



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20543

THIS IS THE BEGINNING OF PUR # 4692

DATE FILMED 5/1/81 CAMERA NO. 1

CAMERA MAN SES

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## REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: APR 11 11 1996

ANALYST: Neill Evans

- I. COMMITTEE: Political Club for Growth  
(C00182964)  
Kelly Forsberg, Treasurer  
(6/1/96 - present)  
Maggy Laws, Treasurer  
(1/31/96 - 5/31/96)  
Lisa B. Nelson, Treasurer  
(2/27/92 - 1/30/96)  
215 East 73rd Street 9E  
New York, NY 10021
- II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(A)(i) & (iii)  
11 CFR §104.5(c)(1)(i)(A) & (iii)(A)

## III. BACKGROUND:

**Chronic Late Filing of Reports**

Political Club for Growth ("the Committee") has failed to file four (4) Reports of Receipts and Disbursements in a timely manner for the 1995-1996 election cycle (see Chart on Page 3). The reports were filed between eleven (11) and one-hundred fifty-four (154) calendar days late.

On August 16, 1996, a Chronic Late Filer Notice was sent to the Committee for failing to file the 1996 April Quarterly and July Quarterly Reports in a timely manner (Attachment 8). 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 Filer Notice, the Committee failed

**POLITICAL CLUB FOR GROWTH  
REPORTS ANALYSIS OGC REFERRAL  
PAGE 2**

to file the 1996 October Quarterly and 30 Day Post-General Reports in a timely manner.

On December 3, 1996, the Reports Analysis Division analyst called and left a message for the committee to inform them of their non-filing of the 1996 July Quarterly and October Quarterly Reports. On December 10, 1996, the treasurer returned the call, and stated that she was on maternity leave, and the filing responsibility was given to another person in the Committee. However, she said that the late reports, including the 30 Day Post-General Report, would be filed by December 13, 1996 (Attachment 13). All three reports were received by the Commission on December 16, 1996.

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## LATE FILING HISTORY

REPORT TYPE	PRIOR NOTICE	DATE DUE	NON-FILER NOTICE	DATE FILED
1996 April Quarterly (1/1/96-3/31/96)	12/29/95 (Attachment 2) 3/22/96 (Attachment 3)	4/15/96	5/08/96 (Attachment 4)	6/04/96 (Attachment 5)
1996 July Quarterly (4/1/96-6/30/96)	12/29/95 (Attachment 2) 6/21/96 (Attachment 6)	7/15/96	8/12/96 (Attachment 7)	12/16/96 (Attachment 14)
1996 October Quarterly (7/1/96-9/30/96)	12/29/95 (Attachment 2) 9/20/96 (Attachment 9)	10/15/96	11/6/96 (Attachment 11) <sup>2</sup>	12/16/96 (Attachment 15)
1996 90 Day Post-General (10/1/96-11/25/96)	12/29/95 (Attachment 2) 9/30/96 (Attachment 10) 11/08/96 (Attachment 12)	12/05/96	None	12/16/96 (Attachment 16)

<sup>2</sup> The Non-Filer Notice was sent via Mailgram.



COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	# OF COPIES	DATE	PAGE	LOCATION	TYPE OF FILER
POLITICAL CLUB FOR GROWTH								
CONNECTED ORGANIZATION:	NONE							
1995 MID-YEAR REPORT		23,100	10,491	1 JAN 95 - 31 JUN 95	12	95FEC/500/2566		
MID-YEAR REPORT - AMENDMENT		-	-	1 JAN 95 - 31 JUN 95	2	95FEC/1018/3937		
REQUEST FOR ADDITIONAL INFORMATION				1 JAN 95 - 31 JUN 95	3	95FEC/597/1505		
REQUEST FOR ADDITIONAL INFORMATION 2ND				1 JAN 95 - 31 JUN 95	4	95FEC/1015/3554		
YEAR-END		450	18,904	1 JUL 95 - 31 DEC 95	6	95FEC/121/3283		
YEAR-END - AMENDMENT		450	18,904	1 JUL 95 - 31 DEC 95	7	95FEC/123/1646		
YEAR-END - AMENDMENT		450	18,904	1 JUL 95 - 31 DEC 95	4	95FEC/172/1566		
REQUEST FOR ADDITIONAL INFORMATION				1 JUL 95 - 31 DEC 95	2	95FEC/131/2241		
1996 STATEMENT OF ORGANIZATION - AMENDMENT				1 JAN 96	1	95FEC/121/3282		
STATEMENT OF ORGANIZATION - AMENDMENT				1 JAN 96	2	95FEC/149/3611		
MISCELLANEOUS NOTICE FROM FEC				1 JAN 96	2	95FEC/172/3331		
APRIL QUARTERLY		20,550	8,462	1 JAN 96 - 31 MAR 96	11	95FEC/155/3086		
APRIL QUARTERLY - AMENDMENT		21,350	8,462	1 JAN 96 - 31 MAR 96	4	95FEC/162/1670		
APRIL QUARTERLY - AMENDMENT		20,550	8,462	1 JAN 96 - 31 MAR 96	11	95FEC/162/1674		
NOTICE OF FAILURE TO FILE				1 JAN 96 - 31 MAR 96	2	95FEC/144/2632		
REQUEST FOR ADDITIONAL INFORMATION				1 JAN 96 - 31 MAR 96	3	95FEC/171/1397		
REQUEST FOR ADDITIONAL INFORMATION 2ND				1 JAN 96 - 31 MAR 96	4	95FEC/176/1508		
JULY QUARTERLY		7,600	99,749	1 APR 96 - 30 JUN 96	7	95FEC/162/1005		
JULY QUARTERLY - AMENDMENT		7,600	99,749	1 APR 96 - 30 JUN 96	2	95FEC/172/1446		
NOTICE OF FAILURE TO FILE				1 APR 96 - 30 JUN 96	2	95FEC/171/1007		
OCTOBER QUARTERLY		3,000	66,146	1 JUL 96 - 30 SEP 96	5	95FEC/162/1002		
OCTOBER QUARTERLY - AMENDMENT		3,000	66,146	1 JUL 96 - 30 SEP 96	2	95FEC/172/1448		
NOTICE OF FAILURE TO FILE				1 JUL 96 - 30 SEP 96	2	95FEC/127/1077		
REQUEST FOR ADDITIONAL INFORMATION				1 JUL 96 - 30 SEP 96	2	95FEC/167/1341		
POST-GENERAL		01	44,746	1 OCT 96 - 1 DEC 96	4	95FEC/162/1091		
POST-GENERAL - AMENDMENT		01	44,746	1 OCT 96 - 1 DEC 96	2	95FEC/172/1433		
REQUEST FOR ADDITIONAL INFORMATION				1 OCT 96 - 1 DEC 96	2	95FEC/167/1330		
YEAR-END		500	600	1 DEC 96 - 31 DEC 96	6	95FEC/172/1427		
1997 STATEMENT OF ORGANIZATION - AMENDMENT				31 JAN 97	1	95FEC/175/1003		
TOTAL		55,200	0	59,106	11	117	TOTAL PAGES	

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COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
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POLITICAL CLUB FOR GROWTH		ID 000102964 NON-PARTY NON-QUALIFIED				
CONNECTED ORGANIZATION: NONE						
1997 STATEMENT OF ORGANIZATION - AMENDMENT				30 JAN 97	1	97FEC/175/0192
APRIL QUARTERLY		0	1,811	1 JAN 97 - 31 MAR 97	4	97FEC/193/1305
TOTAL		0	0	1,811	0	5 TOTAL PAGES

All reports except the 1997 April Quarterly Report have been reviewed.

Cash on Hand as of 3/31/97: \$2177.36

Debts and obligations owed to the committee as of 3/31/97: \$0

Debts and obligations owed by the committee as of 3/31/97: \$0

# YEAR-END REPORT NOTICE

## FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 29, 1995

**WHO MUST FILE**,  
Party committees and PACs (nonconnected committees and separate segregated funds) must file a Year-End Report on January 31, 1996.

### REPORT CONTENT AND DATES

#### I. Semiannual Filers

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Year-End	07/01/95 - 12/31/95	01/31/96	01/31/96

Semiannual filers must disclose financial activity that occurred from July 1 through December 31, 1995, on their Year-End Report.

#### II. Monthly Filers

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Year-End	12/01/95 - 12/31/95	01/31/96	01/31/96

Monthly filers must disclose financial activity from December 1 through December 31, 1995, 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 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.

#### CONSEQUENCE

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 (except for FEC approved computer generated forms) will be required to refile.

\*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

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

(over)



## PARTIES AND PACS

YEAR-END

## 1996 FILING SCHEDULE

## I. Quarterly Filers

REPORT	REPORTING PERIOD*	REG./COMT. MAILING DUE**	FILING DATE
April	01/01/96 - 03/31/96	04/15/96	04/15/96
July	04/01/96 - 06/30/96	07/15/96	07/15/96
October	07/01/96 - 09/30/96	10/15/96	10/15/96
Pre-General	10/01/96 - 10/16/96	10/21/96	10/24/96
----- 24 Hour Reports*** -----			
Post-General	10/17/96 - 11/25/96	12/05/96	12/05/96
Year-End	11/26/96 - 12/31/96	01/31/97	01/31/97

## II. Monthly Filers

REPORT	REPORTING PERIOD*	REG./COMT. MAILING DUE**	FILING DATE
February	01/01/96 - 01/31/96	02/20/96	02/20/96
March	02/01/96 - 02/29/96	03/20/96	03/20/96
April	03/01/96 - 03/31/96	04/20/96	04/20/96
May	04/01/96 - 04/30/96	05/20/96	05/20/96
June	05/01/96 - 05/31/96	06/20/96	06/20/96
July	06/01/96 - 06/30/96	07/20/96	07/20/96
August	07/01/96 - 07/31/96	08/20/96	08/20/96
September	08/01/96 - 08/31/96	09/20/96	09/20/96
October	09/01/96 - 09/30/96	10/20/96	10/20/96
Pre-General	10/01/96 - 10/16/96	10/21/96	10/24/96
----- 24 Hour Reports*** -----			
Post-General	10/17/96 - 11/25/96	12/05/96	12/05/96
Year-End	11/26/96 - 12/31/96	01/31/97	01/31/97

\*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

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

\*\*\*PACs that make independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours before the election must file 24 Hour Reports. Party committees may not make independent expenditures.

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

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# QUARTERLY REPORT NOTICE

## FEDERAL ELECTION COMMISSION

PARTIES AND PACS

March 22, 1996

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
April Quarterly	01/01/96 - 03/31/96	04/15/96	04/15/96

### 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 the activity was not previously reported. See the January 1996 Record.

### 24 HOUR REPORT ON 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.

\*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

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

(over)



**PARTIES AND PACS**

**APRIL 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-FEC forms (except for FEC approved computer generated forms) will be required to refile.

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



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20543

BQ-7

May 8, 1996

Naggy Laws, Treasurer  
Political Club for Kenneth  
1775 Broadway  
New York, NY 10009

Identification Number: C00182964

Reference: April Quarterly Report (1/1/96-3/31/96)

Dear Ms. Laws:

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. §634(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 Secretary of the Senate). 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 §6100.2, 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 Wendy Barkley 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

For Other Than An Authorized Committee  
(Summary Page)

USE FEC MAILING LABEL

TYPE OR PRINT

## 1. NAME OF COMMITTEE (in full)

Political Club For Growth

ADDRESS (number and street) ☐ Check if different than previously reported

1775 BROADWAY

CITY, STATE and ZIP CODE

Ny. Ny. 10019.

FEC FORM # 5

Page 1 of 2

JUN 10 11 25 AM '96

2. IDENTIFICATION NUMBER  
C001829

3. Committee has qualified for nonpartisan convention (see FEC FORM 100)

## 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 28☐ January 31☐ October 31☐ March 31☐ July 31☐ November 30☐ April 30☐ August 31☐ December 31☐ May 31☐ September 30☐ January 31☐ Twelfth day report preceding

(Type or Print)

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

on the detailed summary page

## SUMMARY

5. Covering Period	COLUMN A Total Period	COLUMN B Calendar Year to Date
1-31-96 through 3-31-96		
6. (a) Cash on Hand January 1, 1996		\$ 11,075.38
(b) Cash on Hand at Beginning of Reporting Period	\$ 1058.04	
(c) Total Receipts (from Line 12)	\$ 20,550.00	\$ 20,550.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(b) and 6(c) for Column B)	\$ 21,608.04	\$ 21,608.04
7. Total Disbursements (from Line 23)	\$ 8,462.99	\$ 8,462.99
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 13,145.05	\$ 13,145.05
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ - 0 -	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ - 0 -	

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

Type or Print Name of Treasurer

MAGGY LAWS

Signature of Treasurer

Maggie Laws

Date

6/10/96

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 18 USC 970g.

1	2	3	4	5	6	7	8	9	10
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FEC FORM 28X

(continued)

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Federal Election Commission  
**ENVELOPE REPLACEMENT PAGE  
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

☐

Hand Delivered

DATE OF RECEIPT

☐

First Class Mail

POSTMARKED

☒

Registered/Certified Mail

POSTMARKED

6-4-96

☐

No Postmark

☐

Postmark Illegible

☐Received from the House Office of Records  
and Registration

DATE OF RECEIPT

☐Received from the Senate Office of Public  
Records

DATE OF RECEIPT

☐

Other (Specify):

POSTMARKED

and/or DATE OF RECEIPT

JTB

PREPARED

6-10-96

DATE PREPARED



# QUARTERLY REPORT NOTICE

## FEDERAL ELECTION COMMISSION

REGIONS AND DATES

June 21, 1996

**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.

REPORT	REPORTING PERIOD*	REG./CERT.	FILING DATE
		MAILING DATE**	
July Quarterly	04/01/96 - 06/30/96	07/15/96	07/15/96

**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 1996 Record.

**24 HOUR REPORT ON 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.

\*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

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

(over)



**PARTIES AND PACS**

**JULIE GREENBERG**

**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 (except for FEC approved computer generated forms) will be required to refile.

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



## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-7

August 12, 1996

Kelly Forsberg, Treasurer  
Political Club for Growth  
150 East 35th Street  
New York, NY 10016

Identification Number: C00182964

Reference: July Quarterly Report (4/1/96-6/30/96)

Dear Ms. Forsberg:

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 Secretary of the Senate). 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 Wendy Barkley 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



# QUARTERLY REPORT NOTICE

## FEDERAL ELECTION COMMISSION

PARTIES AND PACS

September 20, 1996

REPORT	REPORTING PERIOD*	MAILING DATE	FILING DATE
October Quarterly	07/01/96 - 09/30/96	10/15/96	10/15/96

**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 1996 Record.

**24 HOUR REPORT ON 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 frequency no more than once per calendar year.

**LABEL**

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

\*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

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

(over)

**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 (except for PEC approved computer generated forms) will be required to refile.

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



# GENERAL ELECTION REPORT NOTICE

## FEDERAL ELECTION COMMISSION

PARTIES AND PACS

September 30, 1996

### I. ALL MONTHLY FILERS

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Pre-General	10/01/96 - 10/16/96	10/21/96	10/24/96
Post-General	10/17/96 - 11/25/96	12/05/96	12/05/96

### II. QUARTERLY FILERS THAT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 16

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Pre-General	10/01/96 - 10/16/96	10/21/96	10/24/96
Post-General	10/17/96 - 11/25/96	12/05/96	12/05/96

### III. QUARTERLY FILERS THAT DO NOT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 16\*\*\*

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Post-General	10/01/96 - 11/25/96	12/05/96	12/05/96

#### WHO MUST FILE

Party committees and PACs must follow the above charts in order to determine whether they must file a report 12 days before the general election on November 5 (the Pre-General Report). All Party committees and PACs, regardless of financial activity, must file a report 30 days after the general election (the Post-General Election Report).

\*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

\*\*Reports sent 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 did not previously report then must also follow Chart II reporting requirements.

(over)

**PARTIES AND PACS**

**PRE/POST GENERAL ELECTION**

**24 HOUR REPORT ON INDEPENDENT EXPENDITURES**

Any PAC that makes independent expenditures aggregating \$1,000 or more during the period beginning October 17 and ending November 3 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 (except for FEC approved computer generated forms) will be required to refile.

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**FOR INFORMATION, CALL: 800/424-9530 or 202/693-3430**

RQ-7

(This is a copy of the text of a mailgram sent to the committee listed below on November 6, 1996.)

Kelly Forsberg, Treasurer  
Political Club for Growth  
150 East 35th Street  
New York, NY 10016

Identification Number: C00182964

Reference: OCTOBER QUARTERLY REPORT (7/1/96-9/30/96)

Dear Ms. Forsberg:

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 Secretary of the Senate). 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 Neil Evans 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

---

**GENERAL ELECTION**

---

**REPORT NOTICE**

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**FEDERAL ELECTION COMMISSION**

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**REMINDER**

**REMINDER**

**REMINDER**

November 8, 1996

All party committees and PACs (nonconnected committees and separate segregated funds) must file a Post-General Election Report. Reports sent by registered or certified mail must be postmarked by the mailing date (December 5, 1996); otherwise, they must be received by the filing date (December 5, 1996). FEC Form 3X is enclosed.

ANALYST:	Neil Evans
COMMITTEE:	Political Club for Growth (COB1829464)
DATE(S):	December 3 and 10, 1996
SUBJECT(S):	Non-Filer

On December 3, 1996, the analyst called and left a message for the committee to inform them of their non-filing of the October Quarterly.

On December 10, 1996, the treasurer returned the call, and stated that she was on maternity leave, and the filing responsibility was given to another person in the committee. However, she said that the late reports, including the 30 Day Post-General Report, would be filed by December 13, 1996.

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## REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee  
(Summary Page)

ATTACHMENT # 14

Page 1 of 2

USE FEC MAILING LABEL  
OR PRINT  
TYPE OR PRINT

## 1. NAME OF COMMITTEE (in full)

Political Club for Greenwich

ADDRESS (number and street) ☐ Check if different than previously reported

1775 Broadway, 26th floor

CITY, STATE and ZIP CODE

New York, NY 10019

## 2. FEC IDENTIFICATION NUMBER

C00182964

3. ☐ This committee has qualified as a multimember committee. (see FEC FORM 114)

## 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 28☐ March 20☐ July 20☐ November 28☐ 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
4-1-96 through 6-30-96		
6. (a) Cash on Hand January 1, 1996		\$ 1,253.26
(b) Cash on Hand at Beginning of Reporting Period	\$ 14,140.27	
(c) Total Receipts (from Line 10)	\$ 7,600.00	\$ 28,950.00
(d) Subtotal (add Lines 6(b) and (c) for Column A and Lines 6(a) and (c) for Column B)	\$ 21,740.27	\$ 30,203.26
7. Total Disbursements (from Line 10)	\$ 9,749.99	\$ 19,242.98
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 12,490.28	\$ 11,090.28
9. Debt and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ -0-	For further information contact: Federal Election Commission 900 E Street, NE Washington, DC 20002 Tel: 202-451-4000 Local: 202-512-5100
10. Debt and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ -0-	

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

Type or Print Name of Treasurer

Signature of Treasurer

Kathy Forsberg

Kathy Forsberg

Date

12/13/96

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 1901.

FEC FORM 3X

**Federal Election Commission  
ENVELOPE REPLACEMENT PAGE  
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

☒ Hand Delivered

DATE OF RECEIPT

12/16/96

☐ First Class Mail

POSTMARKED

☐ Registered/Certified Mail

POSTMARKED

☐ No Postmark☐ Postmark Illegible☐ Received from the House Office of Records  
and Registration

DATE OF RECEIPT

☐ Received from the Senate Office of Public  
Records

DATE OF RECEIPT

☐ Other (Specify):

POSTMARKED

DATE OF RECEIPT

EJ.  
PREPARED12/16/96  
DATE PREPARED

# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee  
(Summary Page)

ATTACHMENT # 15  
Page 1 of 2

USE PRECISELY MARKING LABEL  
TYPE OR PRINT

1. NAME OF COMMITTEE (S-12)		22. PRECIDENT INFORMATION NUMBER <b>C 000182968</b>
Political Club for Growth		
ADDRESS (number and street) <input type="checkbox"/> Check & fill in later previously reported:		
1775 Broadway 2 <sup>nd</sup> Floor		33. <input type="checkbox"/> This committee has qualified as a multicandidate committee. (see FEC FORM 100)
CITY, STATE and ZIP CODE		
New York, NY 10019		

## 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 (Line 10):

<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 21

☐ 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
1. Covering Period	7-1-96 through 9-30-96		
2. (a) Cash on Hand January 1, 96			\$1,253.26
(b) Cash on Hand at Beginning of Reporting Period		\$11,970.28	
(c) Total Receipts (from Line 10)		\$3,000.00	\$31,450.00
(d) Subtotal (add Lines 2(b) and (c) for Column A and Lines 2(a) and (c) for Column B)		\$11,970.28	\$33,203.26
3. Total Disbursements (from Line 10)		\$6,144.92	\$24,359.10
4. Cash on Hand at Close of Reporting Period (add Line 2(d) from Line 10(a))		\$9,343.36	\$8,843.36
5. Debts and Obligations Owed TO the Committee (Review all on Schedule C and/or Schedule D)		\$ -	
6. Debts and Obligations Owed BY the Committee (Review 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

Kelly Frisberg

Signature of Treasurer

Kelly Frisberg

Date

12/13/96

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 3607.

**Federal Election Commission**  
**ENVELOPE REPLACEMENT PAGE**  
**FOR INCOMING DOCUMENTS**

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DATE OF RECEIPT

12/16/96

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☐ No Postmark☐ Postmark Illegible☐ Received from the House Office of Records  
and Registration

DATE OF RECEIPT

☐ Received from the Senate Office of Public  
Records

DATE OF RECEIPT

☐ Other (Specify):

POSTMARKED

DATE OF RECEIPT

PREPARED

DATE PREPARED



# REPORT OF RECEIPTS AND DISBURSEMENTS

For Officer (Then An Authorized Committee Representative)  
(Continuation of Page 1)

ATTACHMENT # 16  
Page 1 of 2

USE PREC MAILING LABEL  
TYPE OR PRINT

11. NAME OF COMMITTEE (7-12)

*Political Club For Growth*

12. ADDRESS (number and street) ☐ Check if different than previously reported

*1775 Broadway 26<sup>th</sup> floor*

13. CITY, STATE and ZIP CODE

*NY NY 10019*

2. FEC IDENTIFICATION NUMBER

*C00182969*

3. ☐ 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:

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

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

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

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. (Covering Period) <i>10-1-96</i> through <i>12-1-96</i>		
6. (a) Disbursements January 1, to <i>96</i>		\$ 1,253.26
(b) Disbursements Beginning of Reporting Period	\$ 8,843.36	
(c) Total Receipts (from Line 15)	\$ 0	\$ 31,950.00
(d) Subtotal (add Lines 6(a) and 6(b) for Column A and Lines 6(c) and 6(d) for Column B)	\$ 8,843.36	\$ 33,203.26
7. Total Disbursements (from Line 6)	\$ 4,746.45	\$ 29,106.35
8. Disbursements Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 4,096.91	\$ 4,096.91
9. Debts and Obligations Owed TO the Committee (Review all on Schedule C and/or Schedule D)	\$ 0	
10. Debts and Obligations Owed BY the Committee (Review all on Schedule C and/or Schedule D)	\$ 0	

For further information contact:  
Federal Election Commission  
600 E Street, NW  
Washington, DC 20542  
Toll Free 800-426-6888  
Local 202-551-0800

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

Typed Name of Treasurer *Kelly Enberg*

Signature of Treasurer *Kelly Enberg*

Date *12-13-96*

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



**Federal Election Commission  
ENVELOPE REPLACEMENT PAGE  
FOR INCOMING DOCUMENTS**

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DATE OF RECEIPT

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POSTMARKED

☐ No Postmark

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☐ Received from the House Office of Records  
and Registration

DATE OF RECEIPT

☐ Received from the Senate Office of Public  
Records

DATE OF RECEIPT

☐ Other (Specify):

POSTMARKED

DATE OF RECEIPT

PREPARED

DATE OF RECEIPT

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

OCT 24 10 30 AM '97

**FIRST GENERAL COUNSEL'S REPORT**

**SENSITIVE**

**RAD REFERRAL: 97NF-9**  
**DATE ACTIVATED: 9/12/97**

**STAFF MEMBER: Ruth Heilizer**

**SOURCE: INTERNALLY GENERATED**

**RESPONDENT: Political Club for Growth and Kelly Forsberg, as treasurer**

**RELEVANT STATUTE: 2 U.S.C. § 434(a)(4)(A)(i) and (iii)**

**INTERNAL REPORTS CHECKED: Disclosure Reports**  
**Referral Material**

**FEDERAL AGENCIES CHECKED: None**

**I. GENERATION OF MATTER**

The Office of General Counsel received a referral from the Reports Analysis Division ("RAD") on April 11, 1997. The basis of the referral is the failure of the Political Club for Growth and Kelly Forsberg, as treasurer, ("Political Club") to file timely four (4) disclosure reports during the 1995-1996 election cycle. Specifically, the Political Club failed to file timely its 1996 April, July and October quarterly reports, and its 1996 30 Day Post-General Report.<sup>1</sup>

**II. FACTUAL AND LEGAL ANALYSIS**

Based on the Factual and Legal Analysis, see Attachment 1, this Office recommends the Commission find reason to believe the respondents violated 2 U.S.C. § 434(a)(4)(A)(i) and (iii).

<sup>1</sup> The Political Club was also the subject of MUR 4221, in which the Commission found reason to believe that the Political Club had failed to file timely six (6) reports and was a chronic late filer of reports in the 1993-1994 election cycle. (At that time, the treasurer was Linn B. Nelson.) The Commission entered into conciliation with the Political Club, which paid a civil penalty of \$3,200.

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

9004000591

#### IV. RECOMMENDATIONS


1. Open a MUR.
2. Find reason to believe that the Political Club for Growth and Kelly Forberg, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (ii) and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the attached Factual and Legal Analysis and Conciliation Agreement.
4. Approve the appropriate letter.

Lawrence M. Noble  
General Counsel

Date

10/23/97

BY:

  
Louis G. Lerner  
Associate General Counsel

#### Attachments:

1. Factual and Legal Analysis
2. Conciliation Agreement


93043380592



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE  
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/LISA DAVIS   
COMMISSION SECRETARY

DATE: OCTOBER 28, 1997

SUBJECT: RAD Referral #97NF-09 - First General Counsel's Report

The above-captioned document was circulated to the Commission  
on Friday, October 24, 1997.

Objection(s) have been received from the Commissioner(s) as  
indicated by the name(s) checked below:

Commissioner Aikens	<u>XXX</u>
Commissioner Elliott	—
Commissioner McDonald	—
Commissioner McGarry	—
Commissioner Thomas	—

This matter will be placed on the meeting agenda for  
Tuesday, November 04, 1997.

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

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) RAD Referral 97MF-9  
Political Club for Growth and )  
Kelly Forsberg, as treasurer )

MUR 4692

CERTIFICATION

I, Marjorie W. Ramons, recording secretary for the Federal Election Commission executive session on November 4, 1997, do hereby certify that the Commission decided by a vote of 4-1 to take the following actions with respect to RAD Referral 97MF-9:

1. Open a MUR.
2. Find reason to believe that the Political Club for Growth and Kelly Forsberg, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (iii) and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the Factual and Legal Analysis and Conciliation Agreement attached to the General Counsel's October 23, 1997 report.

(continued)

20043000594

Federal Election Commission  
Certification for RMD Referral  
97NF-9  
November 4, 1997

Page 2

5. Approve the appropriate letter as recommended in the General Counsel's October 23, 1997 report.

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

Attest:

11-5-97  
Date

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

9804380595



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 7, 1997

Kelly Forsberg, Treasurer  
Political Club for Growth  
1775 Broadway, 26th Floor  
New York, NY 10019

RE: MUR 4692

Dear Ms. Forsberg:

On November 4, 1997, the Federal Election Commission found that there is reason to believe the Political Club for Growth and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (iii), 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.

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

Celebrating the Commission's 20th Anniversary

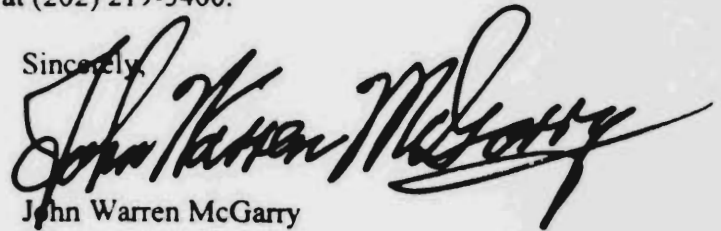
YESTERDAY, TODAY AND TOMORROW  
DEDICATED TO KEEPING THE PUBLIC INFORMED

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 Ruth Heilizer, the attorney assigned to this matter, at (202) 219-3400.

Sincerely,



John Warren McGarry  
Chairman

Enclosures

Factual and Legal Analysis  
Procedures  
Designation of Counsel Form  
Conciliation Agreement

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Political Club for Growth and  
Kelly Forsberg, as treasurer

MUR 4692

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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. 2 U.S.C. § 434(a)(4)(A). Such committees may choose to file reports either on a monthly or a quarterly basis. *Id.*

In any calendar year in which a regularly scheduled general election is held, committees that choose to file on a quarterly basis shall file quarterly reports no later than the 15th day after the last day of each calendar quarter. 2 U.S.C. § 434(a)(4)(A)(i). Such committees shall also file post-general election reports, which shall be filed no later than the 30th day after the general election and which shall be complete as of the 20th day after such general election. 2 U.S.C. § 434(a)(4)(A)(iii).

The Political Club for Growth and Kelly Forsberg, as treasurer, ("Political Club") is a political committee not authorized by any candidate, and has elected to file disclosure reports on a quarterly basis.

Pursuant to 2 U.S.C. § 434(a)(4)(A)(i), the due date for the Political Club's 1996 April Quarterly Report was April 15, 1996. The Commission notified the Political Club on



December 29, 1995 and on March 22, 1996 that their 1996 April Quarterly Report was due on April 15, 1996. On May 8, 1996, the Commission sent the Political Club a non-filer notice instructing them to file the report immediately, and that the Commission may initiate audit or legal enforcement action. On June 4, 1996 the Political Club filed their 1996 April Quarterly Report, 50 days late, disclosing receipts totaling \$20,550.00 and disbursements totaling \$8,426.99.

Pursuant to 2 U.S.C. § 434(a)(4)(A)(i), the due date for the Political Club's 1996 July Quarterly Report was July 15, 1996. The Commission notified the Political Club on December 29, 1995 and on June 21, 1996 that their 1996 July Quarterly Report was due on July 15, 1996. On August 12, 1996, the Political Club was sent a non-filer notice instructing them to file the report immediately, and that the Commission may initiate audit or legal enforcement action. On December 16, 1996 the Political Club filed their 1996 July Quarterly Report, 150 days late, disclosing receipts totaling \$7,600.00 and disbursements totaling \$9,749.99.

On August 16, 1996, the Commission notified the Political Club regarding the failure to timely file their 1996 April Quarterly Report and their 1996 July Quarterly Report. The notice advised the Political Club that any additional reports filed in an untimely manner could result in the Commission initiating legal enforcement action or audit action.

Pursuant to 2 U.S.C. § 434(a)(4)(A)(i), the due date for the Political Club's 1996 October Quarterly Report was October 15, 1996. The Commission notified the Political Club on December 29, 1995 and on September 20, 1996 that their 1996 October Quarterly was due on October 15, 1996. On November 6, 1996, the Political Club was sent a non-filer notice

instructing them to file the report immediately, and that the Commission may initiate audit or legal enforcement action. On December 16, 1996 the Political Club filed their 1996 October Quarterly Report, 62 days late, disclosing receipts totaling \$3,000.00 and disbursements totaling \$6,146.92.

Pursuant to 2 U.S.C. § 434(a)(4)(A)(iii), the due date for the Political Club's 1996 30 Day Post-General Report was December 5, 1996. The Commission notified the Political Club on December 29, 1995, September 30, 1996, and November 8, 1996 that their 1996 30 Day Post-General Report was due on December 5, 1996. On December 16, 1996 the Political Club filed their 1996 30 Day Post-General Report, 11 days late, disclosing receipts totaling \$0.00 and disbursements totaling \$4,746.45.

Therefore, there is reason to believe that the Political Club for Growth and Kelly Forsberg, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (iii).

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# Facsimile Cover Sheet

MUR 4692

To: Ruth Heilizer, Esq.

Company: FEC

Phone:

Fax: 202 219-3923

From: Kelly Luce Forsberg

Company: Political Club For Growth

Phone: 212/679-7330 ext. 2820

Fax: 212/213-9366

Date: 11/18/97

Pages including this 2

cover page:

Comments:

Please see attached

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STATEMENT OF DESIGNATION OF COUNSELNOR 4692

NAME OF COUNSEL:

LARS Forsberg

ADDRESS:

Dickerson + Reilly780 3<sup>rd</sup> Avenue, 20<sup>th</sup> floorNY NY 10017

TELEPHONE:

212 644-7036

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.

Date

11/18/97

Signature

Kelly Forsberg

RESPONDENT'S NAME:

Kelly Forsberg - Treasurer

ADDRESS:

Political Club for Grandly215 East 73<sup>rd</sup> StNew York, NY 10021

HOME PHONE:

212 472-4642

BUSINESS PHONE:

212 679-1330 ext 2820

980043660602





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

November 20, 1997

Lars Forsberg, Esq.  
Dickerson & Reilly  
780 Third Avenue, 20th Floor  
New York, NY 10017

RE: MUR 4692

Dear Mr. Forsberg:

By letter dated November 7, 1997, the Federal Election Commission ("Commission") notified the Political Club for Growth that the Commission found that there is reason to believe the Political Club for Growth and Kelly Forsberg, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (iii), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act").

In a telephone conversation on November 18, 1997 you requested copies of the notification letters to which the Factual and Legal Analysis refers. Enclosed are copies of the notification letters. In addition, you requested that we provide the dates of contacts between the Political Club for Growth and the Commission. According to our records, those dates are December 3, 1996 and December 10, 1996.

I am available to discuss this matter at the earliest mutually convenient time. You can reach me at (202) 219-3400. After 5:30 p.m., you may reach me at (202) 219-3009.

Sincerely,

*Ruth Heinzer*  
Ruth Heinzer  
Attorney

Enclosure  
Notification letters



# YEAR-END REPORT NOTICE

## FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 29, 1995

### WHO MUST FILE

Party committees and PACs (nonconnected committees and separate segregated funds) must file a Year-End Report on January 31, 1996.

### REPORT CONTENT AND DATES

#### I. Semiannual Filers

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Year-End	07/01/95 - 12/31/95	01/31/96	01/31/96

Semiannual filers must disclose financial activity that occurred from July 1 through December 31, 1995, on their Year-End Report.

#### II. Monthly Filers

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Year-End	12/01/95 - 12/31/95	01/31/96	01/31/96

Monthly filers must disclose financial activity from December 1 through December 31, 1995, 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 due under their current reporting schedule. Committees may change their filing frequencies no more than once per calendar year.

### NOTE

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

### CONSEQUENCE

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 (except for FEC approved computer generated forms) will be required to refile.

\*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

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

(over)

# PARTIES AND PACS

YEAR-END

## 1996 FILING SCHEDULE

### I. Quarterly Filers

REPORT	REPORTING PERIOD*	MAILING DATE	FILING DATE
April	01/01/96 - 03/31/96	04/15/96	04/15/96
July	04/01/96 - 06/30/96	07/15/96	07/15/96
October	07/01/96 - 09/30/96	10/15/96	10/15/96
Pre-General	10/01/96 - 10/16/96	10/21/96	10/24/96
-----24 Hour Reports-----			
Post-General	10/17/96 - 11/25/96	12/05/96	12/05/96
Year-End	11/26/96 - 12/31/96	01/31/97	01/31/97

### II. Monthly Filers

REPORT	REPORTING PERIOD*	MAILING DATE	FILING DATE
February	01/01/96 - 01/31/96	02/20/96	02/20/96
March	02/01/96 - 02/29/96	03/20/96	03/20/96
April	03/01/96 - 03/31/96	04/20/96	04/20/96
May	04/01/96 - 04/30/96	05/20/96	05/20/96
June	05/01/96 - 05/31/96	06/20/96	06/20/96
July	06/01/96 - 06/30/96	07/20/96	07/20/96
August	07/01/96 - 07/31/96	08/20/96	08/20/96
September	08/01/96 - 08/31/96	09/20/96	09/20/96
October	09/01/96 - 09/30/96	10/20/96	10/20/96
Pre-General	10/01/96 - 10/16/96	10/21/96	10/24/96
-----24 Hour Reports-----			
Post-General	10/17/96 - 11/25/96	12/05/96	12/05/96
Year-End	11/26/96 - 12/31/96	01/31/97	01/31/97

\*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

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

\*\*\*PACs that make independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours before the election must file 24 Hour Reports. Party committees may not make independent expenditures.

FOR INFORMATION, CALL: 800/424-9530 or 202/692-3000

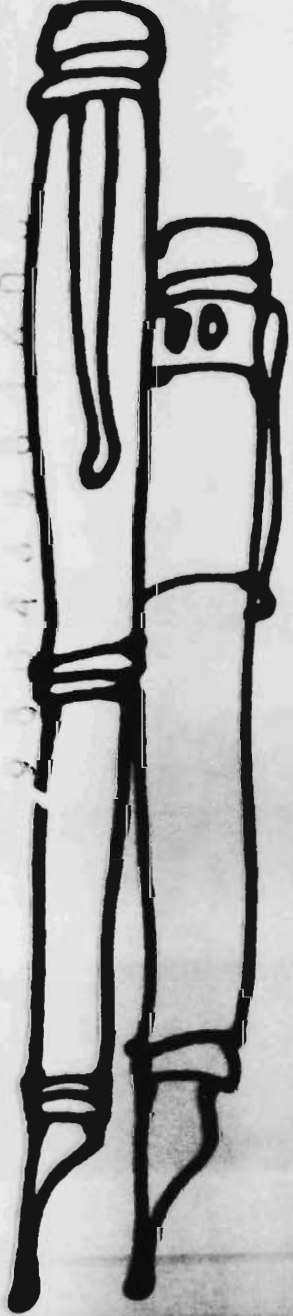
98004300605

# QUARTERLY REPORT NOTICE

## FEDERAL ELECTION COMMISSION

PARTIES AND PACS

March 22, 1996



REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
April Quarterly	01/01/96 - 03/31/96	04/15/96	04/15/96

### 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 the activity was not previously reported. See the January 1996 Record.

### 24 HOUR REPORT ON 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 make 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.

\*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

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

(over)

**ENTRIES AND PAGES**

**APRIL 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-FEC forms (except for FEC approved computer generated forms) will be required to refile.

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





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20543

EQ-7

May 2, 1996

Maggie Laws, Treasurer  
Political Club for Growth  
1775 Broadway  
New York, NY 10019

Identification Number: 0000382854

Reference: April Quarterly Report (1/1/95-3/31/96)

Dear Ms. Laws:

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, NE, Washington, DC 20463 (or with the Secretary of the Senate). 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 Wendy Barkley on our toll-free number (800) 426-9530. Our local number is (202) 219-3580.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division



# QUARTERLY REPORT NOTICE

## FEDERAL ELECTION COMMISSION

### PARTIES AND PACS

June 21, 1996

#### 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.

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
July Quarterly	04/01/96 - 06/30/96	07/15/96	07/15/96

#### 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 1996 Record.

#### 24 HOUR REPORT ON 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.

\*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

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

(over)

**PARTIES AND PACS**

**JULY 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-FEC forms (except for FEC approved computer generated forms) will be required to refile.

90043000610

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



## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

HQ-7

August 12, 1996

Kelly Forsberg, Treasurer  
Political Club for Growth  
150 East 35th Street  
New York, NY 10016

Identification Number: C00182964

Reference: July Quarterly Report (4/1/96-6/30/96)

Dear Ms. Forsberg:

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. 5434(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 Secretary of the Senate). 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 95100.2, 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 Wendy Barkley on our toll-free number (800) 426-2536. Our local number is (202) 219-3500.

Sincerely,

John B. Gilman  
Assistant Staff Director  
Reports Analysis Division

9304380611



**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

MS-L

Kelly Forsberg, Treasurer  
Political Club for Growth  
150 East 35th Street  
New York, NY 10016

AUG 16 1996

Identification Number: C00182964

Reference: 1995-1996 Election Cycle Reports

Dear Ms. Forsberg:

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>
April Quarterly (1/1/96-3/31/96)	4/15/96	6/4/96
July Quarterly (4/1/96-6/30/96)	7/15/96	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 Wendy Barkley on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

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

9004300612



# QUARTERLY REPORT NOTICE

## FEDERAL ELECTION COMMISSION

PARTIES AND PACS

September 20, 1996

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
October Quarterly	07/01/96 - 09/30/96	10/15/96	10/15/96

### 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 1996 Record.

### 24 HOUR REPORT ON 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.

### CHANGES 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.

\*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

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

(over)



**PARTIES AND PAGE**

**COMMITTEE NUMBER**

**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 (except for FEC approved computer generated forms) will be required to refile.

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**FOR INFORMATION, Call: 800/426-9530 or 202/219-3420**

# GENERAL ELECTION REPORT NOTICE

## FEDERAL ELECTION COMMISSION

PARTIES AND PACS

September 30, 1996

### I. ALL MONTHLY FILERS

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Pre-General	10/01/96 - 10/16/96	10/21/96	10/24/96
Post-General	10/17/96 - 11/25/96	12/05/96	12/05/96

### II. QUARTERLY FILERS THAT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 16

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Pre-General	10/01/96 - 10/16/96	10/21/96	10/24/96
Post-General	10/17/96 - 11/25/96	12/05/96	12/05/96

### III. QUARTERLY FILERS THAT DO NOT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 16\*\*\*

REPORT	REPORTING PERIOD*	REG./CERT. MAILING DATE**	FILING DATE
Post-General	10/01/96 - 11/25/96	12/05/96	12/05/96

#### WHO MUST FILE

Party committees and PACs must follow the above charts in order to determine whether they must file a report 12 days before the general election on November 5 (the Pre-General Report). All Party committees and PACs, regardless of financial activity, must file a report 30 days after the general election (the Post-General Election Report).

\*These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

\*\*Reports sent 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 did not previously report them must also follow Chart II reporting requirements.

(over)

**PARTIES AND PACS**

**PRE/POST GENERAL ELECTION**

**IN YOUR REPORT ON INDEPENDENT EXPENDITURES**

Any PAC that makes independent expenditures aggregating \$1,000 or more during the period beginning October 17 and ending November 3 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 (except for FEC approved computer generated forms) will be required to refile.

90043001310  
**FOR INFORMATION, CALL: 800/424-9530 or 202/219-3420**

HQ-7

(This is a copy of the text of a mailing sent to the committee listed below on November 6, 1986.)

Kelly Forsberg, Treasurer  
Political Club for Growth  
150 East 35th Street  
New York, NY 10016

Identification Number: C00182964

Reference: OCTOBER QUARTERLY REPORT (7/1/86-9/30/86)

Dear Ms. Forsberg:

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 Secretary of the Senate). 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 §§101.2, 101.3, 101.4).

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 Neil Evans on our toll-free number (800) 424-9630. Our local number is (202) 219-3580.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

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**GENERAL ELECTION**

# **REPORT NOTICE**

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**FEDERAL ELECTION COMMISSION**

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**REMINDER**

**REMINDER**

**REMINDER**

**November 8, 1996**

All party committees and PACs (nonconnected committees and separate segregated funds) must file a Post-General Election Report. Reports sent by registered or certified mail must be postmarked by the mailing date (December 5, 1996); otherwise, they must be received by the filing date (December 5, 1996). FEC Form 3X is enclosed.

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

9 6 0 4 3 6 0 6 1 0



**DICKERSON & REILLY**

LAW OFFICES  
780 Third Avenue  
New York, NY 10017-2024

(212) 644-0806  
Telecopier (212) 406-3832

LARS FORSBERG  
DIRECT DIAL (212) 644-7836

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

Dec 5 9 55 AM '97

December 4, 1997

Ruth Heilizer, Esq.  
999 E Street, N.W.  
Federal Election Commission  
Washington, D.C. 20463

Re: **POLITICAL CLUB FOR GROWTH**  
Your File N° MUR 4692  
Our File N° 1700-01

Dear Ms. Heilizer:

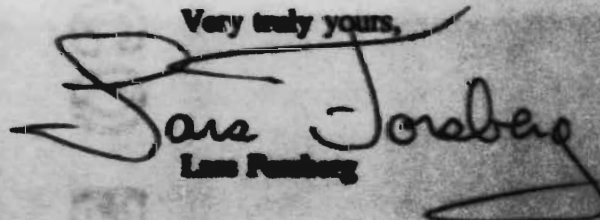
Thank you for your assistance in reviewing the file and attempting to locate correspondence and identify dates for telephone calls to the Commission.

Enclosed please find Kelly L. Forsberg's Declaration in response to the letter dated November 7, 1997 from Chairman John Warren McGarry with the enclosed factual and legal analysis.

I will call you on Friday, December 5th to discuss how the Commission would like to proceed with this matter.

Thank you and your staff for the courtesies and assistance with this matter.

Very truly yours,

  
Lars Forsberg

LF/atl  
Enclosures  
11/27/97

-----x  
THE FEDERAL ELECTION COMMISSION

Plaintiff,

MUR 4692

vs.

POLITICAL CLUB FOR GROWTH  
and KELLY FORSBERG, as Treasurer.

Defendants.  
-----x

**DECLARATION OF KELLY L. FORSBERG**

1. The Political Club for Growth has an official business address of 1775 Broadway, New York, NY 10019. The present mailing address is my home at 215 East 73 Street, New York, NY 10021.

2. The Political Club for Growth (the "Club") is a nonpartisan, unincorporated organization existing in the City of New York. The Club does not solicit or make any contributions to candidates or organizations. During its nine meetings a year, the Club introduces to the members speakers comprised of political candidates, grassroots organizers, think tank analysts and academic leaders. The political candidates could be members of any recognized political party and usually are running for or are already elected to local, state or national public offices.

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3. The Club has approximately eighty dues paying members. The dues are used only for the Club's administrative expenses and are never disbursed to any speaker. (See "Itemized Disbursements" incorporated in FEC Form 3X).

4. I was selected as treasurer for the Club in June of 1996 primarily because of my experience with event planning. My specific duties for the Club are to organize the nine meetings a year; mail announcements; collect dues; coordinate caterers; pay administrative expenses; and file reports.

5. I replaced Maggy Laws who, as a result of illness over the prior five months, was unable to perform many of the duties of the Club. When I assumed the position in June of 1996, I obtained a file which only included 1996 information. (FEC letters dated February 20, 1996 and May 8, 1996, and a copy of the April report)

6. It was not until early July of 1996 that I became aware that Ms. Laws had filed the April 1996 Quarterly report in June of 1996. At the same time I became aware that the April report contained errors and was not complete. I immediately called the Federal Election Commission and requested proper forms for filing the required reports. When I received and reviewed the forms, I realized that I was not in possession of some of the required information. (Exhibit A)

7. In a follow up call to the FEC in early August of 1996, I requested guidance to correct the problems of the previous filing and was instructed to make every effort to supply a completed report. Shortly after my call, I received a letter from Wendy Barkley itemizing the required information. (Exhibit B) Immediately after receipt of that letter, I sent out a mailing to all club members in an effort to obtain the required information. Since the Club does not meet

in July or August, and many members were on vacation, it was difficult to track down the required information.

8. In mid August of 1996, I received two letters from the FEC about late filings (Exhibit C). I called the FEC shortly after the receipt of the second letter and advised them that I was attempting to obtain the required information.

9. The July report was not filed in a timely manner because the same information necessary to complete the April filing was not available at that date. In addition, the previous treasurer was not available for advice due to her illness and hospitalization.

10. Adding to the delays in attempting to obtain the required information, my own pregnancy necessitated a very reduced work schedule in September and almost no work in October of 1996. My twin boys were delivered on October 18, 1996 and I returned to my duties for the Club on a part time basis in early November.

11. On November 6th the FEC sent a "MailGram" regarding the late filing of the October Quarterly report. (Exhibit D) Again, I called shortly after the receipt of this correspondence and advised the FEC that I had just returned to work on a limited schedule.

12. After compiling what I believed to be the required information, I made several confirming telephone calls to the FEC in early December of 1996. On December 13, 1996 I submitted Quarterly reports as well as the 30-Day Post-General Election report. (Exhibit E)

13. Each and every time that I received a correspondence from the FEC, I telephoned the individual named at the bottom of the FEC letters to discuss the issues addressed in the correspondence and to keep the FEC informed of my progress. I have always found the FEC representatives to be very helpful and courteous in their responses. I never had the

impression after any of my telephone calls that the FEC was contemplating a fine for late filings. At no time did I receive the impression that time was of the essence. To the contrary, my impression was that the emphasis was on supplying complete and correct information.

14. About January 15, 1997 I was notified that additional information was necessary for the reports submitted in December, 1996 and I again immediately called to discuss these additions. The requested information was forwarded to the FEC on January 28, 1997.

15. Before I discussed the Chairman's letter with Attorney Heilizer on November 18, 1997, I was totally unaware that there had been a prior Conciliation Agreement involving a former treasurer of the Club. When I was finally able to locate and communicate with this individual, she advised me that she had recently discarded all prior files and had personally negotiated a settlement of her fine without informing the Club. She did not have a copy of her Conciliation Agreement or have any recollection of the amount that she personally paid in resolution of the matter. As a result of her failure to inform anyone associated with the Club, no one was aware that the Club was already under scrutiny for her prior acts/omissions.

16. Throughout my brief tenure, I believe I have acted in good faith and as quickly as possible to correct any deficiencies in the filings of the prior treasurer, to obtain the correct forms from your office, to obtain correct information for insertion into the reports, and to keep your office informed of the status of the reporting.

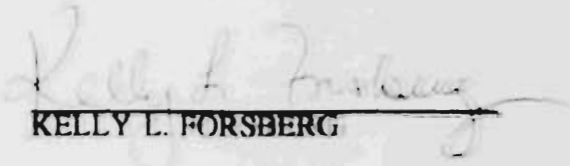
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17. I believe that there are mitigating circumstances given the health problems of the former treasurer and my own pregnancy in the summer and fall of 1996.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
December 4, 1997

  
KELLY L. FORSBERG

(Pursuant Title 28, United States Code, Section 1746)

9304360624

9304380625



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

# FAX TRANSMITTAL

date: 7/12/96  
to: Kelly Forsberg (Political Club For Growth)  
fax #: (212) 213-9369

from: Debbie Manzano

fax #: (202) 219-3496

phone #: (800) 424-9530  
(202) 219-3580

page num: 3  
(w/ cover sheet)

9 0 0 4 3 3 0 0 6 2 6



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

07/17/1996

KELLY FORSBERG  
150 E. 35TH ST., FOURTH FLOOR  
NEW YORK, NY 10016

Dear FEC Constituent:

Enclosed are the materials you ordered from the Federal Election Commission. This shipment contains the following items:

Name of Publication/Form

Form 3X - Report of Receipts and Disbursements

11

We hope you find these materials helpful. If you have any questions, please call the Information Division toll-free (800)424-9530, locally (202)219-3420 or TDD/voice (800)8777-88339.

The Information Division  
Federal Election Commission

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98043080628





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Kelly Forsberg, Treasurer  
Political Club For Growth  
180 East 35th Street  
New York, NY 10016

AUG - 7 1996

Identification Number: C00182964

Reference: 1996 April Quarterly Report (1/1/96-3/31/96)

Dear Ms. Forsberg:

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:

-The beginning cash balance of this report should equal the ending balance of your 1995 Amended Year End Report. Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.

-Please provide the totals for Lines 11(d), 20, 30 and 31, Columns A and B of the Detailed Summary Page. Note that changes in your figures may affect your Column B totals on this report and/or on subsequent reports.

-You must make an attempt to obtain the full name, mailing address, occupation and name of employer for all individuals who contribute more than \$200 in a calendar year. Please amend your report to include the omitted information.

A committee may demonstrate "best efforts" to obtain the required information by providing the Commission with a description of its procedures for requesting the information and may also supply a copy of a solicitation: the committee must request the contributor information in initial solicitations; make follow-up requests (if necessary); report the information; and file amendments to disclose previously unreported information. Each solicitation must include a clear and conspicuous request for the information. If a committee receives a contribution that exceeds the \$200 threshold but lacks contributor information, the committee must, within 30 days, make an additional written or oral request for the information. Please note that a written request may not include an additional solicitation or


material on any other subject, other than thanking the contributor for the donation and must include a pre-addressed return post card or envelope for the contributor's response. An oral request must be documented in writing. Committees must also disclose information that was not provided by the contributor, but is available in any of the committee's records for that current election cycle. Furthermore, if a committee receives contributor information after the contributions have been reported, it must submit, with its next report, an amended memo Schedule A listing all the contributions for which additional information was received or file, on or before the next reporting date, amendments to the previous reports on which the contributions were originally disclosed. See 11 CFR \$104.3(a)(4)(i) and 11 CFR \$104.7.

-On Schedule A supporting Line 11(a)(i) of the Detailed Summary Page, your report disclosed contributions from individuals that omit the Dates of Receipt. Please amend your report by supplying the information. 11 CFR \$104.3(a)(4)(i)

-Line 11(a)(i) of the Detailed Summary Page of your report discloses a total of \$20,550.00 in Itemized Contributions from Individuals. The sum of the entries itemized on Schedule A, however, indicates the total to be \$21,350.00. Please amend your report to clarify the discrepancy.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,,



Wendy Bankley  
Reports Analyst  
Reports Analysis Division

98043380631



FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20463

RQ-7

August 12, 1996

Kelly Forsberg, Treasurer  
Political Club for Growth  
150 East 35th Street  
New York, NY 10016

Identification Number: C00182964

Reference: July Quarterly Report (4/1/96-6/30/96)

Dear Ms. Forsberg:

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 Secretary of the Senate). 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 Wendy Barkley on our toll-free number (800) 424-9539. Our local number is (202) 209-3580.

Sincerely,

A handwritten signature in cursive script, reading "John D. Gibson", is positioned above the typed name and title.

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20543

MS-L

Kelly Forsberg, Treasurer  
Political Club for Growth  
150 East 35th Street  
New York, NY 10016

AUG 11 1996

Identification Number: C00182964

Reference: 1995-1996 Election Cycle Reports

Dear Ms. Forsberg:

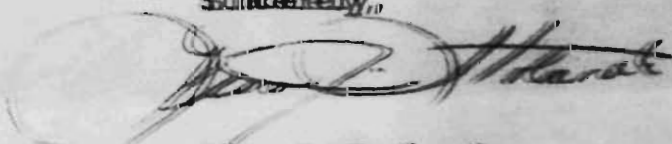
It has come to the attention of the Federal Election Commission ("the Commission") that your committee may have violated 2 U.S.C. §434(a), by failing to timely file Reports of Receipts and Disbursements. The following is a list of the reports in question.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
April Quarterly (1/1/96-3/31/96)	4/15/96	6/4/96
July Quarterly (4/1/96-6/30/96)	7/15/96	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 reports 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 Wendy Barkley on our toll-free number, (800) 424-9530. My local number is (202) 219-8580.

Sincerely,

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



9 8 0 4 3 8 8 0 6 3 4

UNITED STATES  
POSTAL SERVICE

NAY1 - NAYA

MGMCOMP 18:10 EST

9804380636

# Political Club for Growth

1775 Broadway  
Twenty-eighth floor  
New York, NY 10019  
212 765-2500

David Grossel  
Co-Chairman

David Gold  
Co-Chairman

12/13/96

TO FEC

From: Kelly Forsberg  
Political Club for Growth

Re: Reports -

Attached Reports

Revised 1-1-96 - 3-31-96  
4-1-96 - 6-30-96  
7-1-96 - 9-30-96  
10-1-96 - 12-1-96

delay due to polling of members for more information  
and delivery of Policy by treasurer - myself.

Thank you -

Kelly Forsberg

9304300637

**DICKERSON & REILLY**

LAW OFFICES  
780 Third Avenue  
New York, NY 10017-2024

(212) 644-6886  
Telecopier (212) 486-3032

LARS FORSBERG  
DIRECT DIAL (212) 644-7036

December 19, 1997

**VIA TELECOPIER N° (212) 219-3923**  
**and Registered Mail**

John Warren McGarry, Chairman  
Federal Election Commission  
Washington, D.C. 20463

Re: **POLITICAL CLUB FOR GROWTH**  
Your File N° MUR 4692  
Our File N° 1700-01

Dear Sir:

As previously advised, the undersigned represents both the Political Club for Growth and Kelly L. Forsberg, Treasurer. As we understand from both your correspondence and our communications with Ruth Hollier, Esq., the FEC is in the questionable cause phase as described in 2 U.S.C. § 437g. Pursuant to your letter, Kelly Forsberg submitted a Declaration with supporting exhibits on December 4, 1997.

Please be advised that the Political Club for Growth ("Club") and Kelly Forsberg would like to resolve this matter but have concerns regarding both your Factual and Legal Analysis and the terms of the proposed Conciliation Agreement. After careful review of 2 U.S.C. § 431(4), (B)(a) and (9)(a), there is question on my clients' part whether the Club in fact falls within the definition of a "political committee." This, in turn, raises the threshold issue whether your organization has jurisdiction over the Club activities. Please note in the Declaration of Kelly L. Forsberg that she states: (Par. 2) "The Club does not solicit or make any contributions to candidates or organizations." After the present matter is resolved, the Political Club for Growth may seek an advisory opinion under 2 U.S.C. § 437f questioning whether they should be required to register with the FEC and report their activities.



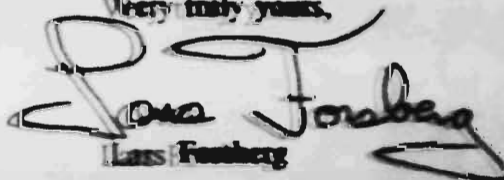
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With regard to the Enforcement Priority System of the FEC and given the identified activities of this Club, it is hard to believe that the FEC would place a high priority on the issues raised. In researching other "matters under review" is our understanding that the goal of effective enforcement relies upon the timely pursuit of complaints and referrals to ensure compliance with the law. The matters in your letter of November 7th relate to events commencing in the spring of 1996. In 1997 there has been total compliance by the Club. It would appear from those facts alone that a fine or penalty at this time would not act as a deterrent. It is possible that your office's delay in pursuing the alleged late filing of the April 1996 Quarterly Report has sent out a misleading message regarding the FEC's level of concern. Again, I refer you to the Declaration of Kelly L. Forsberg.

On behalf of my clients, I respectfully request that the Commission exercise its prosecutorial discretion, take no further action and direct closure of this case. This request is made in light of the information on the record, the relative insignificance of this matter and the amount of time that has elapsed. Closing this case would permit the Commission to focus its resources on more important cases presently pending.

Thank you for your consideration.

Very truly yours,

  
Lars Forsberg

LF/arl

cc: The Political Club for Growth  
Kelly L. Forsberg

170009600973419

**DICKERSON & REILLY**

LAW OFFICES

780 THIRD AVENUE  
NEW YORK, N.Y. 10017

(212) 644-8006

TELECOPIER (212) 486-3038

RECEIVED  
FEDERAL ELECTION  
COMMISSION MAIL ROOM

MAR 27 9 16 AM '98

LARS FORSBERG  
DIRECT DIAL (212) 644-7036

March 26, 1998

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
ACCOUNTING OFFICE  
MAR 27 2 28 PM '98

**VIA FEDERAL EXPRESS**

Ruth Heilizer, Esq.  
999 E Street, N.W.  
Federal Election Commission  
Washington, D.C. 20463

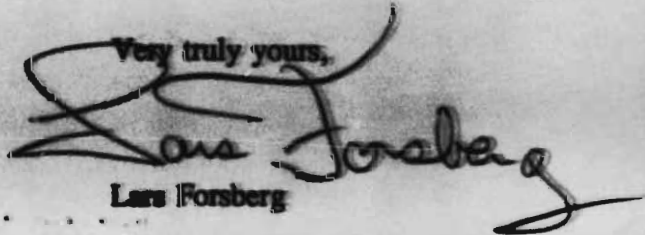
Re: **POLITICAL CLUB FOR GROWTH**  
Your File N° MUR 4692  
Our File N° 1700-01

Dear Ms. Heilizer:

Your assistance has been greatly appreciated in concluding this matter.

Enclosed please find the original conciliation agreement with the penalty payment of \$2,500.00 from the Political Club For Growth. Again, many thanks for your help.

Very truly yours,

  
Lars Forsberg

LF/arl  
Enclosure  
170001VHE198.C26

9804380640

THE POLITICAL CLUB FOR GROWTH

1588

3-16

1998

1-12

PAY TO THE  
ORDER OF

Federal Election Commission

\$ 2,500.00

Twenty Five Hundred and no/100

DOLLARS

**CHEMICAL BANK**  
870 BROADWAY, NEW YORK, N.Y. 10019

FOR Cash Payment +

Kelly Laury

⑆001588⑆ ⑆021000128⑆ 008040311⑆

90043380641



FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20543

FEDERAL ELECTION  
COMMISSION  
OFFICE OF THE CLERK

Mar 31 2 25 PM '98

March 31, 1998

**TWO WAY MEMORANDUM**

TO: OGC Docket

FROM: Rosa E. Swinton *RS*  
Accounting Technician

SUBJECT: Account Determination for Funds Received

We recently received a check from **The Political Club for Growth**, check number **15388**, dated **March 16, 1998**, for the amount of **\$2500.00**. A copy of the check and any correspondence is being forwarded. Please indicate below which account the funds should be deposited and give the MUR/Case number and name associated with the deposit.

TO: Rosa E. Swinton                      Leslie D. Brown  
Accounting Technician                  Disbursing Technician

FROM: OGC Docket

SUBJECT: Disposition of Funds Received

In reference to the above check in the amount of **\$2500.00**, the **MUR/Case** number is 41692 and in the name of The Political Club for Growth. Place this deposit in the account indicated below:

- ☒ Budget Clearing Account (OGC), 95F3875.16
- ☐ Civil Penalties Account, 95-1899.160
- ☐ Other: \_\_\_\_\_

*Rosa E. Swinton*  
Signature

4-3-98  
Date

98040306042



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 7, 1988

Lars Forsberg, Esq.  
Dickerson & Reilly  
780 Third Avenue, 20th Floor  
New York, NY 10017

RE: MUR 4692  
Political Club for Growth

Dear Mr. Forsberg:

Enclosed, for your information, is an FEC Disclosure Form 3X, which the Political Club for Growth should complete if it wishes to terminate. The "type of report" (item 4) should be marked "termination report."

If you have any questions, please contact the Reports Analysis Division at (202) 694-1130.

Sincerely,

*Ruth Heilizer*  
Ruth Heilizer  
Attorney

Enclosure  
FEC Disclosure Form 3X

9 8 0 4 3 6 0 6 4 3



RECEIVED  
FEDERAL  
COMMISSION  
SECRET

APR 10 10 45 AM '98

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of

)

MUR 4692

**SENSITIVE**

Political Club for Growth, and  
Kelly Forsberg, as treasurer

)

)

)

**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND**

On November 4, 1997, the Federal Election Commission ("Commission") found reason to believe that the Political Club for Growth and Kelly Forsberg, as treasurer ("Political Club"), violated 2 U.S.C. § 434(a)(4)(A)(i) and (iii), and determined to enter into pre-probable cause conciliation.

**II. RECOMMENDATIONS**

1. Accept the conciliation agreement.

2004060644

2. Close the file.

3. Approve the appropriate letter.

Lawrence M. Noble  
General Counsel

Date: 12/4/65

BY: 

Lois G. Lerner  
Associate General Counsel

Attachment:

Cover letter, copy of check, and signed conciliation agreement

Staff Assigned:

R. Heilizer

900400010640

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Political Club for Growth, and  
Kelly Forsberg, as treasurer.

)  
)  
)  
)  
)

MUR 4692

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 15, 1998, the Commission decided by a vote of 5-0 to take the following actions in MUR 4692:

1. Accept the conciliation agreement, as recommended in the General Counsel's Report dated April 9, 1998.
2. Close the file.
3. Approve the appropriate letter, as recommended in the General Counsel's Report dated April 9, 1998.

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

Attest:

4-15-98  
Date

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

Received in the Secretariat: Fri., April 10, 1998 10:45 a.m.  
Circulated to the Commission: Fri., April 10, 1998 12:00 p.m.  
Deadline for vote: Wed., April 15, 1998 4:00 p.m.

lrd

930430646



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 21, 1998

Lars Forsberg, Esq.  
Dickerson & Reilly  
780 Third Avenue, 20th Floor  
New York, NY 10017

RE: MUR 4692  
Political Club for Growth  
and Kelly Forsberg, as treasurer

Dear Mr. Forsberg:


On April 15, 1998, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on behalf of the Political Club for Growth and Kelly Forsberg, as treasurer, in settlement of violations of 2 U.S.C. § 434(a)(4)(A)(i) and (iii), provisions of the Federal Election Campaign Act of 1971, as amended. 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. 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) 694-1650.

Sincerely,

  
Ruth Heilizer  
Attorney

Enclosure:  
Conciliation Agreement

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of )  
 ) MUR 4692  
Political Committee for Growth and )  
Kelly Forsberg, as treasurer )

**CONCILIATION AGREEMENT**

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities.

The Commission found reason to believe that the Political Committee for Growth and Kelly Forsberg, as treasurer, ("Respondents") violated 2 U.S.C. § 434(a)(4)(A)(i) and (iii).

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. The Political Club for Growth is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Kelly Forsberg is the treasurer of the Political Club for Growth.



3. 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. 2 U.S.C. § 434(a)(1).

4. In any calendar year in which a regularly scheduled general election is held, committees that choose to file on a quarterly basis shall file quarterly reports no later than the 15th day after the last day of each calendar quarter. 2 U.S.C. § 434(a)(4)(A)(i).

5. In addition, political committees shall file post-general election reports, which shall be filed no later than the 30th day after the general election and which shall be complete as of the 20th day after such general election. 2 U.S.C. § 434(a)(4)(A)(iii).

6. The due date for Respondents' 1996 April Quarterly report was April 15, 1996. 2 U.S.C. § 434(a)(4)(A)(i). Respondents filed their 1996 April Quarterly Report on June 4, 1996, 50 days late, disclosing receipts totaling \$20,551.00 and disbursements totaling \$8,426.99.

7. The due date for Respondents' 1996 July Quarterly Report was July 15, 1996. 2 U.S.C. § 434(a)(4)(A)(i). Respondents filed their 1996 July Quarterly Report on December 16, 1996, 150 days late, disclosing receipts totaling \$7,000.00 and disbursements totaling \$9,749.99.

8. The due date for Respondents' 1996 October Quarterly Report was October 15, 1996. 2 U.S.C. § 434(a)(4)(A)(i). Respondents filed their 1996 October Quarterly Report on December 16, 1996, 62 days late, disclosing receipts totaling \$3,000.00 and disbursements totaling \$6,146.92.

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9. The due date for Respondents' 1996 30 Day Post-General Report was December 5, 1996. 2 U.S.C. § 434(a)(4)(A)(iii). Respondents filed their 30 Day Post-General Report on December 16, 1996, 11 days late, disclosing receipts totaling \$0.00 and disbursements totaling \$4,746.45.

10. On July 31, 1995, Respondents entered into a conciliation agreement for violations of 2 U.S.C. § 434(a)(4)(A)(i), (iii) and (iv) for late-filing the 1993 Mid-Year Report, the 1993 Year End Report, the 1994 April Quarterly Report, the 1994 July Quarterly Report, the 1994 October Quarterly Report, and the 1994 30 Day Post-General Report.

V. Respondents failed to file timely its 1996 April, July and October Quarterly Reports, and its 1996 30 Day Post-General Report, in violation of 2 U.S.C. § 434(a)(4)(A)(i) and (iii).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Two Thousand Five Hundred dollars (\$2,500), 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.

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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.

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

FOR THE COMMISSION:

Lawrence M. Noble  
General Counsel

BY:

*Lois G. Lerner*  
Lois G. Lerner  
Associate General Counsel

Date

4/21/98

FOR THE RESPONDENTS:

*Kelly Trubing*  
(Name)  
(Position) *Assistant*

Date

3/16/98

98043080651



FEDERAL ELECTION COMMISSION

WASHINGTON DC 20463

THIS IS THE END OF MUR # 4692

DATE FILMED 5/14/98 CAMERA NO. 1

CAMERAMAN SES

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