



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2950

DATE FILMED 1/11/89 CAMERA NO. 4

CAMERAMAN AS

800407/1427



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

June 16, 1989

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

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

SUBJECT: UNAUTHORIZED QUARTERLY FILERS WHICH FAILED TO FILE
THE 1988 12 DAY PRE-GENERAL REPORT BY ELECTION DAY

JUN 19 11:41

The attached list of unauthorized committees consists of thirty-seven (37) quarterly filers which failed to file a 1988 12 Day Pre-General Report by Election Day, November 8, 1988.

Unlike the mandatory reporting requirement placed upon monthly filers, 2 U.S.C. §434(a)(4)(A)(ii) requires quarterly filers to submit 12 Day Pre-General Reports only if the committees make contributions to or expenditures on behalf of federal candidates in the general election. All unauthorized committees were sent prior notification regarding the pre- and post-general filing requirements on October 3, 1988 (Attachment 38).

The Party/Non-Party Branch conducted a thorough examination to identify quarterly filers disclosing contributions or expenditures between October 1 and October 19, 1988. The research revealed committees that submitted:

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

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

A-000-1

89NF-69 through 89NF-105

List of Committees and Prior Commission Actions

- 1.
- 2.
3. ~~232~~
- 4.
- 5.
- 6.
- 7.
- 8.
- 9.
10. C00018945 Dorsey Political Fund 39NF-73
- 11.
- 12.
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A-00002

33040771429

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320407/1430

A-00003

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37.

38.

3 2 0 4 0 7 1 4 3 1

A-00004

COMMITTEE ID, NAME AND ADDRESS

CONTACTS
WITH FILER ATCHREPORTS FILED
RESPONSES

230407/1432

A-00005

23040771435

Attachments 10a-10

C00018945

DORSEY POLITICAL FUND

TREASURER'S NAME: DOUGLAS B DONOVAN (8/29/88 to present)*

2200 FIRST BANK PLACE EAST

MINNEAPOLIS

MN 55402

Telecon
1/25/891988 12 Day
Pre-General
Report filed
2/3/89, lette
filed 2/6/89

*James R. Brandt (1/25/83 to 8/28/88)

A-00000

COMMITTEE ID, NAME AND ADDRESS

CONTACTS
WITH FILED ATCH

REPORTS FILED/
RESPONSES

330407/1434

A-00007

3 0 0 4 0 7 / 1 4 3 5

A-00000

COMMITTEE ID, NAME AND ADDRESS

CONTACTS
WITH FILER ATCHREPORTS FILED/
RESPONSES

00040771430

A-00000

220407/1437

A-00010

COMMITTEE ID, NAME AND ADDRESS

CONTACTS
WITH FILER ATCH

REPORTS FILED/
RESPONSES

330407/1438

A-00011

000407/1439

A-00012

Dorsey Political Fund
(Attachments 10a - 10g)

8004071440

8 0 0 4 0 7 7 1 4 4 1

FEDERAL ELECTION COMMISSION

1 JAN 1989

COMMITTEE INFO BY DISCLOSURE DOCUMENTS - (C)

DATE 24MAY89

PAGE 3

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
						TYPE OF FILER
DORSEY POLITICAL FUND						
CORRECTED ORGANIZATION: DORSEY, WINDHURST, BRADFORD, WHITNEY...						
1987	MID YEAR REPORT	12,671	9,325	1JAN87 - 30JUN87	30	87FEC/480/5311
	YEAR END	375	7,755	1JUL87 - 31DEC87	11	88FEC/507/3554
1988	STATEMENT OF ORGANIZATION - AMENDMENT			29AUG88	2	88FEC/543/4556
	APRIL QUARTERLY	8,134	2,900	1JAN88 - 31MAR88	28	88FEC/516/2876
	JULY QUARTERLY	12,990	9,300	1APR88 - 30JUN88	30	88FEC/541/2705
	NOTICE OF FAILURE TO FILE			1APR88 - 30JUN88	1	88FEC/541/0429
	FIRST LETTER INFORMATIONAL NOTICE			1APR88 - 30JUN88	1	88FEC/545/0849
	OCTOBER QUARTERLY	11,478	6,525	1JUL88 - 30SEP88	31	88FEC/559/0484
	PRE-GENERAL	0	5,950	1OCT88 - 19OCT88	9	89FEC/583/5041
	POST GENERAL	360	10,595	20OCT88 - 28NOV88	15	89FEC/583/5026
	NOTICE OF FAILURE TO FILE			28NOV88	1	89FEC/576/2181
	FIRST LETTER INFORMATIONAL NOTICE			20OCT88 - 28NOV88	2	89FEC/586/4847
	YEAR END	478	3,200	29NOV88 - 31DEC88	7	89FEC/583/5019
1989	MISCELLANEOUS REPORT TO FEC			6FEB89	2	89FEC/584/2321
TOTAL		56,426	0	55,550	0	170 TOTAL PAGES

All reports have been reviewed.

Ending cash-on-hand as of 12/31/88: \$1,572

Outstanding debts owed to or by the committee as of 12/31/88: \$0

ATTACHMENT 10a

MEMORANDUM TO THE FILES:

COMMITTEE: Dorsey Political Fund
I.D. NUMBER: C00018945
CONTACT: Ms. Wilson
DATE: 1/25/89
ANALYST: Brian Hancock
SUBJECT: Failure to File the 1988 30G and 12G Reports

I spoke with Ms. Wilson this morning regarding the Fund's failure to file the 30 Day Post General Report. Ms. Wilson stated that to her knowledge, the Fund never received the customary Reporting Notice for this report and for this reason did not realize that a filing was due. After I explained the coverage dates and the content of the report, Ms. Wilson stated that she would also need to send the Commission a 12 Day Pre-General Report as well, since the Fund had made contributions to Federal candidates during the 10/1 to 10/19 period. She promised to send the two delinquent reports, along with a letter of explanation as soon as possible.

330407/1442

RECEIVED
FEDERAL ELECTION COMMISSION
MAR 20 1989

COPIED - 3 APR 11 89

Dorsey Political Fund

3200 First Bank Plaza

C/O, 3200 First Bank Plaza

Minneapolis, MN 55403

April 1989

This report is a continuation
of the report filed for the reporting period

- (a) ☐ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☐ January 31 Year End Report
☐ July 31 Mid Year Report (Plan-election Year Only)

* Quarterly Report Due On:

- | | | |
|--------------------------------------|---------------------------------------|--------------------------------------|
| <input type="checkbox"/> February 28 | <input type="checkbox"/> June 30 | <input type="checkbox"/> October 30 |
| <input type="checkbox"/> March 31 | <input type="checkbox"/> July 31 | <input type="checkbox"/> November 30 |
| <input type="checkbox"/> April 30 | <input type="checkbox"/> August 31 | <input type="checkbox"/> December 31 |
| <input type="checkbox"/> May 31 | <input type="checkbox"/> September 30 | <input type="checkbox"/> January 31 |

☐ with this report preceding General

(Type of Election)

election on 11/8/88 in the State of MI☐ This is a day report following the General Election on

in the State of _____

☐ Termination Report(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>10/19/88</u>		
6. (a) Cash on Hand January 1, 19 <u>88</u>		\$ 1,661.46
(b) Cash on Hand at Beginning of Reporting Period	\$ 20,539.46	
(c) Total Receipts (from Line 18)	\$ -0-	\$ 37,603.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 20,539.46	\$ 39,264.46
7. Total Disbursements (from Line 28)	\$ 5,950.00	\$ 24,675.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 14,589.46	\$ 14,589.46
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$	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)	\$	

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

Douglas D. Donovan

Signature of Treasurer

Douglas D. Donovan

Date

1/31/89

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

FEC FORM 3X

(revised 4/87)

30035835041

11. CONTRIBUTIONS			
(a) Individuals (other than political committees)			
(b) Political Party Committees			
(c) Other Political Committees (such as PACs)			
(d) TOTAL CONTRIBUTIONS (add 11(a), (b), and (c))			26,553.00
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES			
13. ALL LOANS RECEIVED			
14. LOAN REPAYMENTS RECEIVED			
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			11,850.00
17. OTHER RECEIPTS (Dividends, Interest, etc.)			
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)			37,403.00
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES			
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		2,200.00	7,200.00
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		3,750.00	17,425.00
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)		5,950.00	24,625.00
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)			

39033835042

GENERAL

FUNDING INFORMATION

Page Number	21
Page Title	Page 21

BOSNEY POLITICAL FUND

A. Full Name, Mailing Address and ZIP Code Curt Schripf for U.S. Congress 1800 North Broadway Rochester, MN 55904	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/7/88	Amount of Each Disbursement This Period \$ 50.00
B. Full Name, Mailing Address and ZIP Code Friends of Vin Weber P.O. Box 848 New Ulm, MN 56073	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/7/88	Amount of Each Disbursement This Period \$50.00
C. Full Name, Mailing Address and ZIP Code Stangeland for Congress P.O. Box 704 Moorhead, MN 56560	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/7/88	Amount of Each Disbursement This Period \$ 50.00
D. Full Name, Mailing Address and ZIP Code Engeleiter for Senate P.O. Box 822 Brookfield, WI 53008-0822	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/13/88	Amount of Each Disbursement This Period \$100.00
E. Full Name, Mailing Address and ZIP Code Durenberger '88 RE-Election Campaign 8120 Penn Ave. So. #156 Bloomington, MN 55431	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/13/88	Amount of Each Disbursement This Period \$500.00
F. Full Name, Mailing Address and ZIP Code Harlenee for Congress Billings, MT	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/13/88	Amount of Each Disbursement This Period \$250.00
G. Full Name, Mailing Address and ZIP Code Dawkins for U.S. Senate Newark, NJ	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/13/88	Amount of Each Disbursement This Period \$250.00
H. Full Name, Mailing Address and ZIP Code DFL/Dukakis for President 3033 Excelsior Boulevard Suite 417 Minneapolis, MN	Purpose of Disbursement contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 10/13/88	Amount of Each Disbursement This Period \$100.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

\$1,350.00

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Any contribution made by an individual to a political committee or for a candidate for election to federal office must be reported on this schedule.

Page 1 of 1
 Form Line Number
 11

BUREAU POLITICAL FUND

A. Full Name, Mailing Address and ZIP Code Berenberger '88 Re-election Committee 8120 Penn Ave. So. #156 Bloomington, MN 55431	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):	Date (month, day, year) 10/19/88	Amount of Each Disbursement This Period \$500.00
B. Full Name, Mailing Address and ZIP Code Re-Elect Stangeland to Congress Committee 129 7th Ave. St. Paul, MN 55101	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):	Date (month, day, year) 10/19/88	Amount of Each Disbursement This Period \$250.00
C. Full Name, Mailing Address and ZIP Code Hanson '88 Committee P.O. Box 2353 St. Paul, MN 55101	Purpose of Disbursement Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):	Date (month, day, year) 10/14/88	Amount of Each Disbursement This Period \$100.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General 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 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 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 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 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 Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

850.00

TOTAL This Period (last page this line number only)

850.00

3004071440
 300359350440

**FEDERAL ELECTION COMMISSION
ADMINISTRATIVE DIVISION**

80FEB-6 412P-39

BORSEY & WHITNEY

1000 FIRST BANK PLAZA EAST

MINNEAPOLIS, MINNESOTA 55402

(612) 540-1000

TELEX 80-0000

TELETYPE (612) 540-1000

DOUGLAS D. DONOVAN

(612) 540-7000

1000 FIRST BANK PLAZA EAST

MINNEAPOLIS, MINNESOTA 55402

(612) 540-1000

TELEX 80-0000

TELETYPE (612) 540-1000

1000 FIRST BANK PLAZA EAST

MINNEAPOLIS, MINNESOTA 55402

(612) 540-1000

1000 FIRST BANK PLAZA EAST

MINNEAPOLIS, MINNESOTA 55402

(612) 540-1000

TELEX 80-0000

TELETYPE (612) 540-1000

1000 FIRST BANK PLAZA EAST

MINNEAPOLIS, MINNESOTA 55402

(612) 540-1000

February 1, 1989

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

Re: Your letter dated January 6, 1989
Identification Number: C00018945
30 Day Post-General Report (through 11/28/88)

Dear Mr. Gibson:

To our knowledge, we did not receive notification regarding the above report. After consulting with Brian Hancock, we have prepared and filed reports on January 31, 1989, covering the periods October 1, 1988 through October 19, 1988; October 20, 1988 through November 28, 1988; and November 29, 1988 through December 31, 1988.

If you need further information, please let me know.

Very truly yours,

Douglas D. Donovan
Douglas D. Donovan

/rlw

80-0000-45037423217

RECEIVED
FEDERAL ELECTION COMMISSION

89 AUG -9 AM 10: 03

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD REFERRAL: 89NF-69 thru
89NF-105

STAFF MEMBER: Gregory Baker

SOURCE: Internally Generated

RESPONDENTS: a.

b.

c.

d.

e.

f.

g.

h.

i.

j. Dorsey Political Fund and Douglas D. Donovan,
as treasurer (89NF-78)

k.

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2004071448

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

INTERNAL REPORTS CHECKED: Disclosure Reports and
Referral Materials

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred the above (37) committees to the Office of the General Counsel on June 16, 1989. (Attachment 1). The basis for the attached referral is

300407 / 1450

the committees' failure to file the 12 Day Pre-General Report by October 27, 1988.

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, such committees shall submit 12 Day Pre-General Reports if the Committees make any contributions to or expenditures on behalf of federal candidates in the general election. 2 U.S.C. § 434(a)(4)(A)(ii). The 12 Day Pre-General Report is due as of the 12th day before the election (October 27, 1988) and should be complete as of the 20th day before the election (October 19, 1988). The Committees were notified on October 3, 1988, that the report was due on October 27, 1988.

The (37) committees fall into three categories;

(1) committees that filed 12 Day Pre-General Reports in an untimely manner, (2) committees that filed 30 Day Post-General Reports indicating that 12 Day Pre-General Reports should have been filed, and (3) committees that filed Year End Reports indicating that 12 Day Pre-General Reports should have been filed. The following Committees did not file the 1988 12 Day Pre-General Report by October 27, 1988:

3 0 0 4 0 7 / 1 4 5 1

Dorsey Political Fund (89NF-78)

February 3, 1989

800407/1452

- (2) 30 Day Post-General Reports Indicating that 12 Day Pre-General Reports should have been filed.

3 2 0 4 0 7 7 1 4 5 3

- (3) Year End Reports Indicating that 12 day Pre-General Reports should have been filed.

330407/1454

Accordingly, the Office of the General Counsel recommends that the Commission open Matters Under Review and find reason to believe that the above committees and their treasurers violated 2 U.S.C. § 434(a)(4)(A)(ii).

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

This Office also recommends that the Commission offer to enter into conciliation prior to a finding of probable cause to believe with respect to the (37) referred committees. Attached for the Commission's approval are proposed conciliation agreements (Attachment 2). The proposed agreements provide for an admission of the violation and civil penalties computed as follows:

(Pages 9-44 refer to other respondents and have been deleted from this file).

2004071455

IV. RECOMMENDATIONS

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

Dorsey Political Fund and Douglas D. Donovan, as treasurer
(89NF-78)

890407/1456

33040771457

2. Enter into conciliation with the following committees and their treasurers prior to a finding of probable cause to believe.

890407/1458

Dorsey Political Fund and Douglas D. Donovan, as treasurer
(89NF-78)

330407/1459

890407/1460

3. Approve the attached letters, Factual and Legal Analyses, and proposed conciliation agreements to be sent to the respective respondents listed in Recommendation 2.

Lawrence M. Noble
General Counsel

8/7/89
Date

BY: 
Lois G. Lerner
Associate General Counsel

Attachments:

- A. Referral materials
- B. Proposed Conciliation Agreements (37),
Letters and Factual and Legal Analyses (37)

22040771461

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

RAD REFERRALS

#89NF-69 through

#89NF-105

Dorsey Political Fund and Douglas D.
Donovan, as treasurer (89NF-78)

(continued)

200407/1462

**Federal Election Commission
Certification for RAD Referrals
89NF-69 through 89NF-105
August 22, 1989**

Page 2

36471463

(continued)

**Federal Election Commission
Certification for RAD Referrals
89NF-69 through 89NF-105
August 22, 1989**

Page 3

3304971454

(continued)

Federal Election Commission
Certification for RAD Referrals
89NF-69 through 89 NF-105
August 22, 1989

Page 5

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the
Federal Election Commission executive session of August 22,
1989, do hereby certify that the Commission decided by a
vote of 4-0 to take the following actions with respect to
RAD Referrals 89NF-69 through 89NF-105:

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

(continued)

2004071466

Federal Election Commission
Certification for RAD Referrals
89NF-69 through 89NF-105
August 22, 1989

Page 6

Dorsey Political Fund and Douglas D. Donovan,
as treasurer (89NF-78)

9904071467

(continued)

Federal Election Commission
Certification for RAD Referrals
89NF-69 through 89NF-105
August 22, 1989

Page 7

330407/1458

(continued)

Federal Election Commission
Certification for RAD Referrals
89NF-69 through 89NF-105
August 22, 1989

Page 8

99040771469

2. Enter into conciliation with the following committees and their treasurers prior to a finding of probable cause to believe:

(continued)

Federal Election Commission
Certification for RAD Referrals
89NF-69 through 89NF-105
August 22, 1989

Page 9

89040771470
Dorsey Political Fund and Douglas D. Donovan,
as treasurer (89NF-78)

(continued)

Federal Election Commission
Certification for RAD Referrals
89NF-69 through 89NF-105
August 22, 1989

Page 10

330407 / 1471

(continued)

Federal Election Commission
Certification for RAD Referrals
89NF-69 through 89NF-105
August 22, 1989

Page 11

89040771472

(continued)

Federal Election Commission
Certification for RAD Referrals
89NF-69 through 89NF-105
August 22, 1989

Page 12

3. Approve the letters, Factual and Legal Analyses, and proposed conciliation agreements to be sent to the respective respondents listed in Action 2 above, as recommended in the General Counsel's report dated August 7, 1989, subject to amendment of two of the agreements as agreed in the meeting of August 22, 1989.

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

Attest:

8-25-89

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

3304071473



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 6, 1989

Douglas D. Donovan, Treasurer
Dorsey Political Fund
2200 First Bank Place East
Minneapolis, MN 55402

RE: MUR 2950
Dorsey Political Fund
and Douglas D. Donovan,
as treasurer

Dear Mr. Donovan:

On August 22, 1989, the Federal Election Commission found that there is reason to believe Dorsey Political Fund ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

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.

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Douglas D. Donovan, Treasurer
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 Tamara Kapper, the staff person assigned to this matter, at (202) 376-5690.

Sincerely,


Danny L. McDonald
Chairman

Enclosures

- A. Factual and Legal Analysis
- B. Procedures
- C. Designation of Counsel Form
- D. Conciliation Agreement

330407/1475



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 27, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Douglas D. Donovan, Treasurer
Dorsey Political Fund
2200 First Bank Place East
Minneapolis, MN 55402

RE: MUR 2950

Dear Mr. Donovan:

On September 6, 1989, you were notified that the Federal Election Commission determined to enter into negotiations directed toward reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. On that same date you were sent a conciliation agreement offered by the Commission in settlement of this matter.

Please note that conciliation negotiations entered into prior to a finding of probable cause to believe are limited to a maximum of 30 days. To date, you have not responded to the proposed agreement. The 30 day period for negotiations will soon expire. Unless we receive a response from you within five days, this Office will consider these negotiations terminated and will proceed to the next stage of the enforcement process.

Should you have any questions, please contact Tamara Kapper, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

A handwritten signature in dark ink, appearing to read "LGL", is written over the typed name of Lois G. Lerner.

BY: Lois G. Lerner
Associate General Counsel

2004071475

06C 4235

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

DORSEY & WHITNEY

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

2200 FIRST BANK PLACE EAST
MINNEAPOLIS, MINNESOTA 55402

(612) 340-2600

TELEX 29-0605

FAX (612) 340-2868

DOUGLAS D. DONOVAN
DIRECTOR OF FINANCE & ADMINISTRATION
(612) 343-7900

89 OCT 10 AM 11:04

340 FIRST NATIONAL BANK BUILDING
ROCHESTER, MINNESOTA 55903
(507) 266-3156

105 FIRST NATIONAL BANK BUILDING
WAYZATA, MINNESOTA 55391
(612) 475-0373

1200 FIRST INTERSTATE CENTER
BILLINGS, MONTANA 59103
(406) 252-3800

201 DAVIDSON BUILDING
GREAT FALLS, MONTANA 59401
(406) 727-3632

127 EAST FRONT STREET
MISSOULA, MONTANA 59802
(406) 721-6025

RECEIVED
FEDERAL ELECTION COMMISSION
89 OCT 10 PM 3:00

350 PARK AVENUE
NEW YORK, NEW YORK 10022
(212) 415-9800

1100 CONNECTICUT AVENUE, N. W.
WASHINGTON, D. C. 20006
(202) 837-0700

3 GRACECHURCH STREET
LONDON EC3V 0AT, ENGLAND
01-989-3334

36, RUE TRONCHET
75009 PARIS, FRANCE
01-42-66-59-49

FAR EAST FINANCE CENTER
HONG KONG
852-5-8612555

October 5, 1989

Ms. Tamara Kapper
Federal Election Commission
Washington, D.C. 20463

Dear Ms. Kapper:

In accordance with our discussion on October 5, 1989, we are enclosing a signed Conciliation Agreement dated October 5, 1989, and a check for \$500.00 as required under Article VI of the Agreement.

Thank you for your help in resolving the confusion regarding this matter.

Very truly yours,

Douglas D. Donovan

Douglas D. Donovan

DDD/rlw
Enclosures
BY CERTIFIED MAIL

89 OCT 18 AM 11:22

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Dorsey Political Fund
and Douglas D. Donovan,
as treasurer

)
)
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)
)

MUR 2950

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Douglas D. Donovan, the treasurer of Dorsey Political Fund. The attached agreement contains no changes from the agreement approved by the Commission on August 22, 1989. Along with the signed agreement, respondents have submitted a check in payment of the civil penalty.

II. RECOMMENDATIONS


1. Accept the attached conciliation agreement with Dorsey Political Fund and Douglas D. Donovan, as treasurer.
2. Approve the attached letter.
3. Close the file in this matter.

Lawrence M. Noble
General Counsel

Date

10/17/89

BY:


Lois G. Lerner
Associate General Counsel

Attachments

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

Staff Assigned: Tamara Kapper

30040771478

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Dorsey Political Fund and) MUR 2950
Douglas D. Donovan, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 20, 1989, the Commission decided by a vote of 4-0 to take the following actions in MUR 2950:

1. Accept the conciliation agreement with Dorsey Political Fund and Douglas D. Donovan, as treasurer, attached to the General Counsel's Report dated October 17, 1989.
2. Approve the letter attached to the General Counsel's Report dated October 17, 1989.
3. Close the file in this matter.

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

Attest:

10-22-89
Date

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

Received in the Secretariat: Wednesday, October 18, 1989 11:22
Circulated to the Commission: Wednesday, October 18, 1989 4:00
Deadline for vote: Friday, October 20, 1989 4:00

330407/1479



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

October 26, 1989

Douglas D. Donovan, Treasurer
Dorsey Political Fund
2200 First Bank Place East
Minneapolis, MN 55402

RE: MUR 2950
Dorsey Political Fund
and Douglas D. Donovan,
as treasurer

CLOSED

Dear Mr. Donovan:

On October 20, 1989, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted by you in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(ii), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to Dorsey Political 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 questions, please contact Tamara Kapper, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

3904071430

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Dorsey Political Fund) MUR 2950
and Douglas D. Donovan,)
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 the Dorsey Political Fund and Douglas D. Donovan, as treasurer, ("Respondents") violated 2 U.S.C. § 434(a)(4)(A)(ii).

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

I. The Commission has jurisdiction over 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 his matter.

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

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

830407/1481

1. Dorsey Political Fund is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Douglas D. Donovan is the treasurer of Dorsey Political Fund.

3. Section 434(a)(4)(A)(ii) of Title 2 provides that unauthorized committees filing quarterly shall file 12 Day Pre-General Reports if the committee makes any contributions to or expenditures on behalf of federal candidates in the general election. The pre-election reports are to be filed no later than the 12th day before the election and should be complete as of the 20th day before the election.

4. Respondents were required to file the 1988 12 Day Pre-General Report no later than October 27, 1988. Respondents did not file the 12 Day Pre-General Report until February 3, 1989, 99 days late, disclosing \$0.00 in receipts and \$5,950.00 in disbursements for the relevant reporting period.

V. Respondents failed to file the 1988 12 Day Pre-General Report in a timely fashion in violation of 2 U.S.C. § 434(a)(4)(A)(ii).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Five Hundred Dollars (\$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

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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 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 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

10-25-89
Date

FOR THE RESPONDENTS:

Douglas D. Donovan
(Name) DOUGLAS D. DONOVAN
(Position) TREASURER

October 5, 1989
Date

3004071433



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2950

DATE FILMED 1/1/89 CAMERA NO. 4

CAMERAMAN AS

29040711494