



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

THIS IS THE BEGINNING OF MUR # 4721

DATE FILMED 8/23/95 CAMERA NO. 1

CAMERAMAN EES

95043665117

**REPORTS ANALYSIS REFERRAL****TO****OFFICE OF GENERAL COUNSEL****DATE:** April 11, 1995**ANALYST:** Stephen Cohen

**I. COMMITTEE:** Political Club For Growth (C00182964)  
Lisa B. Nelson, Treasurer  
539 South Saint Asaph Street  
Alexandria, VA 22314

**II. RELEVANT STATUTE:** 2 U.S.C. §434(a)(4)(A)(i), (iii) and (iv)  
11 CFR 104.5 (c)(1)(i)(A), (c)(1)(iii)  
and (c)(2)(i)

**III. BACKGROUND:****Failure to Timely File Reports and Chronic Late Filing of Reports**

Political Club for Growth ("the Committee") has failed to file six (6) Reports of Receipts and Disbursements in a timely manner for the 1993-1994 election cycle (see attached chart). The reports were filed between forty-five (45) and one hundred twenty-six (126) calendar days late.

The Committee was notified on July 5, 1993 that the 1993 Mid-Year Report was due July 31, 1993 (Attachment 2). A Non-Filer Notice was sent to the Committee on August 26, 1993 for failing to file the Report (Attachment 3). The Committee filed the 1993 Mid-Year Report on October 6, 1993 (Attachment 4).

On March 4, 1994, a Chronic Late Filing Notice was sent to the Committee for failing to file the 1993 Mid-Year and 1993 Year End Reports in a timely manner (Attachment 7). The notice advised the Committee that any additional late filing of reports may result in legal enforcement action.

Subsequent to the sending of the Chronic Late Filing Notice, the Committee failed to timely file the 1994 April, July and October Quarterly Reports and the 30 Day Post-General Report.

95043665118

On March 22, 1994, the Committee was notified that the 1994 April Quarterly Report was due April 15, 1994 (Attachment 8).

On April 8, 1994, the Reports Analysis Division ("RAD") analyst spoke with Lisa Nelson, treasurer for the Committee. The analyst informed Ms. Nelson that the Committee's 1993 Year End Report was late and needed to be filed as soon as possible. Ms. Nelson stated that the report would be filed by April 11, 1994 (Attachment 9).

A Non-Filer Notice was sent to the Committee on May 10, 1994 for failing to file the 1994 April Quarterly Report (Attachment 10).

The analyst called Ms. Nelson on May 25, 1994, regarding the 1993 Year End Report and 1994 April Quarterly Report not having been filed with the Commission. Ms. Nelson was informed by the analyst that possible legal action could be taken against the Committee regarding the tardiness of reports. Ms. Nelson replied that all late reports would be filed with the Commission immediately (Attachment 11).

On June 8, 1994, the analyst spoke with Ms. Nelson and informed her that the 1994 April Quarterly Report needed to be filed with the Commission by Friday, June 10, 1994. The Committee filed the 1994 April Quarterly Report on June 10, 1994 (Attachment 13).

The analyst spoke with Ms. Nelson on November 28, 1994 regarding the tardiness of the Committee's 1994 October Quarterly Report. Ms. Nelson acknowledged the report being late and informed the analyst that the Committee did not need to file a Pre-General Report. Ms. Nelson stated the October Quarterly Report would be filed with the Commission by November 29, 1994 (Attachment 21).

On December 6, 1994, the analyst called Ms. Nelson to follow-up on their conversation from November 28. Ms. Nelson informed the analyst that the October Quarterly Report would be hand-delivered to the Commission within an hour (Attachment 22).

The analyst called Ms. Nelson on February 2, 1995 regarding the Committee's non-filing of the 30 Day Post-General Report. Ms. Nelson returned the analyst's phone call and stated that the 30 Day Post-General and Year End Reports would be filed with the Commission on February 3, 1995 (Attachment 25).

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# LATE FILING HISTORY

REPORT TYPE	PRIOR NOTICE	DATE DUE	NON-FILER NOTICE	DATE FILED
1993 Mid-Year (1/1/93-6/30/93)	7/5/93 (Attachment 2)	7/31/93	8/26/93 (Attachment 3)	10/6/93 (Attachment 4)
1993 Year End (7/1/93-12/31/93)	12/27/93 (Attachment 5)	1/31/94	2/25/94 (Attachment 6)	6/6/94 (Attachment 12)
1994 April Quarterly (1/1/94-3/31/94)	3/22/94 (Attachment 8)	4/15/94	5/10/94 (Attachment 10)	6/10/94 (Attachment 14)
1994 July Quarterly (4/1/94-6/30/94)	6/21/94 (Attachment 15)	7/15/94	8/4/94 (Attachment 16)	8/29/94 (Attachment 17)
1994 October Quarterly (7/1/94-9/30/94)	9/21/94 (Attachment 18)	10/15/94	11/4/94 (Attachment 20)	12/07/94 (Attachment 23)
1994 30 Day Post-General (10/1/94-11/28/94)	10/3/94 (Attachment 19)	12/8/94	1/4/95 (Attachment 24)	2/3/95 (Attachment 26)



COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
						TYPE OF FILER
POLITICAL CLUB FOR GROWTH						
CONNECTED ORGANIZATION: NONE						
1993 FILING FREQUENCY CHANGE NOTICE				17FEB93	1	93FEC/828/3746
MID-YEAR REPORT	27,100	18,868	1JAN93 -30JUN93	14	93FEC/862/2952	
MID-YEAR REPORT - AMENDMENT	27,100	18,868	1JAN93 -30JUN93	5	94FEC/901/3661	
MID-YEAR REPORT - AMENDMENT	-	-	1JAN93 -30JUN93	3	94FEC/915/0763	
NOTICE OF FAILURE TO FILE			1JAN93 -30JUN93	1	93FEC/858/5393	
REQUEST FOR ADDITIONAL INFORMATION			1JAN93 -30JUN93	2	94FEC/886/1816	
REQUEST FOR ADDITIONAL INFORMATION			1JAN93 -30JUN93	2	94FEC/885/5395	
REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN93 -30JUN93	2	94FEC/908/3518	
YEAR-END	650	9,374	1JUL93 -31DEC93	5	94FEC/901/3666	
YEAR-END - AMENDMENT	-	-	1JUL93 -31DEC93	3	94FEC/915/0758	
NOTICE OF FAILURE TO FILE			1JUL93 -31DEC93	2	94FEC/885/5395	
REQUEST FOR ADDITIONAL INFORMATION			1JUL93 -31DEC93	3	94FEC/904/2515	
REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL93 -31DEC93	4	94FEC/908/3520	
1994 MISCELLANEOUS NOTICE FROM FEC			4MAR94	2	94FEC/886/2811	
APRIL QUARTERLY	26,118	11,621	1JAN94 -31MAR94	12	94FEC/902/1018	
NOTICE OF FAILURE TO FILE			1JAN94 -31MAR94	2	94FEC/898/1172	
REQUEST FOR ADDITIONAL INFORMATION			1JAN94 -31MAR94	3	94FEC/905/1508	
REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN94 -31MAR94	4	94FEC/914/0744	
JULY QUARTERLY	150	7,572	1APR94 -30JUN94	5	94FEC/919/4168	
NOTICE OF FAILURE TO FILE			1APR94 -30JUN94	2	94FEC/915/3553	
REQUEST FOR ADDITIONAL INFORMATION			1APR94 -30JUN94	2	94FEC/921/2063	
REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR94 -30JUN94	3	94FEC/925/2241	
OCTOBER QUARTERLY	1,460	4,066	1JUL94 -30SEP94	7	94FEC/947/0222	
NOTICE OF FAILURE TO FILE			1JUL94 -30SEP94	2	94FEC/943/0719	
POST-GENERAL	0	892	1OCT94 -28NOV94	4	95FEC/964/4632	
NOTICE OF FAILURE TO FILE			1OCT94 -28NOV94	2	95FEC/955/0757	
YEAR-END	0	449	29NOV94 -31DEC94	4	95FEC/964/4628	
TOTAL	55,478	0	53,042	0	101	TOTAL PAGES

ALL REPORTS HAVE BEEN REVIEWED.

ENDING CASH-ON-HAND AS OF 12/31/94:

\$7,099.86.

OUTSTANDING DEBTS AND OBLIGATIONS:

\$0.00.

95043665121

# SEMI-ANNUAL REPORT NOTICE

ATTACHMENT 2

## FEDERAL ELECTION COMMISSION

PARTIES AND PACS

July 5, 1993

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Mid-Year	01/01/93 - 06/30/93	07/31/93	07/31/93

### WHO MUST FILE

Party committees and PACs (nonconnected committees and separate segregated funds) which normally file on a quarterly basis must file a Mid-Year Report in July.

### INDEPENDENT EXPENDITURES

Any PAC that makes independent expenditures in connection with a special election may have to file a 24 hour report. This reporting requirement will be triggered if the committee makes independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the election.

### CHANGE IN FILING FREQUENCY

Committees wishing to change their reporting schedule (for example, from semiannual to monthly) must notify the Commission in writing when filing a report due under their current reporting schedule. Committees may change their filing frequencies no more than once per calendar year.

### LABEL

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

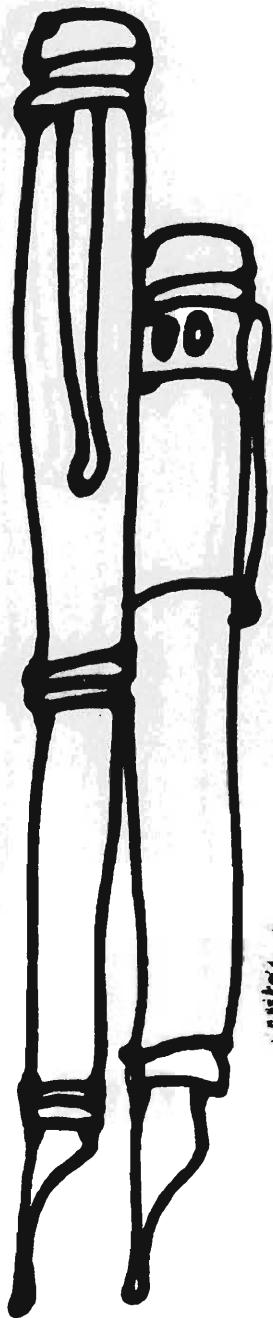
### COMPLIANCE

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.

\*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.

\*\*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 202/219-3420



95043665122



## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20541

HQ-7

August 26, 1993

Lisa B. Nelson, Treasurer  
Political Club for Growth  
150 East 35th Street  
New York, NY 10016

Identification Number: C00182964

Reference: Mid-Year Report (1/1/93-6/30/93)

Dear Ms. Nelson:

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

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20543 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR §§108.2, 108.3, 108.4).

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

If you have any questions, please contact Donald Averett on our toll-free number (800) 424-9530. Our local number is (202) 219-3580.

Sincerely,

A handwritten signature in dark ink, appearing to read "John D. Gibson".

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

# REPORT OF RECEIPTS AND DISBURSES

For Other Than An Authorized Committee  
(Summary Page)

1993 MID-YEAR REPORT  
ATTACHMENT 4

USE PRC MAILING LABEL  
OR  
TYPE OR PRINT

1 NAME OF COMMITTEE (in full) <b>POLITICAL CLUB FOR GROWTH</b>		2 FEC IDENTIFICATION NUMBER <b>C00182964</b>
ADDRESS (number and street) <small>Check if different than previously reported</small> <b>1775 BROADWAY ST 26TH FLOOR</b>		3 <input type="checkbox"/> This committee qualified as a non-federally committee DURING THIS Reporting Period or (Use)
CITY, STATE and ZIP CODE <b>NY NY 10016</b>		

## 4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year-End Report

☒ July 31 Mid-Year Report (Non-election Year Only)

☐ Termination Report

Monthly Report Due On

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

☐ Twelfth day report preceding \_\_\_\_\_  
(Type of Election)  
election on \_\_\_\_\_ in the State of \_\_\_\_\_

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

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

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5	Covering Period <b>JAN, 4, 93</b> through <b>6-30-93</b>		
6	(a) Cash on Hand January 1, 1993		\$4666.09
	(b) Cash on Hand at Beginning of Reporting Period	\$4666.09	
	(c) Total Receipts (from Line 18)	\$27,100.00	\$27,100.00
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Line: 6(a) and 6(c) for Column B)	\$31,766.09	\$31,766.09
	Total Disbursements (from Line 30)	\$18,868.42	\$18,868.42
7	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$12,897.67	\$12,897.67
	Debts and Obligations Owed TO the Committee (itemize all on Schedule C and/or Schedule D)	\$ —	For further information contact Federal Election Commission 600 E Street, NW Washington, DC 20543 Toll Free 800-424-9530 Local 202-219-3420
	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

**LISA B. NELSON**

Signature of Treasurer

*Lisa B. Nelson*

Date

**10/4/93**

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

FEC FORM 278

(Rev. 11-91)



# REPORT NOTICE

## FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 27, 1993

### WHO MUST FILE

Party committees and PACs (nonconnected committees and separate segregated funds) must file a Year-End Report on January 31, 1994.

### REPORT CONTENT AND DATES

#### I. Semiannual Filers

REPORT	REPORTING PERIOD	MAILING DATE	FILING DATE
Year-End	07/01/93 - 12/31/93	01/31/94	01/31/94

Semiannual filers must disclose financial activity that occurred from July 1 through December 31, 1993, on their Year-End Report.

#### II. Monthly Filers

REPORT	REPORTING PERIOD	MAILING DATE	FILING DATE
Year-End	12/01/93 - 12/31/93	01/31/94	01/31/94

Monthly filers must disclose financial activity from December 1 through December 31, 1993, on their Year-End Report.

### CHANGE IN FILING FREQUENCY

Committees wishing to change their reporting schedule (for example, from semiannual to monthly) must notify the Commission in writing when they file their next report and under their current reporting schedule. Committees may change their filing frequency no more than once per calendar year.

### LABELING THE REPORT

Committees should affix the label on the envelope to the front of the report. Corrections should be made on the label.

The period begins with the time 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.

Reports sent by registered post or by certified mail must be postmarked by the mailing date; otherwise, the date is determined by the filing date.

(over)

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PARTIES AND PACS

YEAR-END

1994 FILING SCHEDULE

I. Quarterly Filers

REPORT	PERIOD COVERED*	REG./CERT. MAILING DATE**	FILING DATE
April	01/01/94 - 03/31/94	04/15/94	04/15/94
July	04/01/94 - 06/30/94	07/15/94	07/15/94
October	07/01/94 - 09/30/94	10/15/94	10/15/94
Pre-General	10/01/94 - 10/12/94	10/24/94	10/27/94
Post-General	10/20/94 - 11/12/94	12/08/94	12/08/94
Year-End	11/29/94 - 12/31/94	01/31/95	01/31/95

II. Monthly Filers

REPORT	PERIOD COVERED*	REG./CERT. MAILING DATE**	FILING DATE
February	01/01/94 - 01/31/94	02/20/94	02/20/94
March	02/01/94 - 02/28/94	03/20/94	03/20/94
April	03/01/94 - 03/31/94	04/20/94	04/20/94
May	04/01/94 - 04/30/94	05/20/94	05/20/94
June	05/01/94 - 05/31/94	06/20/94	06/20/94
July	06/01/94 - 06/30/94	07/20/94	07/20/94
August	07/01/94 - 07/31/94	08/20/94	08/20/94
September	08/01/94 - 08/31/94	09/20/94	09/20/94
October	09/01/94 - 09/30/94	10/20/94	10/20/94
Pre-General	10/01/94 - 10/12/94	10/24/94	10/27/94
Post-General	10/20/94 - 11/12/94	12/08/94	12/08/94
Year-End	11/29/94 - 12/31/94	01/31/95	01/31/95

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-PEC FORMS WILL BE REQUIRED TO REFILE.

\*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.

\*\*Reports sent by registered on-cert must be postmarked by the mailing date; otherwise, they must be received by the filing date.

FOR INFORMATION, Call: 800/421-9511 or 202/219-3420

95043665126



## FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20543

February 22, 1994

Lisa B. Nelson, Treasurer  
Political Club for Growth  
150 East 35th Street  
New York, NY 10016

Identification Number: C00182964

Reference: Year End Report (7/1/93-12/31/93)

Dear Ms. Nelson:

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

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR §§100.2, 100.3, 100.4).

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

If you have any questions, please contact Stephen Cohen on our toll-free number (800) 424-9530. Our local number is (202) 219-3500.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

243351325





**FEDERAL ELECTION COMMISSION**  
WASHINGTON, DC 20541

EE-2

Lisa B. Nelson  
Political Club for Growth  
150 East 35th Street  
New York, NY 10016

NR ..4 BX

Identification Number: C00182964

Reference: 1993-1994 Election Cycle Reports

Dear Ms. Nelson:

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

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
1993 Mid-Year (1/1/93-6/30/93)	7/31/93	10/6/93
1993 Year End (7/1/93-12/31/93)	1/31/94	Not Filed

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

You may submit a letter of explanation in response to this notification. If, however, you have any questions, please feel free to contact Stephen Cohen on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

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

05042605128  
340343111



# REPORT NOTICE

## FEDERAL ELECTION COMMISSION

PARTIES AND PACS

March 22, 1994

REPORT	REPORTING PERIOD	REG./CENT. MAILING DATE**	FILING DATE
April Quarterly	01/01/94-03/31/94	04/15/94	04/15/94

### WHO MUST FILE

Party committees and PACs (nonconnected committees and separate segregated funds) filing on a quarterly basis must file a Quarterly Report in April.

### PRE-ELECTION REPORTING

Committees which make contributions or expenditures (including independent expenditures) in connection with an election, must also file a Pre-Election Report, if that activity was not previously reported. See January 1994 Report.

### LAST-MINUTE INDEPENDENT EXPENDITURES

Any PAC that makes independent expenditures in connection with an election may have to file a 24-hour report. This reporting requirement will be triggered if the committee makes independent expenditures aggregating \$1,000 or more on the 20th day, but more than 24 hours, before the election.

### CHANGE IN FILING FREQUENCY

Committees wishing to change their reporting schedule (for example, from quarterly to monthly) must notify the Commission in writing when they file their next report and state their current reporting schedule. Committees may change their filing frequencies no more than once per calendar year.

### LABEL

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

### COMPLIANCE

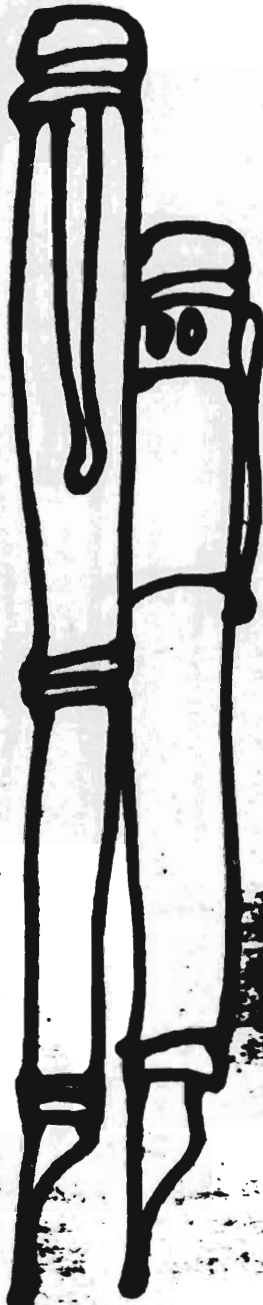
TREASURERS OF POLITICAL COMMITTEES ARE RESPONSIBLE FOR FILING ALL REPORTS ON TIME. FAILURE TO DO SO IS SUBJECT TO ENFORCEMENT ACTION. COMMITTEES FILING ILLEGIBLE REPORTS OR USING NON-FEC FORMS WILL BE REQUIRED TO REFILE.

\*The period begins with the close of the reporting period filed by the committee. If the committee has filed no previous reports, the period begins with the date of the committee's first activity.

\*\*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: 800/424-9644 or 202/715-3420

95043665129



**TELECON**

**ANALYST:**

Stephen Cohen

**CONVERSATION WITH:**

Lisa B. Nelson, Treasurer  
PH# (202) 484-2282

**COMMITTEE:**

Political Club for Growth  
(C00182964)

**DATE:**

April 8, 1994

**SUBJECT(S):**

Late Filing of 1993 Year End Report

The analyst spoke with Ms. Nelson concerning the Committee's non-filing of the 1993 Year End Report. Ms. Nelson acknowledged the report was late and needed to be filed. She stated the report would be filed by Monday, April 11.

95043665130



## FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20541

RQ-7

May 10, 1994

Lisa B. Nelson, Treasurer  
Political Club for Growth  
539 South Saint Asaph Street  
Alexandria, VA 22314

Identification Number: C00182964

Reference: April Quarterly Report (1/1/94-3/31/94)

Re: Ms. Nelson:

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

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR §§108.2, 108.3, 108.4).

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

If you have any questions, please contact Stephen Cohen on our toll-free number (800) 424-9530. Our local number is (202) 215-3580.

Sincerely,

A handwritten signature in dark ink, appearing to read "John D. Gibson".

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

95043665131

**TELECON****ANALYST:**

Stephen Cohen

**CONVERSATION WITH:**Lisa B. Nelson, Treasurer  
PH# (202) 484-2282**COMMITTEE:**Political Club for Growth  
(C00182964)**DATE:**

May 25, 1994

**SUBJECT(S):**Late Filing of 1993 Year End and 1994 April Quarterly  
Reports

The analyst informed Ms. Nelson that the Committee had been delinquent in filing reports since June of 1993, and that there was a possibility of legal action taken against the Committee for late filing of reports. Ms. Nelson replied that all late reports would be filed as soon as possible with the Commission.

95043665132



# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee  
(Summary Page)

1993 YEAR-END REPORT  
ATTACHMENT 12

USE PNC MODEL NO. LAR-1  
FOR  
TYPE ON PAPER

1. NAME OF COMMITTEE (in full)  
**POLITICAL CLUB FOR GROWTH**  
ADDRESS (number and street) Check if different than previously reported  
**1775 BROADWAY ST 26TH FLOOR**  
CITY, STATE and ZIP CODE  
**NY NY 10016**

**JAN 5 3 37 PM '94**

2. FEC IDENTIFICATION NUMBER  
**C00182964**  
3. This committee qualified as a multistate committee DURING THIS Reporting Period on \_\_\_\_\_ (Date)

## 4. TYPE OF REPORT

- (a) April 15 Quarterly Report  
July 15 Quarterly Report  
October 15 Quarterly Report  
☒ January 31 Year End Report

Monthly Report Due On:

February 20	June 20	October 20
March 20	July 20	November 20
April 20	August 20	December 20
May 20	September 20	January 31

July 31 Mid Year Report (Non election Year Only)

Twelfth day report preceding \_\_\_\_\_

(Type of Election)

election on \_\_\_\_\_ in the State of \_\_\_\_\_

Thirtieth day report following the General Election on \_\_\_\_\_

in the State of \_\_\_\_\_

Termination Report

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

## SUMMARY

5. Covering Period **7-1-93** through **12-31-93**

COLUMN A  
This Period

COLUMN B  
Calendar Year-to-Date

6. (a) Cash on Hand January 1, 1993

**\$12,817.67** **\$4,446.09**

(b) Cash on Hand at Beginning of Reporting Period

**\$12,817.67** **\$12,817.67**

(c) Total Receipts (from Line 19)

**\$650.00** **\$27,750.00**

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(b) and 6(c) for Column B)

**\$13,467.67** **\$39,416.09**

Total Disbursements (from Line 30)

**\$9,574.54** **\$28,442.96**

7. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

**\$3,893.13** **\$3,893.13**

8. Debts and Obligations Owed TO the Committee (itemize all on Schedule C and or Schedule D)

\$ —

9. Debts and Obligations Owed BY the Committee (itemize all on Schedule C and or Schedule D)

\$ —

For further information contact:  
Federal Election Commission  
950 E Street, NW  
Washington, DC 20543  
Toll Free 800-424-9530  
Local 202-376-3120

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

**LISA B. NELSON**

Signature of Treasurer

*Lisa B. Nelson*

Date

**6-6-94 (filed later)**

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 31

(Rev. 11/93)

**TELECON**

**ANALYST:** Stephen Cohen

**CONVERSATION WITH:** Lisa B. Nelson, Treasurer  
PH# (202) 484-2282

**COMMITTEE:** Political Club for Growth  
(C00182964)

**DATE:** June 8, 1994

**SUBJECT(S):** Late Filing of 1994 April Quarterly Report

The analyst called Ms. Nelson and informed her that the 1994 April Quarterly Report needed to be filed with the Commission by Friday, June 10. Ms. Nelson stated that the report would be filed by the deadline.

9 5 0 4 3 6 6 5 1 3 4

# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee  
(Summary Page)

1994 APRIL QUARTERLY REPORT  
ATTACHMENT 14

USE PRE-PAID LABEL  
ON FRONT

1 NAME OF COMMITTEE (Print)

POLITICAL CLUB FOR GROWTH

Address (Number and Street) ☐ Check if subject has previously reported

1775 BROADWAY ST. 26<sup>TH</sup> FLOOR

CITY, STATE and ZIP CODE

NY NY 10016

See 10 1 50 1 1 1

2 PRE-PAID LABEL NUMBER

CO0183964

3 ☐ This committee has qualified as a multi-person committee (see FEC #2041 14)

## 4. TYPE OF REPORT

(a) ☒ April 15 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year-End Report

☐ July 31 Mid-Year Report (Non-election Year Only)

☐ Termination Report

Monthly Report Due On:

☐ February 20 ☐ June 20 ☐ October 20  
☐ March 20 ☐ July 20 ☐ November 20  
☐ April 20 ☐ August 20 ☐ December 20  
☐ May 20 ☐ September 20 ☐ January 31

☐ Twelfth day report preceding \_\_\_\_\_ (Type of Election)

election on \_\_\_\_\_ in the State of \_\_\_\_\_

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

(b) Is this Report an Amendment?

☐ YES ☒ NO

## SUMMARY

5	Covering Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
	1-1-94 through 3-31-94		
6	(a) Cash on Hand January 1, 19		\$3973.13
	(b) Cash on Hand at Beginning of Reporting Period	\$3973.13	
	(c) Total Receipts (from Line 19)	\$26118.90	\$26118.90
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$30092.03	\$30092.03
7	Total Disbursements (from Line 30)	\$11,621.15	\$11,621.15
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$18,470.88	\$18,470.88
9	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ —	For further information contact: Federal Election Commission 650 E Street, NW Washington, DC 20463 Toll Free 800-426-6542 Local 202-516-3420
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:

LISA B. NELSON

Signature of Treasurer:

Lisa B. Nelson

Date:

6/10/94

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 3

Revised 9/93

# REPORT NOTICE

## FEDERAL ELECTION COMMISSION

PARTIES AND PACS

June 21, 1994

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
July Quarterly	04/01/94 - 06/30/94	07/15/94	07/15/94

**WHO MUST FILE**

Party committees and PACs (nonconnected committees and separate segregated funds) filing on a quarterly basis must file a Quarterly Report in July.

**PRE-ELECTION REPORTING**

Committees which make contributions or expenditures (including independent expenditures) in connection with an election must also file a Pre-Election Report, if the activity was not previously reported. See the January 1994 Record.

**LAST-MINUTE INDEPENDENT EXPENDITURES**

Any PAC that makes independent expenditures in connection with an election may have to file a 24 hour report. This reporting requirement will be triggered if the committee makes independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the election day.

**CHANGE IN FILING FREQUENCY**

Committees wishing to change their reporting schedule (for example, from quarterly to monthly) must notify the Commission in writing when they file their next report due under their current reporting schedule. Committees may change their filing frequencies no more than once per calendar year.

**LABEL**

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

**COMPLIANCE**

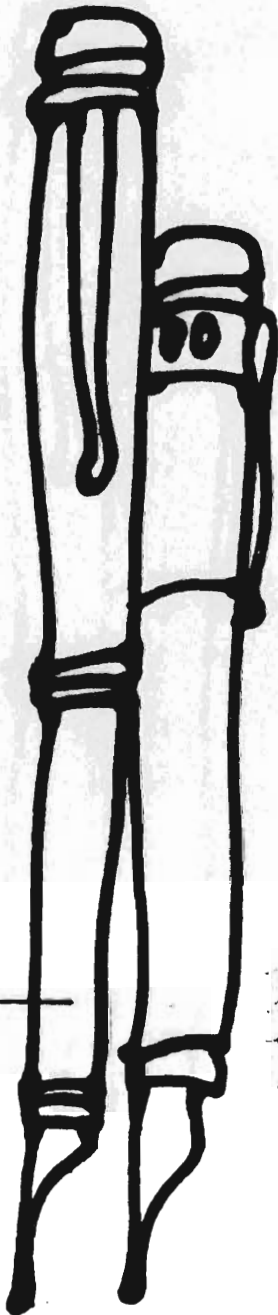
**TREASURERS OF POLITICAL COMMITTEES ARE RESPONSIBLE FOR FILING ALL REPORTS ON TIME. FAILURE TO DO SO IS SUBJECT TO ENFORCEMENT ACTION. COMMITTEES FILING ILLEGIBLE REPORTS OR USING NON-FEC FORMS WILL BE REQUIRED TO REFILE.**

\*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.

\*\*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 202/219-3420

95043665136







## FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20541

EG-7

August 4, 1994

Lisa B. Nelson, Treasurer  
Political Club for Growth  
539 South Saint Asaph Street  
Alexandria, VA 22314

Identification Number: C00182964

Reference: July Quarterly Report (4/1/94-6/30/94)

Dear Ms. Nelson:

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

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR §§100.2, 100.3, 100.4).

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

If you have any questions, please contact Stephen Cohen on our toll-free number (800) 424-9530. Our local number is (202) 219-3580.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee  
(Continuation Page)

1994 JULY QUARTERLY REPORT  
ATTACHMENT 17

SEE FISC 1000 FOR LATER  
TYPE ON FRONT

1. NAME OF COMMITTEE OR CANDIDATE

**POLITICAL CLUB FOR GROWTH**

ADDRESS (Number and Street) ☐ Check if different from previously reported

**1775 BROADWAY ST. 26TH FLOOR**

CITY, STATE AND ZIP CODE

**NY NY 10016**

2. FEDERAL ELECTIONS COMMISSION

**CD-182964**

4. ☐ This committee has qualified as a full-member committee. (See FEC FORM 110)

DATE  
**Aug 25 9 07 AM**

## 4. TYPE OF REPORT

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

- Identify Report Due On:
- |                                      |                                       |                                      |
|--------------------------------------|---------------------------------------|--------------------------------------|
| <input type="checkbox"/> February 28 | <input type="checkbox"/> June 30      | <input type="checkbox"/> October 30  |
| <input type="checkbox"/> March 30    | <input type="checkbox"/> July 30      | <input type="checkbox"/> November 30 |
| <input type="checkbox"/> April 30    | <input type="checkbox"/> August 30    | <input type="checkbox"/> December 30 |
| <input type="checkbox"/> May 30      | <input type="checkbox"/> September 30 | <input type="checkbox"/> January 31  |
- ☐ Twelfth day report preceding \_\_\_\_\_ (Type of Election)
- election on \_\_\_\_\_ in the State of \_\_\_\_\_
- ☐ Thirtieth day report following the General Election or \_\_\_\_\_ in the State of \_\_\_\_\_

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

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	<b>4-1-94 through 6-30-94</b>		
6. (a) Cash on Hand January 1, 19__			<b>\$3973.13</b>
(b) Cash on Hand at Beginning of Reporting Period		<b>\$18470.88</b>	
(c) Total Receipts (from Line 18)		<b>\$ 150.00</b>	<b>\$ 26218.90</b>
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		<b>\$18620.88</b>	<b>\$30242.03</b>
7. Total Disbursements (from Line 30)		<b>\$ 7572.20</b>	<b>\$19,193.35</b>
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		<b>\$11,048.68</b>	<b>\$11,048.68</b>
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		<b>\$ —</b>	For further information contact Federal Election Commission 800 E Street, NW Washington, DC 20540 Toll Free 800-424-9550 Land 202-418-3443
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)		<b>\$ —</b>	

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

Type or Print Name of Treasurer

**LISA B. NELSON**

Signature of Treasurer

*Lisa B. Nelson*

Date

**8/18/94**

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

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FEC FORM 278  
October 1993

# REPORT NOTICE

## FEDERAL ELECTION COMMISSION

PARTIES AND PACS

September 21, 1994

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
October Quarterly	07 01 94 - 09/30/94	10/15/94	10/15/94

**WHO MUST FILE**

Party committees and PACs (nonconnected committees and separate segregated funds) filing on a quarterly basis must file a Quarterly Report in October.

**PRE-ELECTION REPORTING**

Committees which make contributions or expenditures (including independent expenditures) in connection with an election must also file a Pre-Election Report, if the activity was not previously reported. See the January 1994 Record.

**LAST-MINUTE INDEPENDENT EXPENDITURES**

Any PAC that makes independent expenditures in connection with an election may have to file a 24 hour report. This reporting requirement will be triggered if the committee makes independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the election day.

**CHANGE IN FILING FREQUENCY**

Committees wishing to change their reporting schedule (for example, from quarterly to monthly) must notify the Commission in writing when they file their next report due under their current reporting schedule. Committees may change their filing frequencies no more than once per calendar year.

**LABEL**

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

\*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.

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

over

95043665139

**PARTIES AND PACS**

**OCTOBER QUARTERLY**

**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-PEC FORMS WILL BE REQUIRED TO REFILE.**

95043665140

**FOR INFORMATION, Call: 800/424-9530 or 202/219-3420**



# GENERAL ELECTION REPORT NOTICE

ATTACHMENT 19  
PAGE 1 of 2

## FEDERAL ELECTION COMMISSION

PARTIES AND PACS

October 3, 1994

### I. ALL MONTHLY FILERS

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Pre-General	10/01/94 - 10/19/94	10/24/94	10/27/94
Post-General	10/20/94 - 11/28/94	12/08/94	12/08/94

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

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Pre-General	10/01/94 - 10/19/94	10/24/94	10/27/94
Post-General	10/20/94 - 11/28/94	12/08/94	12/08/94

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

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Post-General	10/01/94 - 11/28/94	12/08/94	12/08/94

#### WHO MUST FILE

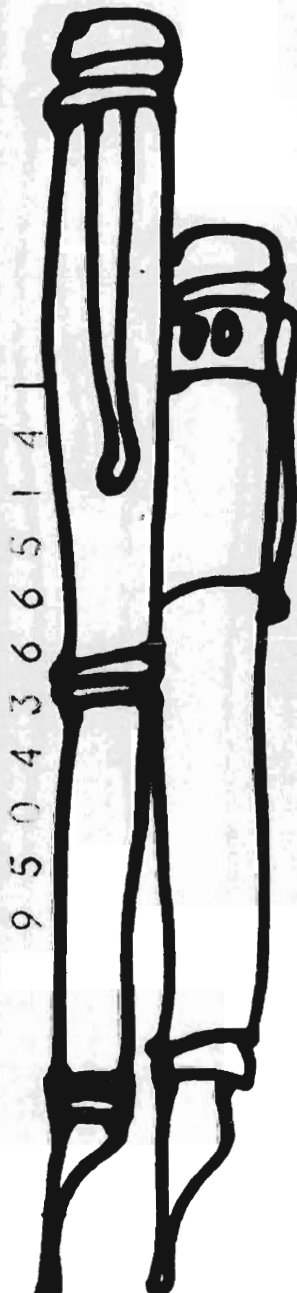
Party committees and PACs must follow the above charts in order to determine whether they must file the Pre-General Election Report. All Party committees and PACs, regardless of financial activity, must file the Post-General Election Report.

\*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.

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

\*\*\*Committees that made general election contributions or expenditures before October 1 and that did not previously report them must also follow the Chart II reporting requirements.

(over)



95043665141

**PARTIES AND PACS**

**GENERAL ELECTION**

**LAST-MINUTE INDEPENDENT EXPENDITURES**

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

**LABEL**

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

**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.

FOR INFORMATION, Call: 800/424-9530 or 202/219-3420

950436651.42



## FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20541

80-7

November 4, 1994

Lisa B. Nelson, Treasurer  
Political Club for Growth  
939 South Saint Joseph Street  
Alexandria, VA 22314

Identification Number: C90182964

Reference: October Quarterly Report (7/1/94-9/30/94)

Dear Ms. Nelson:

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

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR §§100.2, 100.3, 100.4).

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

If you have any questions, please contact Stephen Cohen on our toll-free number (800) 424-9530. Our local number is (202) 219-3580.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

94032430719

**TELECON**

**ANALYST:** Stephen Cohen

**CONVERSATION WITH:** Lisa B. Nelson, Treasurer  
PH# (202) 484-2282

**COMMITTEE:** Political Club for Growth  
(C00182964)

**DATE:** November 28, 1994

**SUBJECT(S):** Late Filing of 1994 October Quarterly Report

Ms. Nelson acknowledged the 1994 October Quarterly Report being late and stated that the Committee did not need to file a 12 Day Pre-General Report. Ms. Nelson informed the analyst that the late report would be hand delivered to the Commission by Tuesday, November 29.

95043665144



**TELECON**

**ANALYST:**

Stephen Cohen

**CONVERSATION WITH:**

Lisa B. Nelson, Treasurer  
PH# (202) 484-2282

**COMMITTEE:**

Political Club for Growth  
(C00182964)

**DATE:**

December 6, 1994

**SUBJECT(S):**

Late Filing of 1994 October Quarterly Report

The analyst called Ms. Nelson to follow-up their conversation from November 28, 1994. Ms. Nelson stated that the Committee's 1994 October Quarterly Report would be hand delivered within the hour.

95043665145

USE PREPARED LABELS  
ON  
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) <b>POLITICAL CLUB FOR GROWTH</b>		Dec 7 12 02 AM '94	
ADDRESS (Number and street) <input type="checkbox"/> Check if different than previously reported <b>1775 BROADWAY 26TH FLOOR</b>		2. FEC IDENTIFICATION NUMBER <b>C00182964</b>	
CITY, STATE and ZIP CODE <b>NY, NY 10016</b>		3. <input type="checkbox"/> This committee qualified as a multicandidate committee DURING THIS Reporting Period on (date).	

4. TYPE OF REPORT

☐ April 15 Quarterly Report

☐ July 15 Quarterly Report

☒ October 15 Quarterly Report

☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-election Year Only)

☐ Termination Report

Monthly Report Due On:

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

☐ Twelfth day report preceding \_\_\_\_\_  
(Type of Election)

election on \_\_\_\_\_ in the State of \_\_\_\_\_

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

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

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. Covering Period	<u>7-1-94</u> through <u>9-30-94</u>		
(a) Cash on Hand January 1, 19__			\$ 973.13
(b) Cash on Hand at Beginning of Reporting Period		\$ 11048.68	
(c) Total Receipts (from Line 19)		\$ 1460.00	\$ 23,728.90
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(b) and 6(c) for Column B)		\$ 12508.68	\$ 21,702.03
7. Total Disbursements (from Line 20)		\$ 4066.75	\$ 23,260.10
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 8441.93	\$ 8441.93
9. Debts and Obligations Owed TO the Committee (Report all on Schedule C and/or Schedule D)		\$ —	For further information contact: Federal Election Commission 900 E Street, NW Washington, DC 20463 Toll Free 800-424-9630 Local 202-219-3400
10. Debts and Obligations Owed BY the Committee (Report 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

**LISA B. NELSON**

Signature of Treasurer

*Lisa B. Nelson*

Date

**12/5/94**

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

95043665146



FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20541

RQ-7

January 4, 1995

Lisa B. Nelson, Treasurer  
Political Club For Growth  
539 S. Saint Asaph Street  
Alexandria, VA 22314

Identification Number: C00182964

Reference: 30 Day Post-General Report (10/1/94-11/28/94)

Dear Ms. Nelson:

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

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer. 11 CFR §§108.2, 108.3, 108.4

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

If you have any questions, please contact Stephen Cohen on our toll-free number (800) 424-9530. Our local number is (202) 219-3580.

Sincerely,

A handwritten signature in black ink, appearing to read "John D. Gibson", is written over the typed name.

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

985432177

**TELECON**

**ANALYST:** Stephen Cohen

**CONVERSATION WITH:** Lisa B. Nelson, Treasurer  
PH# (202) 484-2282

**COMMITTEE:** Political Club for Growth  
(C00182964)

**DATE:** February 2, 1995

**SUBJECT(S):** Late Filing of 1994 30 Day Post-General Report

The analyst called Ms. Nelson regarding non-filing of the 30 Day Post-General. Ms. Nelson's assistant, Julie, informed the analyst that she would pass along the message to Ms. Nelson who was on maternity leave.

Later in the day, Ms. Nelson called to inform the analyst that the Committee's 30 Day Post-General and Year End Reports would be filed with the Commission on 2/3/95.

95043665148



**REPORT OF RECEIPTS AND DISBURSEMENTS**For Other Than An Authorized Committee  
(Summary Page)199 95 30 DAY POST-GENERAL REPORT  
ATTACHMENT# 26

USE FPC MAILING LABEL

TYPE OR PRINT

## 1. NAME OF COMMITTEE (in full)

POLITICAL CLUB FOR GROWTHADDRESS (number and street) ☐ Check if different than previously reported1775 BROADWAY

CITY, STATE and ZIP CODE

NY NY 10019

FEB 3 4 04 PM '95

## 2. FEC IDENTIFICATION NUMBER

C001829643. ☐ This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

## 4. TYPE OF REPORT

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

## Monthly Report Due On:

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

☐ Twelfth day report preceding \_\_\_\_\_  
(Type of Election)

election on \_\_\_\_\_ in the State of \_\_\_\_\_

☒ Thirtieth day report following the General Election on \_\_\_\_\_  
in the State of \_\_\_\_\_

(b) Is this Report an Amendment?

☐ YES☒ NO

## SUMMARY

5. Covering Period 10-1-94 through 11-28-94COLUMN A  
This PeriodCOLUMN B  
Calendar Year-to-Date

6. (a) Cash on Hand January 1, 19 \_\_\_\_\_

\$ 3973.13

(b) Cash on Hand at Beginning of Reporting Period \_\_\_\_\_

\$ 8441.93

(c) Total Receipts (from Line 18) \_\_\_\_\_

\$ - 0 -\$ 27,728.90(d) Subtotal (add Lines 6(b) and 6(c) for Column A and  
Lines 6(a) and 6(c) for Column B) \_\_\_\_\_\$ 8441.93\$ 31,702.03

7. Total Disbursements (from Line 30) \_\_\_\_\_

\$ 892.18\$ 24,152.28

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) ...

\$ 7549.75\$ 7549.159. Debts and Obligations Owed TO the Committee  
(Itemize all on Schedule C and/or Schedule D) \_\_\_\_\_\$ —10. Debts and Obligations Owed BY the Committee  
(Itemize all on Schedule C and/or Schedule D) \_\_\_\_\_\$ —For further information contact:  
Federal Election Commission  
900 E Street, NW  
Washington, DC 20463  
Toll Free 800-424-9530  
Local 202-219-3420

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

LISA B. NELSON

Signature of Treasurer

Lisa B. Nelson

Date

2/2/95

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 8/93)

95039644632

RECEIVED  
FEDERAL ELECTION COMMISSION  
JAN 5 11 01 AM '95

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

**SENSITIVE**

**FIRST GENERAL COUNSEL'S REPORT**

RAD Referral: 95NF-08  
Date Activated: May 12, 1995  
Staff Member: Chris Worden  
Holly Baker

**SOURCE: INTERNALLY GENERATED**

**RESPONDENTS:** Political Club for Growth and  
Lisa B. Nelson, as treasurer

**RELEVANT STATUTES:** 2 U.S.C. § 434(a)(4)(A)(i), (iii) and (iv)  
11 C.F.R. § 104.5(c)(1)(i)(A), (c)(1)(iii)  
and (c)(2)(i)

**I. GENERATION OF MATTER**

The Office of the General Counsel received a referral from the Reports Analysis Division ("RAD") on April 11, 1995.

Attachment 1. The basis for the referral is the failure of the Political Club for Growth and Lisa B. Nelson, as treasurer ("Respondents") to timely file Mid-Year and Year End Reports for 1993, 1994 April, July, and October Quarterly Reports, and the 30 Day Post-General Report for 1994.

**II. FACTUAL AND LEGAL ANALYSIS**

Based on the Factual and Legal Analysis, see Attachment 2, this Office recommends the Commission find reason to believe Respondents violated 2 U.S.C. § 434(a)(4)(A)(i), (iii), and (iv).

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

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**IV. RECOMMENDATIONS**


1. Open a MUR.
2. Find reason to believe that the Political Club for Growth and Lisa B. Nelson, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), (iii), and (iv) and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the attached Factual and Legal Analysis, proposed conciliation agreement, and the appropriate letter.

Lawrence M. Noble  
General Counsel

Date

6/5/95

BY:

  
Lois G. Lerner  
Associate General Counsel

**Attachments:**

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

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Political Club for Growth and  
Lisa B. Nelson, as treasurer.

)  
) RAD Referral  
) #95NF-08  
)

MUR 4221

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 8, 1995, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral #95NF-08:

1. Open a MUR.
2. Find reason to believe that the Political Club for Growth and Lisa B. Nelson, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), (iii), and (iv) and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the Factual and Legal Analysis, proposed conciliation agreement, and the appropriate letter, as recommended in the General Counsel's Report dated June 5, 1995.

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

Attest:

6-8-95  
Date

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

Received in the Secretariat: Mon., June 5, 1995 11:38 a.m.  
Circulated to the Commission: Mon., June 5, 1995 4:00 p.m.  
Deadline for vote: Thurs., June 8, 1995 4:00 p.m.

bjr

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20461

June 14, 1995

Political Club for Growth  
Lisa B. Nelson, Treasurer  
539 South Saint Asaph Street  
Alexandria, VA 22314

RE: MUR 4221  
Political Club for Growth and  
Lisa B. Nelson, as treasurer

Dear Ms. Nelson:

On June 8, 1995, the Federal Election Commission found that there is reason to believe the Political Club for Growth ("Committee") and you, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i), (iii), and (iv), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

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 additional information, 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.

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.

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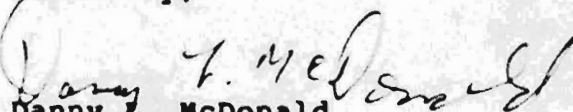
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 Chris Worden, the staff member assigned to this matter, at (202) 219-3437.

Sincerely,

  
Danny Z. McDonald  
Chairman

Enclosures

Factual and Legal Analysis  
Procedures  
Designation of Counsel Form  
Conciliation Agreement

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**FEDERAL ELECTION COMMISSION  
FACTUAL & LEGAL ANALYSIS**

**RESPONDENTS:** Political Club for Growth and  
Lisa B. Nelson, as treasurer

**MUR 4221**

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).

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires treasurers of political committees other than authorized committees of a candidate to file periodic reports of receipts and disbursements. In any calendar year in which a regularly scheduled general election is held, all political committees which choose not to file on a monthly basis must submit quarterly reports which shall be filed no later than the 15th day after the last day of each calendar quarter, except the report for the quarter ending December 31 of such calendar year, which shall be filed no later than January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(A)(i).

Furthermore, the Act requires political committees other than the authorized committees of a candidate to file a post-general election report, which shall be filed no later than the 30th day after the general election and shall be complete as of the 20th day after such general election. 2 U.S.C. § 434(a)(4)(A)(iii).

In non-election years, political committees must file a report covering the period beginning January 1 and ending June 30,

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which shall be filed no later than July 31, and a report covering July 1 and ending December 31, which shall be filed no later than January 31 of the following calendar year.

2 U.S.C. § 434(a)(4)(A)(iv).

The Political Club for Growth ("the Committee") is a political committee that is not authorized by any candidate. Pursuant to 2 U.S.C. § 434(a)(4)(A)(iv), the Committee's 1993 Mid-Year Report was due on July 31, 1993. The Committee did not file its Mid-Year Report, which disclosed receipts of \$27,100 and disbursements of \$18,868, until October 6, 1994, 67 days late. The Committee's 1993 Year-End Report was due on January 31, 1994. However, the Committee did not file its Year-End Report, which disclosed receipts of \$650 and disbursements of \$9,575, until June 6, 1994, 126 days late.

Pursuant to 2 U.S.C. § 434(a)(4)(A)(i), the Committee was required to file its 1994 April Quarterly Report by April 15, 1994. The Committee filed the report 56 days late, on June 10, 1994, listing receipts of \$26,119 and disbursements of \$11,621. The Committee's 1994 July Quarterly Report was due on July 15, 1994, but was filed 45 days late, on August 29, listing receipts of \$150 and disbursements of \$7,572. The Committee's October Quarterly Report, due on October 15, 1994, was filed 53 days late, on December 7, 1994, with receipts of \$1,460 and disbursements of \$4,067.

Finally, pursuant to 2 U.S.C. § 434(a)(4)(A)(iii), the Committee's 30-Day Post-General Report was due December 8, 1994, but was not filed until February 3, 1995, 57 days late, disclosing

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no receipts and disbursements of \$892.

Based on the foregoing, there is reason to believe the Political Club for Growth and Lisa B. Nelson, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), (iii), and (iv) by failing to timely file their 1993 Mid-Year and Year-End Reports, their 1994 April, July, and October Quarterly Reports, and their 1994 30-Day Post-General Report.

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July 13, 1995

Mr. Chris Worden  
Federal Election Committee  
Washington, D.C. 20461

Dear Chris:

I am in receipt of your letter regarding the Political Club for Growth and MUR 4221 and feel that I must communicate the circumstances of my personal life last year in order to clear up this unfortunate situation.

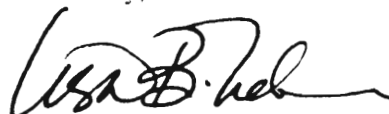
First and foremost, I must acknowledge that your records are indeed accurate. I failed to follow specific filing procedures. Without going into too much detail, I wanted to explain the number of reasons why I was unable to file on time. In addition to holding a full time job, in 1994 my husband and I moved three times, first from the New York/ CT area to Washington D.C. and twice in the Virginia area. On top of our moves and losing quite a bit of mail in the process, I was pregnant and gave birth to a baby girl in January of 1995, which caused me to miss a number of personal and professional deadlines, including the FEC.

While I realize there is no excuse for missing these deadlines, I must also add that I believe that as of now, all of my required reports have been filed. I recognize that the FEC reporting is my responsibility alone.

I also want to assure you that steps have been taken to assure you that our reports will be filed on time. I have recognized that my priorities have forced me to put the club filings after other projects and have hired someone to handle the details of the filings to avoid any future violations. I have also enclosed a signed copy of the conciliation agreement for your files.

Again, I want to stress how much I regret this unfortunate situation, and hope that you will understand my extenuating circumstances. Please call me at (703) 533-0376 with any questions at all

Sincerely,



Lisa B. Nelson

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FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20463

July 17, 1945

## TWO WAY MEMORANDUM

**TO: OGC, Docket**

**FROM: Rosa E. Swinton**  
**Accounting Technician**

**SUBJECT: Account Determination for Funds Received**

We recently received a check from Political Club for  
Growth + L.S.G. Nelson, check number 1074, dated  
July 14, 1995, and in the amount of \$      .  
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: Rosa E. Swinton**  
**Accounting Technician**

FROM: OGC, Docket By aa

In reference to the above check in the amount of \$3,200.00, the MUR number is 4221 and in the name of Political Club for Growth. The account into which it should be deposited is indicated below:

- ✓ Budget Clearing Account (OGC), 95F3875.16  
 — Civil Penalties Account, 95-1099.160  
 Other:

Amita Alexander  
Signature

7-17-95  
Date

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DAVID R. NELSON  
LISA B. NELSON

1074

00-700/600  
27015

July 14, 95

PAY TO THE  
ORDER OF

Federal Election Commission

\$ 3200.00

Thirty two hundred and ~~no~~ <sup>no</sup> DOLLARS

FIRST  
UNION

First Union National Bank  
of Virginia  
McLean, VA

PERFORMANCE BANKING

Lisa B. Nelson

FOR

© Clardy Associates, Inc.

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
SECRET

JUL 21 9 56 AM '95

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Political Club for Growth and ) MUR 4221  
Lisa B. Nelson, as treasurer )  
)

**SENSITIVE**

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On June 5, 1995, the Commission found reason to believe that the Political Club for Growth and Lisa B. Nelson, as treasurer, ("Committee" or "Respondents") violated 2 U.S.C. § 434(a)(4)(A)(i), (iii), and (iv). The Committee failed to timely file its Mid-Year and Year-End Reports for 1993 and its April, July, and October Quarterly and 30-Day Post-General Reports for 1994. On the same date, the Commission offered to enter into pre-probable cause conciliation and approved a conciliation agreement

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IV. RECOMMENDATIONS

1. Approve the attached conciliation agreement and the appropriate letter.
2. Close the file.

Lawrence M. Noble  
General Counsel

Date

2/20/95

BY:

Lois G. Lerner

Associate General Counsel

Attachments

1. Response of Committee
2. Signed Conciliation Agreement
3. Copy of check
4. Letter from Treasurer

Staff assigned: Chris Worden  
Holly Baker

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Political Club for Growth and  
Lisa B. Nelson, as treasurer.

)  
)  
) MUR 4221  
)

CERTIFICATION

I, Marjorie W. Emons, Secretary of the Federal Election Commission, do hereby certify that on July 26, 1995, the Commission decided by a vote of 6-0 to take the following actions in MUR 4221:

1. Approve the conciliation agreement and the appropriate letter, as recommended in the General Counsel's Report dated July 20, 1995.
2. Close the file.

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

Attest:

7-26-95

Date

*for Marjorie W. Emons*  
Secretary of the Commission

Received in the Secretariat: Fri., July 21, 1995 9:56 a.m.  
Circulated to the Commission: Fri., July 21, 1995 12:00 p.m.  
Deadline for vote: Wed., July 26, 1995 4:00 p.m.

bjr

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

August 1, 1995

Lisa B. Nelson  
Political Club for Growth  
6023 Woodley Road  
McLean, VA 22101

Dear Ms. Nelson:

On July 26, 1995, the Federal Election Commission accepted the signed conciliation agreement and civil penalty you submitted on behalf of the Political Club for Growth in settlement of violations of 2 U.S.C. § 343(a)(4)(A)(i), (iii), and (iv), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Accordingly, the file has been closed in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

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 me at (202) 219-3690.

Sincerely,

*Chris Worden*  
Chris Worden  
Staff Member

Enclosure  
Conciliation Agreement

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## BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Political Club for Growth and  
Lisa B. Nelson, as treasurer) MUR 4221  
)  
)

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## CONCILIATION AGREEMENT

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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 Political Club for Growth and Lisa B. Nelson, as treasurer ("Respondents"), violated 2 U.S.C. § 434(a)(4)(A)(i), (iii), and (iv).

NOW, THEREFORE, the Commission and 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 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.



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

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

1. The Political Club for Growth is a political committee within the meaning of 2 U.S.C. § 431(4), and is not an authorized committee for any candidate.

2. Lisa B. Nelson is the treasurer of the Political Club for Growth.

3. The Federal Election Campaign Act of 1971, as amended ("the Act"), requires political committees to file periodic reports of receipts and disbursements. 2 U.S.C. § 434(a)(1).

4. In any calendar year in which a regularly scheduled general election is held, all political committees that choose not to file on a monthly basis shall file quarterly reports which shall be filed no later than the 15th day after the last day of each calendar quarter, except the report for the quarter ending December 31 of such calendar year, which shall be filed no later than January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(a)(i).

5. In any calendar year in which a regularly scheduled general election is held, all political committees shall file a post-general election report no later than the 30th day after the general election. The report shall be complete as of the 20th day after such general election. 2 U.S.C. § 434(a)(4)(A)(iii).

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6. In non-election years, political committees must file a report covering the period beginning January 1 and ending June 30, which shall be filed no later than July 31, and a report covering the period beginning July 1 and ending December 31, which shall be filed no later than January 31 of the following calendar year.

2 U.S.C. § 434(a)(4)(A)(iv).

7. Respondents' 1993 Mid-Year Report was due on July 31, 1993. Respondents filed their 1993 Mid-Year Report on October 6, 1993, 67 days late, listing receipts of \$27,100 and disbursements of \$18,868.

8. Respondents' 1993 Year-End Report was due on January 31, 1994. Respondents filed their 1993 Year-End Report on June 6, 1994, 126 days late, listing receipts of \$650 and disbursements of \$9,575.

9. Respondents' 1994 April Quarterly Report was due on April 15, 1994. Respondents filed their 1994 April Quarterly report on June 10, 1994, 56 days late, listing receipts of \$26,119 and disbursements of \$11,621.

10. Respondents' 1994 July Quarterly Report was due on July 15, 1994. Respondents filed their 1994 July Quarterly Report on August 29, 1994, 45 days late, listing receipts of \$150 and disbursements of \$7,572.

11. Respondents' 1994 October Quarterly Report was due on October 15, 1994. Respondents filed their 1994 October Quarterly Report on December 7, 1994, 53 days late, listing receipts of \$1,460 and disbursements of \$4,067.

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12. Respondents' 1994 30-Day Post-General Report was due on December 8, 1994. Respondents filed their 1994 30-Day Post-General Report on February 3, 1995, 57 days late, disclosing no receipts and disbursements of \$892.

V. Respondents failed to timely file reports, in violation of 2 U.S.C. § 434(a)(4)(A)(i), (iii), and (iv).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Three Thousand Two Hundred Dollars (\$3,200), 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 the requirement contained in this agreement.

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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 by AAS*  
Lois G. Lerner  
Associate General Counsel

Date

*7/31/95*

## FOR THE RESPONDENTS:

*Lisa B. Nelson*  
(Name)  
(Position)

Date

*7/14/95*

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FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

THIS IS THE END OF MUR # 4221

DATE FILMED 8/23/95 CAMERA NO. 1

CAMERAMAN EES

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