



FEDERAL ELECTION COMMISSION  
WASHINGTON, D C 20463

THIS IS THE BEGINNING OF MUR # 1847

DATE FILMED \_\_\_\_\_ CAMERA NO. \_\_\_\_\_

CAMERAMAN \_\_\_\_\_

93040930069



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

3 October 1984

MEMORANDUM

TO: CHARLES N. STEELE  
GENERAL COUNSEL

THROUGH: JOHN C. SURINA  
STAFF DIRECTOR

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

SUBJECT: REFERRAL OF THE NEW REPUBLICAN VICTORY FUND

This is a referral of the New Republican Victory Fund ("the Fund") for failing to file the 1984 July Quarterly Report within thirty (30) calendar days from the date of the Non-Filer Notice.

If you have any questions, please contact Tony Raymond at 523-4048.

Attachment

93040930070

## REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 3 October 1984

ANALYST: ANTHONY RAYMOND

I. COMMITTEE: New Republican Victory Fund  
(C00107557)  
Charles R. Black Jr., Treasurer  
2632 Fort Farnsworth Road  
Suite 2D  
Alexandria, VA 22303

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

## III. BACKGROUND:

## Non-Filing of the 1984 July Quarterly Report

The Republican Victory Fund ("the Fund") failed to timely file the 1984 July Quarterly Report of Receipts and Disbursements. The Fund was notified on June 21, 1984 that the report was due on July 15, 1984 (Attachment 2).

On August 8, 1984, a Non-Filer Notice was sent to the Fund for its failure to file the 1984 July Quarterly Report (Attachment 3). No response was received.

On September 11, 1984, the Reports Analysis Division ("RAD") Analyst spoke to Vicki Ratley, the assistant treasurer, about the failure to file the report. Ms. Ratley stated the report was sent via certified mail before the due date. The analyst asked the assistant treasurer to file a copy of the report along with a copy of the certified receipt as soon as possible. The assistant treasurer said she would mail the copies immediately (Attachment 4).

The copy of the July Quarterly Report, excluding a copy of the certified receipt, was filed on September 17, 1984 (Attachment 5).

On September 18, 1984, the RAD analyst called the assistant treasurer about the omitted copy of the certified receipt. Ms. Ratley said the copy had been inadvertently omitted and stated she would send the copy that day (Attachment 6). As of this date, the certified receipt copy has not been received to prove the report was filed in a timely manner.

## IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

93040930071

9 3 0 4 0 9 3 0 0 7 2  
FEDERAL ELECTION COMMISSION  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (81-82)

DATE 20CT84  
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
NEW REPUBLICAN VICTORY FUND CONNECTED ORGANIZATION: NONE				NON-PARTY QUALIFIED		ID #C00107557
1981	MID-YEAR REPORT	26,153	40,697	1JAN81 -30JUN81	14	81FEC/202/3575
	MID-YEAR REPORT - AMENDMENT	26,153	40,697	1JAN81 -30JUN81	13	82FEC/245/1099
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN81 -30JUN81	1	83FEC/261/3941
	REQUEST FOR ADDITIONAL INFORMATION			1JAN81 -30JUN81	1	82FEC/233/0630
	REQUEST FOR ADDITIONAL INFORMATION			1JAN81 -30JUN81	1	82FEC/234/0307
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN81 -30JUN81	1	82FEC/236/0576
	REQUEST FOR ADDITIONAL INFORMATION			1JAN81 -30JUN81	1	82FEC/242/1804
	REQUEST FOR ADDITIONAL INFORMATION			1JAN81 -30JUN81	1	82FEC/242/3921
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN81 -30JUN81	1	82FEC/254/1133
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN81 -30JUN81	3	82FEC/244/3814
	REQUEST FOR ADDITIONAL INFORMATION			1JAN81 -30JUN81	1	82FEC/253/5311
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN81 -30JUN81	1	82FEC/259/1942
	YEAR-END	11,679	17,152	1JUL81 -31DEC81	13	82FEC/221/0942
	YEAR-END - AMENDMENT	-	-	1JUL81 -31DEC81	1	82FEC/237/3430
	YEAR-END - AMENDMENT	11,679	17,152	1JUL81 -31DEC81	4	82FEC/237/1353
	YEAR-END - AMENDMENT	-	-	1JUL81 -31DEC81	1	83FEC/261/3940
	REQUEST FOR ADDITIONAL INFORMATION			1JUL81 -31DEC81	1	82FEC/233/0628
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL81 -31DEC81	2	82FEC/235/1689
	REQUEST FOR ADDITIONAL INFORMATION			1JUL81 -31DEC81	1	80FEC/242/3920
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL81 -31DEC81	1	82FEC/244/5063
	REQUEST FOR ADDITIONAL INFORMATION			1JUL81 -31DEC81	1	82FEC/253/5310
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL81 -31DEC81	1	82FEC/259/1941
1982	STATEMENT OF ORGANIZATION - AMENDMENT			16APR82	2	82FEC/229/4057
	STATEMENT OF ORGANIZATION - AMENDMENT			15JUL82	4	82FEC/237/1349
	APRIL QUARTERLY	407	1,387	1JAN82 -31MAR82	8	82FEC/229/4049
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN82 -30MAR82	1	82FEC/237/3429
	APRIL QUARTERLY - AMENDMENT	407	1,387	1JAN82 -30MAR82	3	82FEC/237/1357
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN82 -31MAR82	1	83FEC/261/3939
	REQUEST FOR ADDITIONAL INFORMATION			1JAN82 -30MAR82	1	82FEC/253/5309
	REQUEST FOR ADDITIONAL INFORMATION			1JAN82 -31MAR82	1	82FEC/242/3919
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN82 -31MAR82	1	82FEC/244/5064
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN82 -31MAR82	1	82FEC/259/1940
	JULY QUARTERLY	13,393	11,148	1APR82 -30JUN82	8	82FEC/237/1360
	JULY QUARTERLY - AMENDMENT	-	-	1APR82 -30JUN82	7	83FEC/261/2332
	JULY QUARTERLY - AMENDMENT	-	-	1APR82 -30JUN82	1	83FEC/275/2199
	REQUEST FOR ADDITIONAL INFORMATION			1APR82 -30JUN82	1	82FEC/242/1802
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR82 -30JUN82	1	82FEC/244/5065
	REQUEST FOR ADDITIONAL INFORMATION			1APR82 -30JUN82	1	82FEC/253/4538
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR82 -30JUN82	2	82FEC/257/0703
	1'ST LETTER INFORMATIONAL NOTICE			1APR82 -30JUN82	1	83FEC/271/1886
	1'ST LETTER INFORMATIONAL NOTICE			1APR82 -30JUN82	1	83FEC/281/3437
	OCTOBER QUARTERLY	5,861	5,664	1JUL82 -30SEP82	7	82FEC/248/4385
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL82 -30SEP82	1	83FEC/275/2198
	1'ST LETTER INFORMATIONAL NOTICE			1JUL82 -30SEP82	1	83FEC/271/1888

Attachment 1  
(Page 1 of 3)



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FEDERAL ELECTION COMMISSION  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (81-82)DATE 20CT84  
PAGE 2

## NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
POST-GENERAL		2,962	6,948	10CT82 -22NOV82	7	83FEC/265/1416
YEAR-END		466	110	23NOV82 -31DEC82	7	83FEC/266/2660
YEAR-END	- AMENDMENT	466	110	23NOV82 -31DEC82	9	83FEC/275/1488
REQUEST FOR ADDITIONAL INFORMATION				23NOV82 -31DEC82	1	83FEC/271/1334
REQUEST FOR ADDITIONAL INFORMATION 2ND				23NOV82 -31DEC82	2	83FEC/272/1636
TOTAL		60,921	0	83,106	0	146 TOTAL PAGES

All reports have been reviewed.

Cash on hand as of 12/31/82: \$804.00

Debts owed by the Committee as of 12/31/82: \$2866.00

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FEDERAL ELECTION COMMISSION  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (83-84)

DATE 25SEP84  
PAGE 1

## NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
NEW REPUBLICAN VICTORY FUND CONNECTED ORGANIZATION: NONE						NON-PARTY QUALIFIED ID #C00107557
1983	STATEMENT OF ORGANIZATION - AMENDMENT			11JUL83	2	83FEC/275/0126
	STATEMENT OF ORGANIZATION - AMENDMENT			15AUG83	3	83FEC/281/1940
	MID-YEAR REPORT	0	0	1JAN83 -30JUN83	6	83FEC/280/2252
	MID-YEAR REPORT - AMENDMENT	0	0	1JAN83 -30JUN83	3	84FEC/316/5317
	REQUEST FOR ADDITIONAL INFORMATION			1JAN83 -30JUN83	1	84FEC/308/0054
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN83 -30JUN83	2	84FEC/313/2240
	YEAR-END	19,031	11,236	1JUL83 -31DEC83	11	84FEC/296/0007
	YEAR-END - AMENDMENT	19,031	11,236	1JUL83 -31DEC83	3	84FEC/316/5314
	REQUEST FOR ADDITIONAL INFORMATION			1JUL83 -31DEC83	1	84FEC/308/2244
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL83 -31DEC83	1	84FEC/313/2916
	APRIL QUARTERLY	710	4,952	1JAN84 -31MAR84	9	84FEC/309/5256
1984	APRIL QUARTERLY - AMENDMENT	710	4,952	1JAN84 -31MAR84	3	84FEC/324/2532
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN84 -31MAR84	3	84FEC/324/4549
	REQUEST FOR ADDITIONAL INFORMATION			1JAN84 -31MAR84	1	84FEC/318/1545
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN84 -31MAR84	2	84FEC/323/2790
	JULY QUARTERLY	0	3,840	1APR84 -30JUN84	9	84FEC/328/2090
	NOTICE OF FAILURE TO FILE			1APR84 -30JUN84	1	84FEC/325/0601
	TOTAL	19,741	0 20,028	0	61	TOTAL PAGES

All reports have been reviewed except the 1984 July Quarterly.

Cash on hand as of 6/30/84 : \$516.92

Debts owed to the Committee : \$4,000.00

Debts owed by the Committee : \$51,708.38

Attachment 1  
(Page 3 of 3)



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 21, 1984

**JULY REPORTING NOTICE FOR UNAUTHORIZED COMMITTEES**

**WHO MUST FILE**

ALL unauthorized political committees, except those that file monthly, must file a quarterly report by July 15, 1984. (See below.)

**WHAT MUST BE REPORTED**

All financial activity must be disclosed from the last report filed through June 30, 1984. Political committees which have not previously filed a financial disclosure report should report all financial activity from the date of registration,\* through June 30, 1984.

**WHEN TO FILE**

Reports sent by registered or certified mail must be postmarked no later than midnight July 15, 1984. Reports hand delivered or mailed first class must be received no later than close of business July 15, 1984.

**WHERE AND HOW TO FILE**

Committees should consult the instructions on the enclosed FEC Form 3X for details.

**MONTHLY FILERS**

Committees that file on a monthly schedule must file their next report by July 20, 1984, and disclose all financial activity of their committee from June 1 through June 30, 1984. Monthly reports are due by the twentieth of each month and should cover all financial activity of the previous month.

**COMPLIANCE**

Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is a serious violation. Committees are subject to enforcement action for late filing. Illegible reports which can not be clearly reproduced and reports submitted on non-FEC forms will not be accepted. Committees filing such documents will be required to refile.

\*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received during the current reporting period. See 11 CFR 104.3(a) and (b).

93040930075



## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

RC-7

AUG 8 1984

Charles R. Black, Jr., Treasurer  
New Republican Victory Fund  
2632 Fort Farmsworth Road  
Suite 2D  
Alexandria, VA 22303

Identification Number: C00107557

Reference: July Quarterly Report (4/1/84-6/30/84)

Dear Mr. Black:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Report of Receipts and Disbursements as required by the Federal Election Campaign Act. 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, 1325 K Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

The failure to file this report may result in an audit or legal enforcement action.

If you have any questions regarding this matter, please contact Anthony Raymond on our toll-free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

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

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

23040930076



TELECON

Analyst: Tony Raymond

Date : 9/11/84

Committee : New Republican Victory Fund

Contact : Vicki Ratley Asst. Treasurer

---

I spoke to Ms. Ratley about the committee's failure to file the 1984 July Quarterly Report. Ms. Ratley stated that the report was sent via certified mail before the due date. I asked Ms. Ratley to file a copy of the report along with a copy of the certified receipt. She said she would file the copies immediately.

93040930077

# For a Political Committee Other Than an Authorized Candidate

RECEIVED AT THE VES

ALIGN AREA

(Summary Page)

BASED ON

## 1. Name of Committee (in Full)

New Republican Victory Fund

## Address (Number and Street)

2632 Ft. Farnsworth Rd.  
#2D

## City, State and ZIP Code

Alexandria, VA 22303

☐ Check here if address is different than previously reported.

## 2. FEC Identification Number

C00107557

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_

## 4. TYPE OF REPORT (Check appropriate boxes)

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report☒ July 15 Quarterly Report ☐ January 31 Year End Report☐ July 31 Mid Year Report (Non-Election Year Only)☐ Monthly Report for \_\_\_\_\_☐ Twelfth day report preceding \_\_\_\_\_ (Type of Event)

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

☐ Thirtieth day report following the General Election

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

☐ Termination Report

(b) Is this Report an Amendment?

☐ YES☒ NO

## SUMMARY

5. Covering Period 4/1/84 through 6/31/846. (a) Cash on hand January 1, 19 84

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

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

7. Total Disbursements (from Line 28)

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

9. Debts and Obligations Owed TO The Committee  
(Itemize all on Schedule C or Schedule D)10. Debts and Obligations Owed BY the Committee  
(Itemize all on Schedule C 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.

Victoria S. Ratley  
Type or Print Name of Treasurer (Assistant Treasurer)

SIGNATURE OF TREASURER

7/15/84  
Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 18 U.S.C. § 437.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

FEC FORM 3X (3-80)

For further information see:

Federal Election Commission

Tel: 1-800-424-9630

Local: 202-523-4088

04033282090

TELECON

Analyst : Tony Raymond

Date : 9/18/84

Committee : New Republican Victory Fund

Contact : Vicki Ratley Asst. Treasurer

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I called Ms. Ratley because the copy of the July Quarterly Report she sent in to the FEC omitted the copy of the certified receipt of the original report. Ms. Ratley said the copy had been inadvertently omitted and stated she would send the copy in today.-

93040930079

**SENSITIVE**

RECEIVED  
OFFICE OF THE FEC  
SECRETARY

FEDERAL ELECTION COMMISSION  
1325 K Street, N.W.  
Washington, D.C. 20463

84 OCT 31 P2:49

**FIRST GENERAL COUNSEL'S REPORT**

DATE AND TIME OF TRANSMITTAL 84NF-56  
BY OGC TO THE COMMISSION 10/31/84 - 2:45 STAFF MEMBER(S)  
Garr

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

RESPONDENT'S NAME: New Republican Victory Fund

RELEVANT STATUTE: 2 U.S.C. § 434(a)(4)(A)(i)  
11 C.F.R. § 104.5(c)(1)(i)(A)

INTERNAL REPORTS CHECKED: FEC Disclosure Reports

FEDERAL AGENCIES CHECKED: N/A

**GENERATION OF MATTER**

The New Republican Victory Fund ("Fund") was referred to the Office of General Counsel by the Reports Analysis Division for failing to file a 1984 July Quarterly Report in a timely manner.

**SUMMARY OF ALLEGATIONS**

On June 21, 1984, the Fund was notified that its July Quarterly Report was due on July 15, 1984. A non-filer notice was sent to the Fund on August 8, 1984. No response was received.

On September 11, 1984, a RAD analyst contacted the Fund's assistant treasurer, Vicki Ratley, regarding the Fund's failure to file. Ms. Ratley advised the analyst that the report was sent to the Commission via certified mail before the July 15 due date. The analyst then requested that a copy of the report, along with a copy of the certified mail receipt, be sent to the Commission as soon as possible. A copy of the 1984 July Quarterly Report, excluding a copy of the certified receipt, was filed on

93040930080



September 17, 1984, 64 days late.

On September 18, 1984, Ms. Ratley was again contacted by a RAD analyst regarding the omitted certified receipt. As of this date, the Commission has not received a copy of the certified receipt to prove that the Fund's July Quarterly Report was filed in a timely manner.

#### FACTUAL AND LEGAL ANALYSIS

Pursuant to 2 U.S.C. § 434(a)(4)(A)(i) and 11 C.F.R. § 104.5(c)(1)(i)(A) all political committees other than authorized committees of a candidate are required to file in a calendar year in which a regularly scheduled election is held, a quarterly report to be filed no later than the 15th day after the last day of the calendar quarter. Because the New Republican Victory Fund failed to file its 1984 July Quarterly Report in a timely manner, it is recommended that the Commission find reason to believe that the Fund and Charles R. Black, Jr., as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and 11 C.F.R. § 104.5(c)(1)(i)(A).

#### RECOMMENDATION

1. Open a MUR.
2. Find reason to believe that the New Republic Victory Fund and Charles R. Black, Jr., as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and 11 C.F.R. § 104.5(c)(1)(i)(A).

3. Approve the attached letter and General Counsel's Factual and Legal Analysis.

Charles N. Steele  
General Counsel

Oct 31, 1984  
Date

BY:

Kenneth A. Gross  
Associate General Counsel

Attachments

1. Referral
2. Proposed letter
3. General Counsel's Factual and Legal Analysis

93040930082

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
New Republican Victory Fund )

RAD Referral 84NF-56

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 5, 1984, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 84NF-56:

1. Open a MUR.
2. Find reason to believe that the New Republican Victory Fund and Charles R. Black, Jr., as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and 11 C.F.R. § 104.5(c)(1)(i)(A).
3. Approve the letter and General Counsel's Factual and Legal Analysis attached to the First General Counsel's Report signed October 31, 1984.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter.

Attest:

11-5-84

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

Received in Office of Commission Secretary:  
Circulated on 48 hour tally basis:

10-31-84, 2:49  
11-1-84, 11:00

93040930083



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 13, 1984

Charles R. Black, Jr., Treasurer  
New Republican Victory Fund  
2632 Fort Farnsworth Road, Suite 2D  
Alexandria, Virginia 22303

RE: MUR 1847  
New Republican Victory Fund

Dear Mr. Black:

On November 5, 1984, the Federal Election Commission determined that there is reason to believe that the New Republican Victory Fund and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and 11 C.F.R. § 104.5(c)(1)(i)(A) by failing to file a 1984 July Quarterly Report of Receipts and Disbursements in a timely manner. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the Fund. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

93040930084

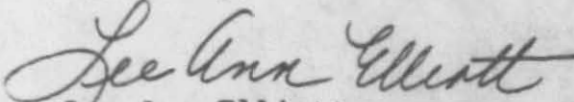


Charles R. Black, Jr.  
Page 2

The investigation now being conducted will be 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 Shelley Garr, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,

  
Lee Ann Elliott  
Chairman

Enclosures

General Counsel's Factual and Legal Analysis  
Procedures  
Designation of Counsel Statement

93040930085



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
THE FEC  
SECRETARY

24 NOV 1984 8:30

November 16, 1984

MEMORANDUM TO: The Commission  
FROM: Charles N. Steele  
General Counsel

**SENSITIVE**

By: Kenneth A. Gross  
Associate General Counsel

SUBJECT: RAD Referral 84NF-56

On November 5, 1984 the Commission approved the recommendation that the subject RAD Referral be made a MUR. Therefore, all documents which had previously been identified as RAD Referral 84NF-56 should now become MUR #1847.

Attachment  
Copy of Certification

93040930086

**SENSITIVE**

BEFORE THE FEDERAL ELECTION COMMISSION OF THE FEC  
COMMISSION SECRETARY

In the Matter of )  
 ) MUR 1847  
New Republican Victory Fund, )  
Charles R. Black, Jr., )  
Treasurer )

RECEIVED  
25 FEB 6 12:59

**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND**

On November 5, 1984, the Commission determined there was reason to believe that the New Republican Victory Fund ("Fund") and Charles R. Black, Jr., as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and 11 C.F.R. § 104.5(c)(1)(i)(A) for failing to file in a timely manner its 1984 July Quarterly Report of Receipts and Disbursements. Notification of the Commission's findings was mailed to the Fund on November 13, 1984. As of this date the Commission has received no response to the reason to believe notification.

On December 12, 1984 the Office of General Counsel received an update from the Reports Analysis Division with respect to the Fund's failure to file its 1984 October Quarterly Report.

On September 21, 1984, the Fund was notified that its 1984 October Quarterly Report was due on October 15. Because the Fund did not respond, a Non-filer Notice was sent on November 6, 1984. Attempts to contact Vicki Ratley, the Assistant Treasurer for the Fund, have been unsuccessful. Finally, a Chronic Late Filer Notice was sent to the Fund on December 5, 1984, for failure to timely file its 1984 July and October Quarterly Reports.

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## II. LEGAL ANALYSIS

Pursuant to 2 U.S.C. § 434(a)(4)(A)(i) and 11 C.F.R. § 104.5(c)(1)(i)(A) all political committees other than authorized committees of a candidate are required to file in a calendar year in which a regularly scheduled election is held, a quarterly report to be filed no later than the 15th day after the last day of the calendar quarter. Because the New Republican Victory Fund failed to file its 1984 October Quarterly Report, it is recommended that the Commission find reason to believe that the Fund and Charles R. Black, Jr., as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and 11 C.F.R. § 104.5(c)(1)(i)(A).

## III. RECOMMENDATION

1. Find reason to believe that the New Republican Victory Fund violated 2 U.S.C. § 434(a)(4)(A)(i) and 11 C.F.R. § 104.5(c)(1)(i)(A) for failure to file its 1984 October Quarterly Report.

Charles N. Steele  
General Counsel

February 6, 1985  
Date

By: Kenneth A. Gross  
Associate General Counsel

Attachments  
Referral Update  
Letter

93040930088



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

New Republican Victory Fund  
Charles R. Black, Jr.,  
treasurer

)  
) MUR 1847  
)  
)  
)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 8, 1985, the Commission decided by a vote of 6-0 to find reason to believe that the New Republican Victory Fund violated 2 U.S.C. § 434(a)(4)(A)(i) and 11 C.F.R. § 104.5(c)(1)(i)(A) for failure to file its 1984 October Quarterly Report.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter.

Attest:

2-11-85

Date

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

Received in Office of Commission Secretary:  
Circulated on 48 hour tally basis:

2-6-85, 12:59  
2-6-85, 4:00

93040930089



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 26, 1985

Charles P. Black, Jr., Treasurer  
New Republican Victory Fund  
2632 Fort Farnsworth Road #2D  
Alexandria, Virginia 22303

RE: MUR 1847  
New Republican Victory Fund

Dear Mr. Black:

On February 8, 1985, the Federal Election Commission determined that there is reason to believe the New Republican Victory Fund and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), a provision of the Federal Election Campaign Act of 1971, as amended and 11 C.F.R. § 104.5(c)(1)(i)(A) by failing to file your 1984 October Quarterly Report of Receipts and Expenditures. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials, within ten days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

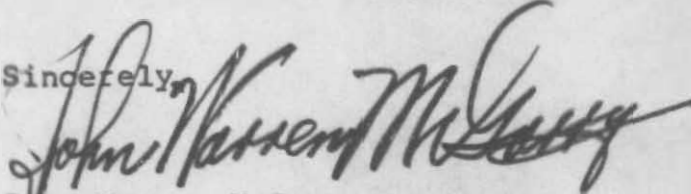
93040930090

Charles R. Black, Jr., Treasurer  
Page 2

The investigation now being conducted will be 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 Shelley Garr, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,

  
John Warren McGarry  
Chairman

Enclosures

General Counsel's Factual and Legal Analysis  
Procedures  
Designation of Counsel Statement

93040930091

**SENSITIVE**

FEDERAL ELECTION COMMISSION  
1325 K Street, N.W.  
Washington, D.C. 20463

RECEIVED  
OFFICE OF THE FEC  
COMMISSIONER SECRETARY

**FIRST GENERAL COUNSEL'S REPORT**

25 APR 26 P 1:13

DATE AND TIME OF TRANSMITTAL  
BY OGC TO THE COMMISSION \_\_\_\_\_

#85NF-82  
STAFF MEMBER  
GARR

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

RESPONDENT'S NAME: New Republican Victory Fund  
Charles R. Black, Jr., Treasurer

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

INTERNAL REPORTS  
CHECKED: FEC Disclosure Documents

FEDERAL AGENCIES  
CHECKED: NA

**GENERATION OF MATTER**

The New Republican Victory Fund ("Fund") was referred to the Office of General Counsel by the Reports Analysis Division for failing to file the 1984 30 Day Post-General and Year End Reports of Receipts and Disbursements.

**SUMMARY OF ALLEGATIONS**

On December 5, 1984, a Chronic Late Filer Notice was sent to the Fund for failing to timely file the 1984 July and October Quarterly Reports.\*

Subsequently, the Fund failed to file the 1984 30 Day Post-General and Year End Reports.

\*/ On November 5, 1984, and February 8, 1985, respectively, the Commission found reason to believe that the New Republican Victory Fund violated 2 U.S.C. § 434(a)(4)(A)(i) for failing to timely file the 1984 July Quarterly Report and for failing to file the 1984 October Quarterly Report. [See MUR 1847].

93040930092



The Reports Analysis Division analyst made several attempts to contact the Fund in January and March, 1985, but the calls were never returned.

#### LEGAL AND FACTUAL ANALYSIS

Pursuant to 2 U.S.C. § 434(a)(4)(A)(i), all political committees other than authorized committees of a candidate are required to file, in a calendar year in which a regularly scheduled election is held, quarterly reports, to be filed no later than the 15th day after the last day of each calendar quarter. For the quarter ending on December 31, the report shall be filed no later than January 31 of the following calendar year.

Further, pursuant to 2 U.S.C. § 434(a)(4)(A)(iii) those committees are required to file a post-general election report, 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 election.

The Fund's failure to file both the 1984 Year End and 30 Day Post General Election Reports of Receipts and Disbursements are in the General Counsel's view, violations of 2 U.S.C. §§ 434(a)(4)(A)(i) and (iii).

#### RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that the New Republican Victory Fund and Charles N. Black, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (iii).

23040930093

3. Merge 85NF-62 with MUR 1847.
4. Approve the attached letter and legal and factual analysis.

Charles N. Steele  
General Counsel

April 25, 1985  
Date

BY:

Kenneth A. Gross  
Associate General Counsel

Attachments

1. Referral
2. Proposed letter and legal and factual analysis.

93040930094



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

28 March 1985

MEMORANDUM

TO: CHARLES N. STEELE  
GENERAL COUNSEL

THROUGH: JOHN C. SURINA *151*  
STAFF DIRECTOR

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

SUBJECT: REFERRAL OF THE NEW REPUBLICAN VICTORY FUND

This is a combined Non-Filer/Chronic Late Filer referral of the New Republican Victory Fund (the "Fund"). The Fund has failed to timely file the 1984 July Quarterly Report, and has not filed the 1984 30 Day Post-General and 1984 Year End Reports. According to the RAD Review and Referral Procedures for Unauthorized Committees (Standards 3 and 4), further examination is required by your office.

For your information, the Fund was referred to your office on October 3, 1984 and December 12, 1984 for failure to timely file the 1984 July Quarterly Report and failure to file the 1984 October Quarterly Report, respectively (see 84NF-56, now MUR 1847).

If you have any questions, please contact Anthony Raymond at 523-4048.

Attachments

*Attachment I - page 1*

93040930095

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 28 March 1985

ANALYST: Anthony Raymond

I. COMMITTEE: New Republican Victory Fund  
(C00107557)  
Charles R. Black Jr., Treasurer  
2632 Fort Farmsworth Road  
Suite 2D  
Alexandria, VA 22305

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

III. BACKGROUND:

Non-Filing and Chronic Late Filing of Reports

The New Republican Victory Fund (the "Fund") failed to timely file four (4) reports (see chart on page 2). The Fund submitted the 1984 July Quarterly Report sixty-four (64) days late and failed to file three (3) subsequent reports.

The Fund was referred previously for failure to timely file the 1984 July Quarterly Report and failure to file the 1984 October Quarterly Report (see 84NF-56, now MUR 1847).\*/ On December 5, 1984, a Chronic Late Filer Notice was sent to the Fund for failing to timely file these reports. The notice advised the Fund that any additional late filing of reports could result in legal enforcement action (Attachment 8). Subsequently, the 1984 30 Day Post-General and the 1984 Year End Reports were not filed.

The Reports Analysis Division ("RAD") analyst made several attempts to contact the Fund in January and March 1985, but the calls were never returned (Attachment 12).

As of this date, the Fund has not filed the 1984 October Quarterly, 30 Day Post-General or Year End Reports.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

\*/Memoranda of telephone conversations which were included in that referral have not been included herein.

Attachment I - page 2

93040930096



## LATE FILING HISTORY

REPORT TYPE	PRIOR NOTICE	DATE DUE	NON-FILER NOTICE	DATE FILED
July Quarterly* (4/1/84-6/30/84)	6/21/84 (Attachment 2)	7/15/84	8/8/84 (Attachment 3)	9/17/84 (Attachment 4)
October Quarterly* (7/1/84-9/30/84)	9/21/84 (Attachment 5)	10/15/84	11/6/84 (Attachment 6)	Not Filed
30 Day Post-General (10/1/84-11/26/84)	10/1/84 (Attachment 7)	12/6/84	12/28/84 (Attachment 9)	Not Filed
Year End (11/27/84-12/31/84)	1/7/85 (Attachment 10)	1/31/85	2/22/85 (Attachment 11)	Not Filed

\*The Fund was referred to your office on December 5, 1984 for failure to timely file the 1984 July Report. This referral was updated on December 12, 1984 for the Fund's failure to file the 1984 October Quarterly Report.

Attachment I - Page 3

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
NEW REPUBLICAN VICTORY FUND	CONNECTED ORGANIZATION: NONE			NON-PARTY QUALIFIED	ID #C00107557	
1983	STATEMENT OF ORGANIZATION - AMENDMENT			11JUL83	2	83FEC/275/0126
	STATEMENT OF ORGANIZATION - AMENDMENT			15AUG83	3	83FEC/281/1940
	MID-YEAR REPORT	0	0	1JAN83 -30JUN83	6	83FEC/280/2252
	MID-YEAR REPORT - AMENDMENT	0	0	1JAN83 -30JUN83	3	84FEC/316/5317
	REQUEST FOR ADDITIONAL INFORMATION			1JAN83 -30JUN83	1	84FEC/308/0054
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN83 -30JUN83	2	84FEC/313/2240
	YEAR-END	19,031	11,236	1JUL83 -31DEC83	11	84FEC/296/7
	YEAR-END - AMENDMENT	19,031	11,236	1JUL83 -31DEC83	3	84FEC/316/5317
	REQUEST FOR ADDITIONAL INFORMATION			1JUL83 -31DEC83	1	84FEC/308/2244
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL83 -31DEC83	1	84FEC/313/2916
1984	MISCELLANEOUS NOTICE FROM FEC			5DEC84	1	84FEC/351/3069
	APRIL QUARTERLY	710	4,952	1JAN84 -31MAR84	9	84FEC/309/5256
	APRIL QUARTERLY - AMENDMENT	710	4,952	1JAN84 -31MAR84	3	84FEC/324/2533
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN84 -31MAR84	3	84FEC/324/4549
	REQUEST FOR ADDITIONAL INFORMATION			1JAN84 -31MAR84	1	84FEC/318/1545
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN84 -31MAR84	2	84FEC/323/2790
	JULY QUARTERLY	0	3,840	1APR84 -30JUN84	9	84FEC/328/2090
	NOTICE OF FAILURE TO FILE			1APR84 -30JUN84	1	84FEC/325/0601
	NOTICE OF FAILURE TO FILE			1JUL84 -30SEP84	1	84FEC/348/2069
	NOTICE OF FAILURE TO FILE			1OCT84 -26NOV84	1	84FEC/357/4994
	NOTICE OF FAILURE TO FILE			27NOV84 -31DEC84	1	85FEC/366/4631
	TOTAL	19,741	0	20,028	0	85 TOTAL PAGES

All reports have been reviewed

Attachment I - page 4

2

NON-FACTORY PLANT

Attachment I - page 5

9 3 0 4 0 9 3 0 1 0 0

FEDERAL ELECTION COMMISSION  
COMMITTEE INDEX OF DISCLOSED DOCUMENTS - (C) (U) (R)

DATE: 2/28/80  
PAGE: 2

## NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
	POST-GENERAL	2,962	6,948	10CT82 - 22NOV82	7	2447/265/1410
	YEAR-END	466	110	22NOV82 - 31DEC82	7	8451/265/2000
	YEAR-END - AMENDMENT	466	110	22NOV82 - 31DEC82	9	8452/275/1400
	REQUEST FOR ADDITIONAL INFORMATION			22NOV82 - 31DEC82	1	8453/277/1300
	REQUEST FOR ADDITIONAL INFORMATION 2ND			22NOV82 - 31DEC82	2	8453/277/1600
	TOTAL	60,921	0	83,106	0	146 TOTAL PAGES

All reports have been reviewed.

Attachment I - page 6





FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20463

June 21, 1984

JULY REPORTING NOTICE FOR UNAUTHORIZED COMMITTEES

WHO MUST FILE

ALL unauthorized political committees, except those that file monthly, must file a quarterly report by July 15, 1984. (See below.)

WHAT MUST BE REPORTED

All financial activity must be disclosed from the last report filed through June 30, 1984. Political committees which have not previously filed a financial disclosure report should report all financial activity from the date of registration,\* through June 30, 1984.

WHEN TO FILE

Reports sent by registered or certified mail must be postmarked no later than midnight July 15, 1984. Reports hand delivered or mailed first class must be received no later than close of business July 15, 1984.

WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed FEC Form 3X for details.

MONTHLY FILERS

Committees that file on a monthly schedule must file their next report by July 20, 1984, and disclose all financial activity of their committee from June 1 through June 30, 1984. Monthly reports are due by the twentieth of each month and should cover all financial activity of the previous month.

COMPLIANCE

Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is a serious violation. Committees are subject to enforcement action for late filing. Illegible reports which can not be clearly reproduced and reports submitted on non-FEC forms will not be accepted. Committees filing such documents will be required to refile.

\*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received during the current reporting period. See 11 CFR 104.3(a) and (b).

Attachment I - page 7

# A REMINDER FOR QUARTERL FILERS

All committees that have made contributions or expenditures (including independent expenditures) in connection with a primary election which have not previously been reported must file a pre-election report.

93040930102

Attachment I - page 8



FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20463

EQ-7

AUG 8 1984

Charles R. Black, Jr., Treasurer  
New Republican Victory Fund  
2632 Fort Farmsworth Road  
Suite 2D  
Alexandria, VA 22303

Identification Number: C00107557

Reference: July Quarterly Report (4/1/84-6/30/84)

Dear Mr. Black:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Report of Receipts and Disbursements as required by the Federal Election Campaign Act. 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, 1325 K Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

The failure to file this report may result in an audit or legal enforcement action.

If you have any questions regarding this matter, please contact Anthony Raymond on our toll-free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Attachment I - page 9



(Summary Page)

ALBANY AREA

418811-2-2-84

1. Name of Committee On Poll

New Republican Victory Fund

Address (Street and Street)

2412 Ft. Belknap Rd.  
62D

City, State and ZIP Code

Alexandria, VA 22303

☐ Check here if address is different than previously reported.

2. PSC Identification Number

000107557

2. ☐ This committee qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_

4. TYPE OF REPORT (Check appropriate box)

1st ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report

☒ July 15 Quarterly Report ☐ January 31 Year End Report

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

☐ Monthly Report for \_\_\_\_\_

☐ Tenth day report preceding \_\_\_\_\_ (Page of Month)

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

☒ Thirtieth day report following the General Election

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

☐ Termination Report

Is this Report an Amendment?

☐ YES

☒ NO

SUMMARY

5. Covering Period 4/1/84 through 6/31/84

6. 1st Cash on hand January 1, 1984

1st Cash on hand at Beginning of Reporting Period

1st Total Receipts From Line 10B

1st Subtotal (add Lines 6(a) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)

7. Total Disbursements From Line 20C

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

9. Debt and Obligations Owed TO The Committee  
Premises all on Schedule C or Schedule D1

10. Debt and Obligations Owed BY the Committee  
Premises all on Schedule C or Schedule D1

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

Victoria S. Partley

Type or Print Name of Treasurer (Assistant Treasurer)

*Victoria S. Partley*  
Signature of Treasurer

7/15/84

Date

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

All previous versions of PSC FORM 2 and PSC FORM 2a are obsolete and should no longer be used.

For further information contact

Federal Election Commission

Toll Free 800-424-9630

Local 703 527-4000

FEC FORM 3X (3-80)

Attachment I - page 10





# FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 21, 1984

## OCTOBER REPORTING NOTICE FOR UNAUTHORIZED COMMITTEES

### WHO MUST FILE

ALL unauthorized political committees, except those that file monthly, must file a quarterly report by October 15, 1984. (See Monthly Filers below.)

### WHAT MUST BE REPORTED

All financial activity must be disclosed from the last report filed through September 30, 1984. Political committees which have not previously filed a financial disclosure report should report all financial activity from the date of registration,\* through September 30, 1984.

### WHEN TO FILE

Reports sent by registered or certified mail must be postmarked no later than October 15, 1984. Reports hand delivered or mailed first class must be received no later than close of business October 15, 1984.

### WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed FEC Form 3X for details.

### MONTHLY FILERS

Committees that file on a monthly schedule must file their next report by October 20, 1984, and disclose all financial activity of their committee from September 1 through September 30, 1984. Monthly reports are due by the twentieth of each month and should cover all financial activity of the previous month.

### COMPLIANCE

Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is a serious violation. Committees are subject to enforcement action for late filing. Illegible reports which can not be clearly reproduced and reports submitted on non-FEC forms will not be accepted. Committees filing such documents will be required to refile.

\*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received during the current reporting period. See 11 CFR 104.3(a) and (b).

FOR INFORMATION CALL: Office of Public Communications  
800/424-9530 or 202/523-4068

Attachment I - page 11



FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20463

70-7

November 6, 1984

Charles R. Black, Jr., Treasurer  
New Republican Victory Fund  
2632 Fort Farnsworth Road #2D  
Alexandria, VA 22303

Identification Number: C00107557

Reference: OCTOBER QUARTERLY REPORT (7/1/84-9/30/84)

Dear Mr. Black:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Report of Receipts and Disbursements as required by the Federal Election Campaign Act. 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, 1325 K Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

The failure to file this report may result in an audit or legal enforcement action.

If you have any questions regarding this matter, please contact Anthony Raymond on our toll-free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Attachment I - page 12



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

October 1, 1984

GENERAL ELECTION FILING NOTICE  
FOR UNAUTHORIZED COMMITTEES

WHO MUST FILE THE PRE-GENERAL ELECTION REPORT

All committees that file monthly reports must file the pre-general election report due October 25, 1984.

In addition all quarterly filing committees that have made contributions or expenditures (including independent expenditures) in connection with the general election must file a pre-election report, if such activity has not previously been reported. See below for post-general filing information.

WHAT MUST BE REPORTED

The report must disclose all financial activity of the committee from the later of, the last report filed or the date of registration\* through October 17, 1984. (Monthly filers must disclose all financial activity from the later of October 1 or the date of registration\* through October 17, 1984.)

WHEN TO FILE

Pre-general election reports sent registered or certified mail must be postmarked no later than October 22, 1984. Reports hand delivered or mailed first class must be received no later than close of business October 25, 1984.

\* \* \* \* \*

WHO MUST FILE THE POST-GENERAL ELECTION REPORT

All committees must file the post-general election report due December 6, 1984, regardless of election activity.

WHAT MUST BE REPORTED

The post-general election report must cover all financial activity of the committee from either the date of the last report filed or the date of registration, whichever is later\* through November 26, 1984.

WHEN TO FILE

Post-general election reports sent by registered or certified mail must be postmarked no later than December 6, 1984. Reports hand delivered or mailed first class must be received no later than close of business December 6, 1984.

\*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received during the current reporting period. See 11 CFR 104.3(a) and (b).

-over- Attachment I - page 13

93040930107



**WHERE AND HOW TO FILE**

Committees should consult the instructions on the enclosed FEC form 3X, for details.

**QUARTERLY FILERS**

Name of Report	Period Covered	Reg./Cert. Mailing Date	Filing Date
3rd Q-Report	07/01* - 09/30	10/15/84	10/15/84
Pre-General	10/01 - 10/17	10/22/84	10/25/84
Post-General**	10/18 - 11/26	12/06/84	12/06/84
Year-end	11/27 - 12/31	01/31/85	01/31/85

\*Or from date of registration, or the close of books of the last report filed, whichever is later.

\*\*Reports filed by committees that did not file the pre-General report should cover all financial activity from the last report filed through November 26, 1984.

\* \* \*

**MONTHLY FILERS**

Name of Report	Period Covered	Reg./Cert. Mailing Date	Filing Date
Oct. Monthly	09/01 - 09/30	10/20/84	10/20/84
Pre-General	10/01 - 10/17	10/22/84	10/25/84
Post-General	10/18 - 11/26	12/06/84	12/06/84
Year-end	11/27 - 12/31	01/31/85	01/31/85

**COMPLIANCE**

Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is a serious violation. Committees are subject to enforcement action for late filing. Illegible reports which can not be clearly reproduced and reports submitted on non-FEC forms will not be accepted. Committees filing such documents will be required to refile.

FOR INFORMATION CALL: Office Of Public Communications  
800/424-9530 or 202/523-4068

Attachment I - page 14

93040930108





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20543

DEC 5 1984

MS-L

Charles R. Black Jr., Treasurer  
New Republican Victory Fund  
2612 Fort Farnsworth Road  
Suite 2D  
Alexandria, VA 22303

Identification Number: C00107557

Reference: 1983-1984 Election Cycle Reports

Dear Mr. Black:

This letter is prompted by the Commission's review of the reports required to be filed by your committee. The following is a list of reports your committee apparently has failed to file in a timely manner.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
July Quarterly (4/1/84-6/30/84)	7/15/84	9/17/84
October Quarterly (7/1/84-9/30/84)	10/15/84	Not Filed

Timely filing is a specific requirement of the Federal Election Campaign 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 with the Commission, any additional failure to timely file a required report by your committee may result in the Commission initiating legal enforcement or audit action.

If you need assistance or have any questions regarding this matter, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Michael B. Filler  
Chief  
Party/Non-Party Branch

Attachment I page 15



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

BQ-7

December 28, 1984

Charles R. Black Jr., Treasurer  
New Republican Victory Fund  
2632 Fort Farnsworth Road  
Suite 2D  
Alexandria, VA 22303

Identification Number: C00107557

Reference: 30 Day Post-General Report (10/01/84-11/26/84)

Dear Mr. Black:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Report of Receipts and Disbursements as required by the Federal Election Campaign Act. 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, 1325 K Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

The failure to file this report may result in an audit or legal enforcement action.

If you have any questions regarding this matter, please contact Anthony Raymond on our toll-free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Attachment I page 16

04033574994



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

January 7, 1985

JANUARY 31 YEAR-END REPORT NOTICE

WHO MUST FILE

ALL POLITICAL COMMITTEES currently registered with the Commission must file a year-end report by January 31, 1985.

WHAT MUST BE REPORTED

All financial activity must be disclosed from the last report filed through December 31, 1984. Political committees that have not previously filed a financial report should report all financial activity from the date of registration\* through December 31, 1984.

WHEN TO FILE

Reports sent by registered or certified mail must be postmarked no later than midnight January 31, 1985. Reports hand delivered or mailed first class must be received no later than close of business January 31, 1985.

WHERE TO FILE

Committees should consult the instructions on the enclosed form for details.

COMPLIANCE

Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is a serious violation. Committees are subject to enforcement action for late filing. Illegible reports which can not be clearly reproduced and reports submitted on non-FEC forms will not be accepted. Committees filing such documents will be required to refile.

1985 FILING REQUIREMENTS

See the January 1985 issue of the FEC Record for filing requirements during 1985.

\*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received during the current reporting period. See 11 CFR 104.3(a) and (b).

FOR INFORMATION CALL: Office of Public Communications  
202/523-4068 or 800/424-9530

Attachment I - page 17





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-7

February 22, 1985

Charles R. Black, Jr., Treasurer  
New Republican Victory Fund  
2632 Fort Farnsworth Road  
Suite 2D  
Alexandria, VA 22303

Identification Number: C00107557

Reference: 1984 Year-End Report (11/27/84-12/31/84)

Dear Mr. Black:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Report of Receipts and Disbursements as required by the Federal Election Campaign Act. 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, 1325 K Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

The failure to file this report may result in an audit or legal enforcement action.

If you have any questions regarding this matter, please contact Anthony Raymond on our toll-free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Attachment I - page 18

9304309631512



MEMORANDUM TO FILE:

FROM: Tony Raymond

DATE : --

TO: -----

TELEPHONE: --

NAME OF COMMITTEE: New Republican Victory Fund

---

1/18/85 -- Attempted to call Vicki Ratley, a committee representative I've spoken to in the past. Ms. Ratley was not in the office.

1/22/85 -- Ms. Ratley was not in the office. I left a message.

1/24/85 -- I left a message for Ms. Ratley to call me.

3/13/85 -- I left a message for Ms. Ratley to call me.

93040930113

Attachment I - page 19



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE  
GENERAL COUNSEL

FROM: *mwe* MARJORIE W. EMMONS/JODY C. RANSOM *JCR*

DATE: MAY 2, 1985

SUBJECT: COMMENTS RE: RAD REFERRAL 85NF-82  
First General Counsel's Report signed 4-25-85

Attached is a copy of Commissioner Aikens' vote sheet with comments regarding the above-captioned matter.

Attachment:  
copy of vote sheet

93040930114

SENSITIVE



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Date and Time Transmitted: MONDAY, 4-29-85, 11:00

COMMISSIONER: MCGARRY, AIKENS, McDONALD, ELLIOTT, REICHE, HARRIS

RETURN TO COMMISSION SECRETARY BY WEDNESDAY, MAY 1, 1985, 11:00

SUBJECT: RAD REFERRAL 85NF-82 - First General Counsel's Report  
signed April 25, 1985

- (✓) I approve the recommendation.  
( ) I object to the recommendation.

COMMENTS: Approve only Rec. #1 and #2 and #4.

93040930115

11:57  
P2:57  
1  
.....

Date: 5-1-85

Signature: John D. Aikens

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 THE DATE AND TIME SHOWN ABOVE.

From the Office of the Commission Secretary

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) RAD Referral 85NF-82  
New Republican Victory Fund )  
Charles R. Black, Jr., treasurer )  
 )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 3, 1985, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 85NF-82, as set forth in the First General Counsel's Report signed April 25, 1985, and amended by the General Counsel's Errata dated May 1, 1985:

1. Open a MUR.
2. Find reason to believe that the New Republican Victory Fund and Charles N. Black, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (iii).
3. Merge 85NF-82 with MUR 1847.
4. Approve the letter and legal and factual analysis attached to the First General Counsel's Report signed April 25, 1985.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter.

Attest:

5-6-85

Date

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

93040930116





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 15, 1985

Charles R. Black, Jr., Treasurer  
New Republican Victory Fund  
2632 Fort Farmsworth Road  
Suite 2D  
Alexandria, VA 22305

RE: MUR 1847  
New Republican Victory Fund

Dear Mr. Black:

On May 3, 1985, the Federal Election Commission determined that there is reason to believe that the New Republican Victory Fund 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") by failing to file the 1984 30 Day Post-General and Year End Reports of Receipts and Disbursements. This enforcement action has been merged with MUR 1847. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

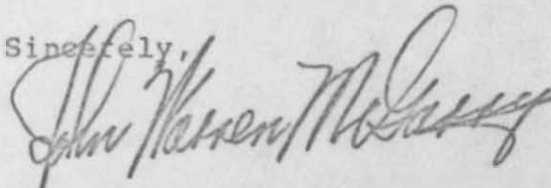
93040930117

Charles R. Black, Jr., Treasurer  
Page 2

The investigation now being conducted will be 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 Shelley Garr, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,



John Warren McGarry  
Chairman

Enclosures

General Counsel's Factual and Legal Analysis  
Procedures  
Designation of Counsel Statement

93040930118



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
OFFICE OF THE SECRETARY  
MAY 13 1985 2:05

May 13, 1985

**SENSITIVE**

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele  
General Counsel *[Signature]*

SUBJECT: MUR #1847  
New Republican Victory Fund  
Charles R. Black, Jr., Treasurer

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondent of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on May 13, 1985. Following receipt of the Respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Brief
2. Letter to Respondent

93040930119

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
New Republican Victory Fund ) MUR 1847  
Charles R. Black, Jr., )  
Treasurer )

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On November 5, 1984, the Commission determined there was reason to believe that the New Republican Victory Fund ("Fund") and Charles R. Black, Jr., as treasurer violated 2 U.S.C. § 434(a)(4)(A)(i) and 11 C.F.R. § 104.5(c)(1)(i)(A) for failing to file in a timely manner its 1984 July Quarterly Report of Receipts and Disbursements. The report was filed 64 days late. The Commission has received no response to this notification.

On December 12, 1984, the Office of General Counsel received an update from the Reports Analysis Division with respect to the Fund's failure to file its 1984 October Quarterly Report. On February 11, 1985, the Commission again found reason to believe that the Fund violated 2 U.S.C. § 434(a)(4)(A)(i) and 11 C.F.R. § 104.5(c)(1)(i)(A) for failing to file its 1984 October Quarterly Report. The Commission has received no response to the second notification.

II. LEGAL ANALYSIS

Pursuant to 2 U.S.C. § 434(a)(4)(A)(i) and 11 C.F.R. § 104.5(c)(1)(i)(A) all political committees other than authorized committees of a candidate are required to file in a calendar year in which a regularly scheduled election is held, a

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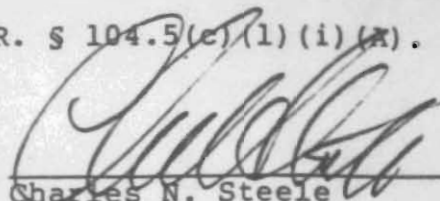


quarterly report to be filed no later than the 15th day after the last day of the calendar quarter. The Fund was required to file its 1984 July and October Quarterly Reports on July 15, and October 15, 1984, respectively. The Fund filed its July Quarterly Report on September 17, 64 days late, and failed to file its October Quarterly Report. The Fund's failure to comply with the reporting requirement is a violation of 2 U.S.C. § 434(a)(4)(A)(i) and of 11 C.F.R. § 104.5(c)(1)(i)(A). Hence, it is the recommendation of the General Counsel that the Commission find probable cause to believe that the Fund violated 2 U.S.C. § 434(a)(4)(A)(i) and 11 C.F.R. § 104.5(c)(1)(i)(A).

### III. RECOMMENDATION

The Office of General Counsel recommends that the Commission find probable cause to believe that the New Republican Victory Fund and Charles R. Black, Jr., as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and 11 C.F.R. § 104.5(c)(1)(i)(A).

13 May 1985  
Date

  
\_\_\_\_\_  
Charles N. Steele  
General Counsel

93040930121



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 13, 1985

Charles R. Black, Jr., Treasurer  
New Republican Victory Fund  
2632 Fort Farnsworth Road #2D  
Alexandria, Virginia 22303

Re: MUR 1847  
New Republican Victory Fund

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on November 5, 1984, and again on February 8, 1985, found reason to believe that the New Republican Victory Fund and you, as treasurer, have violated 2 U.S.C. § 434(a)(4)(A)(i), a provision of the Federal Election Campaign Act of 1971, as amended, and 11 C.F.R. § 104.5(c)(1)(i)(A) and instituted an investigation in this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extensions beyond 20 days.

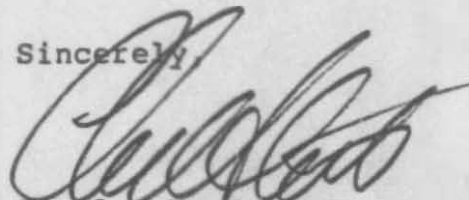
93040930122

Charles R. Black, Jr., Treasurer  
Page 2

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety, days to settle this matter through a conciliation agreement.

Should you have any questions, please contact Shelley Garr the staff member assigned to handle this matter, at (202) 523-4143.

Sincerely,



Charles N. Steele  
General Counsel

Enclosure  
Brief

93040930123



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
OFFICE OF THE FEC  
COMMISSION SECRETARY

95 JUL 22 P12: 56

July 22, 1985

**SENSITIVE**

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele *CN Steele*  
General Counsel

SUBJECT: MUR #1847  
New Republican Victory Fund  
Charles R. Black, Jr., Treasurer

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondent of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on July 22, 1985. Following receipt of the Respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Brief
2. Letter to Respondent

93040930124



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
New Republican Victory Fund ) MUR 1847  
Charles R. Black, Jr., )  
Treasurer )

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On November 5, 1984, the Commission determined there was reason to believe that the New Republican Victory Fund ("Fund") and Charles R. Black, Jr., as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and 11 C.F.R. § 104.5(c)(1)(i)(A) for failing to file in a timely manner its 1984 July Quarterly Report of Receipts and Disbursements. The report was filed 64 days late. The Commission has received no response to this notification.

On December 12, 1984, the Office of General Counsel received an update from the Reports Analysis Division with respect to the Fund's failure to file its 1984 October Quarterly Report. On February 8, 1985, the Commission again found reason to believe that the Fund violated 2 U.S.C. § 434(a)(4)(A)(i) and 11 C.F.R. § 104.5(c)(1)(i)(A) for failing to file its 1984 October Quarterly Report. The Commission has received no response to the second notification. The Office of General Counsel notified the Fund of its intent to recommend probable cause to believe that the Fund violated 2 U.S.C. § 434(a)(4)(A)(i) and 11 C.F.R. § 104.5(c)(1)(i)(A) in its Brief dated May 13, 1985.

93040930125

On May 3, 1985, the Commission again found reason to believe that the Fund violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (iii) for failing to file its 1984 30 Day Post-General Election and Year End Reports of Receipts and Disbursements. The Fund was notified of the newest finding on May 13, 1985. As of this date, the Commission has received no response.

## II. Factual and Legal Analysis

Pursuant to 2 U.S.C. § 434(a)(4)(A)(i) and 11 C.F.R. § 104.5(c)(1)(i)(A), all political committees other than authorized committees of a candidate are required to file, in a calendar year in which a regularly scheduled election is held, quarterly reports, to be filed no later than the 15th day after the last day of each calendar quarter. For the quarter ending on December 31, the report shall be filed no later than January 31 of the following calendar year.

Further, pursuant to 2 U.S.C. § 434(a)(4)(A)(iii), those committees are required to file a post-general election report, 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 election.

The Fund was required to file its 1984 July Quarterly Report on July 15, 1984; its 1984 October Quarterly Report on October 15, 1984; its 1984 30 Day Post-General Election Report on December 6, 1984; and its 1984 Year End Report on January 31, 1984. The Fund filed its July Quarterly Report on September 17, 1984, 64 days late, but it failed to file the October Quarterly,

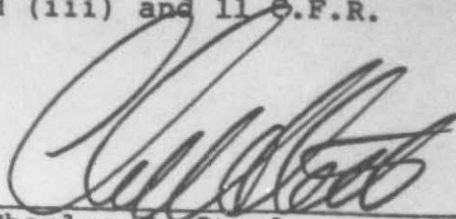
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30 Day Post-General, and Year End Reports. The Fund's failure to comply with the reporting requirement is a violation of 2 U.S.C. §§ 434(a)(4)(A)(i) and (iii) and of 11 C.F.R. § 104.5(c)(1)(i)(A). Hence, it is the recommendation of the General Counsel that the Commission find probable cause to believe that the Fund violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (iii) and 11 C.F.R. § 104.5(c)(1)(i)(A).

III. General Counsel's Recommendation

It is the recommendation of the General Counsel that the Commission find probable cause to believe that the New Republican Victory Fund and Charles R. Black, Jr., as Treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (iii) and 11 C.F.R. § 104.5(c)(1)(i)(A).

15 July 1985  
Date

  
\_\_\_\_\_  
Charles N. Steele  
General Counsel

93040930127



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 22, 1985

Charles R. Black, Jr., Treasurer  
New Republican Victory Fund  
2632 Fort Farnsworth Road #2D  
Alexandria, Virginia 22303

Re: MUR 1847  
New Republican Victory Fund

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on November 5, 1984, and again on February 8, 1985, found reason to believe that the New Republican Victory Fund and you, as treasurer, have violated 2 U.S.C. § 434(a)(4)(A)(i), a provision of the Federal Election Campaign Act of 1971, as amended, and 11 C.F.R. § 104.5(c)(1)(i)(A) and instituted an investigation in this matter. On May 3, 1985, the Commission again found reason to believe that the New Republican Victory Fund violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (iii).

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extensions beyond 20 days.

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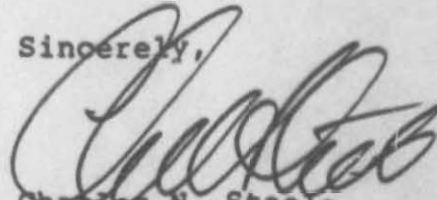


Charles R. Black, Jr., Treasurer  
Page 2

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety, days to settle this matter through a conciliation agreement.

Should you have any questions, please contact Shelley Garr the staff member assigned to handle this matter, at (202) 523-4143.

Sincerely,



Charles N. Steele  
General Counsel

Enclosure  
Brief

93040930129

**BEFORE THE FEDERAL ELECTION COMMISSION**

**SEP 17 1985**

In the Matter of  
New Republican Victory Fund  
Charles R. Black, Jr., Treasurer

MUR 1847

**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND**

On November 5, 1984, the Commission determined there was reason to believe that the New Republican Victory Fund ("Fund") and Charles R. Black, Jr., as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) for failing to file its 1984 July Quarterly Report in a timely manner. The report was filed 64 days late. The Commission has received no response to this notification.

On December 12, 1984, the Office of General Counsel received an update from the Reports Analysis Division with respect to the Fund's failure to file its 1984 October Quarterly Report. On February 11, 1985, the Commission again found reason to believe that the Fund violated 2 U.S.C. § 434(a)(4)(A)(i) for failing to file its 1984 October Quarterly Report. The Commission has received no response to the second notification.

On May 13, 1985, the Office of General Counsel forwarded to the Fund its Brief recommending probable cause to believe that the Fund violated 2 U.S.C. § 434(a)(4)(A)(i). The Fund failed to respond.

The Fund was again referred to the Office of General Counsel by the Reports Analysis Division (85NF-82) for failing to file its 1984 30 Day Post General and Year End Reports. The Commission found reason to believe that the Fund violated 2 U.S.C.

RECEIVED  
OFFICE OF THE FEC  
COMMISSION SECRETARY

85 SEP 11 P 4:38

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§§ 434(a)(4)(A)(i) and (iii) and merged this referral into MUR 1847. The Fund failed to respond to the Commission's notification which was sent on May 13, 1985.

On July 22, 1985, the Office of General Counsel sent the Fund its Brief recommending probable cause to believe. As of this date, the Fund has failed to respond.

## **II. LEGAL ANALYSIS**

The legal analysis remains the same as that outlined in the General Counsel's Brief of July 22, 1985.

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

## **IV. RECOMMENDATION**

1. Find probable cause to believe that the New Republican Victory Fund and Charles R. Black, Jr., as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (iii).

93040930131

2. Approve and send the attached letter and conciliation agreement.

9/11/85  
Date

Charles N. Steele  
Charles N. Steele  
General Counsel

Attachments

1. Proposed conciliation agreement
2. Letter to Respondent

SG #1

93040930132



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
New Republican Victory Fund ) MUR 1847  
Charles R. Black, Jr., Treasurer )

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of September 17, 1985, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in MUR 1847:

1. Find probable cause to believe that the New Republican Victory Fund and Charles R. Black, Jr., as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (iii).
2. Approve and send the letter and conciliation agreement attached to the General Counsel's report dated September 11, 1985.

Commissioners Aikens, Elliott, Josefiak, McDonald, and McGarry voted affirmatively for the decision; Commissioner Harris was not present.

Attest:

9-17-85

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

93040930133



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 24, 1985

Charles R. Black, Jr., Treasurer  
New Republican Victory Fund  
2632 Fort Farmsworth Road  
Suite 2D  
Alexandria, VA 22305

RE: MUR 1847  
New Republican  
Victory Fund

Dear Mr. Black:

On September 17, 1984, the Commission determined that there is probable cause to believe the New Republican Victory Fund and you, as treasurer, committed violations of 2 U.S.C. §§ 434(a)(4)(A)(i) and (iii), provisions of the Federal Election Campaign Act of 1971, as amended in connection with your committee's failure to file in a timely manner the 1984 July Quarterly Report and its failure to file the 1984 October Quarterly, 30 Day Post General, and Year End Reports of Receipts and Disbursements.

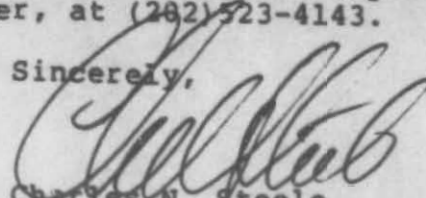
The Commission has a duty to attempt to correct such violations for a period of thirty to ninety days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. If we are unable to reach an agreement during that period, the Commission may institute civil suit in United States District Court and seek payment of a civil penalty.

We enclose a conciliation agreement that this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it along with the civil penalty to the Commission within ten days. I will then recommend that the Commission approve the agreement.

93040930134

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Shelley Garr, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,



Charles N. Steele  
General Counsel

Enclosure  
Conciliation Agreement

SG #1

93040930135

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE  
FEB 12 1986

In the Matter of )  
New Republican Victory Fund )  
Charles R. Black, Jr., Treasurer )

MUR 1847  
FEB 4 1986 4:37

GENERAL COUNSEL'S REPORT

I. Background

On September 17, 1985, the Commission found probable cause to believe that the New Republican Victory Fund ("Fund") and Charles R. Black, Jr., as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (iii) for failing to file in a timely manner the 1984 July Quarterly Report and for failing to file the 1984 October Quarterly, 30 Day Post General, and Year End Reports of Receipts and Disbursements.

this date, the Commission has received no response to its notification.<sup>1/</sup> The Office of General Counsel, then, recommends that the Commission authorize the filing of a civil suit against

<sup>1/</sup> This Office has been unsuccessful in its attempts to contact the New Republican Victory Fund. This Office has made several attempts to telephone Mr. Black. Although messages were left each time with his secretary, Mr. Black failed to return the calls. Further, it should be noted that no Commission correspondence mailed to the Fund has been returned to this Office as undeliverable.

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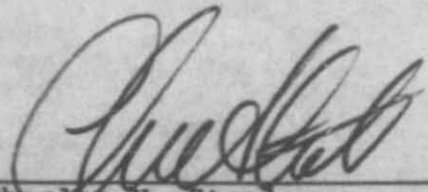


the New Republican Victory Fund and Charles R. Black, Jr., as treasurer.

**II. Recommendation**

1. Authorize the filing of a civil suit against the New Republican Victory Fund and Charles R. Black, Jr., as treasurer.
2. Approve the attached letter.

4 February 1946  
Date

  
Charles N. Steele  
General Counsel

**Attachments**

1. Proposed letter

93040930137

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
New Republican Victory Fund ) MUR 1847  
Charles R. Black, Jr., Treasurer )

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of February 19, 1986, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in MUR 1847:

1. Authorize the filing of a civil suit against the New Republican Victory Fund and Charles R. Black, Jr., as treasurer.
2. Approve the letter attached to the General Counsel's report dated February 4, 1986.

Commissioners Aikens, Elliott, Josefiak, McDonald, and McGarry voted affirmatively for the decision; Commissioner Harris was not present.

Attest:

2/19/86

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 21, 1986

Charles R. Black, Jr., Treasurer  
New Republican Victory Fund  
2632 Fort Farnsworth Road  
Suite 2D  
Alexandria, Virginia 22305

RE: MUR 1847  
New Republican Victory Fund  
Charles R. Black, Jr.,  
Treasurer


Dear Mr. Black:

You were previously notified that on September 17, 1985, the Federal Election Commission found probable cause to believe that the New Republican Victory Fund 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, in connection with the above-captioned matter.

As a result of our inability to settle this matter through conciliation, the Commission has authorized the institution of a civil action for relief in the U.S. District Court.

Should you have any questions, or should you wish to settle this matter prior to suit, please contact Ivan Rivera, the attorney handling this case, at (202) 376-8200 within five days of your receipt of this letter.

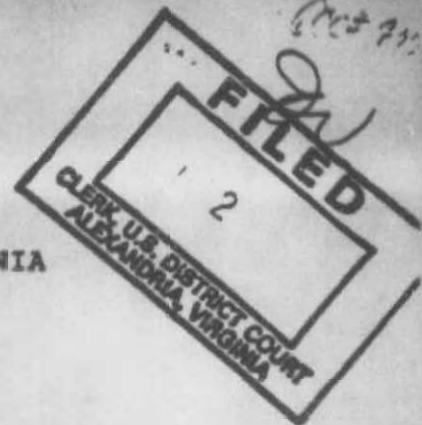
Sincerely,

  
Charles N. Steele  
General Counsel

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86 JUN 24 P12:19

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION



FEDERAL ELECTION COMMISSION, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
NEW REPUBLICAN VICTORY FUND, )  
 et al., )  
 )  
Defendants. )

No. 86-402-A

CONSENT ORDER

CONSENT ORDER

This action for declaratory, injunctive and other appropriate relief was instituted by the plaintiff Federal Election Commission (the "Commission" or "FEC") pursuant to the express authority granted the Commission by sections 307(a)(6) and 309(a)(6)(A) of the Federal Election Campaign Act of 1971, as amended (the "Act" or "FECA"), codified at 2 U.S.C. §§ 437d(a)(6) and 437g(a)(6)(A), against defendants the New Republican Victory Fund ("NRVF"), a political committee within the meaning of 2 U.S.C. § 434, and Charles R. Black, Jr., who was treasurer of NRVF during the time in question.

This court has original jurisdiction over this suit pursuant to 28 U.S.C. § 1345 as an action brought by an agency of the United States expressly authorized to sue by an Act of Congress. Venue is properly found in the Eastern District of Virginia, Alexandria Division in accord with 2 U.S.C. § 437g(a)(6)(A), as all defendants can be found, reside or transact business in this district.

86 JUN 24 P 3:48

CLERK

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In this action, the Commission has alleged that defendants violated 2 U.S.C. §434(a)(4)(A) by filing NRVF's 1984 July Quarterly Report with the Commission on September 17, 1984, approximately sixty-four days late; and by failing to file with the Commission NRVF's 1984 October Quarterly Report, 1984 Post-General Report and 1984 Year-End Report. Defendants contend that all such reports were mailed to the Commission in a timely manner, first-class postage, pre-paid.

To avoid the cost of litigating this matter, the parties now agree to entry of this court's judgment and consent to the issuance of this order, as evidenced by the signatures of their respective counsel affixed hereto. Defendants assure this court through their counsel that they will comply in all respects with the reporting requirements of the Federal Election Campaign Act of 1971, as amended.

Therefore, it is ORDERED, ADJUDGED AND DECREED as follows:

1. That defendants filed NRVF's 1984 July Quarterly Report with the Commission on September 17, 1984, approximately sixty-four (64) days late in violation of 2 U.S.C. § 434(a)(4)(A); and failed to file NRVF's 1984 October Quarterly Report, 1984 Post-General Report or 1984 Year-End Report with the Commission in violation of 2 U.S.C. § 434(a)(4)(A).

2. That defendants agree to file NRVF's 1984 October Quarterly Report, 1984 Year-End Report and 1984 Post-General Report with the Commission within thirty (30) days of the date of the filing of this consent order with the court;

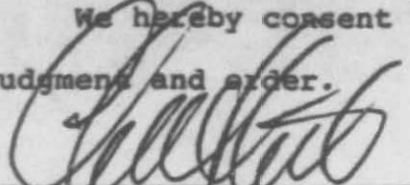
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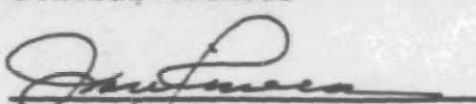
3. That the court imposes and defendants agree to pay, within thirty (30) days from the date of the filing of this consent order with the court, a civil penalty to the Treasurer of the United States in the amount of two thousand three hundred and fifty dollars (\$2,350.00), for which defendants shall be jointly and severally liable.

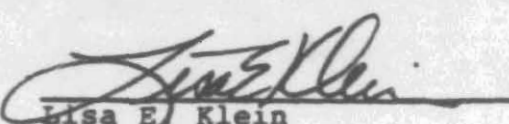
Dated: 6/23/86


C. V. B. I.  
United States District Judge 6/23/86

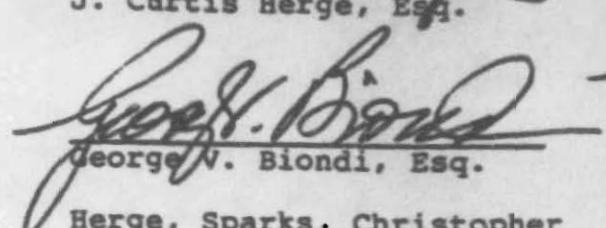
We hereby consent to the entry of the foregoing consent judgment and order.

  
Charles N. Steele  
General Counsel

  
Ivan Rivera  
Assistant General Counsel

  
Lisa E. Klein  
Attorney

  
J. Curtis Herge, Esq.

  
George V. Biondi, Esq.

Herge, Sparks, Christopher  
& Biondi  
8201 Greensboro Drive  
Suite 200  
McLean, Virginia 22102

FOR DEFENDANTS NEW REPUBLICAN  
VICTORY FUND AND  
CHARLES R. BLACK, JR.,  
AS TREASURER

FOR THE PLAINTIFF  
FEDERAL ELECTION COMMISSION  
999 E Street, N.W.  
Washington, D. C. 20463  
(202) 376-5690

93040930142



FEDERAL ELECTION COMMISSION

WASHINGTON, D C 20463

THIS IS THE END OF MUR # 1847

DATE FILMED \_\_\_\_\_ CAMERA NO. \_\_\_\_\_

CAMERAMAN \_\_\_\_\_

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