



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2608

DATE FILMED 4/6/89 CAMERA NO. 4

CAMERAMAN AS

39040742325



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 28, 1988

MEMORANDUM

TO: LAWRENCE M. NOBLE  
GENERAL COUNSEL

THROUGH: JOHN C. SURINA  
STAFF DIRECTOR

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

SUBJECT: RAD REFERRALS #88NF-13, 88NF-14 AND 88NF-15

The Non-Filer Notices included in each of these referrals were incorrect. The correct Non-Filer Notices are attached to this memorandum and should be substituted in the referrals.

Any questions should be directed to Shawn Woodhead at 376-2480.

Attachments

3 3 0 4 0 7 4 2 3 2 6

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 15 April 1988

ANALYST: Brian Morris

I. COMMITTEE: Haig for President Committee  
(C00214189)  
Dominic Saraceno, Treasurer  
(July 21, 1987 - Present)  
Stephen A. Jernigan, Treasurer  
(April 2, 1987 - July 20, 1987)  
1154 15th Street, NW  
Washington, DC 20005

II. RELEVANT STATUTE: 2 U.S.C. §434(a)(3)(A)(i)  
11 CFR 104.5(b)(1)(i)

III. BACKGROUND:

Failure to Timely File a Report

The Haig for President Committee (the "Committee") failed to file the 1988 February Monthly Report in a timely manner.

The Committee was notified on December 18, 1987 that the 1988 February Monthly Report was due on February 20, 1988 (Attachment 2). A mailgram was sent to the Committee on February 26, 1988 for failure to file the 1988 February Monthly Report (Attachment 3). The mailgram informed the Committee that failure to file this report immediately may result in publication, audit, or legal enforcement action.

The name of the Committee was published on March 4, 1988, for failure to file the 1988 February Monthly Report (Attachment 4).

The Committee filed the February Monthly Report on March 8, 1988 (Attachment 5).

IV. OTHER PENDING MATTERS INITIATED BY FAD:

None.

83040742327

FEDERAL ELECTION COMMISSION  
1987-1988  
CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

DATE 7APR88

PAGE 1

CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/	PARTY	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION TYPE OF FILER
			PRIMARY	GENERAL	PRIMARY	GENERAL			

HAIG, ALEXANDER MEIGS JR PRESIDENT REPUBLICAN PARTY

1988 ELECTION ID# P00001040

## 1. STATEMENT OF CANDIDATE

1987 STATEMENT OF CANDIDATE

8APR87

2 87FEC/425/4425

STATEMENT OF CANDIDATE - AMENDMENT

14SEP87

2 87FEC/476/2688

## 2. PRINCIPAL CAMPAIGN COMMITTEE

HAIG FOR PRESIDENT

ID #C00214189 PRESIDENTIAL

1987 STATEMENT OF ORGANIZATION

2APR87

2 87FEC/425/4372

STATEMENT OF ORGANIZATION - AMENDMENT

29MAY87

1 87FEC/468/4341

STATEMENT OF ORGANIZATION - AMENDMENT

27JUL87

2 87FEC/476/1197

STATEMENT OF ORGANIZATION - AMENDMENT

28JUL87

1 87FEC/476/1069

STATEMENT OF ORGANIZATION - AMENDMENT

3AUG87

2 87FEC/476/1254

MISCELLANEOUS REPORT TO FEC

26AUG87

2 87FEC/476/1572

STATEMENT OF ORGANIZATION - AMENDMENT

14SEP87

3 87FEC/476/2690

STATEMENT OF ORGANIZATION - AMENDMENT

20NOV87

1 87FEC/489/0774

MISCELLANEOUS REPORT TO FEC

20NOV87

1 87FEC/489/0772

JULY QUARTERLY

465,001

432,439

2APR87 -30JUN87

166 87FEC/475/0008

JULY QUARTERLY - AMENDMENT

2APR87 -30JUN87

5 87FEC/476/2693

JULY QUARTERLY - AMENDMENT

465,001

432,439

2APR87 -30JUN87

3 87FEC/488/2167

JULY QUARTERLY

6,700

2APR87 -30JUN87

4 87FEC/475/0003

REQUEST FOR ADDITIONAL INFORMATION

2APR87 -30JUN87

3 87FEC/483/0094

REQUEST FOR ADDITIONAL INFORMATION 2ND

2APR87 -30JUN87

1 87FEC/484/4200

OCTOBER QUARTERLY

490,588

436,801

1JUL87 -30SEP87

285 87FEC/488/1759

OCTOBER QUARTERLY - AMENDMENT

490,588

436,801

1JUL87 -30SEP87

12 87FEC/488/3848

OCTOBER QUARTERLY - AMENDMENT

1JUL87 -30SEP87

12 87FEC/489/3848

OCTOBER QUARTERLY

0

1JUL87 -30SEP87

2 87FEC/488/2171

REQUEST FOR ADDITIONAL INFORMATION

1JUL87 -30SEP87

4 87FEC/489/0580

REQUEST FOR ADDITIONAL INFORMATION 2ND

1JUL87 -30SEP87

5 87FEC/489/1579

YEAR-END

692,769

643,077

1OCT87 -31DEC87

254 88FEC/490/5045

YEAR-END - AMENDMENT

692,769

643,077

1OCT87 -31DEC87

21 88FEC/511/2481

YEAR-END - AMENDMENT

692,769

643,077

1OCT87 -31DEC87

19 88FEC/511/2725

YEAR-END - AMENDMENT

692,769

643,077

1OCT87 -31DEC87

2 88FEC/514/4418

REQUEST FOR ADDITIONAL INFORMATION

1OCT87 -31DEC87

2 88FEC/506/3138

1988 FEBRUARY MONTHLY

448,266

274,343

1JAN88 -31JAN88

91 88FEC/511/2633

FEBRUARY MONTHLY - AMENDMENT

1JAN88 -31JAN88

3 88FEC/511/2752

FEBRUARY MONTHLY - AMENDMENT

448,266

567,277

1JAN88 -31JAN88

2 88FEC/511/3559

FEBRUARY MONTHLY - AMENDMENT

448,266

567,277

1JAN88 -31JAN88

4 88FEC/514/4421

NOTICE OF FAILURE TO FILE

1JAN88 -31JAN88

1 88FEC/511/2221

MARCH MONTHLY

264,848

276,092

1FEB88 -29FEB88

73 88FEC/511/3562

MARCH MONTHLY - AMENDMENT

264,848

276,092

1FEB88 -29FEB88

4 88FEC/514/4426

TOTAL

2,361,472

6,700

2,355,686

4

391 TOTAL PAGES

## 3. AUTHORIZED COMMITTEES

## 4. JOINT FUNDRAISING COMMITTEES AUTHORIZED BY THE CAMPAIGN

HERMENDING/HAGS JOINT FUNDRAISING COMMITTEE

ID #C00217026 NON-PARTY NON-QUALIFIED

9 2 0 4 0 7 4 2 3 2 8

FEDERAL ELECTION COMMISSION  
1987-1988  
CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

DATE 7APR88

PAGE 2

CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/	PARTY	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF	MICROFILM
			PRIMARY	GENERAL	PRIMARY	GENERAL		PAGES	LOCATION
								TYPE OF FILER	

1987 STATEMENT OF ORGANIZATION  
MID-YEAR REPORT  
YEAR-END

14AUG87 2 88FEC/512/3512  
1JAN87 -30JUN87 7 88FEC/512/3514  
1JUL87 -31DEC87 4 88HSE/342/4652

13 TOTAL PAGES

ALL REPORTS HAVE BEEN REVIEWED.  
ENDING CASH-ON-HAND AS OF 2/29/88: \$5,685  
DEBTS OWED TO THE COMMITTEE AS OF 2/29/88: \$907  
DEBTS OWED BY THE COMMITTEE AS OF 2/29/88: \$207,498

3 9 0 4 0 7 4 2 3 2 9

# YEAR-END REPORT NOTICE

## FEDERAL ELECTION COMMISSION

PRESIDENTIAL COMMITTEES

December 18, 1987

**WHO MUST FILE**

ALL PRINCIPAL CAMPAIGN COMMITTEES OF PRESIDENTIAL "CANDIDATES" must file a Year-End Report in January. To know whether you qualify as a candidate under the election law, please refer to the enclosed brochure for the definition of the term "candidate."

**REPORTING DATES**

Quarterly. The Year-End Report is due January 31, 1988, and must disclose financial activity that occurred from October 1 through December 31, 1987. Committees which have previously filed 1987 reports should only report activity from the closing date of the last report filed.

Monthly. Committees that choose to file on a monthly basis must file the Year-End Report due January 31, 1988. The report must disclose financial activity from December 1 through December 31, 1987. All other monthly reports are due by the 20th of each month and cover all financial activity of the previous month.

**WHAT MUST BE REPORTED**

A report must disclose all receipts and disbursements (not previously reported) that occurred during the reporting period. A newly registered committee filing its first report should also include all amounts received and expended prior to the candidate's attaining candidate status.

If the campaign has more than one authorized committee, the principal campaign committee must also file a consolidated report (FEC Form 3P, Page 5). For details, see 11 CFR 104.3(f) and the instructions on the back of the form.

**WHERE AND HOW TO FILE**

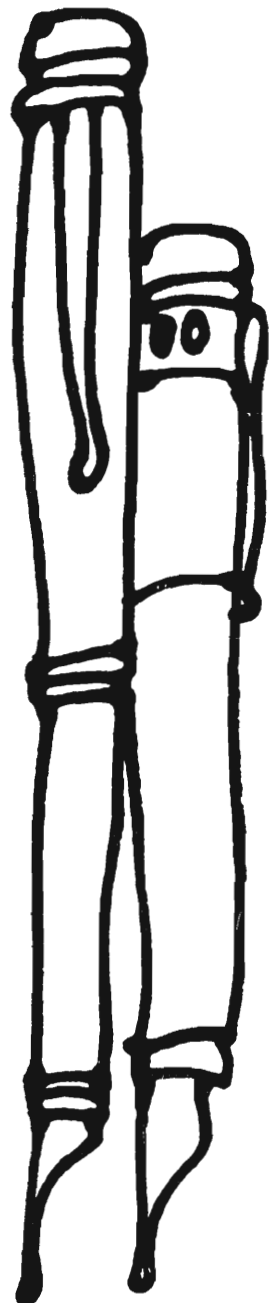
Committees should consult the instructions on the enclosed FEC Form 3P for details. Note State filing requirements also. Affix the peel-off label from the envelope to line 1 of the report. Any corrections in the information should be made directly on the label.

**COMPLIANCE**

Political committees are responsible for filing all reports required under the Act in a timely fashion. Committees and treasurers who file late reports, or fail to file reports, are subject to enforcement action. Illegible reports and reports submitted on non-FEC forms will not be accepted; committees filing such documents will be required to refile.

(over)

9274074330



A committee which does not anticipate that its financial activity will exceed \$100,000 as of January 1, 1988, must file quarterly reports. Such a committee must also file a pre-election report for each election in which the candidate is seeking nomination or election. If the candidate is in the general election the committee must also file a Post-General election report. All committees must file a Year-End report.

A committee which receives contributions or makes expenditures aggregating \$100,000 or more (or which anticipates this level of financial activity) as of January 1, 1988, must file monthly reports. A committee participating in the general election does not file monthly reports during the months of November and December 1988. Rather, the committee must file Pre- and Post-General election reports. The committee of a candidate not participating in the general election must continue to file monthly reports, or must file Pre- and Post-General election reports. All committees must file a Year-End report.

If, during the 1988 election year, a committee receives contributions or makes expenditures aggregating \$100,000 or more, it must begin filing monthly reports starting the next reporting period.

#### MONTHLY FILERS

Report	Period Covered 1/	Reg./Cert. Mailing Date 2/	Filing Date
February	01/01 - 01/31	02/20/88	02/20/88
March	02/01 - 02/29	03/20/88	03/20/88
April	03/01 - 03/31	04/20/88	04/20/88
May	04/01 - 04/30	05/20/88	05/20/88
June	05/01 - 05/31	06/20/88	06/20/88
July	06/01 - 06/30	07/20/88	07/20/88
August	07/01 - 07/31	08/20/88	08/20/88
September	08/01 - 08/31	09/20/88	09/20/88
October	09/01 - 09/30	10/20/88	10/20/88
Pre-General	10/01 - 10/19	10/24/88	10/27/88
Post-General	10/20 - 11/28	12/08/88	12/08/88
Year-End	11/29 - 12/31	01/31/89	01/31/89

#### QUARTERLY FILERS

Report	Period Covered 1/	Reg./Cert. Mailing Date 2/	Filing Date
April-Quarterly	01/01 - 03/31	04/15/88	04/15/88
July-Quarterly	04/01 - 06/30	07/15/88	07/15/88
October-Quarterly	07/01 - 09/30	10/15/88	10/15/88
Pre-General	10/01 - 10/19	10/24/88	10/27/88
Post-General	10/20 - 11/28	12/08/88	12/08/88
Year-End	11/29 - 12/31	01/31/89	01/31/89

1/Newly registered committees should refer to "WHAT MUST BE REPORTED," reverse side.

2/Reports sent by registered or certified mail must be postmarked by the mailing date. Reports mailed first class or hand delivered must be received by the filing date.

RQ-7

(This is a copy of the text of a mailgram sent to the committee listed below on February 26, 1988.)

Dominic J. Saraceno, Treasurer  
Haig for President  
1154 15th Street, NW  
Washington, DC 20005

Identification Number: C00214189

Reference: FEBRUARY MONTHLY REPORT (1/1/88-1/31/88)

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Report of Receipts and Expenditures as required by the Federal Election Campaign Act. You were previously notified of the due date for this report.

You will be allowed four (4) business days from the date of this notice to file the February Monthly Report. The reports should be filed with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463. A copy of the report should also be filed with the appropriate Secretary of State or equivalent state officer (see 11 CFR 108.2).

If you have filed the report timely by certified or registered mail, please notify us immediately, in writing, of the certified or registered number and the date that the report was sent. The failure to file this report may result in publication, audit or legal enforcement action.

If you have any questions regarding this matter, please contact the Reports Analysis Division on our toll free number (800) 424-9530 or on our local number (202) 376-2480.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

2  
3  
3  
4  
4  
7  
9  
9  
9  
9  
9



# FEDERAL ELECTION COMMISSION

ATTACHMENT 4

Press Office

999 E Street, N.W., Washington, D.C. 20463

Phone: Local 376-3155

Toll Free 800-424-9530



FOR IMMEDIATE RELEASE:  
FRIDAY, MARCH 4, 1988

CONTACT: FRED EILAND  
SHARON SNYDER  
KAREN FINUCAN

## 1988 PRESIDENTIAL CAMPAIGNS FAIL TO FILE MONTHLY REPORT

WASHINGTON — The Federal Election Commission today cited five 1988 Presidential campaign committees with failure to file the required February monthly financial disclosure report, covering activity from January 1, 1988, through January 31, 1988. They are:

Babbitt for President Committee...Ronnie Lopez, tres...Bruce Babbitt (Dem)

David Duke for President...Pauline Mackey, tres...David Duke (Dem)

Ben Fernandez for President Committee...Annie Padilla, tres...Ben Fernandez (Rep)

[Haig for President...Dominic J. Saraceno, tres...Alexander Meigs Haig, Jr. (Rep)]

ME Dem Campaign Cmtte/Anthony Martin-Trigona...Anthony Martin-Trigona, tres & (Dem)

The report was to have been filed February 20, 1988, and would have detailed financial activity for the month of January. If sent by certified or registered mail, the report should have been postmarked by midnight February 20.

On February 26, the committees were notified by mailgram that the FEC had not yet received their February monthly report. The campaigns had four business days, from the date of the notice, to respond. Failure to file by close of business Thursday, March 3, resulted in this publication. Notification of required filings, during the 1988 calendar year, was sent to committees on December 18, 1987.

During an election year, Presidential campaign committees that anticipate raising or spending over \$100,000 are required to report on a monthly basis. Those reports are due on the 20th of each month, covering financial activity during the prior month. The next report due from Presidential committees is the March monthly report, covering the period February 1 through February 29.

Further Commission action against non-filers and late filers will be decided on a case-by-case basis. The Federal Election Campaign Act gives the Commission broad authority to initiate enforcement actions, including civil court enforcement and the imposition of civil penalties (\$5,000 for "any violation" and \$10,000 for any "knowing and willful" violation) for infractions of the law, including failure to file required disclosure reports.

\*\*\*

REPORT OF RECEIPTS AND DISBURSEMENTS  
BY AN AUTHORIZED COMMITTEE OF A  
CANDIDATE FOR THE OFFICE OF PRESIDENT

ATTACHMENT 5 PAGE 1 OF 2

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE SERVICES BRANCH

NOTE: This report is to be used by an authorized committee of a candidate seeking nomination for President or Vice President of the United States whether or not public funds are used.

USE FOR ADDITIONAL LABELS OR TYPE OR PRINT	1. NAME OF COMMITTEE (in full) <b>Haig For President, Inc.</b>	2. IDENTIFICATION NUMBER <b>C00214189</b>
	ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported <b>1154 15th Street, NW</b>	3. IS THIS REPORT OF RECEIPTS AND DISBURSEMENTS FOR <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General
	CITY, STATE and ZIP CODE <b>Washington, DC 20005</b>	
4. TYPE OF REPORT ("X" appropriate box and complete, if applicable)	<input type="checkbox"/> Amendment for (Report)	<input checked="" type="checkbox"/> Monthly Report (month) <b>JANUARY</b>
	<input type="checkbox"/> April 15 Quarterly Report	<input type="checkbox"/> January 31 Year-end Report
	<input type="checkbox"/> July 15 Quarterly Report	<input type="checkbox"/> Termination Report
	<input type="checkbox"/> October 15 Quarterly Report	
		<input type="checkbox"/> Twelfth Day Before Election <input type="checkbox"/> Thirtieth Day After Election TYPE OF ELECTION STATE _____ ELECTION DATE _____

COMMITTEE SUMMARY OF RECEIPTS AND DISBURSEMENTS

5. COVERING PERIOD		FROM <b>01-01-88</b>	THROUGH <b>01-31-88</b>
SUMMARY	6. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD	<b>135,939.<sup>65</sup></b>	
	7. TOTAL RECEIPTS THIS PERIOD (From Line 22 Column A)	<b>448,266.<sup>49</sup></b>	
	8. SUBTOTAL (Add Line 6 and 7)	<b>584,206.<sup>14</sup></b>	
	9. TOTAL DISBURSEMENTS THIS PERIOD (From Line 30 Column A)	<b>274,543.<sup>32</sup></b>	
	10. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 9 from 8)	<b>309,662.<sup>82</sup></b>	
	11. DEBTS AND OBLIGATIONS OWED TO THE COMMITTEE (Itemize All on Schedule C or Schedule D)	<b>-</b>	
	12. DEBTS AND OBLIGATIONS OWED BY THE COMMITTEE (Itemize All on Schedule C or Schedule D)	<b>340,148.<sup>35</sup></b>	
	13. EXPENDITURES SUBJECT TO LIMITATION (From FEC Form 3P, Page 4)	<b>(1,234,567.<sup>89</sup>)</b>	
NET YEAR-TO-DATE CONTRIBUTIONS AND EXPENDITURES	14. NET CONTRIBUTIONS (Other than Loans) (Subtract Line 28d Column B from 17a Column B)	<b>1,272,600.<sup>00</sup></b>	
	15. NET OPERATING EXPENDITURES (Subtract Line 20a Column B from 23 Column B)	<b>71,345.<sup>54</sup></b>	

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

TYPE OR PRINT NAME OF TREASURER

**DOMINIC J. SANCHEZ**

SIGNATURE OF TREASURER

*[Signature]*

DATE

**3-8-88**

For further information, contact:

Federal Election Commission  
Toll Free 800-424-9630  
Local 376-3120

NOTE Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. § 437g.

All previous versions of FEC Form 3P are obsolete and should no longer be used.

FEC FORM 3P (2/83)

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE SERVICES BRANCH

08 MAR -8 PM 3:41  
**HAND DELIVERED**

March 8, 1988

Ms. Patricia Behring  
Audit Division  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Dear Patricia:

It is with regret and apologies that we submit our committee's Report of Receipts and Disbursements for January. As you can imagine, the winding down process is much cause for delay.

On behalf of the Haig For President Campaign, please accept my appreciation and thanks for your prompt cooperation.

Should any questions arise, please continue to call on Russell G. Primavera or Kathy MacKenzie at (202) 223-7580.

Sincerely,

  
Dominic J. Saraceno

99733140742335

RECEIVED  
FEDERAL ELECTION COMMISSION

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

88 MAY -2 PM 12:10

EXECUTIVE SESSION  
MAY 17 1988

FIRST GENERAL COUNSEL'S REPORT

RAD Referral 88NF-13  
Staff: Jim Voegeli

**SENSITIVE**

SOURCE OF MATTER: I N T E R N A L L Y G E N E R A T E D  
RESPONDENTS: HAIG FOR PRESIDENT COMMITTEE AND  
DOMINIC SARACENO, AS TREASURER  
RELEVANT STATUTE: 2 U.S.C. § 434(a)(3)(A)(i)  
INTERNAL REPORTS CHECKED: DISCLOSURE REPORTS  
FEDERAL AGENCIES CHECKED: NONE

I. GENERATION OF THE MATTER

The Reports Analysis Division ("RAD") referred the Haig for President Committee and Dominic Saraceno, as treasurer, (the "Committee") to the Office of the General Counsel on April 15, 1988. The basis of the attached referral is the Committee's failure to file its 1988 February Monthly Report in a timely manner.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended, (the "Act") requires that the treasurer of any principal campaign committee of a candidate for the office of the President which meets the financial criteria described below, file monthly reports during any calendar year in which a presidential election is held no later than the 20th day after the last day of each month. 2 U.S.C. § 434(a)(3)(A)(i). Such monthly reports are required if the committee has on January 1 of the calendar year in which the presidential election is held, received contributions aggregating \$100,000 or made expenditures

5  
3  
3  
4  
7  
4  
0  
7  
4  
0  
3  
0  
9

aggregating \$100,000 or anticipates receiving contributions aggregating \$100,000 or making expenditures aggregating \$100,000 or more during such year. Id.

The Committee in this matter failed to meet the Act's reporting requirements with respect to a monthly report. The Committee is the principal campaign committee of a candidate for the office of the President. The Committee's disclosure reports indicate that the Committee had received by January 1, 1988, more than \$100,000 in aggregate contributions. Thus, the Committee was required to file a 1988 February Monthly Report by February 20, 1988. The Committee did not file this report until March 8, 1988, 17 days late. Therefore, this Office recommends that the Commission open a MUR and find reason to believe that the Haig for President Committee and Dominic Saraceno, as treasurer, violated 2 U.S.C. § 434(a)(3)(A)(i).

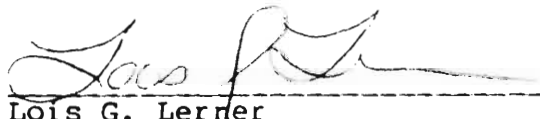
## II. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that the Haig for President Committee and Dominic Saraceno, as treasurer, violated 2 U.S.C. § 434(a)(3)(A)(i).
3. Approve the attached letter and Factual and Legal Analysis.

Lawrence M. Noble  
General Counsel

7/29/88  
Date

BY:

  
Lois G. Lerner  
Associate General Counsel

## Attachments

1. Referral materials
2. Proposed letter (one) and  
Factual and Legal Analysis (one)

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Haig for President Committee and  
Dominic Saraceno, as treasurer

)  
)  
)  
)

RAD Referral 88NF-13

(MUR  
2608)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the  
Federal Election Commission executive session of May 17, 1988,  
do hereby certify that the Commission decided by a vote of  
6-0 to take the following actions in the above-captioned matter:

1. Open a Matter Under Review (MUR).
2. Find reason to believe that the Haig for  
President Committee and Dominic Saraceno,  
as treasurer, violated 2 U.S.C. § 434(a)  
(3)(A)(i).
3. Approve the letter and Factual and Legal  
Analysis attached to the General Counsel's  
report dated April 29, 1988.

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

Attest:

5/18/88

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

8  
3  
3  
2  
4  
7  
0  
4  
0  
0  
3  
0



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 23, 1988

Dominic J. Saraceno, Treasurer  
Haig for President Committee  
1154 15th Street, N.W.  
Washington, D.C. 20005

RE: MUR 2608  
Haig for President  
Committee and Dominic  
Saraceno, as treasurer

Dear Mr. Saraceno:

On May 17, 1988, the Federal Election Commission found that there is reason to believe that the Haig for President Committee and you, as treasurer, (the "Committee") violated 2 U.S.C. § 434(a)(3)(A)(i), 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. 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 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 respondents.

Dominic J. Saraceno  
Page 2

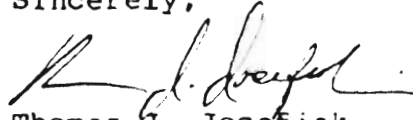
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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.

This matter will remain 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 Jim Voegeli, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

  
Thomas J. Josefiah  
Chairman

Enclosures

Factual and Legal Analysis  
Procedures  
Designation of Counsel Form

3 3 7 4 0 7 4 2 3 4 0



Haig For President  
1312 Vincent Place  
McLean, VA 22101

CCC #9479

RECEIVED  
FEDERAL ELECTION COMMISSION

June 7, 1988

88 JUN -9 AM 9:28

*Mon 2608*

Mr. Jim Voegeli  
Office of the General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Dear Mr. Voegeli:

Per our conversation, June 3, 1988 regarding the May 23, 1988 letter regarding our late filing of our January 1988 and February 1988 monthly reports.

I recall that we were not aware that we were to file a monthly, still thinking we were to file quarterly reports, I spoke with Mr. Lisa and he informed me that we were to file monthly reports.

I have enclosed a copy of a letter sent with our report which explains why we missed the filing.

If you need further information please contact me at 848-9634.

Kathy MacKenzie

Finance Director

*Kathy MacKenzie*

88 JUN -9 PM 12:14

RECEIVED  
FEDERAL ELECTION COMMISSION

8 9 0 4 0 7 4 2 3 4 1



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 27, 1988

Mr. Dominic J. Saraceno, Treasurer  
c/o Ms. Kathy MacKenzie, Finance Director  
Haig for President Committee  
1312 Vincent Place  
McLean, Virginia 22101

RE: MUR 2608  
Haig for President Committee  
and Dominic J. Saraceno, as  
treasurer

Dear Mr. Saraceno:


I am writing to remind you that if you wish to pursue pre-probable cause conciliation for the above-captioned matter you must request this in writing. We have still not received a request and will proceed to the next stage of enforcement unless we receive such within 10 days.

Based on a telephone conversation that Jim Voegeli from our staff had with Finance Director Kathy MacKenzie on June 3, 1988, we were under the impression that you wanted to pursue pre-probable cause conciliation and that we would receive a written request. Pre-probable cause conciliation is described in our letter of May 23, 1988.

Mr. Voegeli has been unsuccessful in reaching you or Ms. MacKenzie again by telephone in order to remind you of the request requirement. If you wish to pursue pre-probable cause conciliation please send us a written request immediately. If you have any questions, feel free to contact Mr. Voegeli at (202) 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel

  
BY: Lois G. Lerner  
Associate General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE  
GENERAL COUNSEL

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

DATE: AUGUST 10, 1988

SUBJECT: MUR 2608  
Comprehensive Investigative Report #1  
Signed August 8, 1988

The above-captioned matter was received in the Secretariat at 4:33 P.M. on Monday, August 8, 1988 and circulated to the Commission on a 24-hour no-objection basis at 11:00 A.M. on Tuesday, August 9, 1988.

There were no objections to the report.

800440742343

88 AUG -8 PM 4:33

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Haig for President Committee ) MUR 2608  
and Dominic J. Saraceno, )  
as treasurer )

**SENSITIVE**

COMPREHENSIVE INVESTIGATIVE REPORT #1

On May 17, 1988, the Commission found reason to believe that the Haig for President Committee ("the Committee") and Dominic J. Saraceno, as treasurer, violated 2 U.S.C. § 434(a)(3)(A)(i) by failing to file the 1988 February Monthly Report in a timely manner. Notification of the Commission's finding was mailed to the Respondents on May 23, 1988, at the most current address listed on their Statement of Organization.


On June 3, 1988, this Office telephoned the Committee to confirm their receipt of the Commission's notice. Ms. Kathy MacKenzie, the Committee's Finance Director, stated that the Commission's notice had not been received and offered, in explanation, that the Committee had recently changed its address. In the discussion of the Commission's finding, Ms. MacKenzie expressed an interest in entering into pre-probable cause conciliation with the Commission and stated that she would submit a written request along with an explanation of the circumstances surrounding the Committee's late report. Immediately following the telephone discussion, this Office sent a copy of the Commission's notice to the Committee's new address.

On June 9, 1988, the General Counsel's Office received a letter from Ms. MacKenzie briefly describing the circumstances

4  
4  
3  
4  
7  
6  
4  
0  
0  
2  
9

Lawrence M. Noble  
General Counsel

8/8/88

  
Lois G. Lerner  
Associate General Counsel

Staff Member: Beverly Kramer

RECEIVED  
FEDERAL ELECTION COMMISSION  
88 SEP 20 PM 4:20

BEFORE THE FEDERAL ELECTION COMMISSION

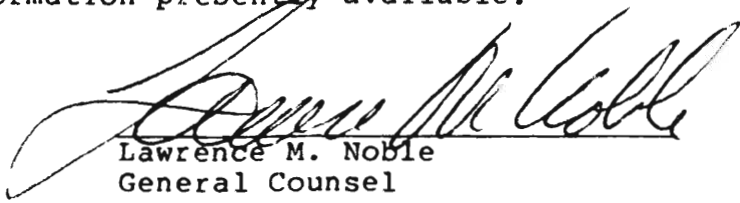
In the Matter of	)	
	)	
Haig for President Committee	)	MUR 2608
and Dominic Saraceno, as	)	
treasurer	)	
	)	

**SENSITIVE**

GENERAL COUNSEL'S REPORT

The Office of the General Counsel is prepared to close the investigation in this matter as to the above respondents, based on the assessment of the information presently available.

Date 9/20/88

  
Lawrence M. Noble  
General Counsel

89040742346

88 OCT -3 PM 3:58



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE**

October 3, 1988

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble *LM*  
General Counsel

SUBJECT: MUR 2608

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 intent to recommend to the Commission a finding of probable cause to believe were mailed on October 3, 1988. Following receipt of the respondents' reply to this notice, this Office will make a further report to the Commission.

Attachments

- 1-Brief
- 2-Letter to respondents

93740742347



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 3, 1988

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Dominic Saraceno, Treasurer  
c/o Ms. Kathy Mackenzie, Finance Director  
Haig for President Committee  
1312 Vincent Place  
McLean, VA 22101

RE: MUR 2608  
Haig for President  
Committee and  
Dominic Saraceno,  
as treasurer

Dear Mr. Saraceno:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on May 17, 1988, the Federal Election Commission found reason to believe that the Haig for President Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(3)(A)(i), 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 (ten 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

0 2 0 4 0 7 4 2 3 4 8



Dominic Saraceno, Treasurer  
Page 2

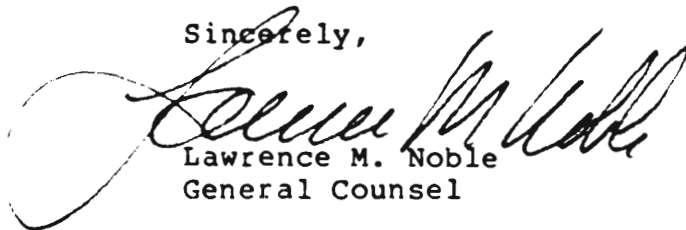
Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

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.

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 Beverly Kramer, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble  
General Counsel

Enclosure  
Brief

33044742349

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Haig for President Committee ) MUR 2608  
and Dominic Saraceno, as )  
treasurer )

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On May 17, 1988, the Commission determined that there is reason to believe the Haig for President Committee and Dominic Saraceno, as treasurer ("the Committee"), violated 2 U.S.C. § 434(a)(3)(A)(i) by failing to file the 1988 February Monthly Report of receipts and disbursements in a timely manner. Notification of the Commission's finding was mailed to the Committee on May 23, 1988. Apparently due to a change in its mailing address, the Committee did not receive this notice. Consequently, on June 3, 1988 a copy of the materials contained in the Commission's notification of May 23, 1988 was sent to the Committee's new address. On June 9, 1988, the Office of the General Counsel received a response from the Committee. 1/

1/ Pursuant to a telephone discussion between the Committee's Finance Director, Ms. Kathy Mackenzie, and a member of the General Counsel's staff, it was understood that the Committee would be submitting a written request to enter into conciliation with the Commission prior to a finding of probable cause to believe. The Committee's June 9th response did not contain the anticipated written request. After several unsuccessful attempts to reach Ms. Mackenzie by phone in order to remind her of the requirement that a request for conciliation must be in writing, this office mailed a written reminder to the Committee on June 27, 1988 stating that we will proceed to the next enforcement stage unless a written request for conciliation is received within 10 days. The Committee has not responded to this written reminder.

## II. ANALYSIS

8 9 0 4 0 7 4 2 3 5 1

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that the treasurer of any principal campaign committee of a candidate for the Office of the President which meets the financial criteria described below, shall file monthly reports during any calendar year in which a presidential election is held no later than the 20th day after the last day of each month. 2 U.S.C. § 434(a)(3)(A)(i). Such monthly reports are required if the committee has, on January 1 of the calendar year in which the presidential election is held, received contributions aggregating \$100,000 or made expenditures aggregating \$100,000 or anticipates receiving contributions aggregating \$100,000 or making expenditures aggregating \$100,000 or more during such year. Id.

The Committee is the principal campaign committee of a candidate for the Office of the President. The Committee's disclosure reports indicate that by January 1, 1988, the Committee had received contributions aggregating in excess of \$100,000. Thus, the Committee was required to file the 1988 February Monthly Report by February 20, 1988. The Committee did not file this report until March 8, 1988, 17 days late.

Responding to the notice of the Commission's reason to believe finding, the Committee does not dispute that its 1988 February Monthly Report was filed in an untimely manner. Rather, the Committee avers that they were not aware they were required

to file monthly, still thinking they were required to file quarterly reports. The Committee further attributes the delay to the winding down process which they state "is much cause for delay."

It is the view of this Office that the Committee's response is not a sufficient defense in light of the fact that the Act expressly states the requirements for filing monthly reports. Although the Committee's statements as to the cause for their delayed report may act in mitigation, this does not alter the fact that a violation, by their own admission, has occurred. Therefore, there is probable cause to believe the Committee violated 2 U.S.C. § 434(a)(3)(A)(i).

III. GENERAL COUNSEL'S RECOMMENDATION

1. Find probable cause to believe that the Haig for President Committee and Dominic Saraceno, as treasurer, violated 2 U.S.C. § 434(a)(3)(A)(i).

Date

9/30/88

  
Lawrence M. Noble  
General Counsel

8 9 0 0 4 0 7 4 2 3 5 2

RECEIVED  
FEDERAL ELECTION COMMISSION

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

88 OCT 18 PM 1:44  
**STATEMENT OF DESIGNATION OF COUNSEL**

88 OCT 17 AM 11:58

**NR** 2608  
**NAME OF COUNSEL:** Lawrence L. Halloran  
**ADDRESS:** C/O Gaffney & DiFabio  
One Liberty Square  
New Britain, CT 06051  
**TELEPHONE:** (203) 229-0301

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.

Oct 12, 1988  
Date

Dominic Saraceno  
Signature

**RESPONDENT'S NAME:** Dominic Saraceno, Treasur  
HAIG FOR PRESIDENT COMMITTEE  
**ADDRESS:** 1312 Vincent Place  
McLean, VA 22101  
**HOME PHONE:** \_\_\_\_\_  
**BUSINESS PHONE:** 617-765-8230

33040242353

BEFORE THE FEDERAL ELECTION COMMISSION

NOV 16 AM 10:08

In the Matter of )  
 )  
Haig for President Committee )  
and Dominic J. Saraceno, as )  
treasurer )

MUR 2608

EXECUTIVE SESSION

DEC 01 1988

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On October 3, 1988, a General Counsel's Brief was mailed to the Haig for President Committee and Dominic J. Saraceno, as treasurer ("Respondents"), recommending that the Commission find probable cause to believe Respondents violated 2 U.S.C.

§ 434(a)(3)(A)(i) by failing to timely file the 1988 February Monthly Report of receipts and disbursements. No response has been received from the Respondents.\* /

II. LEGAL ANALYSIS

Insofar as the Respondents have not submitted a reply to the General Counsel's Brief, the legal analysis remains the same.

See the General Counsel's Brief to the Haig for President Committee and Dominic J. Saraceno, as treasurer, circulated to the Commission on October 3, 1988.

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

\* / On October 17, 1988, Respondents submitted a Designation of Counsel Statement. On November 1, 1988, this Office telephoned Respondents' counsel to ascertain whether they intended to file a responsive brief. Counsel stated that no response would be filed.

83740742354

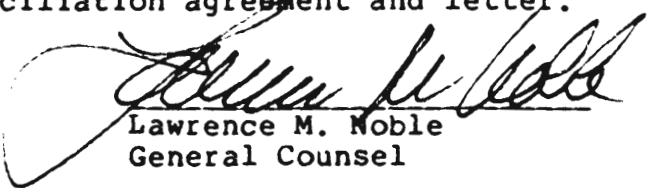
9 2 0 4 0 7 4 2 3 5 5

#### IV. RECOMMENDATIONS

1. Find probable cause to believe that the Haig for President Committee and Dominic J. Saraceno, as treasurer, violated 2 U.S.C. § 434(a)(3)(A)(i).
2. Approve the attached conciliation agreement and letter.

Date

11/15/88

  
Lawrence M. Noble  
General Counsel

#### Attachments

1. Conciliation Agreement
2. Letter

Staff Assigned: Beverly Kramer

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Haig for President Committee ) MUR 2608  
and Dominic J. Saraceno, )  
as treasurer )

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the  
Federal Election Commission executive session of November 30,  
1988, do hereby certify that the Commission decided by a vote  
of 4-0 to take the following actions in MUR 2608:

1. Find probable cause to believe that the Haig  
for President Committee and Dominic J. Saraceno,  
as treasurer, violated 2 U.S.C. § 434(a)(3)(A)(i).
2. Approve the conciliation agreement and letter  
attached to the General Counsel's report dated  
November November 15, 1988.

Commissioners Aikens, Elliott, McDonald, and McGarry voted  
affirmatively for the decision; Commissioners Josefiak and  
Thomas were not present at the time of the vote.

Attest:

12/2/88

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

6  
5  
3  
4  
7  
4  
4  
3  
3  
2





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 5, 1988

Lawrence J. Halloran, Esquire  
c/o Gafney & Difabio  
One Liberty Square  
New Britain, Connecticut 06051

RE: MUR 2608  
Haig for President Committee  
and Dominic J. Saraceno,  
as treasurer

Dear Mr. Halloran:

On November 30, 1988, the Federal Election Commission found that there is probable cause to believe your clients, the Haig for President Committee and Dominic J. Saraceno, as treasurer, violated 2 U.S.C. § 434(a)(3)(A)(i), a provision of the Federal Election Campaign Act of 1971, as amended, in connection with their failure to timely file the 1988 February Monthly Report of receipts and disbursements.

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 ten days. I will then recommend that the Commission accept the agreement. Please make your check for the civil penalty payable to the Federal Election Commission.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a

83040742357

Lawrence J. Halloran, Esquire  
Page 2

meeting in connection with a mutually satisfactory conciliation agreement, please contact Beverly Kramer, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

*LM Noble (7/2)*

Lawrence M. Noble  
General Counsel

Enclosure  
Conciliation Agreement

8374742358

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED  
FEDERAL ELECTION COMMISSION

89 JAN 18 PM 5:11

In the Matter of )

Haig for President Committee )  
and Dominic Saraceno, as )  
treasurer )

MUR 2608

**SENSITIVE**

**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND**

On November 30, 1988, the Commission found probable cause to believe that the Haig for President Committee (the "Committee") violated 2 U.S.C. § 434(a)(3)(A)(i) by failing to file the 1988 February Monthly Report of receipts and disbursements in a timely manner. Notification of the Commission's finding was mailed to the Committee's counsel on December 5, 1988 along with a proposed conciliation agreement.

**II. DISCUSSION OF CONCILIATION AND CIVIL PENALTY**

89040742359

**III. RECOMMENDATIONS**

1. Approve the attached conciliation agreement.
2. Approve and send the attached letter.

Lawrence M. Noble  
General Counsel

1-18-89  
Date

By:   
Lois G. Lerner  
Associate General Counsel

**Attachments**

1. Letter from Respondents' Counsel
2. Revised Proposed Conciliation Agreement
3. Letter to Respondent's counsel

Staff Person: Thomas J. Whitehead

89040742350



FEDERAL ELECTION COMMISSION  
WASHINGTON D.C. 20461

MEMORANDUM

TO: LAWRENCE M. NOBLE  
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JOSHUA MCFADDE *JM*  
COMMISSION SECRETARY

DATE: JANUARY 25, 1989

SUBJECT: OBJECTION TO MUR 2608 - General Counsel's Report  
Signed January 18, 1989

The above-captioned document was circulated to the  
Commission on Thursday, January 19, 1989 at 12:00 p.m. .

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

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

This matter will be placed on the meeting agenda  
for January 31, 1989 .

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

330440742351

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Haig for President Committee ) MUR 2608  
and Dominic Saraceno, as )  
treasurer )

CERTIFICATION

I, Hilda Arnold, recording secretary for the Federal Election Commission executive session of January 31, 1989, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 2608:

1. Approve the conciliation agreement as recommended in the General Counsel's Report dated January 18, 1989.
2. Approve and send the letter as recommended in the General Counsel's Report dated January 18, 1989.

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

Attest:

February 1, 1989  
Date

Hilda Arnold  
Hilda Arnold  
Administrative Assistant

2  
3  
4  
5  
6  
7  
8  
9  
0  
1  
2  
3  
4  
5  
6  
7  
8  
9  
0

OGC 1900

GAFFNEY AND DIFABIO  
ATTORNEYS AT LAW

J. BRIAN GAFFNEY  
ANTHONY F. DIFABIO  
MICHAEL K. PATENAUDE  
JAY F. MALCYNKY  
E. TIMOTHY SULLIVAN JR.

RECEIVED  
FEDERAL ELECTION COMMISSION  
ADMINISTRATIVE DIVISION

89 FEB 21 AM 10:20

ONE LIBERTY SQUARE  
NEW BRITAIN, CONNECTICUT 06051  
TELEPHONE (203) 229-0301

February 15, 1989

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

Attn: Lois G. Lerner  
Associate General Counsel


RE: Conciliation Agreement  
MUR 2608

To The General Counsel:

Enclosed find the signed conciliation agreement in the above-referenced matter.

Pursuant to my conversation with Mr. Whitehead of your office, the Haig for President Committee will forward payment of the civil penalty within thirty (30) days.

Sincerely,

  
Lawrence J. Halloran  
Attorney

enclosure

89 FEB 21 PM 1:50

334072433

BEFORE THE FEDERAL ELECTION COMMISSION

89 MAR -3 PM 12:11

In the Matter of )  
 )  
Haig for President Committee )  
and Dominic Saraceno, as )  
treasurer )

MUR 2608

**SENSITIVE**

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Lawrence J. Halloran as Counsel for the respondents, the Haig for President Committee and Dominic J. Saraceno, as treasurer. The attached agreement contains no changes from the agreement approved by the Commission February 1, 1989. The Commission has not yet received a check for the civil penalty.


II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Haig for President Committee and Dominic J. Saraceno, as treasurer.
2. Close the file.
3. Approve the attached letter.

Lawrence M. Noble  
General Counsel

3/2/89  
Date

By:

  
Lois G. Lerner  
Associate General Counsel

Attachments:

1. Letter from Respondents' Counsel and signed conciliation agreement
2. Letter to respondents' counsel.

Staff Person: Thomas J. Whitehead

4  
3  
3  
4  
7  
4  
0  
4  
4  
0  
0  
0  
0



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Haig for President Committee ) MUR 2608  
and Dominic Saraceno, as )  
treasurer )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 8, 1989, the Commission decided by a vote of 6-0 to take the following actions in MUR 2608:

1. Accept the conciliation agreement with Haig for President Committee and Dominic J. Saraceno, as treasurer, as recommended in the General Counsel's report signed March 2, 1989.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's report signed March 2, 1989.

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

Attest:

3-8-89

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

Received in the Office of Commission Secretary:	Fri.,	3-3-89,	12:11
Circulated on 48 hour tally basis:	Mon.,	3-6-89,	11:00
Deadline for vote:	Wed.,	3-8-89,	11:00



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 10, 1989

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Lawrence J. Halloran, Esquire  
Gaffney & Difabio  
One Liberty Square  
New Britain, Connecticut 06051

RE: MUR 2608  
Haig for President Committee  
and Dominic J. Saraceno, as  
treasurer

Dear Mr. Halloran:

On March 8, 1989, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your behalf in settlement of violations of 2 U.S.C. §§ 433(c) and 434(a)(3)(A)(i), provisions 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 Thomas J. Whitehead, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble  
General Counsel

By: Lois G. Lerner  
Associate General Counsel

Enclosure  
Conciliation Agreement

9 3 7 4 7 4 2 3 6 6

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Haig for President Committee ) MUR 2608  
and Dominic J. Saraceno, as )  
treasurer )

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found probable cause to believe that the Haig for President Committee and Dominic J. Saraceno, as treasurer, ("Respondents") violated 2 U.S.C. § 434(a)(3)(A)(i).

NOW THEREFORE, the Commission and the Respondents, having duly entered into conciliation pursuant to 2 U.S.C. § 437g(a)(4)(A)(i), do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents, and the subject matter of this proceeding.

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. The Haig for President Committee (the "Committee") is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Dominic J. Saraceno is the treasurer of the Committee.

20090742367

3. Pursuant to 2 U.S.C. § 434(a)(3)(A)(i), the Respondents were required to file a 1988 February Monthly Report with the Commission by no later than February 20, 1988. Respondents did not file this report until March 8, 1988, 17 days late.

V. Respondents failed to timely file the 1988 February Report, in violation of 2 U.S.C. § 434(a)(3)(A)(i).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Two Thousand Five Hundred Dollars (\$2,500.00) 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 the same and the Commission has approved the entire agreement.

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

X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and


9 9 0 4 0 7 4 2 3 5 8

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

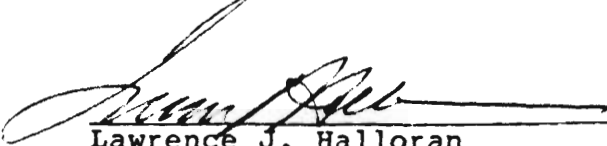
By:

  
Lois G. Lerner  
Associate General Counsel

Date

3/9/89

FOR THE RESPONDENTS:

  
Lawrence J. Halloran  
Attorney

Date

2/15/89

8 2 2 3 4 3 7 4 2 3 6 9



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2608

DATE FILMED 4/6/89 CAMERA NO. 4

CAMERAMAN AS

9 0 0 4 0 7 4 2 3 7 0