C.O.R.K. and Rick
Woodrow, as treasurer

Dear Mr. Woodrow:

On August 27, 1987, the Federal Election Commission found that there is reason to believe C.O.R.K. ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(b)(8), 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.

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Letter to Rick Woodrow, treasurer
Page 2

Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

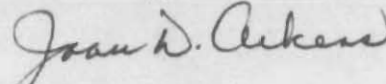
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Joan D. Aikens
Commissioner

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

14 October 1987

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Rick Woodrow, Treasurer
C.O.R.K.
P.O. Box 5490
Everett, WA 98206-5490

RE: MUR 2533
C.O.R.K. and
Rick Woodrow, as treasurer

Dear Mr. Woodrow:

By letter dated September 1, 1987, C.O.R.K. ("the Committee") and you, as treasurer, were notified that on August 27, 1987, the Federal Election Commission found reason to believe that the Committee and you had violated 2 U.S.C. § 434(b)(8), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act").

To date, the Committee and you, as treasurer, have not responded to the notification. Unless we receive a response from you within 5 days, this Office will proceed to the next stage of the enforcement process.

Attached for your information is a copy of the notification and Factual and Legal Analysis, which formed a basis for the Commission's finding.

Should you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

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SENSITIVE

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

87 NOV -4 PM 1:56



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 4, 1987

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble *[Signature]*
General Counsel

SUBJECT: MUR #2533 C.O.R.K. and Rick Woodrow, as treasurer

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondents of the General Counsel's intention to recommend probable cause was mailed on November 4, 1987. Following receipt of the respondents' reply to this notice, this Office will make a further report to the Commission.

Attachments

- 1-Brief (1)
- 2-Letter to respondents

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 4, 1987

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Rick Woodrow, Treasurer
C.O.R.K.
P.O. Box 5490
Everett, WA 98206-5490

RE: MUR 2533
C.O.R.K. and Rick Woodrow
as treasurer

Dear Mr. Woodrow:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on August 27, 1987, found reason to believe that C.O.R.K. and you, as treasurer, violated 2 U.S.C. § 434(b)(8), and instituted an investigation in this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

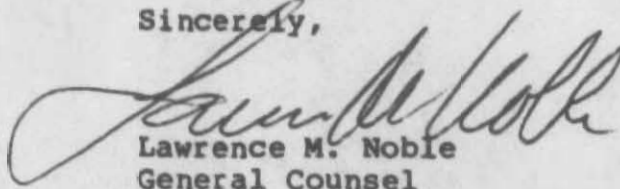
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Letter to Rick Woodrow, Treasurer
Page 2

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Phillip L. Wise, the attorney assigned to handle this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

93040932792

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
C.O.R.K and Rick Woodrow) MUR 2533
as treasurer)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

This matter arose as a referral from the Reports Analysis Division (hereinafter, "RAD"). RAD indicated that C.O.R.K. and Rick Woodrow, as treasurer (hereinafter "Respondents") on their 1986 October Quarterly, 30 Day Post-General, and Year End Reports disclosed \$112,891.29 in debts and obligations owed; however, Respondents failed to provide Schedules C or D to support these entries.

On August 27, 1987, the Commission found reason to believe that Respondents violated 2 U.S.C. § 434(b)(8). A letter notifying Respondents of the Commission's finding was mailed on September 1, 1987. No response has been received to this notification. On October 14, 1987, this Office by certified mail forwarded an additional notice to Respondents informing them of the Commission's finding and, in addition, giving notice that if no response were forthcoming within 5 days, this Office would proceed to the next stage of the enforcement process. No response has been received to this second notice.

II. LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act") provides pursuant to 2 U.S.C. § 434(b)(8), that each report filed by a political committee under this section shall disclose

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the amount and nature of outstanding debts and obligations owed by or to such political committee; and where such debts and obligations are settled for less than their reported amount or value, a statement must be included as to the circumstances and conditions under which such debts or obligations were extinguished and the consideration therefor.

C.O.R.K.'s failure to provide a Schedule C or D to support the amount and nature of outstanding debts and obligations is a violation of 2 U.S.C. § 434(b)(8).

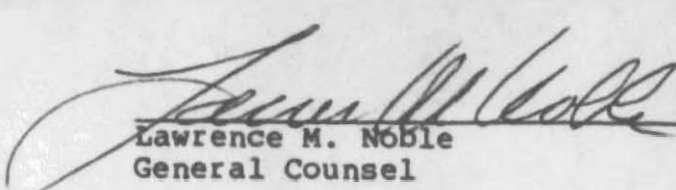
Accordingly, the Office of the General Counsel recommends that the Commission find probable cause to believe C.O.R.K. and Woodrow, as treasurer, violated 2 U.S.C. § 434(b)(8).

II. GENERAL COUNSEL'S RECOMMENDATIONS

1. Find probable cause to believe C.O.R.K. and Rick Woodrow, as treasurer, violated 2 U.S.C. § 434(b)(8).

Date

11/3/57


Lawrence M. Noble
General Counsel

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SENSITIVE

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

BEFORE THE FEDERAL ELECTION COMMISSION

88 JAN -5 PM 1:18

EXECUTIVE SESSION

JAN 12 1988

In the Matter of)
C.O.R.K and Rick Woodrow) MUR 2533
as treasurer)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

This matter arose as a referral from the Reports Analysis Division (hereinafter, "RAD"). RAD indicated that C.O.R.K. and Rick Woodrow, as treasurer (hereinafter "Respondents") on their 1986 October Quarterly, 30 Day Post-General, and Year End Reports disclosed \$112,891.29 in debts and obligations owed; however, Respondents failed to provide Schedules C or D to support these entries.

On August 27, 1987, the Commission found reason to believe that Respondents violated 2 U.S.C. § 434(b)(8). A letter notifying Respondents of the Commission's finding was mailed on September 1, 1987. No response has been received to this notification. On October 14, 1987, this Office by certified mail forwarded an additional notice to Respondents informing them of the Commission's finding and, in addition, giving notice that if no response were forthcoming within 5 days, this Office would proceed to the next stage of the enforcement process. No response has been received to this second notice.

On November 4, 1987 this Office mailed the Respondents a brief stating the position of the General Counsel on the legal and factual issues of the case. This brief also informed the Respondents that the General Counsel was prepared to recommend that the Commission find probable cause to believe that a

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violation had occurred. Respondents received the General Counsel's Brief on November 11, 1987; however, they have not responded thereto.

II. ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act") provides, pursuant to 2 U.S.C. § 434(b)(8), that each report filed by a political committee under this section shall disclose the amount and nature of outstanding debts and obligations owed by or to such political committee; and where such debts and obligations are settled for less than their reported amount or value, a statement must be included as to the circumstances and conditions under which such debts or obligations were extinguished and the consideration therefor.

C.O.R.K.'s failure to provide a Schedule C or D to support the amount and nature of outstanding debts and obligations is a violation of 2 U.S.C. § 434(b)(8).

Accordingly, the Office of the General Counsel recommends that the Commission find probable cause to believe C.O.R.K. and Rick Woodrow, as treasurer, violated 2 U.S.C. § 434(b)(8).

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

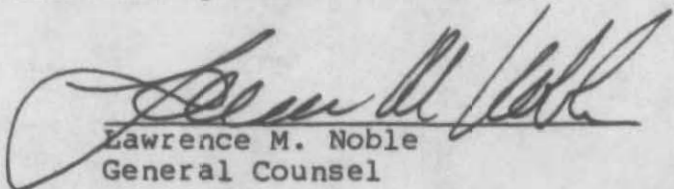
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IV. RECOMMENDATIONS

1. Find probable cause to believe C.O.R.K. and Rick Woodrow, as treasurer, violated 2 U.S.C. § 434(b)(8).
2. Approve the attached conciliation agreement and letter.

Date

1/5/88


Lawrence M. Noble
General Counsel

Attachments:

1. Proposed Conciliation Agreement
2. Letter

Staff Person: Phillip L. Wise

93040932797

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
C.O.R.K. and Rick Woodrow,) MUR 2533
as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of January 12, 1988, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 2533:

1. Find probable cause to believe C.O.R.K. and Rick Woodrow, as treasurer, violated 2 U.S.C. § 434(b)(8).
2. Approve the conciliation agreement and letter attached to the General Counsel's report dated January 5, 1988.

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

Attest:

Jan. 12, 1988
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

93040932798



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 13, 1988

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Rick Woodrow, Treasurer
C.O.R.K.
P.O. Box 5490
Everett, WA 98206-5490

RE: MUR 2533
C.O.R.K. and
Rick Woodrow,
as treasurer

Dear Mr. Woodrow:

On January 12, 1988, the Federal Election Commission found that there is probable cause to believe C.O.R.K., and you, as treasurer, violated 2 U.S.C. § 434(b)(8), a provision of the Federal Election Campaign Act of 1971, as amended, in connection with C.O.R.K.'s failure to provide a Schedule C or D to support the amount and nature of outstanding debts and obligations which were disclosed on the 1986 October Quarterly, 30 Day Post-General, and Year End Reports.

The Commission has a duty to attempt to correct such violations for a period of 30 to 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement during that period, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty.

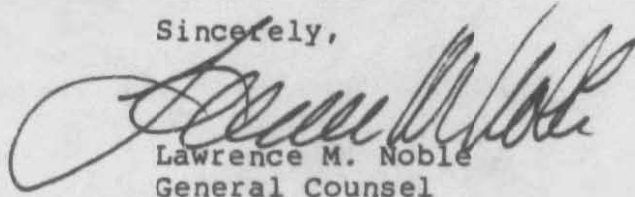
Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission within 10 days. I will then recommend that the Commission approve the agreement. Please make your check for the civil penalty payable to the Federal Election Commission.

93040932799

Letter to Rick Woodrow, Treasurer
Page 2

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

Sincerely,

A handwritten signature in dark ink, appearing to read "Lawrence M. Noble", written in a cursive style.

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

93040932800



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

February 23, 1988

Rick Woodrow, Treasurer
C.O.R.K.
P.O. Box 5490
Everett, WA 98206-5490

RE: MUR 2533
C.O.R.K. and
Rick Woodrow, as treasurer

Dear Mr. Woodrow:

By letter dated January 13, 1988, C.O.R.K. ("the Committee") and you, as treasurer, were notified that on January 12, 1988, the Federal Election Commission found probable cause to believe that there was a violation of 2 U.S.C. § 434(b)(8), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act").

To date, the Committee and you, as treasurer, have not responded to the notification. Unless we receive a response from you within 5 days, this Office will proceed to the next stage of the enforcement process.

Should you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
C.O.R.K. and)
Rick Woodrow, as treasurer)

MUR 2533

SENSITIVE
EXECUTIVE SESSION

APR 05 1988

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On January 12, 1988, the Commission found probable cause to believe that C.O.R.K. and Rick Woodrow, as treasurer, violated 2 U.S.C. § 434(b)(8). The Commission's notification and proposed conciliation agreement were mailed to Respondents by certified mail on January 13, 1988, which Respondents received on January 21, 1988 (Attachment 1). No response was submitted; therefore, on February 23, 1988 this Office mailed Respondents a follow-up letter by both certified and first class mail which requested a response within 5 days (Attachment 2). The letter sent by certified mail was received by Respondents on March 1, 1988. Respondents have not responded to this letter.

Since Respondents have shown no interest in negotiating any agreement, it is recommended that the Commission authorize this Office to file civil suit.

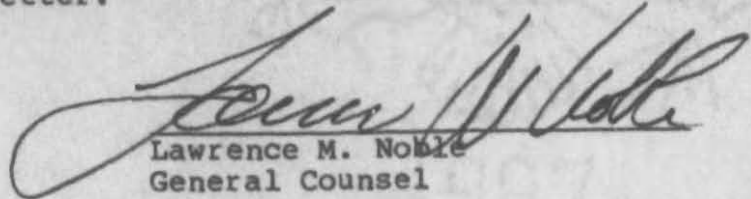
II. RECOMMENDATIONS

1. Authorize the Office of the General Counsel to file a civil suit for relief in the United States District Court against C.O.R.K. and Rick Woodrow, as treasurer.

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2. Approve the attached letter.

3/21/88
Date


Lawrence M. Noble
General Counsel

Attachments

1. Certified receipt dated January 21, 1988
2. Reminders
3. Certified receipt dated March 1, 1988
4. Letter

Staff Person: Phillip L. Wise

93040932803

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
C.O.R.K. and) MUR 2533
Rick Woodrow, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of April 5, 1988, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in MUR 2533:

1. Authorize the Office of the General Counsel to file a civil suit for relief in the United States District Court against C.O.R.K. and Rick Woodrow, as treasurer.
2. Approve the letter attached to the General Counsel's report dated March 21, 1988.

Commissioners Aikens, Elliott, Josefiak, McGarry, and Thomas voted affirmatively for the decision; Commissioner McDonald was not present at the time this matter was under consideration.

Attest:

4-6-88

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

93040932804



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 8, 1988

**CERTIFIED MAIL -
RETURN RECEIPT REQUESTED**

Rick Woodrow, Treasurer
C.O.R.K.
P.O. Box 5490
Everett, WA 98206-5490

RE: MUR 2533
C.O.R.K. and Rick Woodrow,
as treasurer

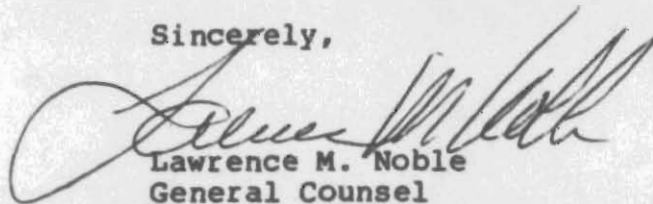
Dear Mr. Woodrow:

You were previously notified that on January 21, 1988, the Federal Election Commission found probable cause to believe that C.O.R.K. and you, as treasurer, violated 2 U.S.C. § 434(b)(8), a provision of the Federal Election Campaign Act of 1971, as amended, in connection with the captioned matter.

As a result of our inability to settle this matter through conciliation within the allowable time period, the Commission has authorized the General Counsel to institute a civil action for relief in the United States District Court.

Should you have any questions, or should you wish to settle this matter prior to suit, please contact Ivan Rivera, Assistant General Counsel at (202)376-8200, within five days of your receipt of this letter.

Sincerely,



Lawrence M. Noble
General Counsel

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FILED
LOGGED
ENTERED
RECEIVED

SEP 14 1992

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

AT TESTIS
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
DEPUTY

FEDERAL ELECTION COMMISSION

Plaintiff,

v.

LIFE AMENDMENT POLITICAL
ACTION COMMITTEE, INC., et al.,

Defendants.

No. C88-860z

ORDER

JUN 26 1992

WESTERN DISTRICT OF WASHINGTON
CLERK

ORDER

This matter having come before the Court upon the Plaintiff's motion for contempt for failure to comply with this Court's June 15, 1989 order;

IT IS HEREBY ORDERED that the Commission's motion be, and the same hereby is, GRANTED;

IT IS FURTHER ORDERED AND HELD that defendants Life Amendment Political Action Committee, Inc., Citizens Organized To Replace Kennedy and Rick Woodrow, as treasurer of both committees, are in civil contempt of this Court;

IT IS FURTHER ORDERED that defendants Life Amendment Political Action Committee, Inc., Citizens Organized To Replace Kennedy and Rick Woodrow, as treasurer of both committees, shall pay an additional penalty of \$ 100⁰⁰ per day from the date of this order until the defendants fully comply with this Court's prior judgment against them;

~~IT IS FURTHER ORDERED that defendants Life Amendment Political Action Committee, Inc., Citizens Organized To Replace~~

1 Kennedy and Rick Woodrow, as treasurer of both committees, shall
2 pay post-judgment interest to the Commission on this Court's
3
4 June 15, 1989 judgment to be computed from that date until the
5 date that the defendants fully comply with that judgment, at a
6 rate of 8.85% per cent annum, 28 U.S.C. § 1961; and

7 IT IS FURTHER ORDERED that defendants Life Amendment
8 Political Action Committee, Inc., Citizens Organized To Replace
9 Kennedy and Rick Woodrow, as treasurer of both committees, shall
10 reimburse the plaintiff Federal Election Commission for all its
11 costs, including attorney's fees at the ~~prevailing market rate,~~
12 ~~incurred in prosecuting this contempt proceeding. The Commission~~
13 ~~will submit a schedule of attorney's fees.~~

14
15 Sept. 11, 1992
16 Date

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28
Thomas S. Zilly
United States District Judge

1
2 Copies to: CC

3 Franciszka A. Monarski
4 Office of the General Counsel
5 Federal Election Commission
6 999 E Street, N.W.
Washington, D.C. 20463
(Counsel for plaintiff),

7 and

8 LIFE AMENDMENT PAC, INC.
9 21616 58th Avenue West
Mountlake Terrace, Washington 98043

10 and

11 CITIZENS ORGANIZED TO REPLACE KENNEDY
12 21616 58th Avenue West
Mountlake Terrace, Washington 98043

13 and

14 RICK WOODROW, Treasurer
15 Life Amendment PAC, Inc. and Citizens Organized
16 To Replace Kennedy
21616 58th Avenue West
Mountlake Terrace, Washington 98043



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2533

DATE FILMED 3-1-93 CAMERA NO. 3

CAMERAMAN E.S.

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