



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

THIS IS THE BEGINNING OF MUR # 2966

DATE FILMED 11/12/89 CAMERA NO. 2

CAMERAMAN AS

890407B1985



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 *JDG*
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. In accordance with Standard 3 of the RAD Review and Referral Procedures for Unauthorized Committees, further examination is required by your office.

Unlike the mandatory reporting requirement placed upon monthly filers, 2 U.S.C. §434(a)(4)(A)(ii) requires quarterly filers to submit 12 Day Pre-General Reports only if the committees make contributions to or expenditures on behalf of federal candidates 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

890407B1986

List of Committees and Prior Commission Actions

89040731987

8 9 0 4 0 7 8 1 9 8 8

26. C00105635

Northwestern Bell Telephone Company
Federal Political Action Committee
(NWB FED PAC)

89NF-94

Attachments 26a-26g

C00105635

NORTHWESTERN BELL TELEPHONE COMPANY FEDERAL POLITICAL ACTION COMMITTEE (NWB FED PAC)

None

1988 12 Day Pre

TREASURER'S NAME: KEN L DETWEILER (7/11/88 to present)*

General Report

1314 DOUGLAS ON THE MALL 14TH FL

filed 12/8/88

OMAHA

NE 68102

*Donald Heiliger (1/1/87-7/10/88)

3 3 0 4 0 7 8 1 9 8 9

**Northwestern Bell Telephone Company Federal Political Action
Committee (NWB Fed PAC)**

(Attachments 26a - 26g)

89040761900

8 9 0 4 0 7 6 1 2 2 1

FEDERAL ELECTION COMMISSION
1987-1988

DATE 22MAY89

COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
				TYPE OF FILE		
NORTHWESTERN BELL TELEPHONE COMPANY FEDERAL POLITICAL ACTION COMMITTEE (NWB FED PAC)				ID #C00105635 NON-PARTY QUALIFIED		
CONNECTED ORGANIZATION: NORTHWESTERN BELL TELEPHONE COMPANY						
1987	MID-YEAR REPORT	33,034	18,519	1JAN87 -30JUN87	15	87FEC/473/4549
	YEAR-END	12,817	17,096	1JUL87 -31DEC87	17	88FEC/500/0266
1988	STATEMENT OF ORGANIZATION - AMENDMENT			15JUL88	3	88FEC/537/3320
	48 HOUR CONTRIBUTION NOTICE			1NOV88	1	88FEC/564/1291
	APRIL QUARTERLY	13,269	21,637	1JAN88 -31MAR88	14	88FEC/519/2648
	JULY QUARTERLY	15,879	16,566	1APR88 -30JUN88	19	88FEC/537/3323
	JULY QUARTERLY - AMENDMENT	15,879	16,566	1APR88 -30JUN88	12	88FEC/543/4158
	OCTOBER QUARTERLY	16,430	47,145	1JUL88 -30SEP88	21	88FEC/555/0299
	PRE-GENERAL	2,605	2,556	1OCT88 -19OCT88	16	88FEC/573/5487
	POST-GENERAL	5,268	2,540	20OCT88 -28NOV88	18	88FEC/574/3611
	YEAR-END	7,786	3,084	29NOV88 -31DEC88	17	89FEC/581/3091
1989	TERMINATION APPROVAL			28APR89	1	89FEC/592/5325
TOTAL		107,088	0 129,143	0	154	TOTAL PAGES

All reports have been reviewed.

Ending cash-on-hand as of 12/31/88: \$32,388

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

8 9 7 4 0 7 6 1 9 9 2

FEDERAL ELECTION COMMISSION

1982-1990

COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE (2JUN89)

PAGE 2

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES TYPE OF FILE	MICROFILM LOCATION
NORTHWESTERN BELL TELEPHONE COMPANY FEDERAL POLITICAL ACTION COMMITTEE (NWB FED PAC)						ID #C00105635 NON-PARTY QUALIFIED
CONNECTED ORGANIZATION: NORTHWESTERN BELL TELEPHONE COMPANY						
	1989 TERMINATION REPORT	126	32,514	1JAN89 -12APR89	9	89FEC/591/2113
	TOTAL TERMINATED	126	0 32,514	0	9	TOTAL PAGES

This report has been reviewed.

Ending cash-on-hand as of 4/12/89: \$0

Outstanding debts owed to or by the committee as 4/12/89: \$0

ATTACHMENT 26b

00 DEC 12 PM 1:30

1. NAME OF CANDIDATE
[REDACTED]

2. NAME OF COMMITTEE
[REDACTED]

3. ADDRESS
[REDACTED]

4. CITY AND STATE ZIP CODE
[REDACTED]

5. TYPE OF REPORT
[REDACTED]

6. THIS COMMITTEE QUALIFIED AS A REPRESENTATIVE COMMITTEE DURING THIS 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 (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 General**
(Type of Election)
election on 11/08/88 in the State of Nebraska

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

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

SUMMARY		COLUMN A	COLUMN B
Covering Period <u>October 1, 1988 through October 19, 1988</u>		This Period	Calendar Year-to-Date
6	(a) Cash on Hand January 1, 19 <u>88</u>		\$ 64,678.38
	(b) Cash on Hand at Beginning of Reporting Period	\$ 24,908.39	
	(c) Total Receipts (from Line 18)	\$ 2,605.25	\$ 48,184.26
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 27,513.64	\$ 112,862.64
7	Total Disbursements (from Line 28)	\$ 2,556.00	\$ 87,905.00
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 24,957.64	\$ 24,957.64
9	Debts and Obligations Owed TO the Committee (Items all on Schedule C and/or Schedule D)	\$ -0-	For further information contact: Federal Election Commission 900 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10	Debts and Obligations Owed BY the Committee (Items all on Schedule C and/or Schedule D)	\$ -0-	

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 **K. L. Detweiler** Assistant Treasurer **J. C. Laing**

Signature of Treasurer *[Signature]* Assistant Treasurer

Date
12/08/88

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)

3330034307 3 6 4 0 3

71-4119/03

11. CONTRIBUTIONS (other than from Line 11(a))	2,605.25	46,648.00
11(a) CONTRIBUTIONS FROM INDIVIDUALS	2,605.25	46,648.00
11(b) CONTRIBUTIONS FROM POLITICAL COMMITTEES	-0-	-0-
11(c) CONTRIBUTIONS FROM OTHER POLITICAL COMMITTEES (such as PACs)	-0-	-0-
11(d) TOTAL CONTRIBUTIONS (add Lines 11(a), 11(b), and 11(c))	2,605.25	46,648.00
12. TRANSFERS FROM AFFILIATED OTHER PARTY COMMITTEES	-0-	-0-
13. ALL LOANS RECEIVED	-0-	-0-
14. LOAN REPAYMENTS RECEIVED	-0-	-0-
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	-0-	-0-
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-
17. OTHER RECEIPTS (Dividends, Interest, etc.)	-0-	1,536.26
18. TOTAL RECEIPTS (add Lines 11(d), 12, 13, 14, 15, 16 and 17)	2,605.25	48,184.26
I. DISBURSEMENTS		
19. OPERATING EXPENDITURES	-0-	-0-
20. TRANSFERS TO AFFILIATED OTHER PARTY COMMITTEES	-0-	-0-
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	1,784.00	80,638.00
22. INDEPENDENT EXPENDITURES (see Schedule E)	-0-	-0-
23. COORDINATE EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441(a)(4) (see Schedule F))	-0-	-0-
24. LOAN REPAYMENTS MADE	-0-	-0-
25. LOANS MADE	-0-	-0-
26. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees	772.00	6,148.00
(b) Political Party Committees	-0-	-0-
(c) Other Political Committees (such as PACs)	-0-	-0-
(d) TOTAL CONTRIBUTION REFUNDS (add Lines 26(a), 26(b), and 26(c))	772.00	6,148.00
27. OTHER DISBURSEMENTS	-0-	1,119.00
28. TOTAL DISBURSEMENTS (add Lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	2,556.00	87,905.00
II. NET CONTRIBUTIONS/OPERATING EXPENDITURES		
29. TOTAL CONTRIBUTIONS (other than from Line 11(a))	2,605.25	46,648.00
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	772.00	6,148.00
31. NET CONTRIBUTIONS (other than from Line 11(a) from Line 29)	1,833.25	40,500.00
32. TOTAL OPERATING EXPENDITURES (from Line 19)	-0-	-0-
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)	-0-	-0-
34. NET OPERATING EXPENDITURES (add Lines 32 from 33)	-0-	-0-

89034593654824

SCHEDULE 2

Page 2 of 1
Line No. 21

Northwestern Bell Telephone Company Federal PAC

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 giving the name and address of any political committee to solicit contributions from such committee.

Full Name Mailing Address and Zip Code	Purpose Disbursement for	Date	Amount
Durenberger for U. S. Senate Volunteer Committee 8120 Penn Avenue South Bloomington MN 55431 DONOR: R JAMES 300 SYCAMORE LAKE PLYMOUTH, MN 55441	Purpose: Current contribution from Ron James For: General	10/17/88	200.00
Friends of Jim Oberstar P. O. Box 465 Duluth MN 55801 DONOR: NW BELL FEDERAL PAC	Purpose: Current contribution from NWB FED PAC For: General	10/14/88	200.00
Friends of Senator David Karnes 626 N. 109th Plaza Omaha NE 68154 DONOR: J S BELL 2936 SO 76 AVE OMAHA, NE 68124	Purpose: Current contribution from J. S. Bell For: General	10/14/88	22.00
Friends of Senator David Karnes 626 N. 109th Plaza Omaha NE 68154 DONOR: W E CAMPBELL 11606 NO POST ROAD OMAHA, NE 68112	Purpose: Current contribution from W. E. Campbell For: General	10/14/88	50.00
SUBTOTAL of Disbursements This Page			472.00

33334307-361865

SCHEDULE 3

page 3 of 5
Line No. 21FED FUNDED DISBURSEMENTS
Northwestern Bell Telephone Company Federal PAC

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 non-legal purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Full Name Mailing Address and Zip Code	Purpose Disbursement for	Date	Amount
Friends of Senator David Barnes 626 W. 109th Plaza Omaha NE 68154 DONOR: J G VONDRA 9925 DEVONSHIRE ROAD OMAHA, NE 68114	Purpose: Current contribution from J. G. Vondras For: General 10/17/88	10/17/88	50.00
George Bush for President, Inc. Compliance P. O. Box 28186 Washington DC 20038 DONOR: R H FRANK 4409 PINE OMAHA, NE 68105	Purpose: Current contribution from R. H. Frank For: General 10/10/88	10/10/88	118.00
Nason '88 Committee 820 W. St. Germain St. Cloud MN 56301 DONOR: NW BELL FEDERAL PAC	Purpose: Current contribution from NWB FED PAC For: General 10/05/88	10/05/88	200.00
SUBTOTAL of Disbursements This Page			368.00

TR
7

3 7 7 3 4 7 7 3 6 5 1 3 3 5

2004 PAC
RM - 14th Floor
ES. 68102

P 683 000 692

2004 PAC

2004 PAC
RM - 14th Floor
ES. 68102

ATTACHMENT 26g

Federal Election Commission
Public Records
999 E Street, NW
Washington, D.C. 20463

First Class Mail

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.

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f.

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89040761998

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y.

z. Northwestern Bell Telephone Company Federal
Political Action Committee (NWB FED PAC) and Ken
L. Detweiler, as treasurer (89NF-94)

22040761999

aa.

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dd.

ee.

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gg.

hh.

ii.

jj.

kk.

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

89040762000

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:

(1) 12 Day Pre-General Reports Filed in an Untimely Manner.

Name of Committee

Date Report filed

89040762002

Northwestern Bell Telephone Company
Federal Political Action Committee
(NWB FED PAC)(89NF-94)

December 8, 1988

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:

8 3 0 4 0 7 6 2 0 3

26. Northwestern Bell Telephone Company Federal Political Action Committee (NWB FED PAC) (89NF-94).

3 2 0 4 0 7 6 2 0 0 4

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. 6 434(a)(4)(A)(ii).

89040762005

93040762005

Northwestern Bell Telephone Company Federal Political
Action Committee (NWB FED PAC) and Ken L. Detweiler, as
treasurer (89NF-94)

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

83040762007

Northwestern Bell Telephone Company Federal Political
Action Committee (NWB FED PAC) and Ken L. Detweiler, as
treasurer (89NF-94)

8 9 0 4 0 7 6 2 0 0 8

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)

20040762009

71-12-20-1-1

In the Matter of

[illegible]

(continued)

89040762010

22940762012

Northwestern Bell Telephone Company
Federal Political Action Committee
(NWB FED PAC) and Ken L. Detweiler,
as treasurer (89NF-94)

(continued)

200407062013

[illegible]

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):

e

(Continued)

3 3 0 4 0 7 6 2 0 1 4

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

Page 6

89040762015

(continued)

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

Page 7

33040762016

Northwestern Bell Telephone Company Federal
Political Action Committee (NWB FED PAC) and
Ken L. Detweiler, as treasurer (89NF-94)

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

Page 8

22040762017

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

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

Page 9

8 1 0 0 7 6 2 0 1 8

1

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

Page 10

89040762019

(continued)

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

Page 11

Northwestern Bell Telephone Company Federal
Political Action Committee (NWB FED PAC) and
Ken L. Detweiler, as treasurer (89NF-94)

89040762020

(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

89040762021



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

September 12, 1989

Ken L. Detweiler, Treasurer
Northwestern Bell Telephone Company
Federal Political Action Committee
(NWB FED PAC)
1314 Douglas on the Mall
14th Floor
Omaha, NE 68102

RE: MUR 2966
Northwestern Bell Telephone Company
Federal Political Action Committee
(NWB FED PAC) and Ken L. Detweiler,
as treasurer

Dear Mr. Detweiler:

On August 22, 1989, the Federal Election Commission found that there is reason to believe Northwestern Bell Telephone Company Federal Political Action Committee (NWB FED PAC) ("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.

Ken L. Detweiler, 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.

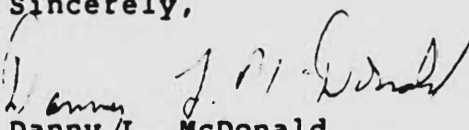
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 Patty Reilly, the attorney 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

33040762023

89 OCT 25 AM 8:12

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Northwestern Bell Telephone)
Company Federal Political Action)
Committee and Ken L. Detweiler,)
as treasurer)

MUR 2966

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement signed by Ruth Anne Evans on behalf of the Northwestern Bell Telephone Company Federal Political Action Committee and Ken L. Detweiler, as treasurer.

The attached agreement contains no changes from the agreement approved by the Commission. A check for the civil penalty accompanied the agreement.

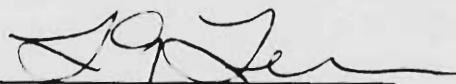
II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Northwestern Bell Telephone Company Federal Political Action Committee and Ken L. Detweiler, as treasurer.
2. Close the file.
3. Approve the attached letter.

Lawrence M. Noble
General Counsel

10-23-89
Date

BY:


Lois G. Verner
Associate General Counsel

Attachments

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

Staff Assigned: Patty Reilly

2 9 0 4 0 7 6 2 0 2 4

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Northwestern Bell Telephone) MUR 2966
Company Federal Political Action)
Committee and Ken L. Detweiler,)
as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 27, 1989, the Commission decided by a vote of 5-0 to take the following actions in MUR 2966:

1. Accept the conciliation agreement with Northwestern Bell Telephone Company Federal Political Action Committee and Ken L. Detweiler, as treasurer, as recommended in the General Counsel's Report dated October 23, 1989.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's Report dated October 23, 1989.

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

Attest:

10-27-89

Date

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

Received in the Secretariat: Wednesday, October 25, 1989 8:12 a.m.
Circulated to the Commission: Wednesday, October 25, 1989 11:00 a.m.
Deadline for vote: Friday, October 27, 1989 11:00 a.m.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 31, 1989

Ken L. Detweiler, Treasurer
Northwestern Bell Telephone
Company Federal Political Action
Committee (NWB FED PAC)
1314 Douglass on the Mall
14th Floor
Omaha, NE. 68102

CLOSED

RE: MUR 2966
Northwestern Bell Telephone Company
Federal Political Action Committee,
and Ken Detweiler, as treasurer

Dear Mr. Detweiler:

On October 27, 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)(ii), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter. This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

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

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

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OGC 4253

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Northwestern Bell Telephone Company)	MUR 2966
Federal Political Action Committee)	
(NWB FED PAC) and Ken L. Detweiler,)	
as treasurer)	

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OFFICE OF THE CLERK
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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 Northwestern Bell Telephone Company Federal Political Action Committee (NWB FED PAC) and Ken L. Detweiler, 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:

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1. Northwestern Bell Telephone Company Federal Political Action Committee (NWB FED PAC) is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Ken L. Detweiler is the treasurer of Northwestern Bell Telephone Company Federal Political Action Committee (NWB FED PAC).

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 December 8, 1988, 42 days late, disclosing \$2,605.25 in receipts and \$2,556.00 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

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issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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

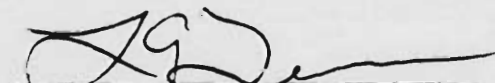
IX. Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

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
Associate General Counsel

10-31-89
Date

FOR THE RESPONDENTS:


(Name)
(Position)
Assistant Secretary

Oct 10, 1989
Date

200407229



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2966

DATE FILMED 4/12/89 CAMERA NO. 2

CAMERAMAN A.S.

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