



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2878

DATE FILMED 9/29/79 CAMERA NO. 3

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REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 24 March 1989

ANALYST: Robert B. DiNardo

I. COMMITTEE: Crestar Financial Corporation Responsible
Government Fund (C00214965)
J. Thomas Vaughan, Treasurer
919 East Main Street
Richmond, VA 23219

II. RELEVANT STATUTE: 2 U.S.C. 434(a)(4)(A)(i), (ii) & (iv)
11 CFR 104.5(c)(1)(i) & (ii)
11 CFR 104.5(c)(2)(i)(B)

III. BACKGROUND:

Chronic Late Filing of Reports and Failure to File the 1988
12 Day Pre-General Report by Election Day

The Crestar Financial Corporation Responsible
Government Fund (the "Fund") failed to file three (3)
Reports of Receipts and Disbursements in a timely manner for
the 1987-1988 election cycle (see Chart). The reports were
filed between forty-three (43) and sixty-one (61) calendar
days late.

On May 25, 1988, a Chronic Late Filing Notice was sent
to the Fund for failing to file the 1987 Year End and 1988
April Quarterly Reports in a timely manner (Attachment 6).
The Notice advised the Fund that any additional late filing
of reports may result in legal enforcement action.

On May 31, 1988, the Reports Analysis Division ("RAD")
analyst called the Fund's Treasurer, Mr. J. Thomas Vaughan.
Mr. Vaughan was not available so the RAD analyst left a
message that the Commission had not received the Fund's 1988
April Quarterly Report. The secretary said the report was
mailed, and that she would give Mr. Vaughan the message
(Attachment 7).

On June 9, 1988, the Commission received a written
response from the Fund. The Fund said it was initially
unaware that a quarterly report was due, but after talking
with a RAD analyst it was told it must file quarterly
reports for 1988 (Attachment 8).

3 3 0 4 0 7 6 5 1 8 5

CRESTAR FINANCIAL CORPORATION
RESPONSIBLE GOVERNMENT FUND
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

On October 3, 1988, the Fund was notified that all committees making contributions or expenditures in connection with the general election during the period ending October 19, 1988 must file a pre-election report by October 27, 1988 if such activity had not previously been disclosed (Attachment 10).

On December 9, 1988, the Fund filed the 1988 30 Day Post-General Report. This report disclosed two (2) contributions made to federal candidates totalling \$1,250 by the Fund that occurred outside the reporting period (Attachment 11).

On January 4, 1989, a Request for Additional Information ("RFAI") was sent, notifying the Fund that its 1988 30 Day Post-General Report disclosed activity that occurred outside the reporting period. The RFAI asked the Fund to amend its report by only disclosing activity that occurred within the reporting period. Activity falling outside this reporting period should be included in relevant amended report(s) (Attachment 12).

On January 13, 1989, the Commission received an amended Schedule B disclosing the contributions as made on October 3, 1988 (Attachment 13). This indicated that a 12 Day Pre-General Report should have been filed by October 27, 1988.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

32040765186

LATE FILING HISTORY

REPORT TYPE	PRIOR NOTICE	DATE DUE	NON-FILER NOTICE	DATE FILED
1987 Year End (7/1/87-12/31/87)	12/13/87 (Attachment 2)	1/31/88	N/A	4/1/88 (Attachment 4)
1988 April Quarterly (1/1/88-3/31/88)	3/22/88 (Attachment 3)	4/15/88	5/6/88 (Attachment 5)	6/14/88 (Attachment 9)
1988 12 Day Pre-General* (10/1/88-10/19/88)	10/3/88 (Attachment 10)	10/27/88	N/A	12/9/88 (Attachment 11)

* The 12 Day Pre-General activity was disclosed on the 1988 30 Day Post-General Report (10/1/88-11/28/88), which was filed on December 9, 1988.

FEDERAL ELECTION COMMISSION
1987-1988
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 15MAR89

PAGE 2

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
						TYPE OF FILER
CRESTAR FINANCIAL CORPORATION RESPONSIBLE GOVERNMENT FUND						
CONNECTED ORGANIZATION: UNITED VIRGINIA BANKSHARES INC						
1987 STATEMENT OF ORGANIZATION						
	MID-YEAR REPORT	17,491	0	4MAY87	3	87FEC/467/0039
	YEAR-END	50,636	31,854	1JAN87 - 30JUN87	6	87FEC/482/2658
	YEAR-END - AMENDMENT	50,636	31,854	1JAN87 - 31DEC87	13	88FEC/515/3426
	YEAR-END - AMENDMENT	43,128	11,254	1JUL87 - 31DEC87	15	88FEC/529/0859
	REQUEST FOR ADDITIONAL INFORMATION			1JAN87 - 31DEC87	8	88FEC/542/0623
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN87 - 31DEC87	2	88FEC/525/0637
				1JAN87 - 31DEC87	3	88FEC/528/3167
1988 MISCELLANEOUS NOTICE FROM FEC						
	MISCELLANEOUS REPORT TO FEC			25MAY88	1	88FEC/528/0166
	MISCELLANEOUS REPORT TO FEC			9JUN88	2	88FEC/528/4898
	STATEMENT OF ORGANIZATION - AMENDMENT			10JUN88	2	88FEC/529/0315
	APRIL QUARTERLY	200	7,900	17AUG88	3	88FEC/542/0619
	APRIL QUARTERLY - AMENDMENT	0	5,300	1JAN88 - 31MAR88	4	88FEC/529/0875
	NOTICE OF FAILURE TO FILE			1JAN88 - 31MAR88	5	88FEC/542/0632
	JULY QUARTERLY	14,292	1,825	1JAN88 - 31MAR88	1	88FEC/524/4880
	JULY QUARTERLY - AMENDMENT	15,917	3,850	1APR88 - 31MAY88	5	88FEC/529/1363
	REQUEST FOR ADDITIONAL INFORMATION			1APR88 - 30JUN88	6	88FEC/542/0638
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR88 - 31MAY88	2	88FEC/533/5344
	NOTICE OF FAILURE TO FILE			1APR88 - 31MAY88	3	88FEC/541/0275
	OCTOBER QUARTERLY	15,619	17,500	1JUN88 - 30JUN88	1	88FEC/541/0463
	POST-GENERAL	9,463	3,250	1JUL88 - 30SEP88	6	88FEC/551/3369
	POST-GENERAL - AMENDMENT	-	-	1OCT88 - 28NOV88	6	88FEC/570/3664
	REQUEST FOR ADDITIONAL INFORMATION			1OCT88 - 28NOV88	3	89FEC/577/1892
	YEAR-END	2,015	0	1OCT88 - 28NOV88	1	89FEC/576/0966
				28NOV88 - 31DEC88	4	89FEC/580/0085
TOTAL		103,633	0 41,154	0	105	TOTAL PAGES

All reports listed have been reviewed

Ending cash-on-hand as of 12/31/88: \$44,989.86

Debts and Obligations owed to the committee as of 12/31/88: \$0

Debts and Obligations owed by the committee as of 12/31/88: \$0

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 18, 1987

WHO MUST FILE

ALL PARTY COMMITTEES and PACs (NON-CONNECTED COMMITTEES AND SEPARATE SEGREGATED FUNDS) must file a Year End Report in January.

REPORTING DATES

Semiannual. The Year End Report is due January 31, 1988, and must disclose financial activity that occurred from July 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 that occurred during the reporting period. A newly registered political committee filing its first report should also include all amounts received and expended before the committee registered. See 11 CFR 104.3. For more detailed information on reporting instructions, consult your Campaign Guide.

WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed FEC Form 3X for details. 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.

CHANGE IN FILING FREQUENCY

Committees that wish to change their reporting schedule (for example, from semiannual to monthly) must notify the Commission by sending a letter with the next report due under their current reporting schedule. Committees may change their filing frequency only once a year.

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.

FOR INFORMATION, Call: Information Services Division
202/376-3120 or 800/424-9530



QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

March 22, 1988

REPORT	REPORTING PERIOD	REG./CERT.	FILING
		MAILING DATE*	DATE
April Quarterly	01/01/88**-03/31/88	04/15/88	04/15/88

WHO MUST FILE

PARTY COMMITTEES AND PACs (NONCONNECTED COMMITTEES AND SEPARATE SEGREGATED FUNDS) filing on a quarterly basis must file their next report in April.

WHAT MUST BE REPORTED

All financial activity (not previously reported) that occurred during the reporting period.

REPORTING FORMS

Party committees and PACs use Form 3X (enclosed).

WHERE TO FILE

Consult the instructions on the back of the Form 3X Summary Page. Note state filing requirements also.

LABEL

Committees should affix the peel-off label from the envelope to Line 1 of the report. Corrections should be made on the label.

PRE-ELECTION REPORTING

Committees which make contributions or expenditures (including independent expenditures) in connection with a candidate's primary election, must also file a 12-day Pre-Election Report if the activity was not previously reported. See the January Record.

LAST-MINUTE INDEPENDENT EXPENDITURES

Committees which make an independent expenditure of \$1,000 or more, after the 20th day, but more than 24 hours before an election, must report it within 24 hours.

COMPLIANCE

TREASURERS OF POLITICAL COMMITTEES ARE RESPONSIBLE FOR FILING ALL REPORTS ON TIME. FAILURE TO DO SO IS SUBJECT TO ENFORCEMENT ACTION. COMMITTEES FILING ILLEGIBLE REPORTS OR USING NON-FEC FORMS WILL BE REQUIRED TO REFILE.

*Reports sent by registered or certified mail must be postmarked by the mailing date. Otherwise, they must be received by the filing date.

**From the date of registration, or the close of books of the last report filed, whichever is later.

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

Attachment 4

RECEIVED
FEDERAL ELECTION COMMISSION

APR - 1 AM 9:24

USE PRECISE LABELS
OR
TYPE ON PREC

1. NAME OF COMMITTEE (in full) Formerly UNITED VIRGINIA BANKSHARES RESPONSIBLE GOVERNMENT FUND Crestar Financial Corporation Responsible Government Fund		2. FEC IDENTIFICATION NUMBER C00214965
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 919 East Main Street CITY, STATE and ZIP CODE Richmond Virginia 23219		3. The committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date)

4. TYPE OF REPORT

- (a) ☐ April 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)
☐ Termination Report
- Monthly Report Due On
☐ February 20
☐ March 20
☐ April 20
☐ May 20
☐ June 20
☐ July 20
☐ August 20
☐ September 20
☐ October 20
☐ November 20
☐ December 20
☐ January 31
- ☐ Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____
- ☐ Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☐ YES ☒ NO

SUMMARY

5	Covering Period January 1 through December 31, 1987	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6	(a) Cash on Hand January 1, 1987		\$.00
	(b) Cash on Hand at Beginning of Reporting Period	\$ 17,491.96	
	(c) Total Receipts (from Line 18)	\$ 50,636.52	\$ 68,128.48
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 68,128.48	\$ 68,128.48
7	Total Disbursements (from Line 28)	\$ 31,854.58	\$ 31,854.58
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 36,273.90	\$ 36,273.90
9	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$.00	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202 378-3120
10	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$.00	

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
William C. Crichton, Assistant Treasurer

Signature of Treasurer

William C. Crichton

Date

1-31-88

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

FEC FORM 3X

(revised 4/87)

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



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

HQ-7

May 6, 1988

J. Thomas Vaughan, Treasurer
United Virginia Bankshares Responsible
Government Fund
919 East Main Street
Richmond, VA 23219

Identification Number: C00214965

Reference: April Quarterly Report (1/1/88-3/31/88)

Dear Mr. Vaughan:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may be in violation of 2 U.S.C. §434(a) for failing to file the above referenced Report of Receipts and Disbursements. You were notified previously of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or the relevant portions should also be filed with the Secretary of State or equivalent State officer. See 2 U.S.C. §439.

Although the Commission may initiate an audit or legal enforcement action concerning this matter, your prompt response and a letter of explanation will be taken into consideration.

If you have any questions, please contact Robert B. DiNardo on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20461

MS-L

MAY 25 1988

J. Thomas Vaughan, Treasurer
United Virginia Bankshares
Responsible Government Fund
919 East Main Street
Richmond, VA 23219

Identification Number: C00214965

Reference: 1987-1988 Election Cycle Reports

Dear Mr. Vaughan:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may have violated 2 U.S.C. §434(a), by failing to timely file Reports of Receipts and Disbursements. The following is a list of the reports in question.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
1987 Year End (7/1/87-12/31/87)	01/31/88	04, 01/88
1988 April Quarterly (1/1/88-3/31/88)	04/15/88	not filed

Timely filing is a specific requirement of the Federal Election Campaign Act ("the Act") and is essential to fulfilling the public disclosure concept embodied in that law. The Commission views the untimely filing of reports as a serious violation of the Act. This communication is to advise you that, notwithstanding any matters which may be pending before the Commission, any additional report which is not submitted in a timely manner by your committee may result in the Commission initiating legal enforcement or audit action.

You may submit a letter of explanation in response to this notification. If, however, you have any questions, please feel free to contact Robert DiNardo on our toll-free number, (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

Lisa J. Stolaruk
Chief, Party/Non-Party Branch
Reports Analysis Division

33040765193

MEMORANDUM TO THE FILES:

COMMITTEE: United Virginia Bankshares Responsible Government Fund
I.D. NUMBER: C00214965
CONTACT: J. Thomas Vaughan, Treasurer
DATE: May 31, 1988
ANALYST: Robert B. DiNardo
SUBJECT: 1988 April Quarterly Report

37747763124
• I called Mr. Vaughan at 4:05 P.M. Mr. Vaughan was not available, so I left a message that the Commission had not received his committee's 1988 April Quarterly Report, and to call me back if he had any questions. The secretary said the report was mailed, and that she would give Mr. Vaughan the message.

83 JUN - 11:20

Attachment 8
CRESTAR

J. Thomas Vaughan
Senior Vice President and
Corporate Government Relations Officer

June, 10, 1988

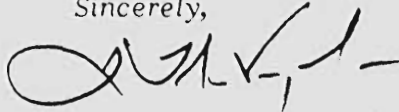
Mr. John D. Gibson
Assistant Staff Director
Reports Analysis Director
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Gibson:

In response to your letter of June 2, we have been in contact with Mr. DiNardo by telephone on two occasions, first we notified him we were unaware of the necessity to file more than once a year; but were told because 1988 being an election year, that we had to file quarterly. Our second call to Mr. DiNardo was for clarification of our 1987 year-end filing that he had questioned.

The corrected year-end, April 14 and June 10th reports will be sent to your attention by June 14, 1988. I am very sorry for the inconvenience and the misunderstanding regarding the filings.

Sincerely,



J. Thomas Vaughan, Treasurer
Crestar Responsible Government Fund

cc: Mr. Robert B. DiNardo
Reports Analyst

Formerly United Virginia Bank

REPORT OF RECEIPTS AND DISBURSEMENTS HAND DELIVERED

For Other Than An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) Crestar Financial Corporation Responsible Government Fund		Attachment 9 68 MAR 14 1990-06
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 919 East Main Street		2. FEC IDENTIFICATION NUMBER COO214865
CITY, STATE and ZIP CODE Richmond, Virginia 23219		3. <input type="checkbox"/> This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date)

4. TYPE OF REPORT

- (a) ☒ April 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)
☐ Termination Report
- Monthly Report Due On
☐ February 20 ☐ June 20 ☐ October 20
☐ March 20 ☐ July 20 ☐ November 20
☐ April 20 ☐ August 20 ☐ December 20
☐ May 20 ☐ September 20 ☐ January 31
- ☐ Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____
- ☐ Thirtieth day report following the General Election on _____
in the State of _____
- (b) Is this Report an Amendment? ☐ YES ☒ NO

SUMMARY

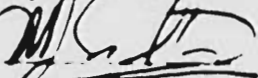
	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>January 1, 1988</u> through <u>March 31, 1988</u>		
6. (a) Cash on Hand January 1, 19 <u>88</u>		\$ 36,273.90
(b) Cash on Hand at Beginning of Reporting Period	\$ 36,273.90	
(c) Total Receipts from Line 18	\$ 200.00	\$ 200.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 36,473.90	\$ 36,473.90
7. Total Disbursements from Line 28	\$ 7,900.00	\$ 7,900.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6 d.)	\$ 28,573.90	\$ 28,573.90
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ None	For further information contact: Federal Election Commission 999 E Street NW Washington, DC 20463 Toll Free 800-424-9530 Local 202 376 3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ None	

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:

William C. Crestar, Assistant Treasurer

Signature of Treasurer:



Date:

6-13-88

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

FEC FORM 3X
revised 4-87

GENERAL ELECTION REPORT NOTICE

Attachment 10
(1 of 2)

FEDERAL ELECTION COMMISSION

PARTIES AND PACs

October 3, 1988

I. ALL MONTHLY FILERS

Report	Reporting Period	Reg./Cert. Mailing Date*	Filing Date
Pre-General	10/01/88**-10/19/88	10/24/88	10/27/88
Post-General	10/20/88 -11/28/88	12/08/88	12/08/88

II. QUARTERLY FILERS THAT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 19***

Report	Reporting period	Reg./Cert. Mailing Date*	Filing Date
Pre-General	10/01/88**-10/19/88	10/24/88	10/27/88
Post-General	10/20/88 -11/28/88	12/08/88	12/08/88

III. QUARTERLY FILERS WHICH DO NOT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 19***

Report	Reporting Period	Reg./Cert. Mailing Date*	Filing Date
Post-General	10/01/88**-11/28/88	12/08/88	12/08/88

WHO MUST FILE

Party committees and PACs must follow the above charts in order to determine whether they must file the pre-general election report. All Party committees and PACs, regardless of financial activity, must file the post-general election report.

WHAT MUST BE REPORTED

All financial activity (not previously reported) that occurred during the reporting period.

*Reports sent by registered or certified mail must be postmarked by the mailing date. Otherwise, they must be received by the filing date.

**Or from the date of registration, or the close of books of the last report filed, whichever is later.

***Committees that made general election contributions or expenditures prior to October 1 which have not been previously reported must also follow the Chart II reporting requirements.

FOR INFORMATION, Call: 202/376-3120 or 800/424-9530

(over)

REPORTING FORMS

Party committees and PACs use Form 3X (enclosed).

WHERE TO FILE

Consult the instructions on the back of the Form 3X Summary Page.
Note State filing requirements also.

LABEL

Committees should affix the peel-off label from the envelope to Line 1 of the report. Corrections should be made on the label.

LAST-MINUTE INDEPENDENT EXPENDITURES

Any PAC which makes any independent expenditures aggregating \$1,000 or more during the period beginning October 20 and ending November 6 must report them within 24 hours. Call the FEC for more information.

COMPLIANCE

TREASURERS OF POLITICAL COMMITTEES ARE RESPONSIBLE FOR FILING ALL REPORTS ON TIME. FAILURE TO DO SO IS SUBJECT TO ENFORCEMENT ACTION. COMMITTEES FILING ILLEGIBLE REPORTS OR USING NON-FEC FORMS WILL BE REQUIRED TO REFILE.

20040765128

REPORT OF CONTRIBUTIONS AND DISBURSEMENTS

For the calendar year ending 12/31/88

(Primary Page)

FEDERAL ELECTION COMMISSION
MAIL ROOM

Attachment 11 (1 of 2)

00 DEC -9 AM 11:05

1. NAME OF COMMITTEE (in full) Greener Financial Corporation Responsible Government Fund		2. FIDUCIARY IDENTIFICATION NUMBER C00214965
Address (number and street) <input type="checkbox"/> Check if address has previously reported 919 East Main Street		
CITY, STATE and ZIP CODE Richmond, VA 23219		3. <input type="checkbox"/> This committee qualified as a multicandidate committee during THIS Reporting Period on 11/28/88

A. TYPE OF REPORT

(a) ☐ April 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)

☐ Termination Report

Monthly Report Due On:

<input type="checkbox"/> February 20	<input type="checkbox"/> June 20	<input type="checkbox"/> October 20
<input type="checkbox"/> March 20	<input type="checkbox"/> July 20	<input type="checkbox"/> November 20
<input type="checkbox"/> April 20	<input type="checkbox"/> August 20	<input type="checkbox"/> December 20
<input type="checkbox"/> May 20	<input type="checkbox"/> September 20	<input type="checkbox"/> January 31

☐ Twelfth day report preceding _____ (Type of Election)

election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☐ YES ☒ NO

SUMMARY

5	Covering Period <u>10/1/88</u> through <u>11/28/88</u>	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6	(a) Cash on Hand January 1, 19 <u>88</u>		\$ 31,873.90
	(b) Cash on Hand at Beginning of Reporting Period	\$ 36,761.58	
	(c) Total Receipts (from Line 18)	\$ 9,463.28	\$ 41,000.00
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 46,224.86	\$ 72,874.86
7	Total Disbursements (from Line 28)	\$ 3,250.00	\$ 29,900.00
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 42,974.86	\$ 42,974.86
9	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ None	For further information contact: Federal Election Commission 990 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ None	

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

Shirley D. Swartout, Secretary - Government Relations Dept.

Signature of Treasurer

Shirley D. Swartout

Date

12/1/88

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

FEC FORM 3X

(revised 4/87)

33040763199
33033703665

SCHEDULE B

ITEMIZED DISBURSEMENTS

(2 of 2)

Page 1 of 1	Page 1 of 1
FOR LINE NUMBER	20

Any information taken from such reports and statements may not be sold or used by any person for the purpose of obtaining contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in full)

Crestar Financial Corporation Responsible Government Fund

RD

A. Full Name, Mailing Address and ZIP Code Curry for Congress P.O. Box 8083 Virginia Beach, VA 23450	Purpose of Disbursement Campaign Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 9/27/88	Amount of Each Disbursement This Period \$250.00
B. Full Name, Mailing Address and ZIP Code Friends of Frank Wolf P.O. Box 6596 McLean, VA 22106-9839	Purpose of Disbursement Campaign Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 9/27/88	Amount of Each Disbursement This Period \$1,000.00
C. Full Name, Mailing Address and ZIP Code Pickett for Congress Post Office Box 2127 Virginia Beach, VA 23452	Purpose of Disbursement Campaign Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/31/88	Amount of Each Disbursement This Period \$2,000.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

\$3,250.00

9 3 0 4 0 7 6 5 2 0 0



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

4-28-88

JUN 4 1988

J. Thomas Vaughan, Treasurer
Crestar Financial Corporation
Responsible Government Fund
919 East Main Street
Richmond, VA 23219

Identification Number: C00214965

Reference: 30 Day Post-General Report (10/1/88-11/28/88)

Dear Mr. Vaughan:

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:

-Your report discloses activity that occurred outside the reporting period. Please amend your report to only include activity that occurred between October 1, 1988 and November 28, 1988. Any activity falling outside these coverage dates should be included in the relevant report(s).

A written response or 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 dark ink, appearing to read "Robert B. DiMardo".

Robert B. DiMardo
Reports Analyst
Reports Analysis Division

3033760955

AMENDED COPY ATTACHED. THE DATES WERE WRONG ON TWO OF THE CONTRIBUTIONS BECAUSE I PUT THE DATE RECEIVED, INSTEAD OF THE DATE WE ACTUALLY SENT THE CHECKS WHICH WAS OCTOBER 1, 1988.



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20461

Thank you,

BQ-2

Shirley Swartwout
Shirley Swartwout 1/9/89

J. Thomas Vaughan, Treasurer
Crestar Financial Corporation
Responsible Government Fund
919 East Main Street
Richmond, VA 23219

JAN 4 1989

JAN 09 1989

RECEIVED
FEDERAL ELECTION COMMISSION
JAN 13 AM 9:28

Identification Number: C00214965

Reference: 30 Day Post-General Report (10/1/88-11/28/88)

Dear Mr. Vaughan:

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:

-Your report discloses activity that occurred outside the reporting period. Please amend your report to only include activity that occurred between October 1, 1988 and November 28, 1988. Any activity falling outside these coverage dates should be included in the relevant report(s).

A written response or 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,

Robert B. DiNardo

Robert B. DiNardo
Reports Analyst
Reports Analysis Division

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

SCHEDULE B

ITEMIZED DISBURSEMENTS

(2 of 2)

Use separate schedules for each category of the Detailed Summary Page

PAGE 1 OF 1
FOR LINE NUMBER 20

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of collecting contributions or for commercial purposes, other than using the name and address of any political committee to collect contributions from such committee.

NAME OF COMMITTEE (in Full)

Grestar Financial Corporation Responsible Government Fund

A. Full Name, Mailing Address and ZIP Code Curry for Congress P.O. Box 8083 Virginia Beach, VA 23450	Purpose of Disbursement Campaign Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/03/88	Amount of Each Disbursement This Period \$250.00
B. Full Name, Mailing Address and ZIP Code Friends of Frank Wolf P.O. Box 6596 McLean, VA 22106-9839	Purpose of Disbursement Campaign Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/03/88	Amount of Each Disbursement This Period \$1,000.00
C. Full Name, Mailing Address and ZIP Code Pickett for Congress Post Office Box 2127 Virginia Beach, VA 23452	Purpose of Disbursement Campaign Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/31/88	Amount of Each Disbursement This Period \$2,000.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional):

TOTAL This Period (on page this line number only):

\$3,250.00

23040765200
335771893

FEDERAL ELECTION COMMISSION
89 MAY 10 PM 2:57

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD Referral #89NF-55
Staff Member: Jeffrey Long

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

RESPONDENTS: Crestar Financial Corporation
Responsible Government Fund and
J. Thomas Vaughan, as treasurer

RELEVANT STATUTES: 2 U.S.C. § 434(a)(4)(A)(i)
2 U.S.C. § 434(a)(4)(A)(ii)
2 U.S.C. § 434(a)(4)(A)(iv)

INTERNAL REPORTS CHECKED: Referral Materials

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred Crestar Financial Corporation Responsible Government Fund and J. Thomas Vaughan, as treasurer ("Crestar"), to the Office of the General Counsel on March 27, 1989. The basis for the attached referral is the Committee's failure to file the 1987 Year End, 1988 April Quarterly, and 1988 12 Day Pre-General Reports in a timely manner.

II. FACTUAL AND LEGAL ANALYSIS

A. Filing of Reports

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that for unauthorized committees filing quarterly, in a non-election year such committees shall file the Year End Report, covering the period beginning July 1 and ending

0040265204

December 31, no later than January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(A)(iv). Crestar did not file the 1987 Year End Report until April 1, 1988, which was 61 days late.

Unauthorized committees filing quarterly, shall file quarterly reports in a calendar year in which a regularly scheduled election is held, no later than the 15th day after the last day of each calendar quarter. 2 U.S.C. § 434(a)(4)(A)(i). The 1988 April Quarterly Report was due on April 15, 1988. Crestar did not file the 1988 April Quarterly Report until June 14, 1988, which was 60 days late. However, the Committee signed a conciliation agreement on October 17, 1988 and paid a \$600 civil penalty in MUR 2661, for failing to file the 1988 April Quarterly Report (Attachment 1). Therefore, there is no civil penalty assessed for the April Quarterly Report in this report.

If an unauthorized committee makes a contribution to or expenditure on behalf of a candidate in an election, that activity shall be disclosed in a pre-election report which shall be filed no later than the 12th day before that election, and which shall be complete as of the 20th day before the election. 2 U.S.C. § 434(a)(4)(A)(ii). The Committee was notified of this filing requirement on October 3, 1988.

Crestar disclosed on its 1988 30 Day Post-General Report, financial activity which indicates that a 12 Day Pre-General Report should have been filed.¹

1. The Committee disclosed the activity in its 1988 30 Day Post-General Report covering the period from October 1, 1988 through November 28, 1988, which was filed on December 9, 1988.

Accordingly, the Office of the General Counsel recommends that the Commission open a Matter Under Review and find reason to believe the Crestar Financial Corporation Responsible Government Fund and J. Thomas Vaughan, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(ii) and 434(a)(4)(A)(iv).

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

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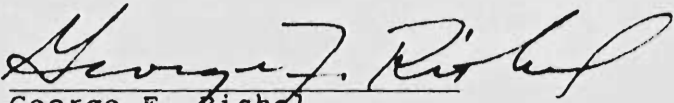
IV. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe the Crestar Financial Corporation Responsible Government Fund and J. Thomas Vaughan, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(ii) and 434(a)(4)(A)(iv), and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the attached letter, Factual and Legal Analysis, and proposed conciliation agreement.

Lawrence M. Noble
General Counsel

May 10, 1989
Date

BY:


George F. Rishel
Acting Associate General
Counsel

Attachments

1. Conciliation Agreement in MUR 2661
2. Referral Materials
3. Proposed Agreement
4. Letter and Factual and Legal Analysis

89040763208

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Crestar Financial Corporation)
Responsible Government Fund and)
J. Thomas Vaughan, as treasurer)

RAD Ref. 89NF-55

(MUR)
2878

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 15, 1989, the Commission decided by a vote of 5-1 to take the following actions in RAD Ref. 89NF-55:

1. Open a MUR.
2. Find reason to believe the Crestar Financial Corporation Responsible Government Fund and J. Thomas Vaughan, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(ii) and 434(a)(4)(A)(iv), and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the letter, Factual and Legal Analysis, and proposed conciliation agreement, as recommended in the First General Counsel's report signed May 10, 1989.

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

Attest:

May 15, 1989
Date

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

Received in the Office of Commission Secretary:	Wed., 5-10-89,	2:57
Circulated on 48 hour tally basis:	Thurs., 5-11-89,	11:00
Deadline for vote:	Mon., 5-15-89,	11:00



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

May 19, 1989

J. Thomas Vaughan, Treasurer
Crestar Financial Corporation
Responsible Government Fund
919 East Main Street
Richmond, Virginia 23219

RE: MUR 2878
Crestar Financial Corporation
Responsible Government Fund
and J. Thomas Vaughan, as
treasurer

Dear Mr. Vaughan:

On May 15, 1989, the Federal Election Commission found that there is reason to believe Crestar Financial Corporation Responsible Government Fund ("Committee") and you, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(ii) and 434(a)(4)(A)(iv), provisions 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.

In order to expedite the resolution of this matter, the Commission has also decided to offer to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. Enclosed is a conciliation agreement that the Commission has approved.

J. Thomas Vaughan
Page 2

If you are interested in expediting the resolution of this matter by pursuing pre-probable cause conciliation and if you agree with the provisions of the enclosed agreement, please sign and return the agreement, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

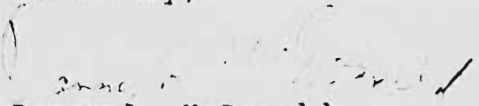
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,


Danny L. McDonald
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form
Conciliation Agreement

99040765211

Crestar Bank
910 East Main Street
P.O. Box 26655
Richmond, Virginia 23261-0655
(804) 782-7906

FEDERAL RESERVE BANK

89 MAY 30 AM 11:03

OGC 2888

89NF, 55

MUR 2878

J. Thomas Vaughan
Senior Vice President and
Corporate Government Relations Officer

CRESTAR

May 26, 1989

Mr. Jeffrey Long
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Long:

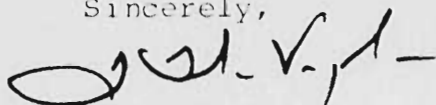
In responding to Mr. Danny L. McDonald's letter of May 19, 1989 in which he indicated that the Crestar Responsible Government Fund was negligent by not submitting a 12 Day Pre-General Report, I wish to explain that the reason for his concern was that our 30 day Post General election report indicated two contributions were made between 10/1/88 and 10/19/88 totaling \$1,250.00.

The dates for these two contributions were in error on the report and were not made on October 3, 1988, as indicated, but were made on November 2, 1988. This was a typographical error and I am enclosing photo copies of the two checks in question and also an amended report which reflects the accurate dates for the contributions.

Since the checks were actually written on November 2, 1988, no 12 Day Pre-General Report was required; therefore, our only negligence was the typographical error and I trust this is insufficient cause for penalty. I apologize for the error.

Your correspondence of May 19, 1989 also indicates that we did not file the 1987 Year End Report until April, 1988. That report was prepared and filed in January, 1988, and we do not understand why the F.E.C. is now claiming that it did not receive it in a timely fashion. (If the report had actually been filed late, we assume the F.E.C. would have contacted us a year ago, especially since our April, 1988 Quarterly Report was the subject of a 1988 Conciliation Agreement).

Sincerely,



J. Thomas Vaughan

/sds

cc: Robert D. DiNardo

Formerly United Virginia Bank

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) Crestar Financial Corporation Responsible Government Fund		89 MAY 30 AM 11:09
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 919 East Main Street		2. FEC IDENTIFICATION NUMBER C00214965
CITY, STATE and ZIP CODE Richmond, VA 23219		3. <input checked="" type="checkbox"/> This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).

4. TYPE OF REPORT

(a) ☐ April 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)

☐ Termination Report

Monthly Report Due On:

<input type="checkbox"/> February 20	<input type="checkbox"/> June 20	<input type="checkbox"/> October 20
<input type="checkbox"/> March 20	<input type="checkbox"/> July 20	<input type="checkbox"/> November 20
<input type="checkbox"/> April 20	<input type="checkbox"/> August 20	<input type="checkbox"/> December 20
<input type="checkbox"/> May 20	<input type="checkbox"/> September 20	<input type="checkbox"/> January 31

☐ Twelfth day report preceding _____ (Type of Election)

election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☐ YES ☒ NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	<u>10/1/88</u> through <u>11/28/88</u>		
6. (a) Cash on Hand January 1, 19 <u>88</u>			\$ 31,873.90
(b) Cash on Hand at Beginning of Reporting Period		\$ 36,761.58	
(c) Total Receipts (from Line 18)		\$ 9,463.28	\$ 41,000.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 46,224.86	\$ 72,874.86
7. Total Disbursements (from Line 28)		\$ 3,250.00	\$ 29,900.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 42,974.86	\$ 42,974.86
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		\$ None	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)		\$ None	
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 Shirley D. Swartwout, Secretary - Government Relations Dept.			
Signature of Treasurer <i>Shirley D. Swartwout</i>		Date 12-5-88	

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

--	--	--	--	--	--	--	--	--	--

FEC FORM 3X
(revised 4/87)

DETAILED SUMMARY PAGE

of Receipts and Disbursements
(Page 2, FEC FORM 3X)

Name of Committee (in full) Crestar Financial Corp. Responsible Government		Report Covering the Period From: 10/1/88 To: 11/28/88	
		COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			
(i) Itemized (use Schedule A)		3,916.00	5,469.00
(ii) Unitemized		5,347.28	35,331.96
(iii) Total of contributions from individuals		9,263.28	40,800.96
(b) Political Party Committees			
(c) Other Political Committees (such as PACs)			
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))		9,263.28	40,800.96
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES			
13. ALL LOANS RECEIVED			
14. LOAN REPAYMENTS RECEIVED			
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		200.00	200.00
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			
17. OTHER RECEIPTS (Dividends, Interest, etc.)			
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)		9,463.28	41,000.96
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES			
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			17,200.00
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		3,250.00	11,800.00
22. INDEPENDENT EXPENDITURES (use Schedule E)			
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)			
24. LOAN REPAYMENTS MADE			
25. LOANS MADE			
26. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees			
(b) Political Party Committees			
(c) Other Political Committees (such as PACs)			
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))			
27. OTHER DISBURSEMENTS			900.00
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)		3,250.00	29,900.00
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))			
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))			
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)			
32. TOTAL OPERATING EXPENDITURES (from Line 19)			
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)			
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)			

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SCHEDULE A

INCREASED RECEIPTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

PAGE 1 OF 2
FOR LINE NUMBER 1 2

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Crestar Financial Corporation Responsible Government Fund

A. Full Name, Mailing Address and ZIP Code Stephen E. Arnold 919 East Main Street Richmond, VA 23219 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Crestar Bank Occupation Sr. Vice Pres. Aggregate Year-to-Date > \$ 200.00	Date (month, day, year) 10/30/88	Amount of Each Receipt this Period \$200.00
B. Full Name, Mailing Address and ZIP Code Stephen C. Asheroff 919 East Main Street Richmond, VA 23219 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Crestar Bank Occupation Executive Vice Pres. Aggregate Year-to-Date > \$ 234.00	Date (month, day, year) 10/30/88	Amount of Each Receipt this Period \$234.00
C. Full Name, Mailing Address and ZIP Code Samuel P. Cardwell 919 East Main Street Richmond, VA 23219 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Crestar Bank Occupation Vice Chairman Aggregate Year-to-Date > \$	Date (month, day, year) 10/30/88	Amount of Each Receipt this Period \$500.00
D. Full Name, Mailing Address and ZIP Code Robert M. DuFour 919 East Main Street Richmond, VA 23219 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Crestar Bank Occupation Asst. Vice Pres. Aggregate Year-to-Date > \$ 368.00	Date (month, day, year) 10/30/88	Amount of Each Receipt this Period \$368.00
E. Full Name, Mailing Address and ZIP Code Patrick D. Giblin 919 East Main Street Richmond, VA 23219 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Crestar Bank Occupation Vice Chairman Aggregate Year-to-Date > \$ 500.00	Date (month, day, year) 10/30/88	Amount of Each Receipt this Period \$500.00
F. Full Name, Mailing Address and ZIP Code William M. Ginther 919 East Main Street Richmond, VA 23219 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Crestar Bank Occupation Executive Vice Pres. Aggregate Year-to-Date > \$ 200.00	Date (month, day, year) 10/30/88	Amount of Each Receipt this Period \$200.00
G. Full Name, Mailing Address and ZIP Code C. Garland Hagen 919 East Main Street Richmond, VA 23219 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Crestar Bank Occupation Executive Vice Pres. Aggregate Year-to-Date > \$ 200.00	Date (month, day, year) 10/30/88	Amount of Each Receipt this Period \$200.00

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

PAGE 2 OF 2
FOR LINE NUMBER

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Crestar Financial Corporation Responsible Government Fund

A. Full Name, Mailing Address and ZIP Code Thomas E. Lutes 919 East Main Street Richmond, VA 23219 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Crestar Bank Occupation Sr. Vice Pres. Aggregate Year-to-Date > \$ 216.00	Date (month, day, year) 10/30/88	Amount of Each Receipt this Period \$216.00
B. Full Name, Mailing Address and ZIP Code J. Thomas Vaughan 919 East Main Street Richmond, VA 23219 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Crestar Bank Occupation Sr. Vice Pres. Aggregate Year-to-Date > \$ 200.00	Date (month, day, year) 10/30/88	Amount of Each Receipt this Period \$200.00
C. Full Name, Mailing Address and ZIP Code James M. Wells, III 919 East Main Street Richmond, VA 23219 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Crestar Bank Occupation President Aggregate Year-to-Date > \$ 400.00	Date (month, day, year) 10/30/88	Amount of Each Receipt this Period \$400.00
D. Full Name, Mailing Address and ZIP Code William K. Butler, Jr. 5 Main Plaza East P. O. Box 2600 Norfolk, VA 23501 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Crestar Bank Occupation Pres., Eastern Region Aggregate Year-to-Date > \$ 264.00	Date (month, day, year) 10/30/88	Amount of Each Receipt this Period \$264.00
E. Full Name, Mailing Address and ZIP Code William C. Harris 15th St. & New York Ave., N.W. Washington, D.C. 20005 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Crestar Bank Occupation Pres., Washington Region Aggregate Year-to-Date > \$ 400.00	Date (month, day, year) 10/30/88	Amount of Each Receipt this Period \$400.00
F. Full Name, Mailing Address and ZIP Code Franklin E. Harris P.O. Box 2867 Roanoke, VA 24011 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Crestar Bank Occupation Pres., Western Region Aggregate Year-to-Date > \$ 234.00	Date (month, day, year) 10/30/88	Amount of Each Receipt this Period \$234.00
G. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

3,916.00

SCHEDULE B

ITEM 2 DISBURSEMENTS

 Separate schedule(s)
for each category of the
Detailed Summary Page

 PAGE 1 OF 1
FOR LINE NUMBER
20

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Crestar Financial Corporation Responsible Government Fund

A. Full Name, Mailing Address and ZIP Code Curry for Congress P.O. Box 8083 Virginia Beach, VA 23450	Purpose of Disbursement Campaign Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 11/2/88	Amount of Each Disbursement This Period \$250.00
B. Full Name, Mailing Address and ZIP Code Friends of Frank Wolf P.O. Box 6596 McLean, VA 22106-9839	Purpose of Disbursement Campaign Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 11/2/88	Amount of Each Disbursement This Period \$1,000.00
C. Full Name, Mailing Address and ZIP Code Pickett for Congress Post Office Box 2127 Virginia Beach, VA 23452	Purpose of Disbursement Campaign Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 11/2/88	Amount of Each Disbursement This Period \$2,000.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

\$3,250.00

837040763217

CRESTAR FINANCIAL CORP.

FEDERAL ACCOUNT
RESPONSIBLE GOVERNMENT FUND
P. O. BOX 28665
RICHMOND, VA. 23261

1520

205857897 11-23-68 024 05 0581

Date 11-2-85

68-2/510

Pay to the order of Friends of Frank Wolf

\$ 1000

One Thousand

00/100

Dollars

CRESTAR

Crestar Bank
Richmond, Virginia

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NO 88 23

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DEPOSIT ONLY
OF FRANK WOLF
1043 7068

3 75708

CRESTAR FINANCIAL CORP.

FEDERAL ACCOUNT
RESPONSIBLE GOVERNMENT FUND
P. O. BOX 26665
RICHMOND, VA. 23261

1521

Date 11-2-88

68-2/510

Pay to the order of

Curry for Congress

\$ 250.00

Two hundred fifty

100

Dollars

CRESTAR

Crestar Bank
Richmond, Virginia

11-2-88

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SCOTLAND BANK N.A.
1000 N. 10th St.
Richmond, VA 23219
803-600-1774

2002 98481

Pay To The Order Of
Curry for Congress
0054-0285

CRESTAR FINANCIAL CORP.

FEDERAL ACCOUNT
RESPONSIBLE GOVERNMENT FUND

P. O. BOX 26665
RICHMOND, VA. 23261

1521

Date 11-2-88

68-2510

Pay to the order of

Curry for Congress

\$ 250⁰⁰

Two hundred fifty

$\frac{8}{100}$

Dollars

CRESTAR

Crestar Bank
Richmond, Virginia

[Signature]

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Pay To The Order Of
Curry for Congress
0054-0285

CRESTAR FINANCIAL CORP.

FEDERAL ACCOUNT

RESPONSIBLE GOVERNMENT FUND

P. O. BOX 26665

RICHMOND, VA. 23261

15

205857857 11-23-88 024 05 0581

Date 11-2-88

Pay to the order of

Friend of Frank Wolf

\$ 100

One Hundred

00
100

CRESTAR

Crestar Bank
Richmond, Virginia

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11-23-88

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BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of

Crestar Financial Corporation)
Responsible Good Government)
Fund and J. Thomas Vaughan, as)
treasurer)

MUR 2878

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On May 15, 1989, the Commission found that there is reason to believe Crestar Financial Corporation Responsible Government Fund and J. Thomas Vaughan, as treasurer, ("Crestar") violated 2 U.S.C. §§ 434(a)(4)(A)(ii) and 434(a)(4)(A)(iv) for failing to file timely the 1988 12 Day Pre-General and 1987 Year-End Reports. |

II. ANALYSIS

Pursuant to 2 U.S.C. § 434(a)(4)(A)(ii), any committee that makes a contribution or expenditure within the period

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ending 20 days prior to an election shall file a report of receipts and disbursements for that period. The reporting period for the 1988 Pre-General Report was October 1 through October 19, 1988. Crestar disclosed on its 1988 30 Day Post-General Report, financial activity which indicates that a 12 Day Pre-General Report should have been filed. That report disclosed two contributions to federal candidates made on October 3, 1988.

3 3 3 0 7 6 5 2 2 5
In Crestar's May 30, 1989 response to this Office, they state that the contributions were reported incorrectly and were actually made on November 2, 1988. The Respondents also provided copies of the checks which reflect the accurate dates. Based on this supplemental information, it is apparent that Respondents failed to accurately report the dates of the contributions, in violation of 2 U.S.C. § 434(b)(6)(B)(iii). Since the Respondents have expressed an interest in continuing with negotiations for reaching a conciliation agreement prior to a finding of probable cause to believe, and because the nature of the above violations are similar in that they both involve a reporting infraction, this Office recommends that the Commission take no further action regarding the 2 U.S.C § 434(a)(4)(A)(ii) violation and find reason to believe that the Respondents violated 2 U.S.C. § 434(b)(6)(B)(iii).

In its response, the Committee also insists that the 1987 Year-End Report was filed on time, particularly since they received no notice of the late filing and the report was not an issue in a previous matter with the Commission. Though the Committee's report was dated January 31, 1987, it was not received by the Commission until April 1, 1988. Attachment 2.

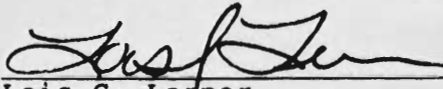
33740765224

RECOMMENDATIONS

1. Find reason to believe that Crestar Financial Corporation Responsible Good Government Fund and J. Thomas Vaughan, as treasurer, violated 2 U.S.C. § 434(b)(6)(B)(iii).
2. Take no further action that Crestar Financial Corporation Responsible Good Government Fund and J. Thomas Vaughan, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii).
3. Approve the attached proposed conciliation agreement, factual and legal analysis, and letter.

Lawrence M. Noble
General Counsel

7/27/88
Date

BY: 
Lois G. Lerner
Associate General Counsel

Attachments

1. Crestar Response
2. Crestar 1987 Year-End Report
3. Proposed letters, factual and legal analysis, and conciliation agreement

Staff Person: Jeffrey Long

00040765225



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS /DELORES R. HARRIS *SEN*
COMMISSION SECRETARY

DATE: AUGUST 2, 1989

SUBJECT: MUR 2878 - GENERAL COUNSEL'S REPORT
SIGNED JULY 27, 1989

The above-captioned document was circulated to the
Commission on Monday, July 31, 1989 at 11:00 a.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	_____
Commissioner McGarry	_____
Commissioner Thomas	_____X_____

This matter will be placed on the meeting agenda
for Tuesday, August 8, 1989 at 10:00 a.m..

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

33940765225

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Crestar Financial Corporation)
Responsible Good Government) MUR 2878
Fund and J. Thomas Vaughan, as)
treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the
Federal Election Commission executive session of August 8,
1989, do hereby certify that the Commission decided by a
vote of 6-0 to take the following actions in MUR 2878:

1. Find reason to believe that Crestar
Financial Corporation Responsible
Good Government Fund and J. Thomas
Vaughan, as treasurer, violated
2 U.S.C. § 434(b)(6)(B)(i).
2. Take no further action that Crestar
Financial Corporation Responsible Good
Government Fund and J. Thomas Vaughan,
as treasurer, violated 2 U.S.C. § 434(a)
(4)(A)(ii).

(continued)

3 2 7 4 0 7 6 5 2 2 7

3. Approve the proposed conciliation agreement, factual and legal analysis, and letter attached to the General Counsel's report dated July 27, 1989, subject to amendment to correct the citations as needed to conform with the actions noted above.

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

Attest:

8-9-89

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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STATEMENT OF DESIGNATION OF COUNSEL

MUR 2878

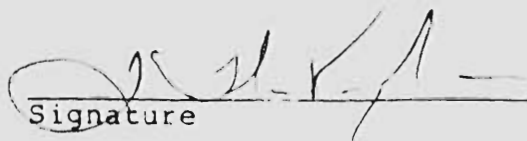
NAME OF COUNSEL: John C. Clark, III

ADDRESS: 919 East Main Street
Richmond
Virginia 23219

TELEPHONE: (804) 782-7445

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.

August 23, 1989
Date


Signature

RESPONDENT'S NAME: J. Thomas Vaughan

ADDRESS: 919 East Main Street
Richmond
Virginia 23219

HOME PHONE: (804) 740-7966

BUSINESS PHONE: (804) 782-7906

SENSITIVE

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

89 SEP 12 AM 10:18

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Crestar Financial Corporation)	
Responsible Government Fund)	
and J. Thomas Vaughan, as)	MUR 2878
treasurer)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by J. Thomas Vaughan, the treasurer of the Crestar Financial Responsible Government Fund.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with the Crestar Financial Corporation Responsible Government Fund and J. Thomas Vaughan, as treasurer.
2. Close the file.

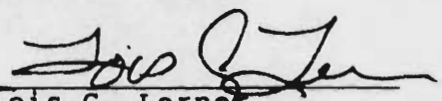
83040763230

3. Approve the attached letter.

Lawrence M. Noble
General Counsel

9/11/89
Date

BY:


Lois G. Lerner
Associate General Counsel

Attachments

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

Staff Assigned: Jeffrey Long

8 3 0 4 0 7 6 5 2 3 1

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Crestar Financial Corporation) MUR 2878
Responsible Government Fund)
and J. Thomas Vaughan, as)
treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 14, 1989, the Commission decided by a vote of 4-0 to take the following actions in MUR 2878:

1. Accept the conciliation agreement with the Crestar Financial Corporation Responsible Government Fund and J. Thomas Vaughan, as treasurer, as recommended in the General Counsel's Report dated September 11, 1989.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's Report dated September 11, 1989.

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

Attest:

9-14-89

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Tuesday, September 12, 1989 10:18 a.m.
Circulated to the Commission: Tuesday, September 12, 1989 4:00 p.m.
Deadline for vote: Thursday, September 14, 1989 4:00 p.m.

930407632



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

September 21, 1989

J. Thomas Vaughan, Treasurer
Crestar Financial Corporation
Responsible Government Fund
919 East Main Street
Richmond, Virginia 23261

CLOSED

RE: MUR 2878
Crestar Financial Corporation
Responsible Government Fund
and J. Thomas Vaughan, as
treasurer

Dear Mr. Vaughan:

On September 14, 1989, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your behalf in settlement of a violation of 2 U.S.C. §§ 434(a)(4)(A)(iv) and 434(b)(6)(B)(i), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to the Crestar Financial Corporation Responsible Government Fund, and you as treasurer. This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

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

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any

J. Thomas Vaughan, Treasurer
Page 2

questions, please contact Jeffrey Long, the staff member
assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY:

Lois G. Lerner
Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

83040765234

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Crestar Financial Corporation)
Responsible Government Fund and) MUR 2878
J. Thomas Vaughan, 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 reason to believe that Crestar Financial Corporation Responsible Government Fund and J. Thomas Vaughan, as treasurer, ("Respondents") violated 2 U.S.C. §§ 434(a)(4)(A)(iv) and 434(b)(6)(B)(i).

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

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

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

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

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

1. Crestar Financial Corporation Responsible Government Fund is a political committee within the meaning of 2 U.S.C. § 431(4).

2. J. Thomas Vaughan is the treasurer of Crestar Financial Corporation Responsible Government Fund.

3. Respondents filed a 1988 Post-General Election Report on December 9, 1988, which disclosed contributions totaling \$1,250.00 to two federal candidates. Respondents initially reported these contributions as made during the 1988 pre-general election reporting period.

4. Respondents provided supplemental information which demonstrated that the dates for making the two contributions were reported inaccurately.

5. Section 434(a)(4)(A)(iv) of Title 2 provides that in a non-election year unauthorized committees shall file a Year-End Report covering the period beginning July 1 and ending December 31, which shall be filed no later than January 31 of the following calendar year.

6. Respondents were required to file the 1987 Year-End Report no later than January 31, 1988. Respondents did not file the 1987 Year-End Report until April 1, 1988, 61 days late, disclosing \$50,636.52 in receipts and \$31,854.58 in disbursements. Respondents amended that report on August 7, 1988 to disclose \$43,128.48 in receipts and \$11,254.58 in disbursements.

V. 1. Respondents failed to accurately report the dates on

which it made contributions to two federal candidates on the 1988 Post-General Report, in violation of 434(b)(6)(B)(i).

2. Respondents failed to file in a timely manner the 1987 Year-End Report in violation of 2 U.S.C. § 434(a)(4)(A)(iv).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of six hundred dollars (\$600.00), 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 executed same and the Commission has approved the entire agreement.

IX. Respondents shall have no more than 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.

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

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY:

Lois G. Lerner
Lois G. Lerner
Associate General Counsel

September 21, 1989
Date

FOR THE RESPONDENTS:

J. Thomas Vaughan
J. Thomas Vaughan
Treasurer
Crestar Financial Corporation
Responsible Government Fund

August 24, 1989
Date

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2878

DATE FILMED 9/29/89 CAMERA NO. 3

CAMERAMAN AS

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