



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3378

DATE FILMED 11/20/91 CAMERA NO. 2

CAMERAMAN AS

91040875363

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 1 July 1991

ANALYST: Jack MacDonald

I. COMMITTEE: Citizens for Eleanor Holmes Norton
(C00244335)
Pauline Schneider, Treasurer
401 C Street, N.E.
Washington, D.C. 20002

II. RELEVANT STATUTE: 2 U.S.C. §434(a)(6)
11 CFR §104.5(f)

III. BACKGROUND:

Failure to File Forty-Eight Hour Notifications

The Citizens for Eleanor Holmes Norton committee ("the Committee") has failed to file the required Forty-Eight (48) Hour Notifications ("48-Hour Notices") for ten (10) contributions and one (1) loan totaling \$33,000 received prior to the 1990 Primary Election.

The candidate was involved in the 1990 Primary Election held on September 11, 1990. Prior Notice was sent to the Committee on August 6, 1990 (Attachment 2). The Notice includes a section titled "Last-Minute Contributions". This section reads "Committees must also file special notices on contributions of \$1,000 or more are received during the period August 23 through September 8, 1990. The notice must reach the appropriate federal and state offices within 48 hours of the committee's receipt."

Schedules A and C of the October Quarterly Report indicate that the Committee failed to file eleven (11) 48-Hour Notices for contributions received during the aforementioned period (Attachment 3). The following is a list of the contributions for which no 48-Hour Notices were filed:

21040875364

CITIZENS FOR ELEANOR HOLMES NORTON
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

<u>Contributor Name</u>	<u>Date</u>	<u>Amount</u>
Margaret Schink	8/23/90	\$1,000
R. Peter Straus	8/27/90	\$1,000
C. Victor Raiser, III	8/30/90	\$1,000
E. Shane	8/30/90	\$1,000
Franklin D. Raines	9/5/90	\$1,000
Smith Bagley	9/6/90	\$1,000
Carpenter's Legislative PAC	9/7/90	\$1,000
Graphic Communications PAC	8/28/90	\$1,000
People PAC	8/30/90	\$2,500
American Fed. of State PAC	9/4/90	\$2,500
Eleanor Holmes Norton (candidate loan)	9/6/90	\$20,000

On April 23, 1991, a Request for Additional Information ("RFAI") was sent to the Committee (Attachment 4). The RFAI noted on an informational basis that the Committee may have failed to file one or more of the required 48-Hour Notices for "last minute" contributions of \$1,000 or more. The notice requested the Committee to review their procedures for checking contributions received during the aforementioned time period. In addition, the notice stated that although the Commission may take legal steps, any response would be taken into consideration.

On May 21, 1991, a written response was received from the Committee which acknowledged the failure to file eleven (11) 48-hour notices prior to the primary election. The Committee also stated that it was unaware that a candidate loan qualified as a reportable 48-hour notice contribution and will be more attentive to filing 48-hour notices in future election cycles (Attachment 5).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

91040875365

FEDERAL ELECTION COMMISSION
1989-1990

DATE 24JUN93

CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

PAGE 1

CANDIDATE/COMMITTEE/DOCUMENT	RECEIPTS		DISBURSEMENTS		# OF PAGES	MICROFILM LOCATION TYPE OF FILER
	OFFICE SOUGHT/	PARTY	PRIMARY	GENERAL	COVERAGE DATES	
NORTON, ELEANOR H		HOUSE 00 DEMOCRATIC PARTY				DIST OF COLUMBIA 1990 ELECTION ID# H00D000258
1. STATEMENT OF CANDIDATE						
1990 STATEMENT OF CANDIDATE					20APR90	1 90HSE/396/3793
2. PRINCIPAL CAMPAIGN COMMITTEE						
CITIZENS FOR ELEANOR HOLMES NORTON						ID #C00244335 HOUSE
1990 STATEMENT OF ORGANIZATION					30APR90	1 90HSE/397/1326
STATEMENT OF ORGANIZATION - AMENDMENT					15MAY90	1 90HSE/397/3827
STATEMENT OF ORGANIZATION - AMENDMENT					14JUN90	1 90HSE/399/2085
48 HOUR CONTRIBUTION NOTICE					19OCT90	1 90HSE/413/2993
48 HOUR CONTRIBUTION NOTICE					24OCT90	1 90HSE/414/5119
48 HOUR CONTRIBUTION NOTICE					25OCT90	1 90HSE/415/3953
48 HOUR CONTRIBUTION NOTICE					26OCT90	1 90HSE/416/1551
48 HOUR CONTRIBUTION NOTICE					2NOV90	1 90HSE/417/0670
48 HOUR CONTRIBUTION NOTICE					5NOV90	1 90HSE/417/0363
48 HOUR CONTRIBUTION NOTICE					7NOV90	2 90HSE/417/2601
48 HOUR CONTRIBUTION NOTICE					9NOV90	1 90HSE/417/3272
48 HOUR CONTRIBUTION NOTICE					9NOV90	1 90HSE/417/3273
STATEMENT OF ORGANIZATION - AMENDMENT					0DEC90	1 90HSE/421/3236
JULY QUARTERLY	117,246		67,515		1APR90 -30JUN90	31 90HSE/402/3870
JULY QUARTERLY - AMENDMENT	-		-		1APR90 -30JUN90	3 90HSE/407/0111
REQUEST FOR ADDITIONAL INFORMATION					1APR90 -30JUN90	2 90FEC/652/1357
PRE-PRIMARY	154,618		120,390		1JUL90 -22AUG90	37 90HSE/407/0372
OCTOBER QUARTERLY		113,205		190,003	23AUG90 -30SEP90	32 90HSE/413/0959
OCTOBER QUARTERLY - AMENDMENT		-		-	-23AUG90 -30SEP90	2 91HSE/428/1234
REQUEST FOR ADDITIONAL INFORMATION					23AUG90 -30SEP90	6 91FEC/694/1452
REQUEST FOR ADDITIONAL INFORMATION 2ND					23AUG90 -30SEP90	3 91FEC/695/3679
PRE-GENERAL		14,350		18,591	1OCT90 -17OCT90	12 90HSE/415/4499
PRE-GENERAL - AMENDMENT		-		-	- 1OCT90 -17OCT90	2 90HSE/416/1671
POST-GENERAL		41,279		43,877	18OCT90 -26NOV90	26 90HSE/419/1862
YEAR-END	6,743		6,402		27NOV90 -31DEC90	12 91HSE/424/3366
TOTAL	278,607	168,834	194,385	252,471		182 TOTAL PAGES
3. AUTHORIZED COMMITTEES						
4. JOINT FUNDRAISING COMMITTEES AUTHORIZED BY THE CAMPAIGN						

ALL REPORTS HAVE BEEN REVIEWED

ENDING CASH-ON-HAND AS OF 12/31/90: \$584.60

OUTSTANDING DEBTS AS OF 12/31/90: \$55,121.77

PRIMARY ELECTION REPORT NOTICE

FEDERAL ELECTION COMMISSION

DISTRICT OF COLUMBIA

August 6, 1990

REPORT	REPORTING PERIOD1/	REG./CERT. MAILING DATE2/	FILING DATE
PRE-PRIMARY	07/01/90 - 08/22/90	08/27/90	08/30/90
OCTOBER QUARTERLY	08/23/90 - 09/30/90	10/15/90	10/15/90

WHO MUST FILE

PRINCIPAL CAMPAIGN COMMITTEES OF CONGRESSIONAL "CANDIDATES" who seek nomination in the September 11, 1990, District of Columbia Primary.

WHAT MUST BE REPORTED

All financial activity that occurred during the reporting period (or before, if not previously reported).

REPORTING FORMS

Candidate committees use Form 3 (enclosed). If the campaign has more than one authorized committee, the principal campaign committee must also file a consolidated report on Form 32.

WHERE TO FILE

Consult the instructions on the back of the Form 3 Summary Page.

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 CONTRIBUTIONS

Committees must also file special notices on contributions of \$1,000 or more, received during the period August 23 through September 8, 1990. The notice must reach the appropriate federal and state offices within 48 hours of the committee's receipt.

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.

1/The period begins with the close of the last report filed by the committee. If the committee has filed no previous reports, the period begins with the date of the committee's first activity.

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

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

9.104.0875367

Citizens For Eleanor Holmes Norton
813 C Street, NW - Washington, DC 20001

ITEMIZED RECEIPTS

PAGE 2 OF 7
FOR LINE 0 11a

PERIOD 08/23/90 TO 09/30/90

NAME AND ADDRESS	EMPLOYER AND OCCUPATION	DATE	AMOUNT	ELECTION
H. Le Baron Taylor 904 Sunshine Lakes Drive Voorhees NJ 08043 YEAR TO DATE \$600.00	CBS Records Executive	08/31/90	\$100.00	Prim
Hyman Bookbinder 6108 Banrockburn Drive Bethesda MD 20817 YEAR TO DATE \$400.00	American Jewish Committee	09/12/90	\$350.00	Prim
Valerie F. Pinson 1822 - 17th Street, NE Washington DC 20018 YEAR TO DATE \$325.00	Nat'l Cable TV Assoc Dir, Gov't Relations	08/27/90	\$100.00	Prim
Thomas G. Krattenmaker 3022 Rodman Street, NW Washington DC 20008 YEAR TO DATE \$250.00	Georgetown Univer. Professor of Law	09/04/90	\$100.00	Prim
Patricia Mathis 1716 U Street, NW Washington DC 20009 YEAR TO DATE \$220.00	Self-employed Consultant	09/12/90	\$20.00	Prim
Wayne L. Horvitz 1820 Jefferson Place, NW Washington DC 20036 YEAR TO DATE \$400.00	Self-employed Consultant	09/11/90	\$200.00	Prim
Margaret Schink 2400 Sand Hill Road Menlo Park CA 94025 YEAR TO DATE \$1000.00	Shaler Adams Foun Director	08/23/90	\$1000.00	Prim
Joan Palevsky 623 S. Beverly Glen Blvd. Los Angeles CA 90024 YEAR TO DATE \$500.00	Retired	08/23/90	\$500.00	Prim
Michael H. Gottesman 3524 Pinetree Terrace Falls Church VA 22041 YEAR TO DATE \$350.00	Wald, Gottesman, et al Attorney	08/27/90	\$350.00	Prim
Garland E. Wood 51 W. 105th Street New York NY 10025 YEAR TO DATE \$500.00	Goldman Sachs & Co Investment Banker	08/27/90	\$500.00	Prim

** conduit; Emily's List
* earmarked; Emily's List

Citizens For Eleanor Holmes Norton
913 G Street, NE - Washington, DC 20001

ITEMIZED RECEIPTS

PAGE 3 OF 7
FOR LINE 0 110

PERIOD 08/23/90 TO 09/30/90

[illegible]

Barbara S. Preiskel	Self-employed	08/27/90	\$500.00	PR1E
36 West 46th Street, Ste 1100	Attorney			
New York NY 10036				
YEAR TO DATE	\$500.00			

R. Peter Straus 1321 4th Street, SW Washington DC 20024 YEAR TO DATE	Straus Communication Media Execs	08/27/90	\$1000.00	Pris
\$1000.00				

J. Bruce Llewellyn 10 Rockefeller Plaza New York NY 10112	Phil. Coca-Cola Bot. Chairman/CEO	08/27/90	\$500.00	Prim
YEAR TO DATE	\$500.00			

Nadine Hach	Self-employed	08/27/90	\$500.00	Prim
Parker House				
Boston	MA 02108			
YEAR TO DATE	\$500.00			

David N. Webster	08/31/90	\$250.00	Prim
2324 California Street, NW			
Washington DC 20008			
YEAR TO DATE		\$250.00	

Patricia L. Irvin	Milhand, Tweed et al	08/31/90	\$250.00	Prin
100 W. 85th Street #2-0	Attorney			
New York NY 10024				
YEAR TO DATE	\$250.00			

C. Victor Ralser, II	Jones & Day	08/30/90	\$1000.00	PAID
3318 O Street, NW	Attorney			
Washington DC 20007				
YEAR TO DATE	\$1000.00			

Martha T. Wallau	08/30/90	\$250.00	Prin
1215 Fifth Avenue			
New York NY 10029			
YEAR TO DATE		\$250.00	

Herbert S. Winokur, Jr.	08/30/90	\$300.00	PRIN
341 North Street			
Greenwich CT 06830			
YEAR TO DATE		\$300.00	

E. Shane	06/30/90	\$1000.00	Pr
(information requested).			
YEAR TO DATE		\$1000.00	

Citizens For Eleanor Holmes Norton
513 C Street, NE - Washington, DC 20001

ITEMIZED RECEIPTS

PAGE 4 OF 7
FOR LINE 0 11a

PERIOD 08/23/90 TO 09/30/90

NAME AND ADDRESS	EMPLOYER AND OCCUPATION	DATE	AMOUNT	ELECTION
J. Howard (information requested)		08/30/90	\$250.00	Prim
YEAR TO DATE \$250.00				
Thomas R. Draper 7135 Hollywood Blvd. #506 Los Angeles CA 90046		08/30/90	\$500.00	Prim
YEAR TO DATE \$500.00				
Hansfield C. Neal, Jr. 400 Glendale Road, Apt. 1-33 Havertown PA 19083		08/30/90	\$250.00	Prim
YEAR TO DATE \$250.00				
Julius W. Erving 636 Creighton Road Villanova PA 19085	Professional Athlete	08/30/90	\$250.00	Prim
YEAR TO DATE \$250.00				
Linda Barney St. Martin 496 Cooper Road Voorhees NJ 08043		08/30/90	\$250.00	Prim
YEAR TO DATE \$250.00				
Andre V. Duggin 156 Three Ponds Lane Malvern PA 19355	Insurance Entrepreneur	08/30/90	\$500.00	Prim
YEAR TO DATE \$500.00				
John Vanderstar 3642 N. Monroe Street Arlington VA 22207	Covington & Burling Attorney	09/04/90	\$250.00	Prim
YEAR TO DATE \$250.00				
Franklin D. Raines 3006 Albemarle Street, NW Washington DC 20006	Investment Banker	09/05/90	\$1000.00	Prim
YEAR TO DATE \$1000.00				
William Tucker 1290 Kalmia Road, NW Washington DC 20012	DC Department of Housing Consultant	09/05/90	\$500.00	Prim
YEAR TO DATE \$500.00				
Kappy Jo Wells 1133 5th Avenue New York NY 10128	Self-employed Sculptor	09/05/90	\$250.00	Prim
YEAR TO DATE \$250.00				

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Citizens For Eleanor Holmes Norton

ITEMIZED RECEIPTS

PAGE 5 OF 7

513 C Street, NE - Washington, DC 20001

FOR LINE 8 11a

PERIOD 08/23/90 TO 09/30/90

NAME AND ADDRESS

EMPLOYER AND OCCUPATION

DATE

AMOUNT

ELECTION

Jane Harman
3550 Williamsburg Lane, NW Jones, Day, Reavis & Pogue
Washington DC 20008 Attorney
YEAR TO DATE \$500.00 09/05/90 \$500.00 Prim

R. Timothy Columbus
6011 Nevada Avenue, NW
Washington DC 20015
YEAR TO DATE \$2000.00 09/16/90 \$2000.00 Prim
Gene

\$1000.00 P'90; \$1000.00 G'90

Smith Bagley
1425 - 21st Street, NW Philanthropist
Washington DC 20036
YEAR TO DATE \$1000.00 09/06/90 \$1000.00 Prim

Julia Walsh
5001 Millwood Lane, NW Tucker Anthony
Washington DC 20016 Managing Director
YEAR TO DATE \$1000.00 09/06/90 \$500.00 Prim
09/11/90 \$500.00 Prim

Pedro Alfonso
1354 Taylor Street, NW Business Executive
Washington DC 20011
YEAR TO DATE \$500.00 09/07/90 \$500.00 Prim

Michael Smith
2802 Arizona Avenue, NW
Washington DC 20016
YEAR TO DATE \$250.00 09/07/90 \$250.00 Prim

Charles Taylor
9920 Hall Road Private Practice
Potomac MD 20854 Attorney at Law
YEAR TO DATE \$500.00 09/07/90 \$500.00 Prim

Jeffrey Thompson
322 Peabody Street, NW Thompson & Curtis
Washington DC 20011 Accountant
YEAR TO DATE \$500.00 09/10/90 \$500.00 Prim

Andrew Rosen
(information requested)
YEAR TO DATE \$250.00 09/11/90 \$250.00 Prim

Thomas Walsh
5001 Millwood Lane, NW
Washington DC 20016
YEAR TO DATE \$500.00 09/11/90 \$500.00 Prim

Citizens For Eleanor Holmes Norton
913 C Street, NE - Washington, DC 20001

ITEMIZED RECEIPTS

PAGE 1 OF 4
FOR LINE 8 11c

PERIOD 09/23/90 TO 09/30/90

NAME AND ADDRESS	EMPLOYER AND OCCUPATION	DATE	AMOUNT	ELECTION
Amer Fed of Teachers PAC 555 New Jersey Avenue, NW Washington DC 20001		09/28/90	\$5000.00	Gene
YEAR TO DATE	\$10000.00			
	\$5000.00 P'90; \$5000.00 G'90			
Carpenter's Legislat PAC 101 Constitution Ave, NW Washington DC 20001		09/07/90	\$1000.00	Prim
		09/21/90	\$500.00	Gene
YEAR TO DATE	\$3500.00			
Drive Political Fund PAC 25 Louisiana Ave, NW Washington DC 20001		09/11/90	\$5000.00	Gene
YEAR TO DATE	\$10000.00			
	\$5000.00 P'90; \$5000 G'90			
AFGE PAC 80 F Street, NW Washington DC 20001		09/07/90	\$250.00	Prim
YEAR TO DATE	\$1500.00			
Graphic Communicat. PAC 1900 L Street, NW Washington DC 20036		08/28/90	\$1000.00	Prim
YEAR TO DATE	\$1000.00			
PEOPLE PAC 1625 L Street, NW Washington DC 20036		08/30/90	\$2500.00	Prim
YEAR TO DATE	\$2500.00			
Friends of M. Tascn PAC 1000 E. Vernon Road Philadelphia PA 19150		09/04/90	\$100.00	Prim
YEAR TO DATE	\$100.00			
Friends of A. Clark PAC (information requested)		09/04/90	\$100.00	Prim
YEAR TO DATE	\$100.00			
Amer Fed of State PAC 1625 L Street, NW Washington DC 20036		09/04/90	\$2500.00	Prim
YEAR TO DATE	\$2500.00			
The Stanley Works PAC P.O. Box 7000 New Britain CT 06050		09/05/90	\$500.00	Prim
YEAR TO DATE	\$500.00			

00014130363

SCHEDULE A **ITEMIZED RECEIPTS**
(LOANS)

Will the amount shown be paid to the donor's beneficiary on the Beneficiary Summary Page

Page 1 of 1

FOR LINE NUMBER 13

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 persons.

NAME OF COMMITTEE IN FULL

Citizen's for Eleanor Holmes Norton

A. Full Name, Mailing Address and ZIP Code Eleanor Holmes Norton 10 9th Street, S. E. Washington, D. C. 20003	Name of Employer Georgetown University, Law Center	Date (month, day, year) 09/06/90	Amount of Each Receipt this Period 20,000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Professor		
	Aggregate Year-to-Date > \$ 20,000.00		
B. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
C. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
D. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
E. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
F. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		

SUBTOTAL of Receipts This Page (optional) 20,000.00

TOTAL This Period (last page this line number only) 20,000.00

00714130322

SCHEDULE C
Flavor 200

LOANS

Part 1 of 2 for
LAW PARADE 30
The borrower's schedule
for each numbered item

Name of Committee (in Full) Citizen's for Eleanor M. Norton			
A. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Comprehensive Payments To Date	Balance Outstanding at Close of This Period
Eleanor Holmes Norton 10 9th Street, S.E. Washington, D. C. 20003 Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	20,000.00	-0-	20,000.00
Terms: Date Incurred 09/06/90 Date Due 12/31/90 Interest Rate N/A (blank) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding		
2. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding		
3. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding		
B. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Comprehensive Payments To Date	Balance Outstanding at Close of This Period
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ (blank) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding		
2. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding		
3. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding		
SUBTOTALS This Period This Page (optional)			20,000.00
TOTALS This Period (last page in this first only)			20,000.00
Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.			

0124130783



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Pauline Schneider, Treasurer
Citizens for Eleanor Holmes
Norton
401 C Street, N.E.
Washington, D.C. 20002

APR 23 1991

Identification Number: C00244335

Reference: October Quarterly Report (8/23/90-9/30/90)

Dear Ms. Schneider:

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:

-When a committee reports receiving a loan from the candidate, it is necessary to clarify whether or not the candidate used his/her personal funds or borrowed the money from a lending institution or any other source. If the candidate borrowed funds from a lending institution, or any other source, please provide the name of the lending institution and the complete terms of the loan. If the loan(s) was from personal funds, please acknowledge that fact in an amendment to this report. It is important to note that "personal funds" is strictly defined by Commission Regulations and may be found in 11 CFR §110.10. (11 CFR §§100.7(a)(1) and 104.3(d))

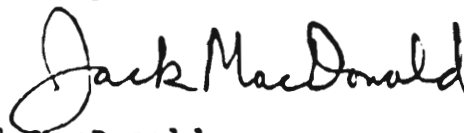
-Schedule A of your report indicates that your committee may have failed to file one or more of the required 48 hour notices regarding "last minute" contributions received by your committee after the close of books for the 12 Day Pre-Primary report. A principal campaign committee must notify the Commission, in writing, within 48 hours of any contribution of \$1,000 or more received between two and twenty days before an election. These contributions are then reported on the next report required to be filed by the committee. To ensure that the Commission is notified of last minute contributions of \$1,000 or more to your campaign, it is recommended that you review your procedures for checking contributions received during the aforementioned time

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

period. Although the Commission may take legal action, any response you wish to make concerning this matter will be taken into consideration. (11 CFR §104.5(f))

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515 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,



Jack MacDonald
Reports Analyst
Reports Analysis Division

996036753881

MAY 17 1991

REGULAR MAIL

Eleanor Holmes Norton



FOR

CONGRESS

May 16, 1991

Donnald K. Anderson, Clerk
U. S. House of Representatives
1036 Longworth House Office Building
Washington, DC 20515

Identification Number: C00244335

Reference: Citizens For Eleanor Holmes Norton (the "Committee")

Dear Mr. Anderson:

This letter is in response to the Commission's letter dated March 19, 1991, requesting additional information on the October Quarterly Report (8/23/90-9/30/90) for the above referenced Committee.

You inquired whether the loan received by the Committee was personal funds or borrowed money. On September 06, 1990, the Committee received a loan in the amount of \$20,000.00 from the candidate's "personal funds" as defined and in compliance with the Code Of Federal Regulations.

In addition, the Committee has thoroughly reviewed its records and has found that the following list of "last minute" contributions received by the Committee between two and twenty days before the primary election were not filed within 48 hours:

Margaret Schink
2400 Sand Hill Road
Menlo Park, CA 94025
08/23/90 \$1,000.00

R. Peter Straus
1321 4th Street, SW
Washington, DC 20024
08/27/90 \$1,000.00

C. Victor Raiser, II
3318 O Street, NW
Washington, DC 20007
08/30/90 \$1,000.00

E. Shane
1414 Avenue Of The Americas
New York, NY 10019
08/30/90 \$1,000.00

Franklin D. Raines
3000 Albemarle Street, NW
Washington, DC 20008
09/05/90 \$1,000.00

Smith Bagley
1425 - 21st Street, NW
Washington, DC 20036
09/06/90 \$1,000.00

401 2003 C Street, N.E., Washington, D.C. 20002 ■ (202) 546-1800 ■ FAX (202) 546-7037

Contributions to this Committee are not tax deductible.

Printed and authorized by Citizens for Eleanor H. Norton

page 2

Graphic Communications
International Union
Political Action Fund
1900 L Street, NW
Washington, DC 20036
08/28/90 \$1,000.00

PEOPLE PAC
1625 L Street, NW
Washington, DC 20036
08/30/90 \$2,500.00

AFSCME PAC
1625 L Street, NW
Washington, DC 20036
09/04/90 \$2,500.00

Carpenters' Legislative
101 Constitution Ave., NW
Washington, DC 20001
09/07/90 \$1,000.00

The Committee was unaware of the fact that the loan received from the candidate should have been considered a contribution to the Committee. Therefore, this contribution was not reported as a "last minute" contribution received prior to the primary election:

Eleanor H. Norton
10 - 9th Street, SE
Washington, DC 20003
09/06/90 \$20,000.00

We respectfully request that you and the Commission accept the above information as the Committee's official filing of these contributions, and that our prior filing be considered amended accordingly.

In future election cycles, we will carefully review our procedures to ensure full compliance with regards to the 48 hour disclosure notices.

Thank you for your assistance in this matter.

Very truly yours,

Pauline A. Schneider
Pauline A. Schneider
Treasurer

cc: J. MacDonald
FEC
Reports Analysis Division

91040875370
91314281235

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

RECEIVED
F.E.C.
SECRETARIAT

91 AUG 15 AM 10:07

FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

RAD Referral #91L-69
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: Citizens for Eleanor Holmes Norton and Pauline
Schneider, as treasurer

RELEVANT STATUTES: 2 U.S.C. § 434(a)(6)
11 C.F.R. § 104.5(f)

I. GENERATION OF MATTER

The Office of the General Counsel received a referral from
the Reports Analysis Division ("RAD") on July 3, 1990.

Attachment 1. The basis for the attached referral is the
failure of the Citizens for Eleanor Holmes Norton and Pauline
Schneider, as treasurer ("Committee"), to file eleven
forty-eight hour notifications ("48 Hour Notices") for
contributions totaling \$33,000.00. Eleanor Holmes Norton won
the September 11, 1990, Primary Election in the District of
Columbia.

II. FACTUAL AND LEGAL ANALYSIS

See Attachment 2.

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

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91040875380

IV. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that the Citizens for Eleanor Holmes Norton and Pauline Schneider, as treasurer, violated 2 U.S.C. § 434(a)(6), and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the appropriate letter, Factual and Legal Analysis, and proposed conciliation agreement.

Lawrence M. Noble
General Counsel

Date 8/14/91

BY: 
Lois G. Lerner
Associate General Counsel

Attachments:

1. Referral Materials
2. Factual and Legal Analysis
3. Proposed Conciliation Agreement

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Citizens for Eleanor Holmes Norton) RAD Referral #91L-69
and Pauline Schneider, as treasurer.)

(MUR
3378)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 19, 1991, the Commission decided by a vote of 5-0 to take the following actions in RAD Referral #91L-69:

1. Open a MUR.
2. Find reason to believe that the Citizens for Eleanor Holmes Norton and Pauline Schneider, as treasurer, violated 2 U.S.C. § 434(a)(6), and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the appropriate letter, Factual and Legal Analysis, and proposed conciliation agreement, as recommended in the General Counsel's Report dated August 14, 1991.

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

Attest:

8-20-91
Date

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

Received in the Secretariat: Thurs., August 15, 1991 10:07 a.m.
Circulated to the Commission: Thurs., August 15, 1991 4:00 p.m.
Deadline for vote: Mon., August 19, 1991 4:00 p.m.

91040875331



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 23, 1991

Pauline Schneider, Treasurer
Citizens for Eleanor Holmes Norton
401 C Street, N.E.
Washington, D.C. 20002

RE: MUR 3378
Citizens for Eleanor Holmes Norton
and Pauline Schneider, as treasurer

Dear Ms. Schneider:

On August 19, 1991, the Federal Election Commission found that there is reason to believe Citizens for Eleanor Holmes Norton ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(6), 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.

91040875382

Pauline Schneider, Treasurer
Page 2

If you are interested in expediting the resolution of this matter by pursuing preprobable 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.

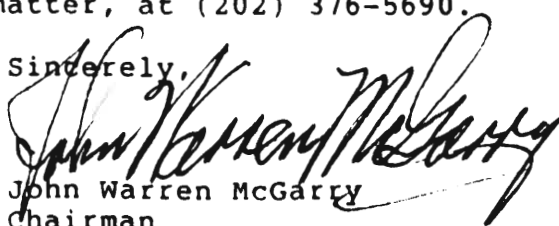
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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,


John Warren McGarry
Chairman

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

91040875383

**FEDERAL ELECTION COMMISSION
FACTUAL & LEGAL ANALYSIS**

RESPONDENTS:

Citizens for Eleanor Holmes Norton
and Pauline Schneider, as treasurer

MUR 3378

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2).

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The Federal Election Campaign Act of 1971, as amended ("the Act"), requires principal campaign committees of candidates for federal office to notify in writing either the Secretary of the Senate, the Clerk of the U.S. House of Representatives or the Commission, as appropriate, and the Secretary of State, of each contribution totaling \$1,000 or more, received by any authorized committee of the candidate after the 20th day but more than 48 hours before any election. 2 U.S.C. § 434(a)(6)(A). The Act further requires notification to be made within 48 hours after the receipt of the contribution and to include the name of the candidate and office sought, the date of receipt, the amount of the contribution, and the identification of the contributor. Id. The notification of these contributions shall be in addition to all other reporting requirements. 2 U.S.C. § 434(a)(6)(B).

The Primary Election in the District of Columbia was held on September 11, 1990. Pursuant to the Act, the Committee was required to notify the Commission, in writing, of all

contributions of \$1,000 or more received from August 23 to September 8, 1990, within 48 hours of their receipt.

A review of the Committee's 1990 October Quarterly Report identified ten contributions and one candidate loan received from August 23 to September 7, 1990, of \$1,000 or more totaling \$33,000. The Committee did not submit 48 Hour Notices for these contributions.

Therefore, there is reason to believe that the Citizens for Eleanor Holmes Norton and Pauline Schneider, as treasurer, violated 2 U.S.C. § 434(a)(6)(A) by failing to report campaign contributions in excess of \$1,000 received after the 20th day, but more than 48 hours before the primary election, within 48 hours of receipt of the contributions.

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FEDERAL ELECTIONS COMMISSION

HARMON, CURRAN, GALLAGHER & SPIELBERG

2001 S STREET, N.W.
SUITE 430
WASHINGTON, D.C. 20009-1125

91 SEP 25 PM 2:04

GAIL McGRHEVY HARMON
DIANE CURRAN
ANNE SPIELBERG
JANNE G. GALLAGHER
JESSICA A. LADD*

TELEPHONE
(202) 328-3500
FAX
(202) 328-6918

Of Counsel:
ERIC R. GLITZENSTEIN
KATHERINE A. MEYER

*Admitted only in Massachusetts

September 24, 1991

Jeffrey Long
Office of General Counsel
Federal Elections Commission
999 E Street, N.W., 6th Floor
Washington, D.C. 20463

Re: MUR 3378
Citizens for Eleanor Holmes Norton and
Pauline Schneider, as treasurer


Dear Mr. Long:

On Friday, September 20th I received a copy of the above referenced complaint. When you were out on Monday I spoke with George Rishel who granted us an extension of two weeks in the above referenced case.

I will file the designation of counsel form with your office in the near future.

If you need further information, please do not hesitate to contact me.

Sincerely,


Gail M. Harmon

cc: Eleanor Holmes Norton
Pauline Schneider

9140875336

91 SEP 25 PM 4:00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 27, 1991

Gail M. Harmon, Esquire
Harmon, Curran, Gallegher & Spielberg
2001 S Street, N.W.
Suite 430
Washington, D.C. 20009-1125

RE: MUR 3378
Citizens for Eleanor Holmes Norton
and Pauline Schneider, as treasurer

Dear Ms. Harmon:

This is in response to your letter dated September 24, 1991, which we received on September 25, 1991, requesting an extension of 14 days to respond in the above-referenced matter. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on October 14, 1991.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

A handwritten signature in dark ink, appearing to read "George F. Rishel", is written over the typed name of the Assistant General Counsel.

BY: George F. Rishel
Assistant General Counsel

91040875387

HARMON, CURRAN, GALLAGHER & SPIELBERG

2001 S STREET, N.W.
SUITE 430
WASHINGTON, D.C. 20009-1125

GAIL MCGREVVY HARMON
DIANE CURRAN
ANNE SPIELBERG
JANNE G. GALLAGHER
JESSICA A. LADD*
Of Counsel:
ERIC R. GLITZENSTEIN
KATHERINE A. MEYER

TELEPHONE
(202) 328-3500
FAX
(202) 328-6918

*Admitted only in Massachusetts

October 11, 1991

Jeffrey Long, Esq.
Office of the General Counsel
Federal Election Commission
Washington, D.C. 20463

RE: MUR 3378
Citizens for Eleanor Holmes North
and Pauline Schneider, as treasurer

91 OCT 11 PM 5:38

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE GENERAL COUNSEL

Dear Mr. Long,

Enclosed is a statement of designation of counsel to authorize me to represent the Respondents in the above referenced complaint.

The Commission's August letter notifying the Respondents of the reason to believe finding enclosed a proposed Conciliation Agreement.

The primary election in which the violation occurred was the first federal election of a candidate who had no previous electoral experience. Although the Campaign should have been familiar with the 48 hour filing requirement, a representative of the campaign has said that she was unaware that the 48 hour rules applied to primary elections. In addition, since the Commission has failed to note a change in the address of the Campaign, we believe that no reminder notice of the 48 hour rule applicable to the primary was

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HARMON, CURRAN, GALLAGHER & SPIELBERG

Jeffrey Long, Esq.
October 10, 1991
Page 2

received by the campaign.¹ Finally, during the general election, long before any correspondence with the Commission related to omissions during the primary season, the campaign complied with the 48 hour rule.

I would welcome the opportunity to discuss this matter with you further.

Sincerely,

Gail M. Harmon

cc: Eleanor Holmes Norton
Pauline Schneider

¹ See enclosed statement of organization informing the Commission of a new address and the enclosed notice regarding filing requirements for the general election which was sent to the address which had not been used for four months.

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RECEIVED OCT - 1 1991

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3378

NAME OF COUNSEL: Gail M. Harmon

ADDRESS: Harmon, Curran, Gallagher & Spielberg

2001 S Street, N.W., Suite 430

Washington, D.C. 20009

TELEPHONE: (202) 328-3500

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 OCT 11 PM 5:33

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.

9/30/91
Date

Pauline A. Schneider
Signature

RESPONDENT'S NAME: Citizens for Eleanor Holmes Norton and Pauline Schneider, as Treasurer

ADDRESS: 401 C Street, N.E.

Washington, D.C. 20002

HOME PHONE: _____

BUSINESS PHONE: (202) 955-1500

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HARMON, CURRAN, GALLAGHER & SPIELBERG

2001 S STREET, N.W.
SUITE 430
WASHINGTON, D.C. 20009-1125

GAIL MCGREEVY HARMON
DIANE CURRAN
ANNE SPIELBERG
JANNE G. GALLAGHER
JESSICA A. LADD*
Of Counsel
ERIC R. GLITZENSTEIN
KATHERINE A. MEYER

TELEPHONE
(202) 328-3500
FAX
(202) 328-6918

*Admitted only in Massachusetts

October 24, 1991

By Messenger
Jeffrey Long, Esq.
Office of the General Counsel
Federal Election Commission
Washington, D.C. 20463

91 OCT 24 PM 5:20

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

RE: MUR 3378
Citizens for Eleanor Holmes Norton and
Pauline Schneider, as treasurer

Dear Mr. Long,

Enclosed please find the Conciliation Agreement which has been signed by Pauline Schneider. Also enclosed are the following documents:


- 1.) A copy of a memo regarding the Pre- and Post-Election Reports of Receipts and Disbursements for the General Election;
- 2.) A copy of an address change for Citizens for Eleanor Holmes Norton; and
- 3.) A copy of Statement of Organization, signed by Pauline Schneider.

These items were left out of the letter to you dated October 11, 1991.

Thank you very much for your prompt and helpful attention to this matter.

If you have any questions or wish to discuss this further, please do not hesitate to contact me.

Sincerely,


Gail M. Harmon

cc: Eleanor Holmes Norton (w/enclosures)

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Office of the Clerk
U.S. House of Representatives
Washington, DC 20515-6601

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 OCT 24 PM 5:20

October 11, 1990

TO: All Candidates and Political Committees Supporting Such
Candidates in the General Election to be Held on November 6, 1990

FROM: DONNALD K. ANDERSON, Clerk
U.S. House of Representatives

AKA

SUBJECT: Pre- and Post-Election Reports of Receipts and Disbursements for the
General Election

Type of Report	Closing date for books	Filing date for report	Mailing date for report*
Pre-Election	Oct. 17, 1990	Oct. 25, 1990	Oct. 22, 1990
Post-Election	Nov. 26, 1990	Dec. 6, 1990	Dec. 6, 1990

* Reports will be considered timely if postmarked Registered or Certified Mail by the Mailing Date.

NOTE: Contributions of \$1,000 or more, received between 2 days and 20 days before the election must be reported within 48 hours of their receipt. Notification of such a contribution shall be in writing and shall include the name of the candidate and the office sought by the candidate, the identification of the contributor, and the date of receipt and amount of the contribution. This notification shall be in addition to the reporting of these contributions on the next regularly scheduled report.

If additional committees are authorized by the candidate, their Reports should be filed with the principal campaign committee which shall compile and file such reports with the Clerk of the House of Representatives.

If you have any questions concerning this matter, please do not hesitate to contact my staff in the Office of Records and Registration at (202) 225-1300.

91040875392

OFFICIAL BUSINESS

CLERK, U.S. HOUSE OF REPRESENTATIVES

09-15/1904 10/15/90
NOTIFY SENDER OF NEW ADDRESS
CITIZENS FOR ELEANOR H NORTON
513 C ST NE
WASHINGTON DC 20002-5809

Pennsylvania

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

91 OCT 24 PM 5:20

9 1 0 4 0 8 7 5 3 9 3

STATEMENT OF ORGANIZATION

(See reverse side for instructions)

1. (a) NAME OF COMMITTEE IN FULL Citizens for Eleanor H. Norton		2. DATE June 01, 1990
(b) Number and Street Address 513 C Street, NE		3. FEC IDENTIFICATION NUMBER C00244335
(c) City, State and ZIP Code Washington, DC 20002		4. IS THIS STATEMENT AN AMENDMENT? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

5. TYPE OF COMMITTEE (Check one)

- ☐ (a) This committee is a principal campaign committee. (Complete the candidate information below.)
- ☐ (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)
- | Name of Candidate | Candidate Party Affiliation | Office Sought | State/District |
|-------------------|-----------------------------|---------------|----------------|
| | | | |
- ☐ (c) This committee supports/opposes only one candidate _____ and is NOT an authorized committee.
(name of candidate)
- ☐ (d) This committee is a _____ committee of the _____ Party.
(National, State or subordinate) (Democratic, Republican, etc.)
- ☐ (e) This committee is a separate segregated fund.
- ☐ (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund or a party committee.

6. Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship

Type of Connected Organization
☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization ☐ Membership Organization ☐ Trade Association ☐ Cooperative

7. Custodian of Records: Identify by name, address (phone number -- optional) and position of the person in possession of committee books and records.

Full Name	Mailing Address	Title or Position
India Brown Duncan	513 C Street, NE Washington, DC 20002	Administrator

8. Treasurer: List the name and address (phone number -- optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name	Mailing Address	Title or Position

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.	Mailing Address and ZIP Code

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

TYPE OR PRINT NAME OF TREASURER

SIGNATURE OF TREASURER

Paul A. Schneider

Paul A. Schneider

11/90

NOTE: In case of false, erroneous, or incomplete information on this subject the person signing this Statement is liable.

18 U.S.C. §437c

ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS

For further information, contact
Federal Election Commission
Toll-free 800-424-9542
Local 202-462-6000

FEC FORM 1
Revised 4-87

91040875394

RECEIVED
F.E.C.
SECRETARIAT

91 OCT 28 AM 11:42

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Citizens for Eleanor Holmes Norton) MUR 3378
and Pauline Schneider, as treasurer)
)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Pauline Schneider, the treasurer of Citizens for Eleanor Holmes Norton.

I. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Citizens for Eleanor Holmes Norton and Pauline Schneider, as treasurer.
2. Close the file.

91040875395

3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

Date

10/25/91

BY:

Lois G. Lerner
Associate General Counsel

Attachments

1. First response
2. Conciliation Agreement

Staff Assigned: Jeffrey Long

91040875396

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Citizens for Eleanor Holmes Norton
and Pauline Schneider, as treasurer.

MUR 3378

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 30, 1991, the Commission decided by a vote of 6-0 to take the following actions in MUR 3378:

1. Accept the conciliation agreement with Citizens for Eleanor Holmes Norton and Pauline Schneider, as treasurer, as recommended in the General Counsel's Report dated October 25, 1991.
2. Close the file.
3. Approve the appropriate letter, as recommended in the General Counsel's Report dated October 25, 1991.

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

Attest:

10-31-91
Date

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

Received in the Secretariat: Mon., Oct. 28, 1991 11:42 a.m.
Circulated to the Commission: Mon, Oct. 28, 1991 4:00 p.m.
Deadline for vote: Wed., Oct. 30, 1991 4:00 p.m.

dr

91240875397



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 6, 1991

CLOSED

Gail M. Harmon, Esquire
Harmon, Curran, Gallegher & Spielberg
2001 S Street, N.W.
Suite 430
Washington, D.C. 20009-1125

RE: MUR 3378
Citizens for Eleanor Holmes Norton
and Pauline Schneider, as
treasurer

Dear Ms. Harmon:

On October 30, 1991, the Federal Election Commission accepted the signed conciliation agreement submitted on your client's behalf in settlement of a violation of 2 U.S.C. § 434(a)(6), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter.

This matter will be placed on 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. I remind you that the civil penalty is due within 30 days of the conciliation agreement's effective date. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

91040875398

91 OCT 24 PH 5:20

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Citizens for Eleanor Holmes Norton
and Pauline Schneider, as treasurer

)
) MUR 3378
)
)

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 Citizens for Eleanor Holmes Norton and Pauline Schneider, as treasurer ("Respondents"), violated 2 U.S.C. § 434(a)(6).

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.

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

1. Citizens for Eleanor Holmes Norton is a political committee within the meaning of 2 U.S.C. § 431(4), and is the authorized principal campaign committee for Ms. Norton's 1990

91040875399

congressional campaign.

2. Pauline Schneider is the treasurer of Citizens for Eleanor Holmes Norton.

3. The Federal Election Campaign Act of 1971, as amended ("the Act"), requires principal campaign committees of candidates for federal office to notify in writing either the Secretary of the Senate, the Clerk of the U.S. House of Representatives or the Commission, as appropriate, and the Secretary of State, of each contribution totaling \$1,000 or more, received by any authorized committee of the candidate after the 20th day but more than 48 hours before any election. 2 U.S.C. § 434(a)(6)(A). The Act further requires notification to be made within 48 hours after the receipt of the contribution and to include the name of the candidate and office sought, the date of receipt, the amount of the contribution, and the identification of the contributor. Id. The notification of these contributions shall be in addition to all other reporting requirements. 2 U.S.C. § 434(a)(6)(B).

4. The Respondents received from August 23 to September 7, 1990, eleven contributions of \$1,000 or more totaling \$33,000.

5. The Respondents did not submit 48 Hour Notices for these eleven contributions.

V. The Respondents failed to report campaign contributions in excess of \$1,000 received after the 20th day, but more than 48 hours before the primary election, within 48 hours of receipt of the contributions, in violation of 2 U.S.C. § 434(a)(6).

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VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of one thousand three hundred fifty dollars (\$1,350.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

VIII. This agreement shall become effective as of the date that all parties hereto have executed 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 requirement 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

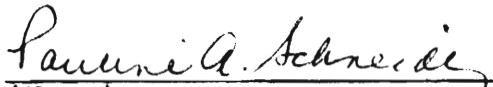
BY:


Lois G. Lerner
Associate General Counsel

Date

11-6-91

FOR THE RESPONDENTS:


(Name)
(Position)

Date

October 22, 1991

91040875402



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3378

DATE FILMED 11/20/91 CAMERA NO. 2

CAMERAMAN AS

91040875403



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 3378 .

12/17/91

91040884074



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

Dec. 13, 1991

TWO WAY MEMORANDUM

TO: Fabrae Brunson
OGC, Docket

FROM: Philomena Brooks *PB*
Accounting Technician

SUBJECT: Account Determination for Funds Received

We recently received a check from Citizens for Eleanor Holmes Norton, check number 5101 dated Dec. 10, 1991, and in the amount of \$1350.00. Attached is a copy of the check and any correspondence that was forwarded. Please indicate below the account into which it should be deposited, and the MUR number and name.

TO: Philomena Brooks
Accounting Technician

FROM: Fabrae Brunson *JB*
OGC, Docket

In reference to the above check in the amount of \$1350.00, the MUR number is 3378 and in the name of Citizens for Eleanor Holmes Norton. The account into which it should be deposited is indicated below:

- ☐ Budget Clearing Account (OGC), 95F3875.16
☒ Civil Penalties Account, 95-1099.160
☐ Other: _____

Fabrae Brunson
Signature

Dec. 16, 1991
Date

15-52 540	
December 10	1991
\$ 1350.00	
DOLLARS	
One-Thousand Three-Hundred Fifty and 00/100	
CRESTAR Crestar Bank N.A. Washington, DC	
FOR Penalties	
"00000101" :054000521: 206550758"	



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

DEC 13 AM 10:04

November 6, 1991

Gail M. Harmon, Esquire
Harmon, Curran, Gallegher & Spielberg
2001 S Street, N.W.
Suite 430
Washington, D.C. 20009-1125

RE: MUR 3378
Citizens for Eleanor Holmes Norton
and Pauline Schneider, as
treasurer

Dear Ms. Harmon:

On October 30, 1991, the Federal Election Commission accepted the signed conciliation agreement submitted on your client's behalf in settlement of a violation of 2 U.S.C. § 434(a)(6), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter.

This matter will be placed on 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. I remind you that the civil penalty is due within 30 days of the conciliation agreement's effective date. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE GENERAL COUNSEL
91 DEC 16 AM 11:13

9104084076

Jeff
new
checking
account
has
been
cleared
per
check
enclosed
12/2/91

Filed: Dec. 2, 1991

STATEMENT OF ORGANIZATION

(See reverse side for instructions)

RECEIVED
FEDERAL ELECTION COMMISSION
DATE
December 2, 1991
91 DEC 2
FEC IDENTIFICATION NUMBER
C00244335

1. (a) NAME OF COMMITTEE IN FULL ☐ (Check if name is changed)
Citizens for Eleanor Holmes Norton
(b) Number and Street Address ☐ (Check if address is changed)
401 C Street, NE
(c) City, State and ZIP Code
Washington, DC 20002
4. IS THIS STATEMENT AN AMENDMENT?
☒ YES ☐ NO

5. TYPE OF COMMITTEE (Check one)

- ☒ (a) This committee is a principal campaign committee. (Complete the candidate information below.)
- ☐ (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)
- | Name of Candidate | Candidate Party Affiliation | Office Sought | State/District |
|-----------------------|-----------------------------|--------------------|----------------|
| Eleanor Holmes Norton | Democrat | U.S. House of Rep. | DC Delegate |
- ☐ (c) This committee supports/opposes only one candidate _____ and is NOT an authorized committee.
(name of candidate)
- ☐ (d) This committee is a _____ committee of the _____ Party.
(National, State or subordinate) (Democratic, Republican, etc.)
- ☐ (e) This committee is a separate segregated fund.
- ☐ (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund or a party committee.

CLIENT COPY

6. Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship

Type of Connected Organization

☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization ☐ Membership Organization ☐ Trade Association ☐ Cooperative

7. Custodian of Records: Identify by name, address (phone number -- optional) and position of the person in possession of committee books and records.

Full Name	Mailing Address	Title or Position
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8. Treasurer: List the name and address (phone number -- optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name	Mailing Address	Title or Position
Pauline Schneider	c/o Citizens for Eleanor Holmes Norton 401 C Street, NE Washington, DC 20002	Treasurer

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
Crestar	645 Pennsylvania Avenue, SE Washington, DC 20003

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

TYPE OR PRINT NAME OF TREASURER	SIGNATURE OF TREASURER	DATE
Pauline Schneider		December 2, 1991

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g. ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

For further information contact:
Federal Election Commission
Toll-free 800-424-9530
Local 202-376-3120

FEC FORM 1
(revised 4/87)

91040884078

101

CITIZENS FOR ELEANOR HOLMES NORTON 11-91

2201 WISCONSIN AVENUE, N.W., SUITE 320
WASHINGTON, D.C. 20007

December 10 1991

15-32
540PAY
TO THE
ORDER OF

Federal Election Commission

\$ 1350.00

One-Thousand Three-Hundred Fifty and 00/100-----DOLLARS

CRESTARCrestar Bank N.A.
Washington, DC

FOR Penalties

Eleanor H Norton

⑈00000101⑈ ⑆054000522⑆ 206550758⑈