

THIS IS THE BEGINNING OF ADMINSTRATIVE FINE CASE

At-171

DATE FILMED 6-4-81 CAMERA NO. 2

CAMERAMAN JmN

6504 050 00 10



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 28, 2000

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

2000 NOV 28 P 1:16

MEMORANDUM

SENSITIVE

TO: THE COMMISSION

THROUGH: JAMES A. PEHRKON
STAFF DIRECTOR

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

SUBJECT: REASON TO BELIEVE RECOMMENDATION -
2000 OCTOBER QUARTERLY REPORT FOR THE
ADMINISTRATIVE FINES PROGRAM

Attached are two lists of political committees and their treasurers who failed to file or timely file the 2000 October Quarterly Report in accordance with 2 U.S.C. 434(a). On September 21, 2000, Prior Notice was sent to all political committees and their treasurers, informing them that the 2000 October Quarterly Report was due on October 15, 2000. The report should cover from July 1, 2000 (or the closing date of the last report filed) through September 30, 2000.

The committees appearing on the first list (not election-sensitive) either filed the report more than five (5) days after the due date, failed to file the report or filed the report more than thirty (30) days after the due date (considered a non-filed report). The committees appearing on the second list (election-sensitive) either filed the report more than five (5) days after the due date, failed to file the report or failed to file the report prior to four (4) days before the general election (considered a non-filed report). In accordance with the schedule of civil money penalties for reports at 11 CFR 111.43, these committees should be assessed the civil money penalties included on the attached lists.

Recommendation

- (1) Find reason to believe that the political committees and their treasurers listed on the RTB Circulation Reports violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Reports.

(2)

- (3) Send the appropriate letters.

(4)

74 03 25 4062

DATE 11/26/2000
PAGE: 4

FEDERAL ELECTION COMMISSION 1999-2000
Reason to Believe Circulation Report
2000 OCTOBER QUARTERLY

AF #	COMMITTEE NAME	COMMITTEE ID	TREASURER	RECEIPT DATE	LEVEL OF ACTIVITY	STATE	THRESHOLD AMOUNT	CANDIDATE NAME	SENSITIVE	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
------	----------------	--------------	-----------	--------------	-------------------	-------	------------------	----------------	-----------	---------------------	---------------------

AF0130 HERGERT FOR U S SENATE
C00352385
DENNIS HADDEN CPA
Not Filed

NE
\$1,081,492
\$270,373 (est)
HERGERT, DAVID
NO
0
\$8,000

DATE 11/28/2000
PAGE: 5FEDERAL ELECTION COMMISSION 1999-2000
Reason to Believe Circulation Report
2000 OCTOBER QUARTERLY

AF #	COMMITTEE NAME	COMMITTEE ID	TREASURER	RECEIPT DATE	LEVEL OF ACTIVITY	THRESHOLD AMOUNT	STATE	SENSITIVE	CANDIDATE NAME	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
AF0138	FRIENDS OF MARK BREWER	C00142725	JOHN MARK BREWER	Not Filed	\$330,033 (est)	\$1,352,132	TX	No	BREWER, JOHN MARK	0	\$8,000
AF0139	JEFF WRIGHT FOR CONGRESS EXPLORATORY COMMITTEE	C00351411	D GERALD SEARFOSS	Not Filed	\$262,092 (est)	\$1,310,462	UT	No	WRIGHT, JEFFREY E	0	\$8,000
AF0140	COMMITTEE TO ELECT KEVIN MCKEIGUE FOR US SENATE	C00353557	KEVIN MCKEIGUE	Not Filed	\$78,180 (est)	\$156,361	WA	No	MCKEIGUE, KEVIN LAWRENCE	0	\$3,500

21 09 250 4054

DATE 11/28/2000
PAGE: 2FEDERAL ELECTION COMMISSION 1999-2000
Reason to Believe Circulation Report
2000 OCTOBER QUARTERLY

AF #	COMMITTEE NAME	COMMITTEE ID	TREASURER	RECEIPT DATE	LEVEL OF ACTIVITY	THRESHOLD AMOUNT	STATE	CANDIDATE NAME	SENSITIVE	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
AF0151	AMERICAN ACADEMY OF EMERGENCY MEDICINE POLITICAL ACTION COMMITTEE	CO0324780	WILLIAM R LITTLE MD FAREM	10/30/2000	\$11,202	\$108,391	WI	Yes	0		\$525
AF0152	AMERICAN HEAT INSTITUTE POLITICAL ACTION COMMITTEE	CO0024281	SARA J LILYGREN	10/26/2000	\$68,365	\$400,430	VA	Yes	0		\$1,275
AF0153	CINCINNATI BELL INC FEDERAL POLITICAL ACTION COMMITTEE	CO0087478	MARK W PETERSON	10/26/2000	\$21,195	\$103,972	OH	Yes	0		\$425
AF0154	CITIZENS FOR THE REPUBLIC	CO0075390	CAROLYN ROBERTSON	10/27/2000	\$62,200	\$482,912	VA	Yes	0		\$1,350
AF0155	DEMOCRATIC FOUNDATION OF THE DESERT; THE	CO0348144	OSCAR G ARMijo	10/24/2000	\$33,015	\$100,433	CA	Yes	0		\$750
AF0156	INN/PAC INT'L ASSN OF HOLIDAY INNS INC POLITICAL ACTION COMMITTEE	CO0084822	JAMES P MCCAULEY	10/25/2000	\$13,976	\$138,963	GA	Yes	0		\$400
AF0158	MARRIOTT INTERNATIONAL INC POLITICAL ACTION COMMITTEE	CO0284810	TRENT M KITTLEMAN	10/25/2000	\$109,699	\$305,974	MD	Yes	0		\$2,150
AF0159	PLUMBERS LOCAL UNION NO 1 NYC-POLITICAL ACTION COMMITTEE	CO0327478	GEORGE W REILLY	10/22/2000	\$110,143	\$584,852	NY	Yes	0		\$1,775

21.09.255.4065

DATE 11/28/2000
PAGE: 3

FEDERAL ELECTION COMMISSION 1999-2000
Reason to Believe Circulation Report
2000 OCTOBER QUARTERLY

AF #	COMMITTEE NAME	COMMITTEE ID	TREASURER	RECEIPT DATE	LEVEL OF ACTIVITY	STATE	THRESHOLD AMOUNT	CANDIDATE NAME	SENSITIVE	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
------	----------------	--------------	-----------	--------------	-------------------	-------	------------------	----------------	-----------	---------------------	---------------------

AF0162	TACO POLITICAL ACTION COMMITTEE	CO0330118	PETER BRAUN	12	\$197,149	KS	\$451,277		Yes	0	\$3,000
AF0163	UNITED ASSOCIATION OF STEAM/PIPEFITTERS LOCAL UNION 524 POLITICAL	CO0131706	ANTHONY GALENAS	6	\$18,433	PA	\$101,440		Yes	0	\$300
AF0164	VIACON INTERNATIONAL INC POLITICAL ACTION COMMITTEE	CO0167759	MICHAEL CRUZ	10	\$31,971	DC	\$700,153		Yes	0	\$800
AF0165	WISCONSIN RIGHT TO LIFE POLITICAL ACTION COMMITTEE	CO0173278	RICHARD J FOX	11	\$48,146	WI	\$234,998		Yes	0	\$850
AF0166	MACOMB COUNTY DEMOCRATIC COMMITTEE	CO0354332	NANCY FALCONE	9	\$67,576	MI	\$80,576		Yes	0	\$1,125
AF0168	WEST VIRGINIA REPUBLICAN STATE EXECUTIVE COMMITTEE	CO0081802	ROBERT J GOULD	8	\$62,204	WV	\$323,816		Yes	0	\$1,050
AF0169	CALIFORNIA VOTER GUIDE	CO0305706	LEE ANN FITZGERALD	*	\$5,300	CA	\$119,262		Yes	0	\$1,000
AF0170	INTERNATIONAL COUNCIL OF CRUISE LINES POLITICAL ACTION COMM	CO0303073	J MICHAEL CRYE	11/08/2000	\$32,403	VA	\$297,164		Yes	1	\$2,500

* Defined as not filed

FEDERAL ELECTION COMMISSION 1999-2000
Reason to Believe Circulation Report
2000 OCTOBER QUARTERLY

AF #	COMMITTEE NAME	COMMITTEE ID	TREASURER	RECEIPT DATE	LEVEL OF ACTIVITY	THRESHOLD AMOUNT	STATE	CANDIDATE NAME	SENSITIVE	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
AF0171	LAW ENFORCEMENT ALLIANCE OF AMERICA INC FUND FOR RESPONSIBLE GOVE	VA									
	CO0291393		JAMES J FOTIS			\$149,381					
	Not Filed					\$37,345 (est)		Yes	0		\$2,000
AF0172	PECO ENERGY COMPANY POLITICAL ACTION COMMITTEE (FKA: PHILADELPHIA	PA									
	CO0160101		THERESA M RUCH			\$144,507		Yes	0		\$2,000
	Not Filed					\$48,169 (est)					
AF0175	LIBERTARIAN PARTY OF ILLINOIS	IL									
	CO0315713		STEVEN I GIVOT			\$278,450		Yes	0		\$3,000
	Not Filed					\$69,612 (est)					
AF0177	COMMITTEE ON ARRANGEMENTS FOR THE 2000 REPUBLICAN NATIONAL CONVEN	VA									
	CO0333088		ALEC POITEVINT			\$24,460,636		Yes	0		\$7,500
	11/20/2000	*	Not Filed			\$225,971					

* Defined as not filed

Gibson
JL



FEDERAL ELECTION COMMISSION
Washington, DC 20463

SENSITIVE

DATE & TIME OF TRANSMITTAL: Tuesday, November 28, 2000 4:00

BALLOT DEADLINE: Friday, December 01, 2000 4:00

COMMISSIONER: MASON, McDONALD, SANDSTROM, SMITH, THOMAS, WOLD

SUBJECT: Reason To Believe Recommendation 2000 October
Quarterly Report For The Administrative Fines Program.

() I approve the recommendation(s)

() I approve the recommendations except those following
to which I object (please insert AF#)

() I approve the recommendations except those following
in which I abstain (please insert AF#)

() I approve the recommendations except those following
in which I am recused (please insert AF#)

A definite vote is required. All ballots must be signed and dated. Please return
ONLY THE BALLOT to the Commission Secretary. Please return ballot no later
than date and time shown above.

DATE: _____

SIGNATURE: _____

FROM THE OFFICE OF THE SECRETARY OF THE COMMISSION

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Reason to Believe Recommendation 2000)
October Quarterly Report for the)
Administrative Fines Program)

Agenda Document
No. X00-87

PEGAM FOR CONGRESS, and JOSEPH CHOU)
as treasurer;)
RAY HAYNES FOR US SENATE, and BETTY)
PRESLEY as treasurer;)

AF# 97

AF# 98

LEE STEERS FOR CONGRESS / 2000, and)
MARY LYNN LANIER as treasurer;)

AF# 100

JANEZICH FOR US SENATE COMMITTEE, and)
RAFAEL ORTEGA as treasurer;)
DANNER FOR CONGRESS, and EARL SOETAERT)
as treasurer;)
MOORE FOR US SENATE, and LARRY KOPSA)
as treasurer;)

AF# 102

AF# 103

AF# 104

TOM FOLEY FOR US SENATE, and FRANK M)
VACCARO JR as treasurer;)

AF# 107

JUDY SMITH FOR CONGRESS, and ALVERNON)
MCHENRY as treasurer;)

AF# 113

Federal Election Commission
Certification for Administrative Fines
December 05, 2000

Page 2

HERGERT FOR U S SENATE, and DENNIS
HADDEN CPA as treasurer;

) AF# 130
)

Federal Election Commission
Certification for Administrative Fines
December 05, 2000

Page 3

FRIENDS OF MARK BREWER, and JOHN MARK) AF# 138
BREWER as treasurer;)
JEFF WRIGHT FOR CONGRESS EXPLORATORY) AF# 139
COMMITTEE, and D GERALD SEARFOSS as)
treasurer;)
COMMITTEE TO ELECT KEVIN MCKEIGUE FOR) AF# 140
US SENATE, and KEVIN MCKEIGUE as)
treasurer;)

HUTCHINS FOR CONGRESS, and BRUCE E) AF# 143
RAFER as treasurer;)

MEEKS FOR CONGRESS 2000, and CHARLES H) AF# 145
REEVES III as treasurer;)

EVA CLAYTON COMMITTEE FOR CONGRESS,) AF# 148
and PATSY T HARGROVE as treasurer;)

E*TRADE GROUP INC PAC (E*TRADE PAC),) AF# 150
and MICHAEL CHOCHON as treasurer;)
AMERICAN ACADEMY OF EMERGENCY MEDICINE) AF# 151
POLITICAL ACTION COMMITTEE AAEM PAC,)
and WILLIAM R LITTLE MD FAAEM as)
treasurer;)
AMERICAN MEAT INSTITUTE POLITICAL) AF# 152
ACTION COMMITTEE, and SARA J LILYGREN)
as treasurer;)

Federal Election Commission
Certification for Administrative Fines
December 05, 2000

Page 4

CINCINNATI BELL INC FEDERAL POLITICAL) AF# 153
ACTION COMMITTEE, and MARK W PETERSON)
as treasurer;)
CITIZENS FOR THE REPUBLIC, and CAROLYN) AF# 154
ROBERTSON as treasurer;)
DEMOCRATIC FOUNDATION OF THE DESERT;) AF# 155
THE, and OSCAR G ARMIJO as treasurer;)
INN/PAC INT'L ASSN OF HOLIDAY INNS INC) AF# 156
POLITICAL ACTION COMMITTEE, and JAMES)
P MCCAULEY as treasurer;)

MARRIOTT INTERNATIONAL INC POLITICAL) AF# 158
ACTION COMMITTEE, and TRENT M)
KITTLEMAN as treasurer;)
PLUMBERS LOCAL UNION NO 1) AF# 159
NYC-POLITICAL ACTION COMMITTEE, and)
GEORGE W REILLY as treasurer;)

TACO POLITICAL ACTION COMMITTEE, and) AF# 162
PETER BRAUN as treasurer;)
UNITED ASSOCIATION OF) AF# 163
STEAM/PIPEFITTERS LOCAL UNION 524)
POLITICAL ACTION FUND, and ANTHONY)
GALENAS as treasurer;)
VIACOM INTERNATIONAL INC POLITICAL) AF# 164
ACTION COMMITTEE, and MICHAEL CRUZ as)
treasurer;)
WISCONSIN RIGHT TO LIFE POLITICAL) AF# 165
ACTION COMMITTEE, and RICHARD J FOX as)
treasurer;)
MACOMB COUNTY DEMOCRATIC COMMITTEE,) AF# 166
and NANCY FALCONE as treasurer;)

Federal Election Commission
Certification for Administrative Fines
December 05, 2000

Page 5

WEST VIRGINIA REPUBLICAN STATE) AF# 168
EXECUTIVE COMMITTEE, and ROBERT J)
GOULD as treasurer;)
CALIFORNIA VOTER GUIDE, and LEE ANN) AF# 169
FITZGERALD as treasurer;)
INTERNATIONAL COUNCIL OF CRUISE LINES) AF# 170
POLITICAL ACTION COMM (ICCL-PAC), and)
J MICHAEL CRYE as treasurer;)
LAW ENFORCEMENT ALLIANCE OF AMERICA) AF# 171
INC FUND FOR RESPONSIBLE GOVERNMENT)
(LEAA), and JAMES J FOTIS as,)
treasurer;)
PECO ENERGY COMPANY POLITICAL ACTION) AF# 172
COMMITTEE (FKA: PHILADELPHIA ELECTRIC)
COMPANY PAC), and THERESA M RUCH as)
treasurer;)

LIBERTARIAN PARTY OF ILLINOIS, and) AF# 175
STEVEN I GIVOT as treasurer;)

CERTIFICATION

I, Darlene Harris, recording secretary for the
Federal Election Commission executive session on
December 5, 2000, do hereby certify that the
Commission took the following actions with respect
to the Reports Analysis Division's Memorandum dated
November 28, 2000, on the following committees:

AF# 97: Decided by a vote of 5-0 to: (1) find
reason to believe that PEGRAM FOR CONGRESS, and
JOSEPH CHOU as treasurer, violated 2 U.S.C. 434(a)
and make a preliminary determination that the civil
money penalty would be the amount indicated on the
report; (2) send the appropriate letter.
Commissioners Mason, McDonald, Sandstrom, Smith, and
Wold voted affirmatively for the decision.
Commissioner Thomas did not vote.

AF# 98: Decided by a vote of 5-0 to: (1) find
reason to believe that RAY HAYNES FOR US SENATE, and
BETTY PRESLEY as treasurer, violated 2 U.S.C. 434(a)

Federal Election Commission
Certification for Administrative Fines
December 05, 2000

Page 14

AF# 130: Decided by a vote of 5-0 to: (1) find reason to believe that HERGERT FOR U S SENATE, and DENNIS HADDEN CPA as treasurer, violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, and Wold voted affirmatively for the decision. Commissioner Thomas did not vote.

Federal Election Commission
Certification for Administrative Fines
December 05, 2000

Page 16

AF# 138: Decided by a vote of 5-0 to: (1) find reason to believe that FRIENDS OF MARK BREWER, and JOHN MARK BREWER as treasurer, violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, and Wold voted affirmatively for the decision. Commissioner Thomas did not vote.

AF# 139: Decided by a vote of 5-0 to: (1) find reason to believe that JEFF WRIGHT FOR CONGRESS EXPLORATORY COMMITTEE, and D GERALD SEARFOSS as treasurer, violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, and Wold voted affirmatively for the decision. Commissioner Thomas did not vote.

AF# 140: Decided by a vote of 5-0 to: (1) find reason to believe that COMMITTEE TO ELECT KEVIN

Federal Election Commission
Certification for Administrative Fines
December 05, 2000

Page 20

AF# 152: Decided by a vote of 5-0 to: (1) find reason to believe that AMERICAN MEAT INSTITUTE POLITICAL ACTION COMMITTEE, and SARA J LILYGREN as treasurer, violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, and Wold voted affirmatively for the decision. Commissioner Thomas did not vote.

AF# 153: Decided by a vote of 5-0 to: (1) find reason to believe that CINCINNATI BELL INC FEDERAL POLITICAL ACTION COMMITTEE, and MARK W PETERSON as treasurer, violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, and Wold voted affirmatively for the decision. Commissioner Thomas did not vote.

AF# 154: Decided by a vote of 5-0 to: (1) find reason to believe that CITIZENS FOR THE REPUBLIC, and CAROLYN ROBERTSON as treasurer, violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, and Wold voted affirmatively for the decision. Commissioner Thomas did not vote.

AF# 155: Decided by a vote of 5-0 to: (1) find reason to believe that DEMOCRATIC FOUNDATION OF THE DESERT; THE, and OSCAR G ARMIJO as treasurer, violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, and Wold voted affirmatively for

Federal Election Commission
Certification for Administrative Fines
December 05, 2000

Page 21

the decision. Commissioner Thomas did not vote.

AF# 156: Decided by a vote of 5-0 to: (1) find reason to believe that INN/PAC INT'L ASSN OF HOLIDAY INNS INC POLITICAL ACTION COMMITTEE, and JAMES P MCCAULEY as treasurer, violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, and Wold voted affirmatively for the decision. Commissioner Thomas did not vote.

AF# 158: Decided by a vote of 5-0 to: (1) find reason to believe that MARRIOTT INTERNATIONAL INC POLITICAL ACTION COMMITTEE, and TRENT M KITTLEMAN as treasurer, violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, and Wold voted affirmatively for the decision. Commissioner Thomas did not vote.

AF# 159: Decided by a vote of 5-0 to: (1) find reason to believe that PLUMBERS LOCAL UNION NO 1 NYC-POLITICAL ACTION COMMITTEE, and GEORGE W REILLY as treasurer, violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report;

Federal Election Commission
Certification for Administrative Fines
December 05, 2000

Page 24

AF# 168: Decided by a vote of 5-0 to: (1) find reason to believe that WEST VIRGINIA REPUBLICAN STATE EXECUTIVE COMMITTEE, and ROBERT J GOULD as treasurer, violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, and Wold voted affirmatively for the decision. Commissioner Thomas did not vote.

AF# 169: Decided by a vote of 5-0 to: (1) find reason to believe that CALIFORNIA VOTER GUIDE, and LEE ANN FITZGERALD as treasurer, violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, and Wold voted affirmatively for the decision. Commissioner Thomas did not vote.

AF# 170: Decided by a vote of 5-0 to: (1) find reason to believe that INTERNATIONAL COUNCIL OF CRUISE LINES POLITICAL ACTION COMM (ICCL-PAC), and J MICHAEL CRYE as treasurer, violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty be reduced to \$2000, to eliminate the "previous violation" weighting factor; (2) send the appropriate letter.

Federal Election Commission
Certification for Administrative Fines
December 05, 2000

Page 25

Commissioners Mason, McDonald, Sandstrom, Smith, and Wold voted affirmatively for the decision. Commissioner Thomas did not vote.

AF# 171: Decided by a vote of 5-0 to: (1) find reason to believe that LAW ENFORCEMENT ALLIANCE OF AMERICA INC FUND FOR RESPONSIBLE GOVERNMENT (LEAA), and JAMES J FOTIS as treasurer, violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, and Wold voted affirmatively for the decision. Commissioner Thomas did not vote.

AF# 172: Decided by a vote of 5-0 to: (1) find reason to believe that PECO ENERGY COMPANY POLITICAL ACTION COMMITTEE (FKA: PHILADELPHIA ELECTRIC COMPANY PAC), and THERESA M RUCH as treasurer, violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, and Wold voted affirmatively for the decision. Commissioner Thomas did not vote.

Federal Election Commission
Certification for Administrative Fines
December 05, 2000

Page 26

AF# 175: Decided by a vote of 5-0 to: (1) find reason to believe that LIBERTARIAN PARTY OF ILLINOIS, and STEVEN I GIVOT as treasurer, violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, and Wold voted affirmatively for the decision. Commissioner Thomas did not vote.

Attest:

December 7, 2000
Date

Darlene Harris
Darlene Harris
Acting Deputy Secretary
of the Commission

**WESTERN
UNION**

WESTERN UNION COMMERCIAL SERVICES

CONFIRMATION OF CMGM

TO: JAMES J FOTIS

LAW ENFORCEMENT ALLIANCE OF AMERICA FFRG
7700 LEESBURG PIKE STE 421
FALLS CHURCH VA 22043-2633FEDERAL ELECTION COMMISSION
LEAH PALMER
999 E ST NW # 709
WASHINGTON DC 20463

DECEMBER 7, 2000

JAMES J FOTIS
LAW ENFORCEMENT ALLIANCE OF AMERICA FFRG
7700 LEESBURG PIKE SUITE 421
FALLS CHURCH VA 22043C00291393
AF#: 171

DEAR JAMES J FOTIS:

THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED ("THE ACT"), REQUIRES THAT YOUR COMMITTEE FILE AN OCTOBER QUARTERLY REPORT OF RECEIPTS AND DISBURSEMENTS IN A CALENDAR YEAR IN WHICH A REGULARLY SCHEDULED GENERAL ELECTION IS HELD. THIS REPORT, COVERING THE PERIOD THROUGH SEPTEMBER 30TH, SHALL BE FILED NO LATER THAN OCTOBER 15TH. 2 U.S.C. 434(A). YOU WERE PREVIOUSLY NOTIFIED OF THE DUE DATE FOR THIS REPORT. RECORDS AT THE COMMISSION INDICATE THAT THIS REPORT WAS NOT FILED PRIOR TO FOUR (4) DAYS BEFORE THE GENERAL ELECTION HELD ON NOVEMBER 7, 2000. YOU SHOULD FILE THE OCTOBER QUARTERLY REPORT IF YOU HAVE NOT ALREADY DONE SO.

THE ACT WAS FURTHER AMENDED IN 1999 TO PERMIT THE FEDERAL ELECTION COMMISSION ("THE COMMISSION") TO IMPOSE CIVIL MONEY PENALTIES FOR VIOLATIONS OF THE REPORTING REQUIREMENTS OF 2 U.S.C. 434(A). 2 U.S.C. 437G(A)(4). ON 12/05/2000, THE COMMISSION FOUND THAT THERE IS REASON TO BELIEVE ("RTB") THAT LAW ENFORCEMENT ALLIANCE OF AMERICA FFRG AND YOU, AS TREASURER, VIOLATED 2 U.S.C. 434(A) BY FAILING TO FILE TIMELY THIS REPORT ON OR BEFORE OCTOBER 15TH. BASED ON THE COMMISSION'S SCHEDULES OF CIVIL MONEY PENALTIES AT 11 CFR 111.43, THE AMOUNT OF YOUR CIVIL MONEY PENALTY CALCULATED AT RTB IS \$2000.00. IT IS DUE BY 01/14/2001 AND IS BASED ON THESE FACTORS:

ELECTION SENSITIVITY OF REPORT: ELECTION SENSITIVE
LEVEL OF ACTIVITY*: \$37345
NUMBER OF DAYS LATE: NOT FILED
NUMBER OF PREVIOUS CIVIL MONEY PENALTIES ASSESSED: 0

*IF THE REPORT WAS NOT RECEIVED, THE LEVEL OF ACTIVITY WAS ESTIMATED

**WESTERN
UNION****WESTERN UNION COMMERCIAL SERVICES**

USING TOTAL RECEIPTS AND DISBURSEMENTS FOR THE CURRENT 2-YEAR ELECTION CYCLE (OR PRIOR CYCLE, IF NO REPORTS WERE FILED THIS CYCLE) DIVIDED BY THE NUMBER OF REPORTS FILED.

TO PAY THE CALCULATED CIVIL MONEY PENALTY

TO PAY THE CALCULATED CIVIL MONEY PENALTY, SEND THE ENCLOSED REMITTANCE AND YOUR PAYMENT TO THE COMMISSION AT THE ADDRESS ON PAGE 3. UPON RECEIPT OF YOUR PAYMENT, THE COMMISSION WILL SEND YOU A FINAL DETERMINATION LETTER.

TO CHALLENGE THE RTB FINDING AND/OR CALCULATED CIVIL MONEY PENALTY

TO CHALLENGE THE RTB FINDING AND/OR CALCULATED CIVIL MONEY PENALTY, YOU MUST SUBMIT A WRITTEN RESPONSE TO THE COMMISSION'S OFFICE OF ADMINISTRATIVE REVIEW, 999 E STREET, NW, WASHINGTON, DC 20463. YOUR RESPONSE MUST BE RECEIVED BY 01/14/2001. YOUR WRITTEN RESPONSE MUST INCLUDE THE REASON(S) WHY YOU ARE CHALLENGING THE RTB FINDING AND/OR CALCULATED CIVIL MONEY PENALTY. THE COMMISSION WILL ONLY CONSIDER CHALLENGES THAT ARE BASED ON A FACTUAL ERROR, MISCALCULATION OF THE CALCULATED CIVIL MONEY PENALTY BY THE COMMISSION, OR THE EXISTENCE OF EXTRAORDINARY CIRCUMSTANCES THAT PERSISTED FOR MORE THAN 48 HOURS THAT WERE BEYOND YOUR CONTROL AND PREVENTED YOU FROM FILING THE REPORT IN A TIMELY MANNER. YOUR RESPONSE MUST INCLUDE THE FACTUAL BASIS SUPPORTING THE REASON(S) AND SUPPORTING DOCUMENTATION. THE COMMISSION STRONGLY ENCOURAGES THAT DOCUMENTS BE SUBMITTED IN THE FORM OF AFFIDAVITS OR DECLARATIONS. EXTRAORDINARY CIRCUMSTANCES THAT WILL NOT BE CONSIDERED INCLUDE, BUT ARE NOT LIMITED TO, NEGLIGENCE, PROBLEMS WITH VENDORS OR CONTRACTORS, STAFF ILLNESS, COMPUTER FAILURES AND SIMILAR CIRCUMSTANCES. 11 CFR 111.35(3)(1)(III) AND (4).

IF YOU INTEND TO BE REPRESENTED BY COUNSEL, PLEASE ADVISE THE OFFICE OF ADMINISTRATIVE REVIEW. YOU SHOULD PROVIDE, IN WRITING, THE NAME, ADDRESS AND TELEPHONE NUMBER OF YOUR COUNSEL AND AUTHORIZE COUNSEL TO RECEIVE NOTIFICATIONS AND COMMUNICATIONS RELATING TO THIS CHALLENGE AND IMPOSITION OF THE CALCULATED CIVIL MONEY PENALTY.

IF YOU DO NOT PAY THE CALCULATED CIVIL MONEY PENALTY OR SUBMIT A CHALLENGE

IF YOU DO NOT PAY THE CALCULATED CIVIL MONEY PENALTY OR SUBMIT A WRITTEN RESPONSE, THE COMMISSION WILL ASSUME THAT THE PRECEDING FACTUAL ALLEGATIONS ARE TRUE AND MAKE A FINAL DETERMINATION THAT LAW ENFORCEMENT ALLIANCE OF AMERICA FERG AND YOU, AS TREASURER, VIOLATED 2 U.S.C. 434(A) AND ASSESS A CIVIL MONEY PENALTY.

UNPAID CIVIL MONEY PENALTIES ASSESSED THROUGH THE ADMINISTRATIVE FINE REGULATIONS WILL BE SUBJECT TO THE DEBT COLLECTION ACT OF 1982("DCA") AS AMENDED BY THE DEBT COLLECTION IMPROVEMENT ACT OF 1996, 31 U.S.C. 3701 ET SEQ. THE COMMISSION MAY TAKE ANY AND ALL APPROPRIATE ACTION AUTHORIZED AND REQUIRED BY THE DCA, AS AMENDED, INCLUDING TRANSFER TO THE U.S. DEPARTMENT OF THE TREASURY FOR COLLECTION. 11 CFR 111.45.

THIS MATTER WAS GENERATED BASED ON INFORMATION ASCERTAINED BY THE COMMISSION IN THE NORMAL COURSE OF CARRYING OUT ITS SUPERVISORY RESPONSIBILITIES. 2 U.S.C. 4376(A)(2). IT WILL REMAIN CONFIDENTIAL IN ACCORDANCE WITH 2 U.S.C. 4376(A)(4)(B) AND 4376(A)(12)(A) UNLESS YOU NOTIFY THE COMMISSION IN WRITING THAT YOU WISH THE MATTER TO BE

**WESTERN
UNION**

WESTERN UNION COMMERCIAL SERVICES

MADE PUBLIC.

ADDITIONAL INFORMATION ON THE COMMISSION'S ADMINISTRATIVE FINE PROGRAM, INCLUDING THE FINAL REGULATIONS, IS LOCATED AT THE COMMISSION'S WEBSITE AT WWW.FEC.GOV. IF YOU HAVE QUESTIONS REGARDING THE PAYMENT OF THE CALCULATED CIVIL MONEY PENALTY, PLEASE CONTACT MARY E. SEILER IN THE REPORTS ANALYSIS DIVISION AT OUR TOLL FREE NUMBER (800)424-9530 (PRESS 1, THEN PRESS 2) OR (202)694-1130. IF YOU HAVE QUESTIONS REGARDING THE SUBMISSION OF A CHALLENGE, PLEASE CONTACT THE OFFICE OF ADMINISTRATIVE REVIEW AT OUR TOLL FREE NUMBER (800)424-9530 (PRESS 0, THEN EXT. 1660) OR (202)694-1660.

SINCERELY,

DARRYL WGLD
CHAIRMAN* * * * *
ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS

IN ACCORDANCE WITH THE SCHEDULE OF PENALTIES AT 11 CFR 111.43, THE AMOUNT OF YOUR CIVIL MONEY PENALTY CALCULATED AT RTB IS \$2000.00 FOR THE 2000 OCTOBER QUARTERLY REPORT.

PLEASE MAIL THIS REMITTANCE WITH A CHECK OR MONEY ORDER MADE PAYABLE TO THE FEDERAL ELECTION COMMISSION TO THE FOLLOWING ADDRESS:
FEDERAL ELECTION COMMISSION
P.O. BOX 952182
ST. LOUIS, MO 63195-2182

IF YOU CHOOSE TO SEND YOUR REMITTANCE AND PAYMENT BY COURIER OR OVERNIGHT DELIVERY, PLEASE USE THIS ADDRESS:
FIRSTAR - GOVERNMENT LOCKBOX
FEC #952132
1005 CONVENTION PLAZA
ST. LOUIS, MO 63101

THE REMITTANCE AND YOUR PAYMENT ARE DUE BY 01/14/2001. UPON RECEIPT OF YOUR REMITTANCE AND PAYMENT, THE COMMISSION WILL SEND YOU A FINAL DETERMINATION LETTER.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: LAW ENFORCEMENT ALLIANCE OF AMERICA FERG

FEC ID#: C00291393

AFF#: 171

PAYMENT DUE DATE: 01/14/2001

PAYMENT AMOUNT DUE: \$2000.00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 27, 2001

RECEIVED
FEDERAL ELECTION
COMMISSION
MAR 29 2001

2001 MAR 29 P 12:34

SENSITIVE

MEMORANDUM

TO: THE COMMISSION

THROUGH: JAMES A. PEHRKON
STAFF DIRECTOR.

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

SUBJECT: ADMINISTRATIVE FINES FINAL DETERMINATION
RECOMMENDATION FOR THE 2000 OCTOBER
QUARTERLY AND NOVEMBER MONTHLY REPORTS

Attached are two lists of political committees and their treasurers which the Commission has found reason to believe (RTB) and assessed proposed civil money penalties calculated at RTB for failure to file or failure to timely file the 2000 October Quarterly and November Monthly Reports. The first list represents committees that have paid the civil money penalty and the second list represents those that have not paid. The committees that have not paid have been given at least forty (40) days from the date of the RTB notification to remit payment.

In accordance with 11 CFR 111.34 and 11 CFR 111.40, the Commission shall send a final determination notice to those respondents that have either paid or not paid the civil money penalty.

committees have filed their reports after the RTB finding. The actual level of activity disclosed on the report results in a civil money penalty which is lower than that assessed at RTB.

Friends of Mark Brewer (AF 138) disclosed zero receipts and disbursements, thus bringing their final civil money penalty to zero as well. The remaining committees are:

- Committee to Elect Kevin McKeigue for US Senate
AF #140

None of the committees listed above have paid the civil money penalty. The actual level of activity and receipt date of the reports, as well as the revised civil money penalties, are reflected on the attached "not paid" circulation report.

additional committees filed the report after the RTB finding and disclosed levels of activity that would have resulted in higher civil money penalties had the reports been filed prior to the RTB stage. However, the internal procedures adopted by the Commission on March 20, 2001 only allows for approval of a lower civil money penalty at the final determination stage if the report discloses an actual level of activity which is less than the estimate on which the RTB civil money penalty was based. Therefore, the civil money penalty that is recommended at the final determination stage for the following committees is the same amount that was approved at the RTB stage:

- Eva Clayton Committee for Congress (AF #148)
RTB fine based on estimated level of activity: \$4,000
Actual level of activity fine: \$5,000
(The \$4,000 fine has been paid by the Committee)

RAD Recommendation

- (1) Make final determinations that the political committees and their treasurers on the attached lists violated 2 U.S.C. 434(a) and assess the civil money penalties so indicated.
- (2) Send the appropriate letters.

24-09-250-4037

FEDERAL ELECTION COMMISSION 1999-2000
FINAL DETERMINATION CIRCULATION REPORT
NOT PAID

AF #	CANDIDATE NAME	RECEIPT DATE	RTB DATE	DAYS LATE	RTB PENALTY	LEVEL OF ACTIVITY	COMMITTEE ID	TREASURER	STATE	TX	REPORT TYPE
											FINAL CIVIL MONEY PENALTY

2000 OCTOBER QUARTERLY

\$0

JOHN MARK BREWER

\$0

C00342725

Not Filed
12/05/2000

12/05/2000

112

\$8,000

2000 OCTOBER QUARTERLY

\$1,800

KEVIN MCKEIGUE

\$38,552

C00353557

Not Filed
12/05/2000

12/05/2000

112

\$3,500

2000 OCTOBER QUARTERLY

\$1,275

SARA J LILYGREN

\$68,365

C00024281

11
12/05/2000

12/05/2000

112

\$1,275

2000 OCTOBER QUARTERLY

\$750

OSCAR G ARMIJO

\$33,019

C00348144

9
12/05/2000

12/05/2000

112

\$750

2000 OCTOBER QUARTERLY

\$400

JAMES P MCCAULEY

\$13,976

C00084822

10
12/05/2000

12/05/2000

112

\$400

74 09 250 4383

FEDERAL ELECTION COMMISSION 1999-2000
FINAL DETERMINATION CIRCULATION REPORT
NOT PAID

AF #	CANDIDATE NAME	RECEIPT DATE	RTB DATE	DAYS LATE	RTB PENALTY	COMMITTEE ID	LEVEL OF ACTIVITY	TREASURER	STATE	REPORT TYPE
------	----------------	--------------	----------	-----------	-------------	--------------	-------------------	-----------	-------	-------------

FINAL CIVIL MONEY PENALTY

AF0170	INTERNATIONAL COUNCIL OF CRUISE LINES POLITICAL ACTION COMM (ICCL-PAC)	Not Filed	12/05/2000			C00303073	\$32,403	J MICHAEL CRYE	VA	2000 OCTOBER QUARTERLY
		11/08/2000					\$2,000			\$2,000

AF0171	LAW ENFORCEMENT ALLIANCE OF AMERICA INC FUND FOR RESPONSIBLE GOVERNMENT (LE VA	Not Filed	12/05/2000			C00291393	\$41,889	JAMES J FOTIS	VA	2000 OCTOBER QUARTERLY
		12/01/2000					\$2,000			\$2,000

AF0172	PECO ENERGY COMPANY POLITICAL ACTION COMMITTEE (PKA: PHILADELPHIA ELECTRIC PA	Not Filed	12/05/2000			C00160101	\$48,169 (est)	THERESA M RUCH	PA	2000 OCTOBER QUARTERLY
		Not Filed	12/05/2000				\$2,000			\$2,000

AF0162	TACO POLITICAL ACTION COMMITTEE	Not Filed	12/05/2000			C00330118	\$197,149	PETER BRAUN	KS	2000 OCTOBER QUARTERLY
		10/27/2000					\$3,000			\$3,000

AF0175	LIBERTARIAN PARTY OF ILLINOIS	Not Filed	12/05/2000			C00315713	\$69,612 (est)	STEVEN I GIVOT	IL	2000 OCTOBER QUARTERLY
		Not Filed	12/05/2000				\$3,000			\$3,000

Hilson



FEDERAL ELECTION COMMISSION
Washington, DC 20463

SENSITIVE

DATE & TIME OF TRANSMITTAL: Wednesday, March 28, 2001 4:00

BALLOT DEADLINE: Monday, April 02, 2001 4:00

COMMISSIONER: MASON, McDONALD, SANDSTROM, SMITH, THOMAS, WOLD

SUBJECT: **Administrative Fines Final Determination Recommendation
For The 2000 October Quarterly And November Monthly
Reports.**

() I approve the recommendation(s)

() I object to the recommendation(s)

() I approve the recommendations except those following
to which I object (please insert AF#)

() I approve the recommendations except those following
in which I abstain (please insert AF#)

() I approve the recommendations except those following
in which I am recused (please insert AF#)

A definite vote is required. All ballots must be signed and dated. Please return
ONLY THE BALLOT to the Commission Secretary. Please return ballot no later
than date and time shown above.

DATE: _____

SIGNATURE: _____

FROM THE OFFICE OF THE SECRETARY OF THE COMMISSION

60047 0512 60 71

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Administrative Fines Final
Determination Recommendation For The
2000 October Quarterly And November
Monthly Reports

PEGAM FOR CONGRESS, and JOSEPH CHOU
as treasurer;
LEE STEERS FOR CONGRESS / 2000, and
MARY LYNN LANIER as treasurer;
JANEZICH FOR US SENATE COMMITTEE, and
RAFAEL ORTEGA as treasurer;
TOM FOLEY FOR US SENATE, and FRANK M
VACCARO JR as treasurer;

) AF# 97

) AF# 100

) AF# 102

) AF# 107

FRIENDS OF MARK BREWER, and JOHN MARK
BREWER as treasurer;

) AF# 138

Federal Election Commission
Certification for Administrative Fines
April 02, 2001

Page 2

COMMITTEE TO ELECT KEVIN MCKEIGUE FOR) AF# 140
US SENATE, and KEVIN MCKEIGUE as)
treasurer;)
HUTCHINS FOR CONGRESS, and BRUCE E) AF# 143
RAFER as treasurer;)
MEEKS FOR CONGRESS 2000, and CHARLES H) AF# 145
REEVES III as treasurer;)

EVA CLAYTON COMMITTEE FOR CONGRESS,) AF# 148
and PATSY T HARGROVE as treasurer;)

E*TRADE GROUP INC PAC (E*TRADE PAC),) AF# 150
and MICHAEL CHOCHON as treasurer;)
AMERICAN ACADEMY OF EMERGENCY MEDICINE) AF# 151
POLITICAL ACTION COMMITTEE AAEM PAC,)
and WILLIAM R LITTLE MD FAAEM as)
treasurer;)
AMERICAN MEAT INSTITUTE POLITICAL) AF# 152
ACTION COMMITTEE, and SARA J LILYGREN)
as treasurer;)
CINCINNATI BELL INC FEDERAL POLITICAL) AF# 153
ACTION COMMITTEE, and MARK W PETERSON)
as treasurer;)
CITIZENS FOR THE REPUBLIC, and CAROLYN) AF# 154
ROBERTSON as treasurer;)
DEMOCRATIC FOUNDATION OF THE DESERT;) AF# 155
THE, and OSCAR G ARMIJO as treasurer;)
INN/PAC INT'L ASSN OF HOLIDAY INNS INC) AF# 156
POLITICAL ACTION COMMITTEE, and JAMES)
P MCCAULEY as treasurer;)
MARRIOTT INTERNATIONAL INC POLITICAL) AF# 158
ACTION COMMITTEE, and TRENT M)
KITTLEMAN as treasurer;)
PLUMBERS LOCAL UNION NO 1) AF# 159
NYC-POLITICAL ACTION COMMITTEE, and)
GEORGE W REILLY as treasurer;)

Federal Election Commission
Certification for Administrative Fines
April 02, 2001

Page 3

2004-003-0012

TACO POLITICAL ACTION COMMITTEE, and)	AF# 162
PETER BRAUN as treasurer;)	
VIACOM INTERNATIONAL INC POLITICAL)	AF# 164
ACTION COMMITTEE, and MICHAEL CRUZ as)	
treasurer;)	
WISCONSIN RIGHT TO LIFE POLITICAL)	AF# 165
ACTION COMMITTEE, and RICHARD J FOX as)	
treasurer;)	
MACOMB COUNTY DEMOCRATIC COMMITTEE,)	AF# 166
and NANCY FALCONE as treasurer;)	
WEST VIRGINIA REPUBLICAN STATE)	AF# 168
EXECUTIVE COMMITTEE, and ROBERT J)	
GOULD as treasurer;)	
INTERNATIONAL COUNCIL OF CRUISE LINES)	AF# 170
POLITICAL ACTION COMM (ICCL-PAC), and)	
J MICHAEL CRYE as treasurer;)	
LAW ENFORCEMENT ALLIANCE OF AMERICA)	AF# 171
INC FUND FOR RESPONSIBLE GOVERNMENT)	
(LEAA), and JAMES J FOTIS as)	
treasurer;)	
PECO ENERGY COMPANY POLITICAL ACTION)	AF# 172
COMMITTEE (FKA: PHILADELPHIA ELECTRIC)	
COMPANY PAC), and THERESA M RUCH as)	
treasurer;)	
LIBERTARIAN PARTY OF ILLINOIS, and)	AF# 175
STEVEN I GIVOT as treasurer;)	
COMMITTEE ON ARRANGEMENTS FOR THE 2000)	AF# 177
REPUBLICAN NATION CONVENTION, and ALEC)	
POITEVINT as treasurer;)	
BILL BRADLEY FOR PRESIDENT INC, and)	AF# 237
THEODORE V WELLS JR as treasurer;)	

CERTIFICATION

I, Mary W. Dove, Secretary of the Federal Election Commission, do hereby certify that on April 2, 2001 the Commission took the following actions on the Final Determination Recommendation For The 2000 October Quarterly And November Monthly Report in the Administrative Fines Program, as recommended in the Reports Analysis Division's Memorandum dated March 27, 2001, on the following committees:

AF# 97: Decided by a vote of 6-0 to: (1) make a final determination that the PEGRAM FOR CONGRESS, and JOSEPH CHOU as treasurer, violated 2 U.S.C. 434(a) and assess a civil money penalty indicated in the Reports Analysis Division's Memorandum dated March 27, 2001; (2) send the appropriate letter.

Federal Election Commission
Certification for Administrative Fines
April 02, 2001

Page 8

AF# 138: Decided by a vote of 6-0 to: (1) make a final determination that the FRIENDS OF MARK BREWER, and JOHN MARK BREWER as treasurer, violated 2 U.S.C. 434(a) and assess a civil money penalty indicated in the Reports Analysis Division's Memorandum dated March 27, 2001; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 140: Decided by a vote of 6-0 to: (1) make a final determination that the COMMITTEE TO ELECT KEVIN MCKEIGUE FOR US SENATE, and KEVIN MCKEIGUE as treasurer, violated 2 U.S.C. 434(a) and assess a civil money penalty indicated in the Reports Analysis Division's Memorandum dated March 27, 2001; (2) send the appropriate letter.

2001;(2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 153: Decided by a vote of 6-0 to: (1) make a final determination that the CINCINNATI BELL INC FEDERAL POLITICAL ACTION COMMITTEE, and MARK W PETERSON as treasurer, violated 2 U.S.C. 434(a) and assess a civil money penalty indicated in the Reports Analysis Division's Memorandum dated March 27, 2001;(2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 154: Decided by a vote of 6-0 to: (1) make a final determination that the CITIZENS FOR THE REPUBLIC, and CAROLYN ROBERTSON as treasurer, violated 2 U.S.C. 434(a) and assess a civil money penalty indicated in the Reports Analysis Division's Memorandum dated March 27, 2001;(2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 155: Decided by a vote of 6-0 to: (1) make a final determination that the DEMOCRATIC FOUNDATION OF THE DESERT; THE, and OSCAR G ARMIJO as treasurer, violated 2 U.S.C. 434(a) and assess a civil money penalty indicated in the Reports Analysis Division's Memorandum dated March 27, 2001;(2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 156: Decided by a vote of 6-0 to: (1) make a final determination that the INN/PAC INT'L ASSN OF HOLIDAY INNS INC POLITICAL ACTION COMMITTEE, and JAMES P MCCAULEY as treasurer, violated 2 U.S.C. 434(a) and assess a civil money penalty indicated in

AF# 168: Decided by a vote of 6-0 to: (1) make a final determination that the WEST VIRGINIA REPUBLICAN STATE EXECUTIVE COMMITTEE, and ROBERT J GOULD as treasurer, violated 2 U.S.C. 434(a) and assess a civil money penalty indicated in the Reports Analysis Division's Memorandum dated March 27, 2001;(2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 170: Decided by a vote of 6-0 to: (1) make a final determination that the INTERNATIONAL COUNCIL OF CRUISE LINES POLITICAL ACTION COMM (ICCL-PAC), and J MICHAEL CRYE as treasurer, violated 2 U.S.C. 434(a) and assess a civil money penalty indicated in the Reports Analysis Division's Memorandum dated March 27, 2001;(2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 171: Decided by a vote of 6-0 to: (1) make a final determination that the LAW ENFORCEMENT ALLIANCE OF AMERICA INC FUND FOR RESPONSIBLE GOVERNMENT (LEAA), and JAMES J FOTIS as treasurer, violated 2 U.S.C. 434(a) and assess a civil money penalty indicated in the Reports Analysis Division's Memorandum dated March 27, 2001;(2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 172: Decided by a vote of 6-0 to: (1) make a final determination that the PECO ENERGY COMPANY POLITICAL ACTION COMMITTEE (FKA: PHILADELPHIA

Federal Election Commission
Certification for Administrative Fines
April 02, 2001

Page 14

AF# 168: Decided by a vote of 6-0 to: (1) make a final determination that the WEST VIRGINIA REPUBLICAN STATE EXECUTIVE COMMITTEE, and ROBERT J GOULD as treasurer, violated 2 U.S.C. 434(a) and assess a civil money penalty indicated in the Reports Analysis Division's Memorandum dated March 27, 2001; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 170: Decided by a vote of 6-0 to: (1) make a final determination that the INTERNATIONAL COUNCIL OF CRUISE LINES POLITICAL ACTION COMM (ICCL-PAC), and J MICHAEL CRYE as treasurer, violated 2 U.S.C. 434(a) and assess a civil money penalty indicated in the Reports Analysis Division's Memorandum dated March 27, 2001; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 171: Decided by a vote of 6-0 to: (1) make a final determination that the LAW ENFORCEMENT ALLIANCE OF AMERICA INC FUND FOR RESPONSIBLE GOVERNMENT (LEAA), and JAMES J FOTIS as treasurer, violated 2 U.S.C. 434(a) and assess a civil money penalty indicated in the Reports Analysis Division's Memorandum dated March 27, 2001; (2) send the appropriate letter. Commissioners Mason, McDonald, Sandstrom, Smith, Thomas, and Wold voted affirmatively for the decision.

AF# 172: Decided by a vote of 6-0 to: (1) make a final determination that the PECO ENERGY COMPANY POLITICAL ACTION COMMITTEE (FKA: PHILADELPHIA ELECTRIC COMPANY PAC), and THERESA M RUCH as treasurer, violated 2 U.S.C. 434(a) and assess a civil money penalty indicated in the Reports Analysis Division's Memorandum dated March 27, 2001; (2) send the appropriate letter. Commissioners

Mason, McDonald, Sandstrom, Smith, Thomas, and Wold
voted affirmatively for the decision.

AF# 175: Decided by a vote of 6-0 to: (1) make a
final determination that the LIBERTARIAN PARTY OF
ILLINOIS, and STEVEN I GIVOT as treasurer, violated
2 U.S.C. 434(a) and assess a civil money penalty
indicated in the Reports Analysis Division's
Memorandum dated March 27, 2001; (2) send the
appropriate letter. Commissioners Mason, McDonald,
Sandstrom, Smith, Thomas, and Wold voted
affirmatively for the decision.

AF# 177: Decided by a vote of 6-0 to: (1) make a
final determination that the COMMITTEE ON
ARRANGEMENTS FOR THE 2000 REPUBLICAN NATION
CONVENTION, and ALEC POITEVINT as treasurer,
violated 2 U.S.C. 434(a) and assess a civil money
penalty indicated in the Reports Analysis Division's
Memorandum dated March 27, 2001; (2) send the
appropriate letter. Commissioners Mason, McDonald,
Sandstrom, Smith, Thomas, and Wold voted
affirmatively for the decision.

AF# 237: Decided by a vote of 6-0 to: (1) make a
final determination that the BILL BRADLEY FOR
PRESIDENT INC, and THEODORE V WELLS JR as treasurer,
violated 2 U.S.C. 434(a) and assess a civil money
penalty indicated in the Reports Analysis Division's
Memorandum dated March 27, 2001; (2) send the
appropriate letter. Commissioners Mason, McDonald,
Sandstrom, Smith, Thomas, and Wold voted
affirmatively for the decision.

Federal Election Commission
Certification for Administrative Fines
April 02, 2001

Page 16

Attest:

April 4, 2001
Date

Mary W. Dove
Mary W. Dove
Secretary of the Commission

Received in the Secretariat: Wed., Mar. 28, 2001 12:34 p.m.
Circulated to the Commission: Wed., Mar. 28, 2001 4:00 p.m.
Deadline for vote: Mon., Apr. 02, 2001 4:00 p.m.

0604 053 60 12
21 09 250 4098

**WESTERN
UNION**

WESTERN UNION COMMERCIAL SERVICES

CONFIRMATION OF CASH

TO: JAMES J FOTIS

LAW ENFORCEMENT ALLIANCE OF AMERICA INC
7700 LEESBURG PIKE STE 421
FALLS CHURCH VA 22043-2633FEDERAL ELECTION COMMISSION
LEAH PALMER
999 E ST NW # 709
WASHINGTON DC 20463

APRIL 4, 2001

JAMES J FOTIS
LAW ENFORCEMENT ALLIANCE OF AMERICA INC
7700 LEESBURG PIKE SUITE 421
FALLS CHURCH VA 22043C00291393
AF# 171

DEAR JAMES J FOTIS,

ON 12/05/2000, THE FEDERAL ELECTION COMMISSION ("THE COMMISSION") FOUND REASON TO BELIEVE ("RTB") THAT LAW ENFORCEMENT ALLIANCE OF AMERICA INC AND YOU, AS TREASURER, VIOLATED 2 U.S.C. 434(A) FOR FAILING TO FILE THE 2000 OCTOBER QUARTERLY REPORT. BY MAILGRAM DATED 12/07/2000, THE COMMISSION SENT YOU NOTIFICATION OF THE RTB FINDING THAT INCLUDED A CIVIL MONEY PENALTY CALCULATED AT RTB OF \$2000.00 IN ACCORDANCE WITH THE SCHEDULE OF PENALTIES AT 11 C.F.R. 111.43. WITHIN 40 DAYS OF THE COMMISSION'S RTB FINDING, YOU WERE REQUIRED TO EITHER TRANSMIT PAYMENT OF THE CALCULATED CIVIL MONEY PENALTY OR SUBMIT A WRITTEN RESPONSE CHALLENGING EITHER THE RTB FINDING OR THE CALCULATED CIVIL MONEY PENALTY. YOU MUST ALSO FILE THE 2000 OCTOBER QUARTERLY REPORT IF YOU HAVE NOT ALREADY DONE SO.

THE COMMISSION DID NOT RECEIVE PAYMENT OF THE CALCULATED CIVIL MONEY PENALTY OR YOUR WRITTEN RESPONSE WITHIN THE TIME PERMITTED. THEREFORE, THE COMMISSION MADE A FINAL DETERMINATION ON 04/02/2001 THAT YOU, AS TREASURER, AND LAW ENFORCEMENT ALLIANCE OF AMERICA INC VIOLATED 2 U.S.C. 434(A) AND ASSESSED A CIVIL MONEY PENALTY IN THE AMOUNT OF \$2000.00 IN ACCORDANCE WITH 11 C.F.R. 111.43. THE CIVIL MONEY PENALTY IS BASED ON THESE FACTORS:

ELECTION SENSITIVITY OF REPORT: ELECTION SENSITIVE

LEVEL OF ACTIVITY*: 541389

NUMBER OF DAYS LATE: NOT FILED

NUMBER OF PREVIOUS CIVIL MONEY PENALTIES ASSESSED: 0

*IF THE REPORT WAS NOT RECEIVED, THE LEVEL OF ACTIVITY

**WESTERN
UNION****WESTERN UNION COMMERCIAL SERVICES**

WAS ESTIMATED USING TOTAL RECEIPTS AND DISBURSEMENTS FOR THE CURRENT 2-YEAR ELECTION CYCLE (OR PRIOR CYCLE, IF NO REPORTS WERE FILED THIS CYCLE) DIVIDED BY THE NUMBER OF REPORTS FILED.

TO PAY THE CIVIL MONEY PENALTY

TO PAY THE CIVIL MONEY PENALTY, SEND THE ENCLOSED FORM AND YOUR PAYMENT TO THE ADDRESS ON PAGE 3 WITHIN 30 DAYS OF RECEIPT OF THIS LETTER.

IF YOU DO NOT PAY THE CIVIL MONEY PENALTY

UNPAID CIVIL MONEY PENALTIES ASSESSED THROUGH THE ADMINISTRATIVE FINE REGULATIONS WILL BE SUBJECT TO THE DEBT COLLECTION ACT OF 1982 ("DCA"), AS AMENDED BY THE DEBT COLLECTION IMPROVEMENT ACT OF 1996 ("DCIA"), 31 U.S.C. 3701 ET SEQ. IF YOU DO NOT PAY THIS DEBT WITHIN 30 DAYS (OR FILE A WRITTEN PETITION TO A FEDERAL DISTRICT COURT - SEE BELOW), THE COMMISSION WILL TRANSFER THE DEBT TO THE U.S. DEPARTMENT OF THE TREASURY ("TREASURY") FOR COLLECTION. WITHIN 5 DAYS OF ITS TRANSFER TO TREASURY, TREASURY WILL CONTACT THE DEBTOR AND REQUEST PAYMENT. TREASURY CURRENTLY CHARGES A FEE OF 18% OF THE CIVIL MONEY PENALTY FOR ITS COLLECTION SERVICES. THE FEE WILL BE ADDED TO THE AMOUNT OF THE CIVIL MONEY PENALTY THAT YOU OWE. SHOULD TREASURY'S ATTEMPTS FAIL, TREASURY WILL TRANSFER THE DEBT TO A PRIVATE COLLECTION AGENCY ("PCA"). IF THE DEBT IS REFERRED TO A PCA, THE TREASURY AND PCA COLLECT A FEE OF 28% OF THE CIVIL MONEY PENALTY AMOUNT WHICH WILL BE ADDED TO THE AMOUNT OF THE CIVIL MONEY PENALTY. IF THE DEBT REMAINS UNPAID, TREASURY MAY RECOMMEND THAT THE COMMISSION REFER THE MATTER TO THE DEPARTMENT OF JUSTICE FOR LITIGATION.

IF YOU CHOOSE TO APPEAL THE FINAL DETERMINATION OR CIVIL MONEY PENALTY

IF YOU CHOOSE TO APPEAL THE FINAL DETERMINATION, YOU SHOULD SUBMIT A WRITTEN PETITION, WITHIN 30 DAYS OF RECEIPT OF THIS LETTER, TO THE DISTRICT COURT OF THE UNITED STATES FOR THE DISTRICT IN WHICH THE COMMITTEE OR YOU RESIDE, OR TRANSACT BUSINESS, REQUESTING THAT THE FINAL DETERMINATION BE MODIFIED OR SET ASIDE. SEE 2 U.S.C. 437G(A)(4)(C)(III). YOUR FAILURE TO RAISE AN ARGUMENT IN A TIMELY FASHION DURING THE ADMINISTRATIVE PROCESS SHALL BE DEEMED A WAIVER OF THE RESPONDENT'S RIGHT TO PRESENT SUCH ARGUMENT IN A PETITION TO THE DISTRICT COURT UNDER 2 U.S.C. 437G. 11 C.F.R. 111.33.

THE CONFIDENTIALITY PROVISIONS AT 2 U.S.C. 437G(A)(12) NO LONGER APPLY AND THIS MATTER IS NOW PUBLIC. THE FILE WILL BE MADE A PART OF THE PUBLIC RECORD PURSUANT TO 11 C.F.R. 111.42(D). ALTHOUGH THE COMPLETE FILE MUST BE PLACED ON THE PUBLIC RECORD WITHIN 30 DAYS FROM THE DATE OF THE COMMISSION'S NOTIFICATION, THIS MAY OCCUR AT ANY TIME FOLLOWING CERTIFICATION OF THE COMMISSION'S VOTE.

IF YOU HAVE ANY QUESTIONS REGARDING THE PAYMENT OF THE CIVIL MONEY PENALTY, PLEASE CONTACT MARY E. SEILER AT FEDERAL ELECTION COMMISSION, 200 E ST., NW, WASHINGTON, DC 20463, OR OUR TOLL FREE NUMBER (800)424-9530 (PRESS 1, THEN PRESS 2) OR (202)694-1130.

**WESTERN
UNION**

WESTERN UNION COMMERCIAL SERVICES

SINCERELY,

DANNY LEE McDONALD
CHAIRMAN-----
ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS

IN ACCORDANCE WITH THE SCHEDULE OF PENALTIES AT 11 C.F.R.
111.43, THE CIVIL MONEY PENALTY IS \$2000.00 FOR THE
2000 OCTOBER QUARTERLY REPORT.

THIS PENALTY SHOULD BE PAID BY CHECK OR MONEY ORDER MADE PAYABLE
TO THE FEDERAL ELECTION COMMISSION. IT SHOULD BE SENT BY MAIL TO:

FEDERAL ELECTION COMMISSION
PO BOX 952182
ST. LOUIS, MO 63195-2182

IF YOU CHOOSE TO SEND YOUR PAYMENT BY COURIER OR OVERNIGHT
DELIVERY, PLEASE USE THIS ADDRESS:

FIRSTSTAR - GOVERNMENT LOCKBOX
FEC #952182
1005 CONVENTION PLAZA
ST. LOUIS, MO 63101

THE FORM AND PAYMENT ARE DUE WITHIN 30 DAYS OF RECEIPT OF THIS
LETTER.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR LAW ENFORCEMENT ALLIANCE OF AMERICA INC

FEC ID# C00291393

AFF# 171

PAYMENT AMOUNT DUE \$2000.00


CERTIFICATION - DEBT COLLECTION

With respect to the debts attached or transmitted with this certification, I certify the following:

1. **Valid Debts.** The debts are delinquent, valid and legally enforceable in the amounts stated. No debtor has repaid or agreed to repay the claim under a signed repayment agreement or filed for review of the claim.
2. **No Bar to Collection.** The debts are not subject to any circumstances that legally preclude or bar collection. There are no foreclosures pending with respect to any collateral securing a debt. The Agency's records do not show that any debtor owing a debt has filed for bankruptcy protection. Alternatively, the Agency can clearly establish that any automatic stay has been lifted or is no longer in effect.
3. **Due Process.** The Agency, at a minimum, has made reasonable efforts to obtain payment of the debt: demanded payment and provided the debtor with the notice and opportunities described below:
 - A. At least 30 days prior to the date of this certification, the Agency has provided, or made reasonable efforts to provide each debtor with:
 - written notice, at the debtor's most current known address, of the nature and the amount of the debt, the intention of the Agency to collect the debt through referral to Treasury, and actions that may be taken by Treasury including referral of the debt to a private collection agency and referral of the debt to the Department of Justice for litigation.
 - an opportunity to inspect and copy the records of the Agency with respect to the debt;
 - an opportunity for review within the Agency of the determination of the Agency with respect to the debt, including the opportunity to present evidence that all or part of the debt is not past-due or legally enforceable.
 - B. The Agency has considered any evidence presented by the debtor and determined that the amount of the debt is past-due and legally enforceable and there are no pending appeals of such determination.
4. **Interest and Penalties.** The Agency has complied with all of the provisions of 31 U.S.C. § 3717 and 4 C.F.R. Part 102, as well as other statutes, regulations and policies applicable to the Agency's assessment of interest, penalties and administrative costs. The Agency has mailed or hand-delivered a written notice to all debtors explaining the Agency's requirements concerning the charges.

CERTIFICATION: Pursuant to 28 U.S.C. § 1746, I certify under penalty of perjury that to the best of my knowledge and belief, and/or based upon Agency certification, that the foregoing is true and correct. I certify that I have been delegated authority to execute this certification on behalf of the head of my agency.

May 17, 2001
Date


Signature of Certifying Official
Print Name: Shawn Woodhead Werth
Title: Director, Office of Administrative Review
Agency: Federal Election Commission

THIS IS THE END OF ADMINSTRATIVE FINE CASE
AT-171

DATE FILMED 6-4-01 CAMERA NO. 2

CAMERAMAN Jm U

2014-06-04 10:00:00