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THIS MUR (2799) IS A COMBINATION OF MURS 2525, 2613, 2648 AND 2799. FOR YOUR CONVIENCE, EACH MUR HAS BEEN SEPARATED BY MARKERS SO IT CAN BE VIEWED IN ITS ENTIRETY.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2799, 2525, 2613, 2648

DATE FILMED 3-1-93 CAMERA NO. 3

CAMERAMAN E.S.

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AR-86-30
NRN



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 11, 1986

MEMORANDUM:

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: ROBERT J. COSTA
ASSISTANT STAFF DIRECTOR
AUDIT DIVISION

SUBJECT: LIFE AMENDMENT POLITICAL ACTION COMMITTEE (A85-22)

On September 9, 1986, the Commission approved the Final Audit Report of the Audit Division on the aboved named Committee. Attached at Exhibits A through E are matters noted in the Final Audit Report which the Commission also voted to refer to your office for review and consideration.

Should you have any questions regarding these matters, please contact Tom Nurthen or Rick Halter at 376-5320.

Attachment as stated

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Misstatement of Financial Activity

Sections 434(b)(1)(2) and (4) of Title 2 of the United States Code require, in part, disclosure of the amount of cash on hand at the beginning of the reporting period and the total sum of all receipts and expenditures.

The Committee did not provide the Audit staff with records pertaining to its 1983 bank activity. In addition, the following accounts were determined to be active in 1984, but not available for review.

<u>Bank</u>	<u>Account Number</u>	<u>Missing Records</u>
Key Savings and Loan	(Not provided)	From the inception of the account to 12/31/84.
First American Bank	3-198-685	January 1, 1983 through July 2, 1984.

<u>Bank</u>	<u>Account Number</u>	<u>Missing Records</u>
First American Bank	0309 4001 355	From the inception of the account to July 11, 1984 and for the period December 12, 1984 to December 31, 1984.

Since the 1983 bank records were not available, the Audit staff was unable to perform a bank reconciliation for the calendar year 1983. A reconciliation of available bank records to disclosure reports covering the period January 1, 1984 to December 31, 1984 indicated that reported receipts were understated by \$7,732.22 and expenditures were understated by \$8,503.08.*

* It should be noted that the understatements in reported receipts and disbursements would increase by the amount of the reportable activity contained in the accounts for which no bank records were available.

The reason(s) for the understatement of receipts cannot be determined at this time due to the unavailability of bank records as described above. The Audit staff did identify the causes of the understatement in disbursements which were due to the improper reporting of a voided check, failure to report expenditures, and math discrepancies.

The Treasurer did not offer any response regarding the math discrepancies and reporting errors, but did state that he would obtain the missing bank records as soon as possible. Schedules detailing the reporting errors and math discrepancies were provided to the Committee at the exit conference.

In the interim report, the Audit staff recommended that the Committee, within 30 days of receipt of the report, amend its 1983 and 1984 disclosure reports to accurately depict its financial activity. Also, it was recommended that the Committee provide all 1983 bank records and all missing 1984 bank records as noted above. Finally, it was noted that additional recommendations may be forthcoming based on our review of the records received.

Recommendation

In accordance with the Commission-approved Materiality Thresholds, this matter is referable to the Office of General Counsel due to the Committee's failure to respond to the recommendation contained in the interim report.

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Missing Contributor Records

Sections 432(c)(1), (2), (3) and (d) of Title 2 of the United States Code state that the treasurer of a political committee shall keep an account of all contributions received by or on behalf of such political committees; the name and address of any person who makes any contribution in excess of \$50, together with the identification of any person who makes a contribution or contributions aggregating more than \$200 during a calendar year, together with the date and amount of any such contribution. The treasurer shall preserve all records required to be kept by this section and copies of all reports required to be filed by this subchapter for 3 years after the report is filed.

During the period January 1, 1983 through December 31, 1983, the Committee reported receiving \$76,432.75 in contributions from individuals. The documentation maintained by the Committee for this activity consisted of a journal listing the amount of receipts deposited by date and contributor envelopes which had the contributors name, address, amount of contribution and date received recorded on the face of each envelope.

The Audit staff's review of the Committee's 1983 contributor source documentation revealed that the total dollar amount of contributor envelopes was \$55,755.45 less than the total reported contributions from individuals.

Total reported contributions from individuals	\$76,432.75
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Total dollar value of contributor envelopes	<u>20,677.30</u>
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Difference	<u><u>\$55,755.45</u></u>
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For the period January 1, 1984 through December 31, 1984 the Committee reported \$126,649.97* in contributions from individuals. As in 1983, the Committee maintained a receipts

* This figure does not include a \$1,000 loan from an individual, repaid in the same reporting period.

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Exhibit B
Page 2 of 2

ledger and contributor envelopes. In addition, the Committee provided the Audit staff with a computer listing of 1984 contributions. The Audit staff's review of the Committee's 1984 contributor source documentation revealed that the contributor envelopes totaled \$34,048.27 less than the total reported contributions from individuals.

Total reported contributions from individuals	\$126,649.97
Total dollar value of contributor envelopes	<u>92,601.70</u>
Difference	<u>\$ 34,048.27</u>

Also, the Audit staff's examination of the Committee's computer listing revealed that it was \$35,544.27 less than the total reported contributions from individuals.

Total reported contributions from individuals	\$126,649.97
Total individual receipts per computer listing	<u>91,105.70</u>
Difference	<u>\$ 35,544.27</u>

On January 10, 1986, the Committee was provided a summary depicting the discrepancies between its available records and reported contributions from individuals. The Committee treasurer commented that the Committee changed offices and the records may have been lost during the move.

In the interim report, the Audit staff recommended that the Committee within 30 days of receipt of the report, obtain and submit copies of all receipts records for 1983 and 1984. Further, it was noted that additional recommendations may be forthcoming based on our review of the records received.

Recommendation

In accordance with the Commission-approved Materiality Thresholds, this matter is referable to the Office of General Counsel due to the Committee's failure to respond to the recommendation contained in the interim report.

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Missing Disbursement Records

Section 432(c)(5) of Title 2, of the United States Code, states that the treasurer of a political committee shall keep an account of the name and address of every person to whom any disbursement is made, the date, amount, and purpose of the disbursement, and the name of the candidate and the office sought by the candidate, if any, for whom the disbursement was made, including a receipt, invoice, or cancelled check for each disbursement in excess of \$200.

Section 432(d) of Title 2, of the United States Code states, in part, that the treasurer shall preserve all records required to be kept by this section and all reports required to be filed by this subchapter for 3 years after the report is filed.

For the period January 1, 1983 through December 31, 1983, the Committee reported \$79,303.69 in disbursements. The disbursement records made available by the Committee for this period consisted of copies of its disclosure reports and a cash disbursements journal. The information contained in the cash disbursement journal and the disclosure reports consisted of the name, address, date, amount, and purpose, with respect to each payee/disbursement. However, the Committee did not maintain a receipt or invoice from the payee or a cancelled check to the payee as required by 2 U.S.C. § 432(c)(5) for 130 disbursements, each in excess of \$200, totaling \$72,501.49.

The Treasurer commented that most receipts and invoices were discarded once paid. The Audit staff provided schedules which identified the disclosure report and page number for the disbursements noted above.

In the interim report, the Audit staff recommended that, within 30 days of receipt of the report, the Committee obtain and submit a receipt, invoice, or cancelled check for the 130 disbursements noted above.

Recommendation

In accordance with the Commission-approved Materiality Thresholds, this matter is referable to the Office of General Counsel due to the Committee's failure to respond to the recommendation contained in the interim report.

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Reporting of Disbursements

Section 434(b)(4) of Title 2, of the United States Code states, in part, that each report under this section shall disclose for the reporting period and the calendar year, the total amount of all disbursements.

Sections 434(b)(5)(A) and (C) of Title 2, of the United States Code state, in part, that each report under this section shall disclose the name and address of each person to whom an expenditure in an aggregate amount or value in excess of \$200 within a calendar year is made by the reporting committee, together with the date, amount and purpose of such operating expenditure. In addition, each report shall disclose the name and address of each affiliated committee and political committee to which a transfer is made by the reporting committee during the reporting period, together with the date and amount of such transfers.

Section 434(b)(6)(B)(iii) of Title 2, of the United States Code states, in part, that each report under this section shall disclose (for any other political committee), the name and address of each person who received any disbursement during the reporting period in an aggregate amount or value in excess of \$200 within the calendar year in connection with an independent expenditure by the reporting committee, together with the date, amount, and purpose of any such independent expenditure and a statement which indicates whether such independent expenditure is in support of, or in opposition to, a candidate, as well as the name and office sought by such candidate.

The Audit staff determined that the Committee failed to report 20 disbursements totaling \$8,650.70. In addition, the Committee failed to itemize 5 other disbursements totaling \$551.38 which aggregated in excess of \$200 during the calendar year. The Treasurer was provided a schedule of the above mentioned disbursements at the exit conference.

Further, it was noted that the Committee failed to report adequate disclosure information for 77 of 313 (25%) expenditures as follows:

The proper name and/or address of the payee was not disclosed for 67 expenditures;

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Exhibit D
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The correct amount was not disclosed for three expenditures;
One disbursement was disclosed, but not made; and

In the case of 13 independent expenditures, the name of the candidate supported or opposed was not disclosed.

The Treasurer stated that he was unaware of any disclosure problems but would make the necessary corrections. The Committee was provided with a schedule of the transactions which lacked the adequate disclosure information noted above.*

In the interim report, the Audit staff recommended that the Committee, within 30 days of receipt of the report, amend its reports to properly disclose the disbursements noted above.

Recommendation

In accordance with the Commission-approved Materiality Thresholds, this matter is referable to the Office of General Counsel due to the Committee's failure to respond to the recommendation contained in the interim report.

* Some of the transactions reviewed had multiple disclosure errors.

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Reporting of Debts and Obligations

Section 434(b)(8) of Title 2, of the United States Code states that each report shall disclose the amount and nature of outstanding debts and obligations owed by or to such political committee; and where such debts and obligations are settled for less than their reported amount or value, a statement as to the circumstances and conditions under which such debts or obligations were extinguished and the consideration therefor.

Section 104.11 of Title 11, Code of Federal Regulations states, in part, that debts and obligations owed by or to a political committee which remain outstanding shall be continuously reported until extinguished. In addition, a debt, obligation, or other promise to make an expenditure, the amount of which is \$500 or less, shall be reported as of the time payment is made or no later than 60 days after such obligation is incurred, whichever comes first. Any loan, debt or obligation, the amount of which is over \$500, shall be reported as of the time of the transaction.

During the review of the Committee's debts and obligations, it was noted that 4 debts, totaling \$15,199.28, were not reported by the Committee. With respect to one of the debts (U.S. Fullfillment, Inc.), the Committee has apparently reached a debt settlement agreement with the vendor. Although a statement of settlement has been filed with the Commission, neither the debt nor a subsequent partial payment has been disclosed on Schedule D (Debts and Obligations). In addition, the reported balances of 3 other debts at December 31, 1984 were understated \$601.85, while the reported balances of 2 other debts at December 31, 1984 were overstated \$1,694.38.

The Treasurer stated that the debt settlement transactions occurred prior to his tenure with the Committee. He further commented that he did not know why the transactions were not reported. With respect to the remaining disclosure problems, the Treasurer stated that they were due to oversights.

The Treasurer was given a schedule of the above mentioned debts at the exit conference.

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Exhibit E
Page 2 of 2

In the interim report, the Audit staff recommended that the Committee amend its reports to disclose the above debts, and any payments thereto, within 30 days of receipt of the report.

Recommendation

In accordance with the Commission-approved Materiality Thresholds, this matter is referable to the Office of General Counsel due to the Committee's failure to respond to the recommendation contained in the interim report.

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

FIRST GENERAL COUNSEL'S REPORT

MUR 2525

STAFF MEMBER: Susan Beard

SENSITIVE

17 AUG 18
A 9:29

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

RESPONDENTS: Life Amendent Political Action Committee and
Rick Woodrow, as treasurer

RELEVANT STATUTES: 2 U.S.C. § 432(c)
2 U.S.C. § 432(d)
2 U.S.C. § 434(b)(2)
2 U.S.C. § 434(b)(4)
2 U.S.C. § 434(b)(5)
2 U.S.C. § 434(b)(6)
2 U.S.C. § 434(b)(8)
11 C.F.R. § 102.9(c)
11 C.F.R. § 104.11
11 C.F.R. § 104.14(b)

INTERNAL REPORTS CHECKED: Audit Report and Disclosure Reports

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

Pursuant to 2 U.S.C. § 438(b), the Commission conducted an examination and audit of the Life Amendment Political Action Committee. After this examination and audit, the Commission voted to refer certain matters to the Office of the General Counsel.^{1/}

^{1/} The Commission approved the final audit report on September 9, 1986. When the referral was received by this Office, it was inadvertently misfiled. As soon as this oversight was discovered, this matter was assigned and this report was prepared.

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II. FACTUAL AND LEGAL ANALYSIS

The Life Amendment Political Action Committee ("Committee") registered with the Commission on November 7, 1977.^{2/} According to its Statement of Organization, Rick Woodrow, is currently the Committee's treasurer.^{3/}

1. Unavailable and Missing Bank Records

Pursuant to 11 C.F.R. § 104.14(b), bank records which pertain to reportable matters are to be kept for not less than three years and be available for audit, inspection or examination by the Commission.

During the audit, the Committee did not provide records concerning its 1983 bank activity. Also, records were not provided for part of 1984 on three bank accounts:

^{2/} This Committee has been involved in several MURs. Most recently, in MUR 2386, this Committee was referred to this Office by the Reports Analysis Division for failing to file five reports during the 1985-86 election cycle. In MUR 1595, a conciliation agreement was entered into regarding the Committee's failure to continuously report certain debts. The check sent by the Committee to cover the civil penalty was not paid by the Committee's bank due to insufficient funds. The Commission authorized a civil suit in this matter; however, the Committee paid the civil penalty before the suit was initiated. In MURs 996 and 961, it was alleged that the Committee and several other right to life organizations were affiliated. In MUR 996 the Commission took no action, while in MUR 961 the Commission found no probable cause to believe that a violation occurred. Finally, in MUR 960, a conciliation agreement was entered into concerning general public communications which expressly advocated the election of clearly identified persons that did not contain a notice of authorization or nonauthorization.

^{3/} Mr. Woodrow became the Committee's treasurer on April 11, 1984. From March 1, 1984, to April 10, 1984, the treasurer was Mr. Robert Sassone. From January 1, 1983, to March 1, 1984, the treasurer was Mr. Paul Brown. The audit covered the period from January 1, 1983, through December 31, 1984.

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<u>Bank</u>	<u>Account Number</u>	<u>Missing Records</u>
Key Savings & Loan ^{4/}	(Not provided)	From the inception of the account to 12/31/84.
First American Bank	3-198-685	1/1/84 to 7/2/84.
First American Bank	0309-4001-355	From the inception of the account to 7/11/84, and from 12/12/84 to 12/31/84.

These records were within the three year period specified in 11 C.F.R. §104.14(b) at the time of the audit.

Accordingly, this Office recommends that the Commission find reason to believe that the Life Amendment Political Action Committee and Rick Woodrow, as treasurer, violated 11 C.F.R. § 104.14(b).

2. Misstated Financial Activity

Pursuant to 2 U.S.C. §§ 434(b)(2) and (4), the total sum of all receipts and disbursements must be reported. See also 11 C.F.R. § 104.3(a)(2)(ix) and (b)(1)(x).

The examination and audit of the Committee determined that reported receipts and disbursements had been understated. The reconciliation of available bank records to disclosure reports covering the period from January 1, 1984, to December 31, 1984, indicated that reported receipts were understated by \$7,732.22, and

^{4/} Key Savings and Loan was also referred to as Keystone Federal Savings and Key Federal Savings and Loan in the audit work papers.

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reported disbursements were understated by \$8,503.08. Since there were missing bank records, the amounts of the understatements do not reflect all activity that may have occurred in these accounts. Thus, the amounts of the understatements would increase by the reportable activity contained in the three accounts for which no bank records were available. The reason(s) for the understatement of receipts could not be determined due to the unavailability of bank records. The audit determined that the understatement of disbursements was caused by improper reporting of a voided check, failure to report disbursements, and math discrepancies.

Accordingly, this Office recommends that the Commission find reason to believe that the Life Amendment Political Action Committee and Rick Woodrow, as treasurer, violated 2 U.S.C. § 434(b)(2) and (4).

3. Missing Contributor Records

Pursuant to 2 U.S.C. § 432(c)(1), (2), and (3), the treasurer of a political committee shall keep an account of all contributions received by or on behalf of the political committee, including the name and address of any person who makes any contribution in excess of \$50 and the date of contribution, and the identification of any person who makes a contribution or contributions aggregating more than \$200 during a calendar year along with the date(s) and amount(s) of the contribution. See also, 11 C.F.R. § 102.9(a). Pursuant to 2 U.S.C. § 432(d), the treasurer shall preserve these records for three years after the report is filed with the Commission. See 11 C.F.R. § 102.9(c).

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The examination and audit of the Committee determined that records for some of the reported contributions in 1983 and 1984 were missing. In 1983, the Committee reported \$76,432.75 in contributions from individuals; however, the documentation retained by the Committee covered only \$20,677.30 in individual contributions. Thus, \$55,755.45 in reported individual contributions were not accounted for by the records maintained by the Committee. In 1984, the Committee used two methods to record individual contributions, contributor envelopes and a computer listing. The Committee reported individual contributions of \$126,649.97. However, the contributor envelopes showed \$92,601.70 in individual contributions, while the computer listing showed \$91,105.70. Thus, \$34,048.27 was not accounted for by the contributor envelopes, and \$35,544.27 was not accounted for by the computer listing. The audit could not determine the extent to which the envelopes contained names not on the computer listing or vice versa because of incomplete and missing information on the envelopes.

Accordingly, this Office recommends that the Commission find reason to believe that the Life Amendment Political Action Committee and Rick Woodrow, as treasurer, violated 2 U.S.C. §§ 432(c)(1), (2), and (3), and 432(d).

4. Missing Disbursement Records

Pursuant to 2 U.S.C. § 432(c)(5), the treasurer of a political committee shall keep a record of "the name and address

of every person to whom a disbursement is made, the date, amount, and purpose of the disbursement, and the name of the candidate and the Office sought by the candidate, if any, for whom the disbursement was made, including a receipt, invoice, or cancelled check for each disbursement in excess of \$200." See also 11 C.F.R. § 102.9(b). Pursuant to 2 U.S.C. § 432(d), these records are to be preserved for three years. See 11 C.F.R. § 102.9(c).

The examination and audit of the Committee determined that the Committee did not maintain a receipt or invoice from the payee or a cancelled check to the payee for 129 disbursements over \$200 in 1983. These disbursements totaled \$72,201.49.^{5/} According to the audit, the Treasurer stated that most receipts and invoices were discarded after they were paid.

Accordingly, this Office recommends that the Commission find reason to believe that the Life Amendment Political Action Committee and Rick Woodrow, as treasurer, violated 2 U.S.C. §§ 432(c)(5) and 432(d).

5. Reporting of Disbursements

Pursuant to 2 U.S.C. § 434(b)(4), each report shall disclose for the reporting period and the calendar year, the total amount of all disbursements. Each report shall disclose the name and address of each person to whom an expenditure in an aggregate

^{5/} The referral refers to 130 disbursements totaling \$72,501.49; however, after a review of the work papers and consultation with the auditors, it was determined that the records are missing for 129 disbursements totaling \$72,201.49.

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amount or value in excess of \$200 within a calendar year is made by the reporting committee to meet an operating expense, together with the date, amount and purpose of the operating expenditure.

2 U.S.C. § 434(b)(5)(A). In addition, each report for an unauthorized political committee shall disclose, the name and address of each person who received any disbursement in an aggregate amount in excess of \$200 in connection with an independent expenditure by the reporting committee, together with the date, amount, and purpose of the independent expenditure, and a statement which indicates whether the independent expenditure is in support of, or in opposition to, a candidate, as well as the name and office sought by the candidate. 2 U.S.C. § 434(b)(6)(B)(iii).

The examination and audit of the Committee determined that it had not reported 20 disbursements totaling \$8,650.70. Also, the Committee failed to itemize five other disbursements totaling \$551.38 which aggregated in excess of \$200.

Also, the Committee failed to report adequate disclosure information for 77 of 313 expenditures. In 67 expenditures the proper name and/or address of the payee was not disclosed. In three expenditures the correct amount was not disclosed. In one case, a disbursement was disclosed, but it was not made. Also, the name of the candidate supported or opposed was not disclosed in 13 independent expenditures.

Accordingly, this Office recommends that the Commission find reason to believe that the Life Amendment Political Action

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Committee and Rick Woodrow, as treasurer, violated 2 U.S.C. § 434(b)(4), (5), and (6).

6. Reporting of Debts and Obligations

The Act provides that the amount and nature of outstanding debts and obligations owed by or to a political committee shall be disclosed, and if the debts and obligations are settled for less than their reported amounts, a statement as to the circumstances including the consideration under which the debts and obligations were extinguished shall be made. 2 U.S.C. § 434(b)(8). See also, 11 C.F.R. § 104.3(d). The regulations provide that debts and obligations owed by or to a political committee which remain outstanding should be continuously reported. 11 C.F.R. § 104.11(a). Also, any debt or obligation in excess of \$500, shall be reported as of the time of the transaction. 11 C.F.R. § 104.11(b).

The examination and audit of the Committee determined that it failed to report four debts, totaling \$15,199.28. In one of these four debts, the Committee has apparently reached a debt settlement with the vendor. The vendor was U.S. Fulfillment, Inc. A debt settlement statement was filed by the Committee on June 4, 1984; however, the Committee never supplied the Commission with the information needed to process the debt settlement. Neither the debt nor a subsequent partial payment has been disclosed on a Schedule D. In addition there were reporting problems in the balances of five other debts. On the 1984 Year End Report, the reported balances of three debts were

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understated by \$601.85, while reported balances of two other debts were overstated by \$1,694.38.

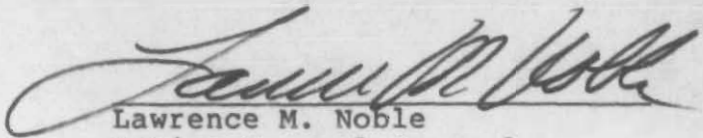
Accordingly, this Office recommends that the Commission find reason to believe that the Life Amendment Political Action Committee and Rick Woodrow, as treasurer, violated 2 U.S.C. § 434(b)(8) and 11 C.F.R. § 104.11.

III. RECOMMENDATIONS

1. Find reason to believe that the Life Amendment Political Action Committee and Rick Woodrow, as treasurer, violated:
 - a. 2 U.S.C. §§ 432(c)(1), (2), (3), and (5) and 432(d);
 - b. 2 U.S.C. § 434(b)(2), (4), (5), (6), and (8).
 - c. 11 C.F.R. § 104.14(b); and,
 - d. 11 C.F.R. § 104.11
2. Approved the attached letter, factual and legal analysis, and subpoena.

Date

8/17/87


Lawrence M. Noble
Acting General Counsel

Attachments:

1. Audit Referral
2. Proposed Letter, Factual and Legal Analysis, and Subpoena

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Life Amendent Political Action Committee and) MUR 2525
Rick Woodrow, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 20, 1987, the Commission decided by a vote of 6-0 to take the following actions in MUR 2525:

1. Find reason to believe that the Life Amendment Political Action Committee and Rick Woodrow, as treasurer, violated:
 - a. 2 U.S.C. §§ 432(c)(1), (2), (3), and (5) and 432(d);
 - b. 2 U.S.C. § 434(b)(2), (4), (5), (6), and (8).
 - c. 11 C.F.R. § 104.14(b); and,
 - d. 11 C.F.R. § 104.11
2. Approve the letter, factual and legal analysis, and subpoena, as recommended in the First General Counsel's report signed August 17, 1987.

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

Attest:

8-21-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Tues., 8-18-87, 9:29
Circulated on 48 hour tally basis: Tues., 8-18-87, 4:00
Deadline for vote: Thurs., 8-20-87, 4:00

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 10, 1987

Mr. Rick Woodrow, Treasurer
Life Amendment Political Action Committee
P.O. Box 5490
Everett, WA 98206

RE: MUR 2525
Life Amendment Political
Action Committee and Rick
Woodrow, as treasurer

Dear Mr. Woodrow:

On August 20, 1987, the Federal Election Commission found that there is reason to believe that the Life Amendment Political Action Committee ("Committee") and you, as treasurer, violated 2 U.S.C. §§ 432(c)(1), (2), (3), and (5), 432(d), and 434(b)(2), (4), (5), (6), and (8), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"), and 11 C.F.R. §§ 104.11 and 104.14(b), provisions of the Commission's regulations. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office, along with responses to the enclosed subpoena, within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that

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Letter to Rick Woodrow, Treasurer
Page 2

pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

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

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

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 Susan Beard, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Scott E. Thomas
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form

93040932604

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)
)
) MUR 2525
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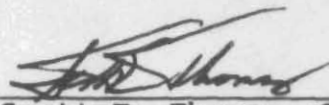
SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Rick Woodrow, Treasurer
Life Amendment Political Action Committee
P. O. Box 5490
Everett, WA 98206

Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment to this Order. Legible copies which, where applicable, show both sides of the documents, may be substituted for originals.

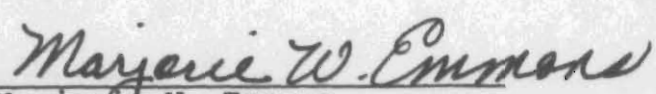
Such answers must be submitted under oath and must be forwarded to the Commission along with the requested documents within 15 days of your receipt of this Order and Subpoena.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on this 10th, day of September, 1987.



Scott E. Thomas, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments

Questions and Document Requests(5 pages)

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INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery requests shall refer to the time period from January 1, 1983, to December 31, 1984.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

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DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

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INTERROGATORIES AND REQUEST FOR DOCUMENTS

1. a. State each and every reason why, in detail, that the following documents were not available for audit, inspection or examination by the Commission and/or its representatives during the audit of Life Amendment Political Action Committee, Inc. for the period of January 1, 1983, to December 31, 1984:

(1) All bank records for the year 1983;

(2) Bank records on First American Bank, account number 3-198-685 from January 1, 1984, to July 2, 1984;

(3) Bank records on First American Bank, account number 0309-4001-355 from January 1, 1984, to July 11, 1984, and from December 12, 1984 to December 31, 1984;

(4) All bank records on account(s) at Key Savings and Loan Association also referred to as Key Federal Savings and Loan Association or Keystone Savings and Loan Association, from January 1, 1984, to December 31, 1984;

(5) All individual contributor records for 1983 and 1984;

(6) All cancelled checks for items listed as itemized disbursements on the Committee's Mid-Year 1983 Report;

(7) All cancelled checks for items listed as itemized disbursements on the Committee's Year End 1983 Report;

(8) All cancelled checks for items listed as itemized independent expenditures on the Committee's Year End 1983 report;

(9) The cancelled checks for two unreported disbursements to JNP Consultants, check numbers 2637 and 2638; and,

(10) One cancelled check for an unreported disbursement to Master Card, check number 2609.

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b.(1) Provide all documents listed above in 1.a. (1)-(10).

(2) If any or all such documents cannot be provided, explain, in detail, the reasons why they are not being provided.

2. In the interim audit report it was recommended that the Life Amendment Political Action Committee provide to the Commission, within 30 days of receipt of the report, the items listed below. State each and every reason why, in detail, that the Committee has not, to date, complied with this recommendation:

a. All Committee bank records for 1983;

b. Bank records on First American Bank, account number 3-198-685 from January 1, 1984, to July 2, 1984;

c. Bank records on First American Bank, account number 0309-4001-355 from January 1, 1984, to July 11, 1984, and from December 12, 1984, to December 31, 1984;

d. All bank records on account(s) at Key Savings and Loan Association, also referred to as Key Federal Savings and Loan Association or Keystone Savings and Loan Association, from January 1, 1984, to December 31, 1984;

e. All Committee receipt records for 1983 and 1984; and,

f. The receipts, invoices or cancelled checks for all itemized disbursements or itemized independent expenditures in excess of \$200 for 1983.

3. a. In the interim audit report, it was recommended that the Life Amendment Political Action Committee take the actions listed below within 30 days of receipt of the report. State each

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and every reason why the Committee has not, to date, complied with the recommendations:

(1) To amend its 1984 reports to properly disclose disbursements;

(2) To amend its 1984 reports to disclose all debts and any payments thereto; and,

(3) To amend its 1983 and 1984 disclosure reports to accurately depict financial activity.

b.(1) Provide the above amended reports as set forth in the interim audit report.

(2) If such amended reports cannot be provided, explain in detail the reasons why such amended reports are not being provided.

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Life Amendent Political Action MUR 2525
Committee and Rick Woodrow, as
treasurer

The Life Amendment Political Action Committee ("Committee") registered with the Commission on November 7, 1977. According to its Statement of Organization, Rick Woodrow, is currently the Committee's treasurer.^{1/}

1. Unavailable and Missing Bank Records

Pursuant to 11 C.F.R. § 104.14(b), bank records which pertain to reportable matters are to be kept for not less than three years and be available for audit, inspection or examination by the Commission.

During the audit, the Committee did not provide records concerning its 1983 bank activity. Also, records were not provided for part of 1984 on three bank account:

<u>Bank</u>	<u>Account Number</u>	<u>Missing Records</u>
Key Savings & Loan ^{2/}	(Not provided)	From the inception of the account to 12/31/84.
First American Bank	3-198-685	1/1/84 to 7/2/84.

^{1/} Mr. Woodrow became the Committee's treasurer on April 11, 1984. From March 1, 1984, to April 10, 1984, the treasurer was Mr. Robert Sassone. From January 1, 1983, to March 1, 1984, the treasurer was Mr. Paul Brown. The audit covered the period from January 1, 1983, through December 31, 1984.

^{2/} Key Savings and Loan has also been referred to as Keystone Savings and Loan and Key Federal Savings and Loan.

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<u>Bank</u>	<u>Account Number</u>	<u>Missing Records</u>
First American Bank	0309-4001-355	From the inception of the account to 7/11/84, and from 12/12/84 to 12/31/84.

These records were within the three year period specified in 11 C.F.R. § 104.14(b) at the time of the audit.

Accordingly, the Commission found reason to believe that the Life Amendment Political Action Committee and Rick Woodrow, as treasurer, violated 11 C.F.R. 104.14(b).

2. Misstated Financial Activity

Pursuant to 2 U.S.C. §§ 434(b)(2) and (4), the total sum of all receipts and disbursements must be reported. See also, 11 C.F.R. § 104.3(a)(2)(ix) and (b)(1)(x).

The examination and audit of the Committee determined that reported receipts and disbursements had been understated. The reconciliation of available bank records to disclosure reports covering the period from January 1, 1984, to December 31, 1984, indicated that reported receipts were understated by \$7,732.22, and reported disbursements were understated by \$8,503.08. Since there were missing bank records, the amounts of the understatements do not reflect the activity that may have occurred on these accounts. Thus, the amounts of the understatements would increase by the reportable activity contained in the three accounts for which no bank records were available. The reason(s) for the understatement of receipts could not be determined due to the unavailability of bank

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records. The audit determined that the understatement of disbursements was caused by improper reporting of a voided check, failure to report disbursements, and math discrepancies.

Accordingly, the Commission found reason to believe that the Life Amendment Political Action Committee and Rick Woodrow, as treasurer, violated 2 U.S.C. § 434(b)(2) and (4).

3. Missing Contributor Records

Pursuant to 2 U.S.C. § 432(c)(1), (2), and (3), the treasurer of a political committee shall keep an account of all contributions received by or on behalf of the political committee, including the name and address of any person who makes a contribution in excess of \$50 and the date of contribution, and the identification of any person who makes a contribution or contributions aggregating more than \$200 during a calendar year along with the date(s) and amount(s) of contribution. See also, 11 C.F.R. § 102.9(a). Pursuant to 2 U.S.C. § 432(d), the treasurer shall preserve these records for three years after the report is filed with the Commission.

The examination and audit of the Committee determined that records for some of the reported contributions in 1983 and 1984 were missing. In 1983, the Committee reported \$76,432.75 in contributions from individuals; however, the documentation retained by the Committee showed \$20,677.30 in individual contributions. Thus, \$55,755.45 in reported individual contributions were not accounted for by the records maintained by the Committee. In 1984, the Committee used two methods to record

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individual contributions, contributor envelopes and a computer listing. The Committee reported individual contributions of \$126,649.97. However, the contributor envelopes showed \$92,601.70 in individual contributions, while the computer listing showed \$91,105.70. Thus, \$34,048.27 was not accounted for by the contributor envelopes, and \$35,544.27 was not accounted for by the computer listing. The audit could not determine the extent to which the envelopes contained names not on the computer listing or vice versa because of incomplete and missing information on the envelopes.

According, the Commission found reason to believe that the Life Amendment Political Action Committee and Rick Woodrow, as treasurer violated 2 U.S.C. §§ 432(c)(1), (2), and (3) and 432(d).

4. Missing Disbursement Records

Pursuant to 2 U.S.C. § 432(c)(5), the treasurer of a political committee shall keep a record of "the name and address of every person to whom a disbursement is made, the date, amount, and purpose of the disbursement, and the name of the candidate and the Office sought by the candidate, if any, for whom the disbursement was made, including a receipt, invoice, or cancelled check for each disbursement in excess of \$200." See also, 11 C.F.R. § 102.9(b). Pursuant to 2 U.S.C. § 432(d), these records are to be preserved for three years.

The examination and audit of the Committee determined that the Committee did not maintain a receipt or invoice from the

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payee or a cancelled check to the payee for 129 disbursements over \$200 in 1983. These disbursements totaled \$72,201.49. According to the audit, the Treasurer stated that most receipts and invoices were discarded after they were paid.

Accordingly, the Commission found reason to believe that the Life Amendment Political Action Committee and Rick Woodrow, as treasurer, violated 2 U.S.C. §§ 432(c)(5) and (d).

5. Reporting of Disbursements

Pursuant to 2 U.S.C. § 434(b)(4), each report shall disclose for the reporting period and the calendar year, the total amount of all disbursements. Each report shall disclose the name and address of each person to whom an expenditure in an aggregate amount or value in excess of \$200 within a calendar year is made by the reporting committee to meet an operating expense, together with the date, amount and purpose of the operating expenditure. 2 U.S.C. § 434(b)(5)(A). In addition, each report for an unauthorized political committee shall disclose, the name and address of each person who received any disbursement in an aggregate amount in excess of \$200 in connection with an independent expenditure by the reporting committee, together with the date, amount, and purpose of the independent expenditure, and a statement which indicates whether the independent expenditure is in support of, or in opposition to, a candidate, as well as the name and office sought by the candidate. 2 U.S.C. § 434(b)(6)(B)(iii).

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The examination and audit of the Committee determined that it had not reported 20 disbursements totaling \$8,650.70. Also, the Committee failed to itemize 5 other disbursements totaling \$551.38 which aggregated in excess of \$200.

Also, the Committee failed to report adequate disclosure information for 77 of 313 expenditures. In 67 expenditures the proper name and/or address of the payee was not disclosed. In three expenditures the correct amount was not disclosed. In one case, a disbursement was disclosed, but it was not made. Also, the name of the candidate supported or opposed was not disclosed in 13 independent expenditures.

Accordingly, the Commission found reason to believe that the Life Amendment Political Action Committee and Rick Woodrow, as treasurer, violated 2 U.S.C. § 434(b)(5) and (b)(6).

6. Reporting of Debts and Obligations

The Act provides that the amount and nature of outstanding debts and obligations owed by or to a political committee shall be disclosed, and if the debts and obligations are settled for less than their reported amounts, a statement as to the circumstances including the consideration under which the debts and obligations were extinguished shall be made. 2 U.S.C. § 434(b)(8). See also, 11 C.F.R. § 104.3(d). The regulations provide that debts and obligations owed by or to a political committee which remain outstanding should be continuously reported. 11 C.F.R. § 104.11(a). Also, any debt or obligation in excess of \$500, shall be reported as of the time of the transaction. 11 C.F.R. § 104.11(b).

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The examination and audit of the Committee determined that it failed to report four debts, totaling \$15,199.28. In one of these four debts, the Committee has apparently reached a debt settlement with the vendor. The vendor was U.S. Fulfillment, Inc. A debt settlement statement was filed by the Committee on June 4, 1984; however, the Committee never supplied the Commission with the information needed to process the debt settlement. Neither the debt nor a subsequent partial payment has been disclosed on a Schedule D. In addition there were reporting problems in the balances of five other debts. On December 31, 1984, the reported balances of three debts were understated by \$601.85, while reported balances of two other debts were overstated by \$1,694.38.

Accordingly, the Commission found reason to believe that the Life Amendment Political Action Committee and Rick Woodrow, as treasurer, violated 2 U.S.C. § 434(b)(8) and 11 C.F.R. § 104.11.

93040932617



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

8 October 1987

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Rick Woodrow, Treasurer
Life Amendment Political Action Committee
P. O. Box 5490
Everett, WA 98206

RE: MUR 2525
Life Amendment Political
Action Committee and Rick
Woodrow, as treasurer

Dear Mr. Woodrow:

On September 10, 1987, you were notified that the Federal Election Commission had found reason to believe that the Life Amendment Political Action Committee and you, as treasurer, had violated 2 U.S.C. §§ 432(c)(1), (2), (3), and (5), 432(d), and 434(b)(2), (4), (5), (6), and (8) and 11 C.F.R. §§ 104.11 and 104.14(b). On that same date, you were sent a subpoena to produce documents and an order to submit written answers.

Please note that the answers and the requested documents were to be submitted to the Commission within 15 days of your receipt of the order and subpoena. To date, you have not responded to the order and subpoena. Unless we receive a response from you within 5 days, this Office will request the Commission to authorize the enforcement of the order and subpoena in United States District Court.

Should you have any questions, please contact Susan Beard, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

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LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.

P.O. BOX 5490

EVERETT, WA 98206-5490

Rick Woodrow
Executive Director

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
(206) 337-4100
87 OCT 16 PM 3:32

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
87 OCT 19 PM 4:49

October 13, 1987

Mr. Scott E. Thomas, Chairman
Federal Elections Commission
Washington, D.C. 20463

Dear Mr. Thomas:

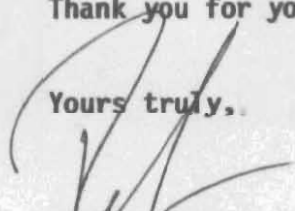
This letter is in response to your letter of September 10, 1987 regarding MUR 2525.

I am requesting a brief further delay in the filing of our response. I realize that we are already past the due date and apologize for this fact. As you may know, we were undergoing an FEC audit for the 1985-1986 election cycle and our time has been spent preparing for the audit as well as the time was consumed with the auditors during the actual audit.

With your permission, you will have our response in your office no later than October 23, 1987. In addition to answering all of the questions set forth in your letter, we will also attempt to demonstrate what steps we have taken and will be taking to bring the Life Amendment Political Action Committee into total compliance with your department. I realize that many mistakes have been made and it is our desire to take any and all necessary corrective action to prevent any future violations of the Federal Elections Code.

Thank you for your kind consideration in this matter.

Yours truly,


Rick Woodrow
Executive Director/Treasurer

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

23 October 1987

Rick Woodrow, Treasurer
Life Amendment Political Action Committee
P.O. Box 5490
Everett, WA 98206-5490

RE: MUR 2525
Life Amendment Political
Action Committee and
Rick Woodrow, as treasurer

Dear Mr. Woodrow:

This is in response to your letter dated October 13, 1987, which this Office received on October 19, requesting an extension until October 23, 1987, to respond to the subpoena to produce documents and the order to submit written answers. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by close of business on October 23, 1987.

If you have any questions, please contact Susan Beard, the attorney assigned to this matter at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

By: Lois G. Lerner
Associate General Counsel

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BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

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SENSITIVE
EXECUTIVE SESSION
NOV 10 1987

In the Matter of)
)
Life Amendment Political Action) MUR 2525
Committee and Rick Woodrow, as)
treasurer)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On August 20, 1987, the Commission found reason to believe that the Life Amendment Political Action Committee (the "Committee") and Rick Woodrow, as treasurer, violated 2 U.S.C. §§ 432(c)(1), (2), (3), and (5), 432(d), and 434(b)(2), (4), (5), (6), and (8), and 11 C.F.R. §§ 104.11 and 104.14(b). On September 10, 1987, a subpoena to produce documents and an order to submit written answers were sent to the Committee. After no response was received by this Office, a follow-up letter was sent on October 8, 1987. On October 16, 1987, the Commission received a letter from the Committee stating that the response would be received by the Commission "no later than October 23, 1987." To date this Office has not received a response.

The investigation in this matter cannot proceed without a response from the Committee. According to 2 U.S.C. § 437d(b), the Commission may petition the United States District Court in case of a refusal to obey a subpoena or order issued by the Commission. Based on the foregoing, the General Counsel recommends that the Commission authorize this Office to institute a civil action seeking subpoena enforcement.

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II. RECOMMENDATIONS

1. Authorize the General Counsel to institute a civil action pursuant to 2 U.S.C. § 437d(b), seeking enforcement of the subpoena and order against Life Amendment Political Action Committee and Rick Woodrow, as treasurer.
2. Approve the attached letter.

Date

10/30/87


Lawrence M. Noble
General Counsel

Attachments

1. Letter from Respondent
2. Proposed letter

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Life Amendment Political Action) MUR 2525
Committee and Rick Woodrow, as)
treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the
Federal Election Commission executive session of November 10,
1987, do hereby certify that the Commission decided by a vote
of 6-0 to take the following actions in MUR 2525:

1. Authorize the General Counsel to institute
a civil action pursuant to 2 U.S.C.
§ 437d(b), seeking enforcement of the
of the subpoena and order against Life
Amendment Political Action Committee and
Rick Woodrow, as treasurer.
2. Approve the letter attached to the General
Counsel's report dated October 30, 1987.

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

Attest:

11-10-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

93040932623



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

18 November 1987

Mr. Rick Woodrow, Treasurer
Life Amendment Political Action Committee
P. O. Box 5490
Everett, WA 98206-5490

RE: MUR 2525
Life Amendment Political
Action Committee and Rick
Woodrow, as treasurer

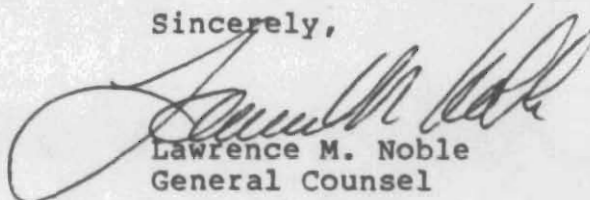
Dear Mr. Woodrow:

You were previously notified that on August 20, 1987, the Federal Election Commission found reason to believe that the Life Amendment Political Action Committee and you, as treasurer, violated 2 U.S.C. §§ 432(c)(1), (2), (3), and (5), 432(d), and 434(b)(2), (4), (5), (6), and (8), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"), and 11 C.F.R. §§ 104.11 and 104.14(b), provisions of the Commission's regulations, in connection with the above-captioned matter. A subpoena to produce documents and an order to submit written answers were sent to you on September 10, 1987.

Since a response to the subpoena has not been received, the Commission has authorized the General Counsel to institute a civil action for subpoena enforcement in the United States District Court.

Should you have any questions, or should you wish to comply with the order and subpoena prior to suit, please contact Ivan Rivera, Assistant General Counsel, at (202) 376-8200, within five days of your receipt of this letter.

Sincerely,


Lawrence M. Noble
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARY'S OFFICE

88 APR 15 PM 12:01

SENSITIVE

April 15, 1988

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
General Counsel

BY: Lois G. Lerner *LL*
Associate General Counsel

SUBJECT: Subpoena Enforcement Litigation on MUR 2525

On November 10, 1987, the Commission authorized the General Counsel to institute a civil action pursuant to 2 U.S.C. § 437d(b), seeking enforcement of a subpoena and order against Life Amendment Political Action Committee (the "Committee") and Rick Woodrow, as treasurer. The subpoena and order sought the production of records that were unavailable during the 1983-84 election cycle audit of the Committee or an explanation of why these documents were unavailable.

In response to the litigation, this Office received a response to the subpoena and order on March 22, 1988. The Committee did not produce any documents; however, the response admitted that the records were unavailable and gave reasons for their unavailability. After reviewing the response, this Office has determined that it has obtained an adequate response to the subpoena and order. As a result, this Office is dismissing the subpoena enforcement litigation.

93040932625

BEFORE THE FEDERAL ELECTION COMMISSION

88 JUN -1 PM 12: 22

In the Matter of)

Life Amendment Political Action)
Committee, Inc. and Rick Woodrow)
as treasurer)

MUR 2525

GENERAL COUNSEL'S REPORT

SENSITIVE

The Office of the General Counsel is prepared to close the investigation in this matter as to all Respondents, based on the assessment of the information presently available.

Date

6/1/88


Lawrence M. Noble
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
SECRET

88 JUN 15 AM 10:48

SENSITIVE

June 15, 1988

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
General Counsel

SUBJECT: MUR 2525

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 findings of probable cause to believe was mailed on June 15, 1988. 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

Staff Person: Susan Beard

93040932627



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 15, 1988

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Rick Woodrow, Treasurer
Life Amendment Political Action
Committee, Inc.
P.O. Box 5490
Everett, WA 98206

RE: MUR 2525
Life Amendment Political
Action Committee, Inc.
and Rick Woodrow, as
treasurer

Dear Mr. Woodrow:

- Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on August 20, 1987, found reason to believe that Life Amendment Political Action Committee, Inc. and you, as treasurer, violated 2 U.S.C. §§ 432(c)(1), (2), (3), and (5), 432(d), and 434(b)(2), (4), (5), (6), and (8), and 11 C.F.R. §§ 104.11 and 104.14(b), 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.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 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 the 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 whether there is probable cause to believe a violation has occurred.

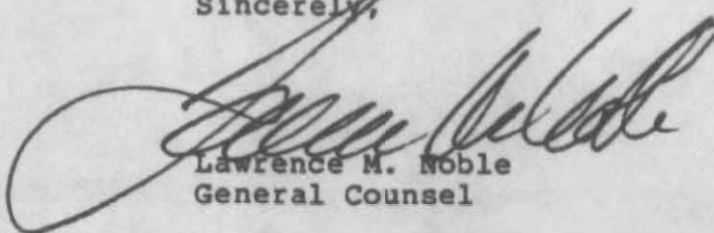
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Rick Woodrow, Treasurer
Page 2

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extension of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

Should you have any questions, please contact Susan Beard, the attorney assigned to handle this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

93040932629

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Life Amendment Political) MUR 2525
Action Committee, Inc.)
and Rick Woodrow, as treasurer)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

Pursuant to 2 U.S.C. § 438(b), the Commission conducted an audit of the Life Amendment Political Action Committee, Inc. (the "Committee"). This matter pertains to the failure of the Committee to maintain bank records, the misstatement of financial activity by the Committee, the failure of the Committee to maintain contributor records, the failure of the Committee to maintain disbursement records, the failure of the Committee to properly report disbursements, and the failure of the Committee to properly report debts and obligations. The audit covered the period from January 1, 1983, to December 31, 1984.^{1/}

On August 20, 1987, the Commission found reason to believe that the Life Amendment Political Action Committee, Inc. and Rick Woodrow, as treasurer, violated 2 U.S.C. §§ 432(c)(1), (2), (3) and (5), 432(d), and 434(b)(2), (4), (5), (6), and (8), and 11 C.F.R. §§ 104.11 and 104.14(b), and an investigation was conducted.

^{1/} Mr. Woodrow became the Committee's treasurer on April 11, 1984. From March 1, 1984, to April 10, 1984, the treasurer was Robert Sassone. From January 1, 1983, to March 1, 1984, the treasurer was Paul Brown.

II. ANALYSIS

A. Unavailable and Missing Bank Records

Pursuant to 11 C.F.R. § 104.14(b), bank records which pertain to reportable matters are to be kept for not less than three years and be available for audit, inspection or examination by the Commission.

According to the audit, the Committee failed to provide the auditors with all of its bank records for the audit period. Specifically, the Committee did not provide any bank records for 1983; it did not provide the bank records for an account at Key Savings & Loan from the account's inception to December 31, 1984; it did not provide the bank records on account number 3-198-685 at First American Bank from January 1, 1984, to July 2, 1984; and it did not provide the bank records on account number 0309-4001-355 at First American Bank from the inception of the account to July 11, 1984, and from December 12, 1984, to December 31, 1984. The Committee acknowledged it did not have the missing bank records in its possession.^{2/}

Therefore, the Office of the General Counsel recommends that the Commission find probable cause to believe that the Life Amendment Political Action Committee, Inc. and Rick Woodrow, as treasurer, violated 11 C.F.R. § 104.14(b).

^{2/} In a telephone conversation with a representative of this Office, Mr. Woodrow stated that he did not know the banks at which the Committee had accounts during 1983. The Committee did give some details concerning the Key Savings and Loan account in its response. The Committee stated that the "account was only open a few weeks. A deposit was made of \$500 but returned from the bank within the same month after denial of a Master Card application and was a 'wash-out' in our account. Apparently this was an error in reporting on our part and I [the treasurer] have been unable to locate the records concerning this."

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B. Misstated Financial Activity

Sections 434(b)(2) and (4) require that the total amount of all receipts and disbursements must be reported. See also, 11 C.F.R. § 104.3(a)(2)(ix) and (b)(1)(x).

The audit determined that the Committee misstated its financial activity because its reported receipts and disbursements were understated. The reconciliation of the available bank records to disclosure reports covering the period from January 1, 1984, to December 31, 1984, showed that reported receipts were understated by \$7,732.22, and reported disbursements were understated by \$8,503.08. Because there were missing bank records, the amounts of the understatements do not reflect all activity that may have occurred in these accounts. Thus, the amounts of the understatements would increase by the reportable activity contained in the three accounts for which no bank records were available. The understatement of disbursements was caused by improper reporting of a voided check, failure to report disbursements, and math discrepancies. The Committee did not address this issue in its response.

Therefore, the Office of the General Counsel recommends that the Commission find probable cause to believe that the Life Amendment Political Action Committee, Inc. and Rick Woodrow, as treasurer, violated 2 U.S.C. §§ 434(b)(2) and (4).

C. Missing Contributor Records

Pursuant to 2 U.S.C. §§ 432(c)(1), (2), and (3), the treasurer of a political committee shall keep an account of all

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contributions received by or on behalf of the political committee, including the name and address of any person who makes any contribution in excess of \$50 and the date of the contribution, and the identification of any person who makes a contribution or contributions aggregating more than \$200 during a calendar year along with the date(s) and amount(s) of the contribution(s). See also, 11 C.F.R. § 102.9(a). Pursuant to 2 U.S.C. § 432(d), the treasurer shall preserve these records for three years after the report is filed with the Commission. See, 11 C.F.R. § 102.9(c).

The audit also found that some of the Committee's contributor records for 1983 and 1984 were missing. In 1983, the Committee reported \$76,432.75 in contributions from individuals; however, the documentation retained by the Committee covered only \$20,677.30 in individual contributions. Thus, \$55,755.45 in reported individual contributions were not accounted for by the records maintained by the Committee. In 1984, the Committee used two methods to record individual contributions, contributor envelopes and a computer listing. The Committee reported individual contributions of \$126,649.97. However, the contributor envelopes showed \$92,601.70 in individual contributions, while the computer listing showed \$91,105.70. Thus, \$34,048.27 was not accounted for by the contributor envelopes, and \$35,544.27 was not accounted for by the computer listing. Moreover, the audit could not determine the extent to which the envelopes contained names not on the computer listing

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or vice versa because of incomplete and missing information on the envelopes. In its response, the Committee acknowledged that it had provided the Commission with all of the individual contribution records in its possession. The Committee also noted that an employee who was terminated in early 1985, destroyed an unknown number of records.

Therefore, the Office of the General Counsel recommends that the Commission find probable cause to believe that the Life Amendment Political Action Committee, Inc. and Rick Woodrow, as treasurer, violated 2 U.S.C. §§ 432(c)(1), (2), and (3) and 432(d).

D. Missing Disbursement Records

Pursuant to 2 U.S.C. § 432(c)(5), the treasurer of a political committee shall keep a record of "the name and address of every person to whom any disbursement is made, the date, amount, and purpose of the disbursement, and the name of the candidate and the Office sought by the candidate, if any, for whom the disbursement was made, including a receipt, invoice, or cancelled check for each disbursement in excess of \$200." See also, 11 C.F.R. § 102.9(b). Pursuant to 2 U.S.C. § 432(d), these records are to be preserved for three years.

The audit determined that the Committee did not maintain all of its disbursement records. The Committee did not maintain a receipt or invoice from the payee or a cancelled check to the payee for 129 disbursements over \$200 in 1983. These disbursements totaled \$72,201.49. The audit noted that the

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treasurer stated that most receipts and invoices were discarded after they were paid. In the Committee's response, the Committee stated that it "had no access to financial records for 1983." As a result, it appears that the required disbursement records were not maintained.

Therefore, the Office of the General Counsel recommends that the Commission find probable cause to believe that the Life Amendment Political Action Committee, Inc. and Rick Woodrow, as treasurer, violated 2 U.S.C. §§ 432(c)(5) and 432(d).

E. Reporting of Disbursements

Pursuant to 2 U.S.C. § 434(b)(4), each report shall disclose for the reporting period and the calendar year, the total amount of all disbursements. Each report shall disclose the name and address of each person to whom an expenditure in an aggregate amount or value in excess of \$200 within a calendar year is made by the reporting committee to meet an operating expenditure, together with the date, amount and purpose of the operating expenditure. 2 U.S.C. § 434(b)(5)(A). In addition, each report for an unauthorized political committee shall disclose, the name and address of each person who received any disbursement in an aggregate amount in excess of \$200 in connection with an independent expenditure by the reporting committee, together with the date, amount, and purpose of the independent expenditure, and a statement which indicates whether the independent expenditure is in support of, or in opposition to, a candidate, as well as the name and office sought by the candidate. 2 U.S.C. § 434(b)(6)(B)(iii).

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The audit found that the Committee did not properly report all of its disbursements. The Committee did not report 20 disbursements totalling \$8,650.70. Also, the Committee failed to itemize five other disbursements totalling \$551.38 which aggregated in excess of \$200. Also, the Committee failed to report adequate disclosure information for 77 of 313 disbursements. In 67 disbursements the proper name and/or address of the payee was not disclosed. In three disbursements the correct amount was not disclosed. In one case, a disbursement was disclosed, but it was not made. Also, the name of the candidate supported or opposed was not disclosed in 13 independent expenditures. The Committee's response did not address these findings.

Therefore, the Office of the General Counsel recommends that the Commission find probable cause to believe that the Life Amendment Political Action Committee, Inc. and Rick Woodrow, as treasurer, violated 2 U.S.C. §§ 434(b)(4), (5), and (6).

F. Reporting of Debts and Obligations

Section 2 U.S.C. § 434(b)(8) provides that the amount and nature of outstanding debts and obligations owed by or to a political committee shall be disclosed, and if the debts and obligations are settled for less than their reported amounts, a statement as to the circumstances including the consideration under which the debts and obligations were extinguished shall be made. See also, 11 C.F.R. § 104.3(d). Pursuant to 11 C.F.R.

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§ 104.11(a), debts and obligations owed by or to a political committee must be continuously reported. Also, pursuant to 11 C.F.R. § 104.11(b), any debt or obligation in excess of \$500, shall be reported as of the time of the transaction.

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The audit found that the Committee did not properly report its debts and obligations. The Committee failed to report four debts, totalling \$15,199.28. In one of these four debts, the Committee has apparently reached a debt settlement with the vendor. The vendor was U.S. Fulfillment, Inc. A debt settlement was filed by the Committee on June 4, 1984; however, the Committee never supplied the Commission with the information needed to process the debt settlement. Neither the debt settlement nor a subsequent partial payment has been disclosed on a Schedule D. In addition, there were reporting problems in the balances of five other debts. On the 1984 Year End Report, the reported balances of three debts were understated by \$601.85, while reporting balances on two other debts were overstated by \$1,694.38. The Committee's response did not address these findings.

Therefore, the Office of the General Counsel recommends that the Commission find probable cause to believe that the Life Amendment Political Action Committee, Inc. and Rick Woodrow, as treasurer, violated 2 U.S.C. § 434(b)(8) and 11 C.F.R. § 104.11.

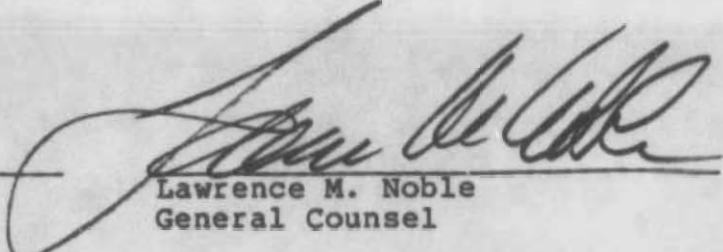
III. GENERAL COUNSEL'S RECOMMENDATION

Find probable cause to believe that the Life Amendment Political Action Committee, Inc. and Rick Woodrow, as treasurer,

violated 2 U.S.C. §§ 432(c)(1), (2), (3) and (5), 432(d), and
434(b)(2), (4), (5), (6), and (8), and 11 C.F.R. §§ 104.11 and
104.14(b).

Date

6/13/88


Lawrence M. Noble
General Counsel

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END OF MUR 2525

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BEGINNING OF MUR 2613



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 6, 1988

RECEIVED
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OFFICE OF GENERAL COUNSEL
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MEMORANDUM

TO: Lawrence M. Noble
General Counsel

Through: John C. Surina
Staff Director

From: Robert J. Costa
Assistant Staff Director
Audit Division

Subject: Life Amendment Political Action
Committee, Inc. Matters Referrable
To The Office of General Counsel

On May 4, 1988, the Commission voted to refer the attached matters to your office for appropriate action. Should you have any questions or require access to Audit workpapers, please contact Dexter Curry or Marty Favin at 376-5320.

Attachments as stated

Exhibit A Failure to maintain records

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Failure to Maintain Records

Background

The Audit staff suspended the fieldwork portion of the audit on September 24, 1987 because the Committee did not provide adequate records to test contributions, disbursements, debts and obligations, and reported financial activity. The Treasurer stated at the exit conference that all of the missing records mentioned above were in Oregon and would arrive at his office during the last week of September 1987. He added that he would forward them to the auditors immediately. The records were never forwarded to the auditors and the Treasurer did not contact the auditors to offer an explanation.

After several unsuccessful attempts to contact the Committee by telephone, the Audit staff sent the Committee a letter requesting that the records be forwarded within 30 days of receipt of the letter. The letter was received by the Committee on January 12, 1988. The Committee did not respond.

The Audit staff also attempted to contact the Committee by telephone on February 4, 1988, and received a recorded message stating that the Committee's telephone had been disconnected.

1. Bank Records

Section 104.14(b) (1) of Title 11 of the Code of Federal Regulations requires political committees to maintain records, including bank records, with respect to the matters required to be reported, in sufficient detail that the necessary information and data from which the filed reports and statements may be verified and checked for accuracy and completeness.

The Committee provided the Audit staff with bank records for nine checking accounts maintained at five depositories at various times throughout 1985 and 1986.

The bank statements, together with deposit slips, cancelled checks (original or microfilm - front and back) and related debit and credit memos for the following accounts were not included:

- (a) United States National Bank of Oregon #025-0203-114 (January and February 1986)
- (b) Oregon Bank #30157285 (1/1/85 - 6/12/86 and 9/16/86 - 12/12/86)
- (c) Oregon Bank #12245226 (6/21/86 - 8/11/86)

- (d) Pioneer Bank #05-00038658 (cancelled checks only 11/21/86 - 12/31/86)
- (e) Pioneer Bank #08-00023194 (1/1/85 - 9/18/86) (cancelled checks 1/1/85 - 11/21/86)
- (f) First Virginia Bank #0861-5942 (January, April and September 1985; March 1986 1/, and May 1 through December 31, 1986)
- (g) First Virginia Bank #0711-0499 (4/1/85 - 12/31/86)
- (h) First Interstate Bank #023-0-23375-7 (8/7/85 - 12/31/86)

2. Contributor Records

Sections 432(c)(1), (2), (3) and (d) of Title 2 of the United States Code state that the treasurer of a political committee shall keep an account of all contributions received by or on behalf of such political committees; the name and address of any person who makes any contribution in excess of \$50, together with the date and amount of such contribution by any person; and, the identification of any person who makes a contribution or contributions aggregating more than \$200 during a calendar year, together with the date and amount of any such contribution. The treasurer shall preserve all records required to be kept by this section and copies of all reports required to be filed by this subchapter for 3 years after the report is filed.

During the period January 1, 1985 through December 31, 1985, the Committee reported \$74,562.85 in contributions. The Committee's documentation consisted of a computerized listing of all contributions received July 1, 1985 through December 31, 1985, which totaled \$13,526.17, a difference of \$61,036.68; 81.9% of the records were missing.

During the period January 1, 1986, through December 31, 1986, the Committee reported \$69,119.28 in contributions. The computerized listing provided by the Committee contained \$63,260.38 in contributions. This resulted in a difference of \$5,858.90; 8.5% of the records were missing.

1/ March 1986 bank statement with cancelled checks was received via mail on October 13, 1987.

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3. Debts and Obligations

Political committees are required by 11 C.F.R. § 104.14(b) (1) to maintain records, with respect to the matters required to be reported, in sufficient detail that the necessary information and data from which the filed reports and statements may be verified and checked for accuracy and completeness.

During the period of the audit, the Committee reported \$81,622.10 in debts and obligations (of which \$15,700 was loans owed by the committee). The auditors were provided with 22 invoices, totaling \$15,706.89 or 19.2% of the reported debts and obligations. Further, the Committee had no documentation for the \$15,700 in loans reported.

Recommendation

The Audit staff recommends that this matter be referred to the Office of General Counsel.

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MUR 2613



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

A87-29

June 14, 1988

MEMORANDUM

TO: FRED EILAND
CHIEF, PRESS OFFICE

FROM: ROBERT J. COSTA *RK*
ASSISTANT STAFF DIRECTOR
AUDIT DIVISION

SUBJECT: PUBLIC ISSUANCE OF FINAL AUDIT REPORT -
LIFE AMENDMENT POLITICAL ACTION

Attached please find a copy of the final audit report of Life Amendment Political Action which was approved by the Commission on May 4, 1988.

Informational copies of the report have been received by all parties involved and the report may be released to the public.

Attachment as stated

cc: ✓ Office of General Counsel
Office of Public Disclosure
Reports Analysis Division
FEC Library

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**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

**REPORT OF THE AUDIT DIVISION
ON THE
LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.****I. Background****A. Overview**

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This report is based on an audit of the Life Amendment Political Action Committee, Inc. ("the Committee"), undertaken by the Audit Division of the Federal Election Commission in accordance with the Commission's audit policy to determine whether there has been compliance with the provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The audit was conducted pursuant to Section 438(b) of Title 2 of the United States Code which states, in part, that the Commission may conduct audits and field investigations of any political committee required to file a report under Section 434 of this title. Prior to conducting any audit under this subsection, the Commission shall perform an internal review of reports filed by selected committees to determine if the reports filed by a particular committee meet the threshold requirements for substantial compliance with the Act.

The Committee registered with the Federal Election Commission on November 7, 1977. The Committee maintains its headquarters in Everett, Washington.

The audit covered the period January 1, 1985 through December 31, 1986. The Committee reported a cash balance on January 1, 1985 of \$1,892.06; total receipts for the period of \$143,682.13; total disbursements for the period of \$141,658.55; and a cash balance on December 31, 1986 of \$3,915.64.

This audit report is based on documents and workpapers which support each of its factual statements. They form part of the record upon which the Commission based its decisions on the matters in the report and were available to the Commissioners and appropriate staff for review.

B. Key Personnel

The Treasurer of the Committee during the period covered by the audit was Mr. Rick Woodrow.

C. Scope

The audit included such tests as verification of total reported receipts and disbursements and individual transactions; review of required supporting documentation; analysis of Committee debts and obligations; and such other audit procedures as deemed necessary under the circumstances. However, because the Committee provided incomplete bank records for 1985 and 1986, the Audit staff was unable to verify total reported receipts and disbursements. Further, incomplete contribution, disbursement, and debts and obligations records severely hampered the reviews necessary to determine whether the Committee's 1985 and 1986 reported activity was in substantial compliance with the Act.

II. Audit Finding and Recommendation

A matter noted during the audit was referred to the Commission's Office of General Counsel.

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Washington, D.C. 20463

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FIRST GENERAL COUNSEL'S REPORT

MUR # 2613
Staff Member Susan Beard

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

RESPONDENTS: Life Amendment Political Action Committee, Inc.
and Rick Woodrow, as treasurer

RELEVANT STATUTES: 2 U.S.C. § 432(c)
2 U.S.C. § 432(d)
11 C.F.R. § 102.9(a)
11 C.F.R. § 102.9(c)
11 C.F.R. § 104.14(b)

EXECUTIVE SESSION
JUN 14 1988

INTERNAL REPORTS
CHECKED: Audit Report and Previous MURs

FEDERAL AGENCIES
CHECKED: None

I. GENERATION OF MATTER

Pursuant to 2 U.S.C. § 438(b), the Commission conducted an examination and audit of the Life Amendment Political Action Committee, Inc. (the "Committee"). After this examination and audit, the Commission voted to refer certain matters to the Office of the General Counsel.

II. FACTUAL AND LEGAL ANALYSIS

The Committee registered with the Commission on November 7, 1977.^{1/} According to its Statement of Organization, Rick Woodrow

^{1/} The Committee has been involved in several MURs. Most recently in MUR 2525, the Committee was referred to this Office because of violations found during the audit of the Committee's records for the 1983-84 election cycle. The violations included unavailable and missing bank records, misstated financial activity, missing contributor records, missing disbursement (Footnote continued)

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is currently the Committee's treasurer. Mr. Woodrow became the Committee's treasurer on April 11, 1984. At the exit conference for the 1985-86 audit, Mr. Woodrow informed the auditors that all of the missing records discussed below were in Oregon, and that the records were scheduled to arrive at his office during the last week of September 1987. Mr. Woodrow stated that he would forward the records to the Commission immediately upon their receipt. The records were never received by the Commission, and Mr. Woodrow has not contacted the auditors to offer an explanation.

A. Missing Bank Records

Pursuant to 11 C.F.R. § 104.14(b), bank records which pertain to reportable matters are to be kept for not less than three years and be available for audit, inspection or examination

(Footnote continued)

records, reporting of disbursements, and reporting of debts and obligations. The Commission had authorized litigation in order to enforce the subpoena and order that were issued by the Commission; however, the litigation was dismissed after a response was received. The Committee was also involved in MUR 2386. The Committee was referred for failing to file five reports during the 1985-86 election cycle. The Commission has authorized civil suit in this MUR. In MUR 1595, a conciliation agreement was entered into regarding the Committee's failure to continuously report certain debts. The check sent by the Committee to cover the civil penalty was not paid by the Committee's bank due to insufficient funds. The Commission authorized a civil suit in this matter; however, the Committee paid the civil penalty before the suit was initiated. In MURs 996 and 961, it was alleged that the Committee and several other right to life organizations were affiliated. In MUR 996 the Commission took no action, while in MUR 961 the Commission found no probable cause to believe that a violation occurred. Finally, in MUR 960, a conciliation agreement was entered into concerning general public communications which expressly advocated the election of clearly identified persons that did not contain a notice of authorization or nonauthorization.

(Footnote continued)

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by the Commission. During the audit, the Committee did not provide bank statements, deposit slips, cancelled checks and related debit and credit memos for the following accounts:

<u>Bank</u>	<u>Account Number</u>	<u>Missing Records</u>
United States National Bank of Oregon	025-0203-114	1/86 and 2/86
Oregon Bank	30157285	1/1/85 - 6/12/86 and 9/10/86 - 12/12/86
Oregon Bank	12245226	6/21/86 - 8/11/86
Pioneer Bank	05-00038658	11/21/86 - 12/31/86 ^{2/}
Pioneer Bank	08-00023194	1/1/85 - 11/21/86 ^{3/}
First Virginia Bank	0861-5942	1/85; 4/85; 9/85; 3/86; and 5/1/86 - 12/31/86 ^{4/}
First Virginia Bank	0711-0499	4/1/85 - 12/31/86
First Interstate Bank	023-0-23375-7	8/7/85 - 12/31/86

During the 1983-84 election cycle audit, the Committee was unable to provide any of its bank records for 1983 and records for

(Footnote continued)

The treasurer of the Committee, Rick Woodrow, is also the treasurer of CORK. CORK and Rick Woodrow, as treasurer, are Respondents in MUR 2533. On April 5, 1988, the Commission authorized filing a civil suit since no response to the proposed post-probable cause conciliation agreement was received.

^{2/} The only records that have not been received by the auditors are cancelled checks.

^{3/} The auditors have not received any of the records from January 1, 1985, to September 18, 1986. From September 19, 1986, to November 21, 1986, the only records that have not been received are cancelled checks.

^{4/} The auditors received the records for March 1986 on October 13, 1987, by mail.

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three bank accounts during 1984. The failure to produce the required bank records was discussed with the Committee's treasurer, Rick Woodrow, at the exit conference of the 1983-84 election cycle audit on January 16, 1986. Since the Committee had a similar problem with missing bank records during the audit of its records for the 1983-84 election cycle, it appears that the failure to provide the auditors with the requested documents and the failure to maintain the documents was knowing and willful.

Accordingly, this Office recommends that the Commission find reason to believe that the Life Amendment Political Action Committee, Inc. and Rick Woodrow, as treasurer, knowingly and willfully violated 11 C.F.R. § 104.14(b).

B. Missing Contributor Records

Pursuant to 2 U.S.C. § 432(c)(1), (2), and (3), the treasurer of a political committee shall keep an account of all contributions received by or on behalf of the political committee, including the name and address of any person who makes any contribution in excess of \$50 and the date of contribution, and the identification of any person who makes a contribution or contributions aggregating more than \$200 during a calendar year along with the date(s) and amount(s) of the contribution. See also, 11 C.F.R. § 102.9(a). Pursuant to 2 U.S.C. § 432(d), the treasurer shall preserve these records for three years after the report is filed with the Commission. See 11 C.F.R. § 102.9(c).

The examination and audit of the Committee determined that records for some of the reported contributions in 1985 and 1986

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were missing. In 1985, the Committee reported \$74,562.85 in contributions; however, the documentation consisted of computerized listing of all contributions received between July 1, 1985, and December 31, 1985. The contributions on the computerized list totalled \$13,526.17; thus \$61,036.68 or 81.9% of the contributor records for 1985 are missing. In 1986, the Committee reported \$69,119.28 in contributions; however, the computerized listing provided by the Committee only totalled \$63,260.38. Thus in 1986, \$5,858.90 or 8.5% of the contributor records are missing.

During the 1983-84 election cycle audit there also was missing contributor records. In 1983, the Committee reported \$76,432.75 in contributions from individuals; however, \$55,755.45 in reported individual contributions were not accounted for by the records maintained by the Committee. In 1984, the Committee reported individual contributions of \$126,649.97; however, approximately \$34,000 was not accounted for by the records maintained by the Committee. The failure to maintain the necessary records was discussed with Rick Woodrow, the Committee's treasurer at the exit conference of the 1983-84 audit. Since the Committee had a similar problem with missing contributor records for the 1983-84 election cycle, it appears that the failure to maintain these records for the 1985-86 election cycle is knowing and willful.

Accordingly, this Office recommends that the Commission find reason to believe that the Life Amendment Political Action Committee, Inc. and Rick Woodrow, as treasurer, knowingly and willfully violated 2 U.S.C. §§ 432(c)(1), (2), and (3), and 432(d).

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C. Missing Records on Debts and Obligations

Pursuant to 11 C.F.R. § 104.14(b), political committees are required to maintain records with respect to matters that must be reported. The records shall provide in sufficient detail the necessary information from which the filed reports may be verified, explained, clarified, and checked for accuracy and completeness.

During the 1985-86 election cycle, the Committee reported \$81,622.10 in debts and obligations, which in part, consisted of \$15,700 in loans owed by the Committee. The Committee provided the auditors with 22 invoices totalling \$15,706.89 or 19.2% of the reported debts and obligations. The Committee provided no documentation on the \$15,700 in loans which the Committee reported it owed. The Committee has not been involved with a violation of maintaining records of debts and obligations in the past. However, the Committee and its treasurer were aware of the requirements of 11 C.F.R. § 104.14(b), since this regulation was also involved in the Committee's 1983-84 election cycle audit. Therefore, it appears that the failure to maintain the records of debts and obligations is knowing and willful.

Accordingly, this Office recommends that the Commission find reason to believe that the Life Amendment Political Action Committee, Inc. and Rick Woodrow, as treasurer, knowingly and willfully violated 11 C.F.R. § 104.14(b).

III. RECOMMENDATIONS

1. Find reason to believe that the Life Amendment Political Action Committee, Inc. and Rick Woodrow, as treasurer, knowingly and willfully violated 2 U.S.C. §§ 432(c)(1), (2), and (3), 432(d) and 11 C.F.R. § 104.14(b).

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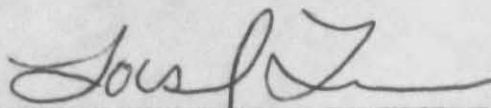
2. Approve the attached letter, factual and legal analysis and subpoena.

Lawrence M. Noble
General Counsel

Date

6/6/88

BY:



Lois G. Lerner
Associate General Counsel

Attachments:

1. Audit Referral
2. Proposed letter, Factual and Legal Analysis, and Subpoena

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS / KAREN E. TRACH *MT*
COMMISSION SECRETARY

DATE: JUNE 9, 1988

SUBJECT: OBJECTION TO: MUR 2613 - FIRST GENERAL COUNSEL'S
REPORT SIGNED JUNE 6, 1988

The above-captioned document was circulated to the
Commission on TUESDAY, JUNE 7, 1988, at 4:00 p.m..

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

Commissioner Aikens	_____
Commissioner Elliott	<u> X </u>
Commissioner Josefiak	_____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Thomas	_____

This matter will be placed on the meeting agenda
for JUNE 14, 1988.

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

23040932655

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Life Amendment Political Action) MUR 2613
Committee, Inc. and Rick)
Woodrow, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of June 14, 1988, do hereby certify that the Commission decided by a vote of 5-1 to take the following actions in MUR 2613:

1. Find reason to believe that the Life Amendment Political Action Committee, Inc. and Rick Woodrow, as treasurer, knowingly and willfully violated 2 U.S.C. §§ 432(c)(1), (2), and (3), 432(d) and 11 C.F.R. § 104.14(b).
2. Approve the letter, factual and legal analysis and subpoena attached to the General Counsel's report dated June 6, 1988.

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

Attest:

6-15-88

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

93040932656



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 17, 1988

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Mr. Rick Woodrow, Treasurer
Life Amendment Political Action
Committee, Inc.
P.O. Box 5490
Everett, WA 98206

RE: MUR 2613
Life Amendment Political
Action Committee, Inc. and
Rick Woodrow, as treasurer

Dear Mr. Woodrow:

On June 14, 1988, the Federal Election Commission found that there is reason to believe that the Life Amendment Political Action Committee, Inc. ("Committee") and you, as treasurer, knowingly and willfully violated 2 U.S.C. §§ 432(c)(1), (2), and (3) and 432(d), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act") and 11 C.F.R. § 104.14(b). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office, along with answers to the enclosed order to submit written answers, within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

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If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

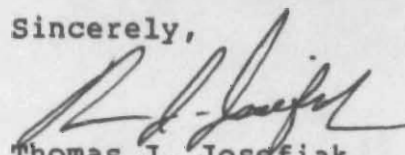
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Susan Beard, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Thomas J. Josefiak
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Order to Submit Written Answers

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BEFORE THE FEDERAL ELECTION COMMISSION

To the matter of

MUR 2613

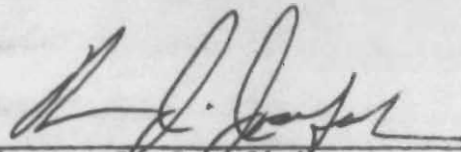
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Rick Woodrow, as treasurer
Life Amendment Political Action
Committee, Inc.
P.O. Box 5490
Everett, WA 98206

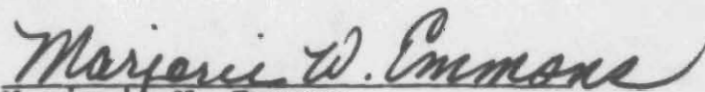
Pursuant to 2 U.S.C. § 437d(a)(1), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order.

Such answers must be submitted under oath and must be forwarded to the Commission within 15 days of your receipt of this Order.

WITNESSE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this *20th* day of *June* 1988.


Thomas J. Josefiak
Chairman
Federal Election Commission

ATTEST:


Marjorie W. Emmons
Secretary to the Commission

Attachment
4 pages

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONSE TO: Life Amendment Petition, Action: MPR 2613
Committee, Inc. and Rick Woodrow,
as treasurer.

The Committee registered with the Commission on November 1, 1977. According to its Statement of Organization, Rick Woodrow is currently the Committee's treasurer. Mr. Woodrow became the Committee's treasurer on April 11, 1984. At the exit conference for the 1985-86 audit, Mr. Woodrow informed the auditors that all of the missing records discussed below were in Oregon, and that the records were scheduled to arrive at his office during the last week of September 1987. Mr. Woodrow stated that he would forward the records to the Commission immediately upon their receipt. The records were never received by the Commission, and Mr. Woodrow has not contacted the auditors to offer an explanation.

A. Missing Bank Records

Pursuant to 11 C.F.R. § 104.14(b), bank records which pertain to reportable matters are to be kept for not less than three years and be available for audit, inspection or examination by the Commission. During the audit, the Committee did not provide bank statements, deposit slips, cancelled checks and related debit and credit memos for the following accounts:

<u>Bank</u>	<u>Account Number</u>	<u>Missing Records</u>
United States National Bank of Oregon	025-0203-114	1/86 and 2/86
Oregon Bank	30157285	1/1/85 - 6/12/86 and 9/10/86 - 12/12/86

Bank	Account Number	Living Records
First Virginia Bank	12245224	6/21/85 - 8/12/86
Pioneer Bank	05480033658	11/21/86 - 12/31/86 ¹
Pioneer Bank	09400073124	1/1/85 - 11/21/86 ²
First Virginia Bank	0861-5942	1/85, 4/85, 9/85, 3/86, and 5/1/86 - 12/31/86 ³
First Virginia Bank	0717-0499	4/1/85 - 12/31/86
First Interstate Bank	023-0-23375-7	8/7/85 - 12/31/86

During the 1983-84 election cycle audit, the Committee was unable to provide any of its bank records for 1983 and records for three bank accounts during 1984. The failure to produce the required bank records was discussed with the Committee's treasurer, Rick Woodrow, at the exit conference of the 1983-84 election cycle held on January 16, 1986. Since the Committee had a similar problem with missing bank records during the audit of its records for the 1983-84 election cycle, it appears that the failure to provide the auditors with the requested documents and the failure to maintain the documents was knowing and willful.

Accordingly, there is reason to believe that the Life Amendment Political Action Committee, Inc. and Rick Woodrow,

1/ The only records that have not been received by the auditors are cancelled checks.

2/ The auditors have not received any of the records from January 1, 1985, to September 18, 1986. From September 19, 1986, to November 21, 1986, the only records that have not been received are cancelled checks.

3/ The auditors received the records for March 1986 on October 13, 1987, by mail.

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the treasurer knowingly and willfully violated 11 C.F.R. § 102.9(d).

B. Missing Contributor Records

Pursuant to 2 U.S.C. § 432(c)(1), (2), and (3), the treasurer of a political committee shall keep an account of all contributions received by or on behalf of the political committee, including the name and address of any person who makes any contribution in excess of \$50 and the date of contribution, and the identification of any person who makes a contribution or contributions aggregating more than \$200 during a calendar year along with the date(s) and amount(s) of the contribution. See also, 11 C.F.R. § 102.9(a). Pursuant to 2 U.S.C. § 432(d), the treasurer shall preserve these records for three years after the report is filed with the Commission. See 11 C.F.R. § 102.9(c).

The examination and audit of the Committee determined that records for some of the reported contributions in 1985 and 1986 were missing. In 1985, the Committee reported \$74,562.85 in contributions; however, the documentation consisted of computerized listing of all contributions received between July 1, 1985, and December 31, 1985. The contributions on the computerized list totalled \$13,526.17; thus \$61,036.68 or 81.9% of the contributor records for 1985 are missing. In 1986, the Committee reported \$69,119.28 in contributions; however, the computerized listing provided by the Committee only totalled \$63,260.38. Thus in 1986, \$5,858.90 or 8.5% of the contributor records are missing.

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During the 1983-84 election cycle audit there also was missing contributor records. In 1983, the Committee reported \$7,427.73 in contributions from individuals; however, \$55,755.49 in reported individual contributions were not accounted for by the records maintained by the Committee. In 1984, the Committee reported individual contributions of \$126,649.97; however, approximately \$14,000 was not accounted for by the records maintained by the Committee. The failure to maintain the necessary records was discussed with Rick Woodrow, the Committee's treasurer at the exit conference of the 1983-84 audit. Since the Committee had a similar problem with missing contributor records for the 1983-84 election cycle, it appears that the failure to maintain these records for the 1985-86 election cycle is knowing and willful.

Accordingly, there is reason to believe that the Life Executive Political Action Committee, Inc., and Rick Woodrow, as treasurer, knowingly and willfully violated 2 U.S.C. §§ 432(c) (1), (2), and (3), and 432(d).

C. Missing Records on Debts and Obligations

Pursuant to 11 C.F.R. § 104.14(b), political committees are required to maintain records with respect to matters that must be reported. The records shall provide in sufficient detail the necessary information from which the filed reports may be verified, explained, clarified, and checked for accuracy and completeness.

During the 1985-86 election cycle, the Committee reported \$81,622.10 in debts and obligations, which in part, consisted of \$15,700 in loans owed by the Committee. The Committee provided the

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officer with 22 invoices totalling \$15,786.39 as 12-18 of the
reported debts and obligations. The Committee provided no
documentation on the \$15,786 in loans which the Committee reported
it owed. The Committee has not been involved with a violation of
maintaining records of debts and obligations in the past. However,
the Committee and its treasurer were aware of the requirements of
11 C.F.R. § 104.14(b), since this regulation was also involved in
the Committee's 1983-84 election cycle audit. Therefore it
appears that the failure to maintain the records of debts and
obligations is knowing and willful.

Accordingly, there is reason to believe that the Life
Amendment Political Action Committee, Inc. and Rick Woodrow, as
treasurer, knowingly and willfully violated 11 C.F.R. § 104.14(b).

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INSTRUCTIONS

In answering these interrogatories and requests for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to which, under to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery requests shall refer to the time period from January 1, 1985, to the present.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

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DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, firm, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, maps, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

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INTERROGATORIES

1. State each and every reason why, in detail, the following documents were not available for audit, inspection or examination by the Commission and/or its representatives during the audit of the Life Amendment Political Action Committee, Inc. for the period of January 1, 1985, to December 31, 1986:

a. Bank statements, deposit slips, cancelled checks, and related debit and credit memos for account number 025-0203-114 at the United States National Bank of Oregon for January and February of 1986;

b. Bank statements, deposit slips, cancelled checks, and related debit and credit memos for account number 30157285 at the Oregon Bank for January 1, 1985, to June 12, 1986, and September 10, 1986, to December 12, 1986;

c. Bank statements, deposit slips, cancelled checks, and related debit and credit memos for account 12215226 at the Oregon Bank for June 21, 1986, to August 11, 1986;

d. Cancelled checks for account number 05-00078658 at Pioneer Bank for November 21, 1986, to December 31, 1986;

e. Bank statements, deposit slips, cancelled checks, and related debit and credit memos for account number 08-00023194 at Pioneer Bank for January 1, 1985, to September 18, 1986;

f. Cancelled checks for account number 08-00023194 at Pioneer Bank for September 19, 1986, to November 21, 1986;

g. Bank statements, deposit slips, cancelled checks, and related debit and credit memos for account number 0861-5942 at First Virginia Bank for January, April and September 1985, March 1986, and May 1 through December 31, 1986;

h. Bank statements, deposit slips, cancelled checks, and related debit and credit memos for account number 0711-0499 at First Virginia Bank for April 1, 1985, to December 31, 1986;

i. Bank statements, deposit slips, cancelled checks, and related debit and credit memos for account number 023-0-23375-7 at First Interstate Bank for August 7, 1985, to December 31, 1986;

j. All individual contributor records for 1985 and 1986; and,

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John Woodrow
Page 5

1. Invoices and documentation for all debts and
obligations owed by the Life Amendment Political Action
Committee.

2. For each document that was mentioned in Interrogatory 1
state the following:

a. whether the document is still unavailable.

b. if so, state each and every reason, in detail, why the
document is still unavailable.

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BEFORE THE FEDERAL ELECTION COMMISSION

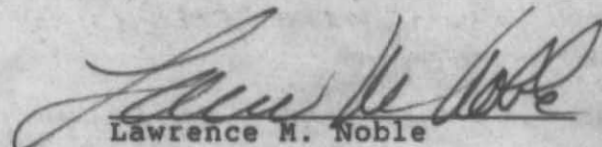
In the Matter of)	
)	
Life Amendment Political Action)	MUR 2613
Committee and Rick Woodrow,)	
as treasurer)	

SENSITIVE

GENERAL COUNSEL'S REPORT

The Office of the General Counsel is prepared to close the investigation in this matter as to Life Amendment Political Action Committee, Inc., and Rick Woodrow, as treasurer, based on the assessment of the information presently available.

8/29/88
Date _____


Lawrence M. Noble
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION

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SENSITIVE

September 8, 1988

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
General Counsel *LMN*

SUBJECT: MUR 2613 - Life Amendment Political Action Committee and
Rick Woodrow, as 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 respondents of the General Counsel's intent to recommend to the Commission findings of probable cause to believe were mailed on September 8, 1988. Following receipt of the respondents' reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Brief
2. Letter to respondents

Staff Person: Susan Beard

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 8, 1988

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Rick Woodrow, Treasurer
Life Amendment Political
Action Committee, Inc.
P. O. Box 5490
Everett, WA 98206

RE: MUR 2613
Life Amendment Political
Action Committee, Inc.,
and Rick Woodrow, as
treasurer

Dear Mr. Woodrow:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on June 14, 1988, the Federal Election Commission found reason to believe that Life Amendment Political Action Committee, Inc., ("Committee") and you, as treasurer, knowingly and willfully violated 2 U.S.C. §§ 432(c)(1), (2), and (3), and 432(d), and 11 C.F.R. § 104.14(b), 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 violations have occurred.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should

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Rick Woodrow, Treasurer
Page 2

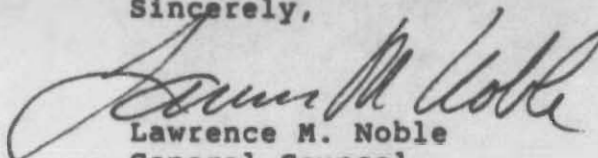
also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Susan Beard, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Lawrence M. Noble
General Counsel

Enclosure
Brief

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Life Amendment Political Action) MUR 2613
Committee, Inc. and Rick Woodrow,)
as treasurer)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

Pursuant to 2 U.S.C. § 438(b), the Commission conducted an audit of the Life Amendment Political Action Committee, Inc. (the "Committee"). The audit covered the period from January 1, 1985, to December 31, 1986. The fieldwork was suspended due to lack of records, and the exit conference was held on September 24, 1987. This matter pertains to the failure of the Committee to maintain bank records, contributor records, and debt and obligation records.

On June 14, 1988, the Commission found reason to believe that the Life Amendment Political Action Committee, Inc. and Rick Woodrow, as treasurer, knowingly and willfully violated 2 U.S.C. §§ 432(c)(1), (2), and (3), 432(d) and 11 C.F.R. § 104.14(b).

II. LEGAL ANALYSIS

A. Missing Bank Records

Pursuant to 11 C.F.R. § 104.14(b), bank records which pertain to reportable matters are to be kept for not less than three years and be available for audit, inspection or examination by the Commission. During the audit, the Committee did not provide bank statements, deposit slips, cancelled checks, and related debit and credit memos for the following accounts:

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<u>Bank</u>	<u>Account Number</u>	<u>Missing Records</u>
United States National Bank of Oregon	025-0203-114	1/86 and 2/86
Oregon Bank	30157285	1/1/85 - 6/12/86 and 9/16/86 - 12/12/86
Oregon Bank	12245226	6/21/86 - 8/11/86
Pioneer Bank	05-00038658	11/21/86 - 12/31/86 ¹
Pioneer Bank	08-00023194	1/1/85 - 11/21/86 ²
First Virginia Bank	0861-5942	1/85; 4/85; 9/85; 3/86; and 5/1/86 - 12/31/86 ³
First Virginia Bank	0711-0499	4/1/85 - 12/31/86
First Interstate Bank	023-0-23375-7	8/7/85 - 12/31/86

Pursuant to 11 C.F.R. § 104.14(b), the above documents should have been available for audit, inspection, and examination by the Commission, since the audit was conducted within the three year period.

B. Missing Contributor Records

Pursuant to 2 U.S.C. § 432(c)(1), (2), and (3), the treasurer of a political committee shall keep an account of all contributions received by or on behalf of the political committee, including the name and address of any person who makes any contribution in excess of \$50 and the date of the contribution, and the identification of any person who makes a

1. The only records that have not been received by the auditors are cancelled checks.
2. The auditors have not received any of the records from January 1, 1985, to September 18, 1986. From September 19, 1986, to November 21, 1986, the only records that have not been received are cancelled checks.
3. The auditors received the records for March 1986 on October 13, 1987, by mail.

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contribution or contributions aggregating more than \$200 during a calendar year along with the date(s) and amount(s) of the contribution(s). See, 11 C.F.R. § 102.9(a). Pursuant to 2 U.S.C. § 432(d), the treasurer shall preserve these records for three years after the report is filed with the Commission. See, 11 C.F.R. § 102.9(c).

According to the audit, the Committee failed to provide records for some of its reported contributions in 1985 and 1986. In 1985, the Committee reported \$74,562.85 in contributions; however, the documentation consisted of a computerized listing of all contributions received between July 1, 1985, and December 31, 1985. The contributions on the computerized list totalled \$13,526.17; thus \$61,036.68 or 81.9% of the contributor records for 1985, are missing. In 1986, the Committee reported \$69,119.28 in contributions; however, the computerized listing provided by the Committee only totalled \$63,260.38. Thus, in 1986, \$5,858.90 or 8.5% of the contributor records are missing.

Sections 432(c)(1), (2), and (3), and 432(d) of Title 2 were violated by the Committee since the Committee failed to maintain its contributor records for the required three year period.

C. Missing Records on Debts and Obligations

Pursuant to 11 C.F.R. § 104.14(b), political committees are required to maintain records with respect to matters that must be reported. The records shall provide in sufficient detail the necessary information from which the filed reports may be verified, explained, clarified, and checked for accuracy and completeness.

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During the 1985-86 election cycle, the Committee reported \$81,622.10 in debts and obligations, which in part, consisted of \$15,700 in loans owed by the Committee. According to the auditors, the Committee produced 22 invoices, at the time of the audit, totalling \$15,706.89 or 19.2% of the reported debts and obligations. The Committee provided no documentation on the \$15,700 in loans which the Committee reported it owed. The Committee violated 11 C.F.R. § 104.14(b), by failing to maintain adequate records with regard to the Committee's debts and obligations.

D. Knowing and Willful Violations

The legislative history of the 1976 amendments to the Act discuss knowing and willful violations of the Act. Knowing and willful violations are "violations as to which the Commission has clear and convincing proof that the acts were committed with a knowledge of all the relevant facts and a recognition that the action is prohibited by law." H.R. Rep. No. 94-917, 94th Cong. 2d Sess. 4 (1976). Congressman Hays during the House debates on the Conference Report stated that the phrase "knowing and willful" referred "to actions taken with full knowledge of all of the facts and a recognition that the action is prohibited by law." 122 Cong. Rec. H3778 (daily ed. May 3, 1976)(remarks of Congressman Hays).

The knowing and willful standard has also been discussed by the courts. In Federal Election Commission v. John A. Dramesi for Congress Committee, 640 F.Sup. 985 (D.N.J. 1986), the court noted that the knowing and willful standard requires knowledge

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that one is violating a law.

In the instant case the Committee has a history of violations similar to the ones at issue in this matter. The Committee was also audited for the 1979-80, 1981-82, and 1983-84 election cycles. The exit conference for the 1983-84 audit was held on January 16, 1986, and Mr. Woodrow, the Committee's treasurer, was present at the exit conference. At that exit conference employees of the Commission discussed several violations of the Act and the Commission's regulations, including 2 U.S.C. §§ 432(c)(1), (2), (3), and 432(d), and 11 C.F.R. § 104.14(b). These provisions are the provisions that are at issue in this matter.

At the exit conference for the 1983-84 audit, the Committee's failure to produce all of its bank records was discussed. The problem the Committee had with regard to its failure to produce bank records during the 1983-84 audit period is similar to the situation in the 1985-86 audit period. The Commission's representatives informed Mr. Woodrow at the exit conference that the Commission may request the 1985 bank statements to verify that all information was being reported by the Committee. Representatives of the Commission discussed with Mr. Woodrow the requirement that bank records be maintained and available for Commission review for three years. Thus, Mr. Woodrow and the Committee knew the requirements of 11 C.F.R. § 104.14(b). As a result, the Committee's failure to provide the auditors with the requested documents and the failure to maintain the documents was a knowing and willful violation of 11 C.F.R. § 104.14(b).

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The Committee's missing contributor records were also discussed at the 1983-84 audit exit conference. The Committee's failure to maintain contributor records for 1983-84 is similar to the Committee's failure to maintain these records for 1985-86. In 1983, the Committee reported \$76,432.75 in contributions from individuals; however, \$55,755.45 in reported individual contributions were not accounted for by the records maintained by the Committee. In 1984, the Committee reported individual contributions of \$126,649.97; however, approximately \$34,000 was not accounted for by the records maintained by the Committee. The requirements of 2 U.S.C. §§ 432(c)(1), (2), (3), and 432(d) were discussed with Rick Woodrow, the Committee's treasurer. Thus, Mr. Woodrow and the Committee knew the requirements of these provisions of the Act. As a result, the Committee's failure to maintain its contributor records for the 1985-86 election cycle is a knowing and willful violation of 2 U.S.C. §§ 432(c)(1), (2), (3), and 432(d).

The Committee has not been involved with a violation of maintaining records of debts and obligations in the past. However, the Committee and its treasurer were aware of the requirements of 11 C.F.R. § 104.14(b), since the regulation was also involved in the Committee's 1983-84 election cycle audit. Therefore, the failure to maintain records of the Committee's debts and obligations is a knowing and willful violation of 11 C.F.R. § 104.14(b).

Accordingly, the Office of the General Counsel recommends that the Commission find probable cause to believe that the Life

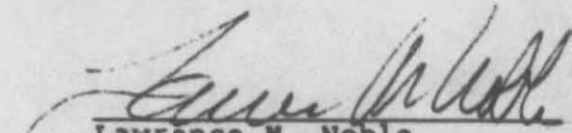
Amendment Political Action Committee, Inc. and Rick Woodrow, as treasurer, knowingly and willfully violated 2 U.S.C.

§§ 432(c)(1), (2), (3), and 432(d) and 11 C.F.R. § 104.14(b).

III. GENERAL COUNSEL'S RECOMMENDATIONS

Find probable cause to believe that the Life Amendment Political Action Committee, Inc. and Rick Woodrow, as treasurer, knowingly and willfully violated 2 U.S.C. §§ 432(c)(1), (2), and (3), and 432(d) and 11 C.F.R. § 104.14(b).

9/6/88
Date


Lawrence M. Noble
General Counsel

93040932679

OGC#764
Life Amendment Political Action Committee, Inc.

"The Nation's Oldest Pro-Life Political Action Committee"

P.O. Box 5490 Everett, WA 98206

(206) 853-8983 XXXXXXXX 353-7933

(206) 672-9415

October 19, 1988

Susan Beard
Office of General Counsel
Federal Elections Commission
Washington, D.C. 20463

RE: MUR 2613

Dear Susan;

The letter of September 8, 1988 from Mr. Noble regarding the above MUR has just been brought to my attention. I'll do my best to respond to the General Counsel's Brief.

- 93040360280
- A. MISSING BANK RECORDS: At the time of the audit, I explained to your field staff that a former employee confiscated with a great deal of our records, particularly the records compiled during the time our office was in Virginia. We had moved our main office to Oregon but had left a small office in the Washington, D.C. area with one employee. When it became necessary to terminate this employee due to lack of production and unauthorized issuing of LAPAC's checks the situation got somewhat ugly and in the process a large amount of our records disappeared. Immediately following the field audit I requested copies of our records from the banks and have not been successful in obtaining them. In addition, it is apparent that some records were lost in our move from Oregon to Washington.
- B. MISSING CONTRIBUTOR RECORDS: As the Counsel's brief states, a great deal of our contributor records from 1985 are missing. In late 1985 our office was broken into and our computer was among the things stolen. In the computer were all of our contributor records for 1985. We did the best we could in reconstructing the donations but are well aware that we lost not only a great deal of the records regarding donations, but also we lost a large number of contributor names and addresses.

The Brief also shows that 8.5% of the contributor records for 1986 are missing. All I can say is that a great deal of LAPAC's efforts in 1986 were done by volunteers and obviously some major mistakes were made.

- C. MISSING RECORDS ON DEBTS AND OBLIGATIONS: Again here we are faced with the problems concerning the employee who was terminated. A very large portion of our Accounts Payable files had been left in Virginia to be shipped at a later date once we knew for sure that we would keep our office on the West Coast.
- D. KNOWING AND WILLFUL VIOLATIONS: I would dispute the findings that these violations were willful. Realizing the tremendous power that Congress has granted to the FEC and being well aware that the Commission can demand a full audit whenever they feel it is necessary, it would be extremely stupid to willfully violate the code. There is no question that in terms of strict adherence to the code there were some failures but I assure you that these were not willful violations and I would hope that the explanations above would make that evident.

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RECEIVED
FEDERAL ELECTION COMMISSION

A number of steps have been taken to prevent this situation of happening again and I would like to outline them briefly for you.

First of all, all of our bank records are kept on computer as well as in a special filing system so that we now have a double record of each and every financial transaction taken by LAPAC. The computer system records all information concerning our finances including all bank activity and all accounts payable.

Second, all keying into the computer of contributor records is being done by staff members who are here each day rather than by volunteers. To avoid the problem we encountered when our computer was stolen in 1985 we back up this information on a regular basis and these discs are kept separately from the computer.

Third, we now have a system of handling the information concerning our debts. All invoices are recorded into the computer and then filed. Here again, we now have two sets of information to work from. While we have not been able to recapture some of the invoices from 1985 and 1986, we do know that we have an accurate accounting of all debt information on file since then.

As I stated in my letter to you concerning MUR 2648, I am involved with LAPAC on a volunteer basis and a lot of things have fallen between the cracks as we have tried to work out a situation that would enable me to stay on top of LAPAC's problems as well as devote the time needed to my employment. After a lot of misfirings and mistakes I believe that we now finally have a staff in place that will prevent future problems. We have filed to have Gina Frane, an individual who is here in the office each day, serve as Assistant Treasurer so that when I am not available this matters can still be taken care of.

As one could readily see by our debt figures, each day has been a struggle to survive and we have allowed far too many mistakes to happen by trying to take on too much while operating with a very small staff. On top of all of this, the medical problems that I have experienced this year have only complicated matters even more. We have, however, taken steps to assure compliance with the Federal Election Commission code and anticipate no further failures on our end. I have told my staff to conduct business each day with the assumption that we will have an audit by your filed staff. In light of this, we are doing our own internal audit on a regular basis to be sure that we are on course and doing things properly. In fact, it was this internal audit that brought to my attention a computer glitch which was giving us false information concerning our Schedule A for several reports which has now been corrected and amendments filed.

In your decision making process, I hope that you will consider the above information as well as the fact that our August, September and October reports have been filed on time, if not early, and that letters from your Reports Analyst department are normally being answered within 24 hours of our receiving them.

As stated in my letter regarding MUR 2648 I will be in Washington, D.C. November 11 - 15 and would like very much the opportunity to meet with you and work towards a resolution of any and all matters of concern. I look forward to seeing you then.

Yours truly,

Rick Woodrow, Treasurer
LAPAC

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END OF MUR 2613

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BEGINNING OF MUR 2648

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: June 23, 1988

ANALYST: Robert B. DiNardo

I. COMMITTEE: Life Amendment Political Action
Committee, Inc. (C00082297)
Rick Woodrow, Treasurer
P.O. Box 5490
Everett, WA 98206

II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(B)
11 CFR 104.5(c)(3)(i)

III. BACKGROUND:

Failure to File the 1988 April Monthly Report

The Life Amendment Political Action Committee, Inc. ("the Committee") failed to file the 1988 April Monthly Report of Receipts and Disbursements covering the period from March 1, 1988 to March 31, 1988.

The Committee was notified on December 18, 1987 that all monthly reports were due the 20th day of the following month (Attachment 2).^{1/} A Non-Filer Notice was sent to the Committee on May 9, 1988 (Attachment 3).

On June 3, 1988, the Reports Analysis Division ("RAD") analyst contacted the Committee's treasurer, Mr. Rick Woodrow, to discuss the non-filing of the 1988 April Monthly Report. Mr. Woodrow told the RAD analyst that he was on sick leave the past few weeks and was unable to file the report in question. Mr. Woodrow said he anticipated mailing the 1988 April Monthly Report and other amended reports on June 3, 1988 (Attachment 4).

As of the date of this referral, the 1988 April Monthly Report has not been filed.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

^{1/} The Committee notified the Commission of its intention to change its filing frequency from quarterly to monthly on February 24, 1988, twelve days after the prior notice was sent to all monthly filers.

93040932684

FEDERAL ELECTION COMMISSION
1987-1988
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 17JUN88

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
				TYPE OF FILER		
LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.				ID #C00082297	NON-PARTY QUALIFIED	
CONNECTED ORGANIZATION: NONE						
	1987 MID-YEAR REPORT	29,536	33,215	1JAN87 -30JUN87	21	87FEC/484/0535
	NOTICE OF FAILURE TO FILE			1JAN87 -30JUN87	1	87FEC/484/0813
	REQUEST FOR ADDITIONAL INFORMATION			1JAN87 -30JUN87	2	87FEC/492/5122
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN87 -30JUN87	3	87FEC/495/1129
	YEAR-END	23,892	23,713	1JUL87 -31DEC87	41	88FEC/510/3939
	NOTICE OF FAILURE TO FILE			31DEC87	1	88FEC/510/2908
	REQUEST FOR ADDITIONAL INFORMATION			1JUL87 -31DEC87	1	88FEC/515/1079
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL87 -31DEC87	2	88FEC/518/5021
1988	MISCELLANEOUS REPORT TO FEC			24FEB88	1	88FEC/510/3938
	MISCELLANEOUS REPORT FROM FEC			4MAY88	1	88FEC/524/1422
	MISCELLANEOUS NOTICE FROM FEC			13MAY88	1	88FEC/525/1707
	FEBRUARY MONTHLY	7,105	7,304	1JAN88 -31JAN88	32	88FEC/510/3986
	REQUEST FOR ADDITIONAL INFORMATION			1JAN88 -31JAN88	2	88FEC/525/0591
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN88 -31JAN88	5	88FEC/528/3106
	MARCH MONTHLY	3,801	3,889	1FEB88 -29FEB88	20	88FEC/515/1390
	REQUEST FOR ADDITIONAL INFORMATION			1FEB88 -29FEB88	2	88FEC/525/0588
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1FEB88 -29FEB88	5	88FEC/528/3101
	NOTICE OF FAILURE TO FILE			1MAR88 -31MAR88	1	88FEC/524/4961
	NOTICE OF FAILURE TO FILE			1APR88 -30APR88	1	88FEC/528/4694
	TOTAL	64,334	0 68,121 0		143	TOTAL PAGES

All reports reviewed through the 1988 March Monthly Report.

Ending Cash on Hand as of 2/29/88: \$128.36

Outstanding Debts and Obligations Owed TO the Committee: \$0

Outstanding Debts and Obligations Owed BY the Committee: \$92,353.20

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 18, 1987

WHO MUST FILE

ALL PARTY COMMITTEES and PACs (NON-CONNECTED COMMITTEES AND SEPARATE SEGREGATED FUNDS) must file a Year End Report in January.

REPORTING DATES

Semiannual. The Year End Report is due January 31, 1988, and must disclose financial activity that occurred from July 1 through December 31, 1987. Committees which have previously filed 1987 reports should only report activity from the closing date of the last report filed.

Monthly. Committees that choose to file on a monthly basis must file the Year End Report due January 31, 1988. The report must disclose financial activity from December 1 through December 31, 1987. All other monthly reports are due by the 20th of each month and cover all financial activity of the previous month.

WHAT MUST BE REPORTED

A report must disclose all receipts and disbursements that occurred during the reporting period. A newly registered political committee filing its first report should also include all amounts received and expended before the committee registered. See 11 CFR 104.3. For more detailed information on reporting instructions, consult your Campaign Guide.

WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed FEC Form 3X for details. Affix the peel-off label from the envelope to line 1 of the report. Any corrections in the information should be made directly on the label.

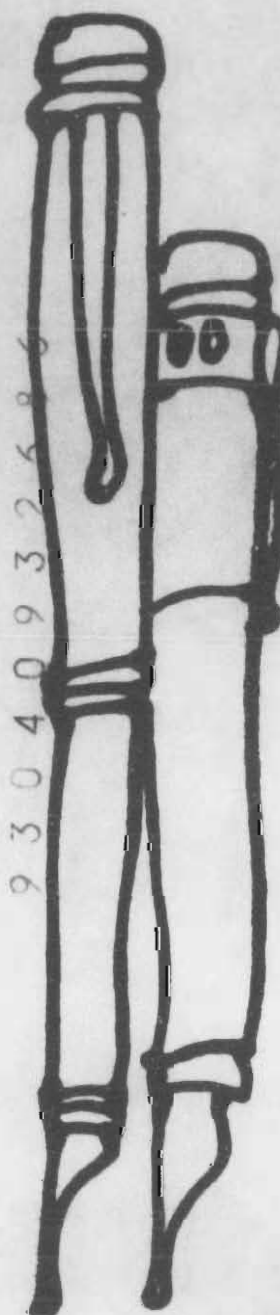
CHANGE IN FILING FREQUENCY

Committees that wish to change their reporting schedule (for example, from semiannual to monthly) must notify the Commission by sending a letter with the next report due under their current reporting schedule. Committees may change their filing frequency only once a year.

COMPLIANCE

Political committees are responsible for filing all reports required under the Act in a timely fashion. Committees and treasurers who file late reports, or fail to file reports, are subject to enforcement action. Illegible reports and reports submitted on non-FEC forms will not be accepted; committees filing such documents will be required to refile.

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





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-7

May 9, 1988

Rick Woodrow, Treasurer
Life Amendment Political
Action Committee, Inc.
P.O. Box 5490
Everett, WA 98206

Identification Number: C00082297

Reference: April Monthly Report (3/1/88-3/31/88)

Dear Mr. Woodrow:

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

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or the relevant portions should also be filed with the Secretary of State or equivalent State officer. See 2 U.S.C. §439.

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

If you have any questions, please contact Mark Eilers on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

John D. Gibson
John D. Gibson
Assistant Staff Director
Reports Analysis Division

93040932687

TELECON

Analyst: Mark Eilers
Conversation with: Mr. Woodrow, Treasurer
Committee: LIFE Amendment P.A.C.
DATE: June 3, 1988
Subject: Failure to File the April Monthly Report

I called Mr. Woodrow to inform him of the need to comply with FEC reporting requirements and that he should get the April Monthly Report in as soon as possible. He informed me that he had been out of the office for the past few weeks on sick leave. This resulted in the committee falling behind on their reporting schedule. He also informed me that he anticipated mailing the April Monthly and other amended reports today (June 3, 1988).

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD Referral # 88NF-31
Staff Member: Susan Beard

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

RESPONDENTS: Life Amendment Political Action Committee, Inc. and
Rick Woodrow, as treasurer

RELEVANT STATUTE: 2 U.S.C. § 434(a)(4)(B)

INTERNAL REPORTS CHECKED: Referral Materials

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred the Life Amendment Political Action Committee, Inc. ("Committee") and Rick Woodrow, as treasurer, to the Office of the General Counsel on June 23, 1988. The basis for the referral was the Committee's failure to file its 1988 April Monthly Report. The Committee is also the Respondent in two other MURs that are currently open which involve the 1983-84 and 1985-86 audits of the Committee. See, MURs 2525 and 2613. The Committee was also referred to this Office as a chronic late filer. This referral became MUR 2386 which is currently in litigation.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that for unauthorized committees filing monthly, such committees shall file a report no later than the 20th day after the last day of the month that shall be complete as of the last day of the month. 2 U.S.C. § 434(a)(4)(B). Thus, the due

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date for the 1988 April Monthly Report was April 20, 1988. As of June 30, 1988, the Committee has not yet filed the 1988 April Monthly Report. The Committee has also failed to file its 1988 May Monthly Report and June Monthly Report which should have been filed by May 20, 1988, and June 20, 1988, respectively. This Office understands that the Reports Analysis Division may refer the Committee for an expedited audit.

Accordingly, the Office of the General Counsel recommends that the Commission open a Matter Under Review and find reason to believe that the Life Amendment Political Action Committee, Inc. and Rick Woodrow, as treasurer, violated 2 U.S.C. § 434(a)(4)(B). The Office of the General Counsel also recommends that the Commission decide that the Reports Analysis Division will notify the Office of the General Counsel of any further instances in which the Life Amendment Political Action Committee, Inc. fails to file a report, but will make no further referrals of the Life Amendment Political Action Committee, Inc. for failing to file such reports until this matter is resolved through a conciliation agreement or otherwise.¹

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

This Office also recommends that the Commission offer to enter into conciliation with the respondents prior to a finding of probable cause to believe. Attached for the Commission's

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IV. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe the Life Amendment Political Action Committee, Inc. and Rick Woodrow, as treasurer, violated 2 U.S.C. § 434(a)(4)(B), and enter into conciliation prior to a finding of probable cause to believe.
3. Decide that the Reports Analysis Division will notify the Office of the General Counsel of any further instances in which the Life Amendment Political Action Committee, Inc. fails to file a report, but will make no further referrals of the Life Amendment Political Action Committee, Inc. for failing to file such reports until this matter is resolved through a conciliation agreement or otherwise.
4. Approve the attached letter, Factual and Legal Analysis, and proposed conciliation agreement.

Lawrence M. Noble
General Counsel

Date

July 11, 1968

BY:

Lois G. Lerner
Lois G. Lerner
Associate General Counsel

Attachments

1. Referral Materials
2. Proposed agreement
3. Letter and Factual and Legal Analysis

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Life Amendment Political Action Committee,
Inc. and Rick Woodrow, as treasurer

RAD Ref. 88NF-31

(MUR)
2648

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal
Election Commission, do hereby certify that on July 14,
1988, the Commission decided by a vote of 6-0 to take
the following actions in RAD Ref. 88NF-31:

1. Open a MUR.
2. Find reason to believe the Life Amendment
Political Action Committee, Inc. and
Rick Woodrow, as treasurer, violated
2 U.S.C. § 434(a)(4)(B), and enter into
conciliation prior to a finding of probable
cause to believe.
3. Decide that the Reports Analysis Division will
notify the Office of the General Counsel
of any further instances in which the Life
Amendment Political Action Committee, Inc.
fails to file a report, but will make no
further referrals of the Life Amendment Polit-
ical Action Committee, Inc. for failing to file
such reports until this matter is resolved
through a conciliation agreement of otherwise.

(Continued)

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4. Approve the letter, Factual and Legal Analysis, and proposed conciliation agreement, as recommended in the First General Counsel's report signed July 11, 1988.

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

Attest:

7-15-88

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Tues., 7-12-88, 9:58
Circulated on 48 hour tally basis: Tues., 7-12-88, 4:00
Deadline for vote: Thurs., 7-14-88, 4:00

93040932693



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 26, 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Rick Woodrow
Life Amendment Political Action
Committee, Inc.
P.O. Box 5490
Everett, WA 98206

RE: MUR 2648
Life Amendment Political
Action Committee, Inc. and
Rick Woodrow, as
treasurer

Dear Mr. Woodrow:

On July 14, 1988, the Federal Election Commission found that there is reason to believe the Life Amendment Political Action Committee, Inc. ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(B), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

In order to expedite the resolution of this matter, the Commission has also decided to offer to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. Enclosed is a conciliation agreement that the Commission has approved.

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Rick Woodrow
Page 2

If you are interested in expediting the resolution of this matter by pursuing preprobable cause conciliation and if you agree with the provisions of the enclosed agreement, please sign and return the agreement, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

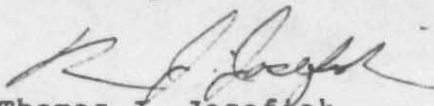
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Susan Beard, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Thomas J. Josefiak
Chairman

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

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RECEIVED
FEDERAL ELECTION COMMISSION
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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Life Amendment Political Action)
Committee, Inc. and Rick Woodrow, as)
treasurer)

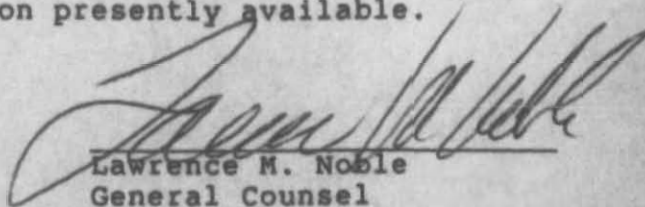
MUR 2648

SENSITIVE

GENERAL COUNSEL'S REPORT

The Office of the General Counsel is prepared to close the investigation in this matter as to all of the respondents, based on the assessment of the information presently available.

9/20/88
Date


Lawrence M. Noble
General Counsel

Staff Persons: Susan Beard
James Brown

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88 SEP 29 PM 2:46



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

September 29, 1988

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
General Counsel *LMN*

SUBJECT: MUR 2648

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 intention to recommend to the Commission a finding of probable cause to believe were mailed on September 29, 1988. 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

Staff persons: Susan Beard
James Brown

93040932697



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

September 29, 1988

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Rick Woodrow
Life Amendment Political Action
Committee, Inc.
P.O. Box 5490
Evorett, WA 98206

RE: MUR 2648
Life Amendment Political Action
Committee, Inc., and Rick
Woodrow, as treasurer

Dear Mr. Woodrow:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities and information supplied by you on August 3, 1988, the Federal Election Commission found reason to believe that the Life Amendment Political Action Committee, Inc. ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(B), 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 knowing and willful violation has occurred.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten 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 the 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 whether there is probable cause to believe a violation has occurred.

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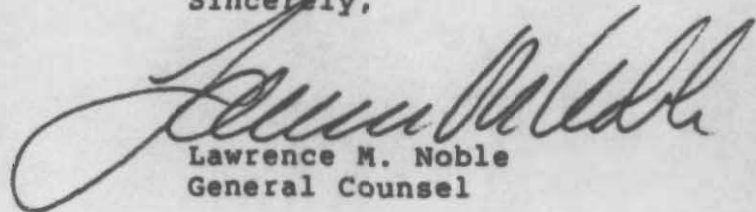
Rick Woodrow
Page 2

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Susan Beard, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

93040932699

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Life Amendment Political Action) MUR 2648
Committee, Inc. and Rick Woodrow,)
as treasurer)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On July 14, 1988, the Commission found reason to believe Life Amendment Political Action Committee, Inc. and Rick Woodrow, as treasurer, (the "Committee") violated 2 U.S.C. § 434(a)(4)(B), by failing to timely file a 1988 April Monthly Report, a 1988 May Monthly Report, and a 1988 June Monthly Report. Subsequently, the 1988 July Monthly Report was not timely filed.

The Committee had been notified on December 18, 1987, that all monthly reports covering all financial activity during that month are due by the 20th of the next month. According to a return receipt, on August 1, 1988, the Committee received a certified letter notifying it of the Commission's finding of reason to believe the Committee had violated 2 U.S.C. § 434(a)(4)(B). That certified letter informed the Committee of the opportunity to demonstrate that no action was warranted against it.

On August 3, 1988, the Committee filed the delinquent monthly reports for April, May, June, and July of 1988, as well as a timely 1988 August Monthly Report. The Committee has not responded to the Commission's reason to believe finding.

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II. ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), specifically provides that all unauthorized political committees filing monthly shall file a report no later than the 20th day after the last day of the month, and complete as of the last day of the month. 2 U.S.C. § 434(a)(4)(B).

The legislative history of the 1976 amendments to the Act discuss knowing and willful violations of the Act. Knowing and willful violations are "violations as to which the Commission has clear and convincing proof that the acts were committed with a knowledge of all the relevant facts and a recognition that the action is prohibited by law." H.R. Rep. No. 94-917, 94th Cong. 2d Sess. 3-4 (1976). Congressman Hays during the House debates on the Conference Report stated that the phrase "knowing and willing" referred "to actions taken with full knowledge of all of the facts and a recognition that the action is prohibited by law." 122 Cong. Rec. H3778 (daily ed. May 3, 1976)(remarks of Congressman Hays).

The knowing and willful standard has also been discussed by the courts. In Federal Election Commission v. John A. Dramesi for Congress Committee, 640 F. Supp. 985 (D.N.J. 1986), the court noted that the knowing and willful standard requires knowledge that one is violating the law.

The Act and Commission regulations are quite specific that all unauthorized committees filing on a monthly basis shall submit complete reports no later than the 20th day following the last day of the month being reported. Here, the Committee failed to file

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the four (4) consecutive monthly reports of April, May, June and July 1988 until the untimely date of August 3, 1988. Therefore, the Committee violated 2 U.S.C. § 434(a)(4)(B).

The Committee and Mr. Woodrow, its treasurer, have previously been involved in a matter under review which concerned the failure to timely file reports. The Commission found probable cause to believe that the Committee and its treasurer violated 2 U.S.C. § 434(a)(4)(A)(iv) by failing to timely file its 1985 Mid-Year Report, its 1985 Year-End Report, and its 1987 Mid-Year Report. The Commission found probable cause to believe that the Committee and its treasurer violated 2 U.S.C. § 434(a)(4)(A)(ii) by failing to timely file its 1986 Pre-General Report. Finally, the Commission found probable cause to believe the Committee and its treasurer violated 2 U.S.C. § 434(a)(4)(A)(i) by failing to timely file the 1986 October Quarterly and Year-End Reports.

The Committee and its treasurer were notified on April 9, 1987, that the Commission had found reason to believe the above violations occurred. The Committee and its treasurer were notified that probable cause was found on January 11, 1988. Finally, the Committee and its treasurer were notified that the Commission had authorized civil suit on May 24, 1988. The Commission has filed a civil suit in the Western District of Washington as a result of these probable cause finding against the Committee and Mr. Woodrow.

On February 21, 1988, Mr. Woodrow wrote the Commission a letter which the Commission received on February 24, 1988. That letter requested that the Committee's filing status be changed

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to monthly during the 1988 election cycle. The Committee's filing status became monthly on February 24, 1988.

It is clear that the Committee and its treasurer were aware of the duty to timely file reports with the Commission. The Committee knew of this requirement because: (1) it was notified of it in writing, by letter dated December 18, 1987; (2) it requested to become a monthly filer; and, (3) it was involved in previous enforcement proceedings for failing to timely file reports. As a result it appears that the Life Amendment Political Action Committee, Inc. and Rick Woodrow, as treasurer, knowingly and willfully violated 2 U.S.C. § 434(a)(4)(B).

III. GENERAL COUNSEL'S RECOMMENDATION

Find probable cause to believe that the Life Amendment Political Action Committee, Inc. and Rick Woodrow, as treasurer, knowingly and willfully violated 2 U.S.C. § 434(a)(4)(B).

Date

9/29/88

Lawrence M. Noble
General Counsel

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OGC# 733

Life Amendment Political Action Committee, Inc.

"The Nation's Oldest Pro-Life Political Action Committee"

P.O. Box 5490 Everett, WA 98206

(206) ~~224-XXXX~~ 353-7933

(206) 672-9415

October 19, 1988

Susan Beard
Office of General Counsel
Federal Election Commission
Washington, D.C. 20463

RE: MUR2648

Dear Susan;

I recently received a letter dated September 29, 1988 from Mr. Noble regarding the above MUR. Apparently the issues involve the lateness of LAPAC's 1988 April Monthly Report, 1988 May Monthly Report, 1988 June Monthly Report as well as the 1988 July Monthly Report.

While there is no question that these reports were late, I believe there were some valid reasons for their lateness.

On August 1, 1988, I sent Mark Eilers a letter explaining why these reports were late. I have enclosed a copy of that letter for you. I explained that due to medical problems I was only able to work a very limited schedule and was unaware that the reports had not been sent out. I also requested to be advised if there were any other outstanding issues that needed to be resolved since I had been gone for so long and realize that there was a strong possibility that somethings may have fallen through the cracks. I heard nothing further until I received the letter from Mr. Noble.

In the General Counsel's Brief, there is no mention of my letter to Mark and the brief gives the impression that I did not respond to my opportunity to demonstrate that no action should be taken. As you will see from your copy of the letter, I even offered to produce medical documentation if that would be helpful to the Commission. I was under the impression that this letter to Mark Eilers explaining the situation would be considered a response to the Commission's finding. Was I wrong?

We have taken some major steps to assure timely filing in the future including adding on an individual as Assistant Treasurer so that everything involving the reports was on the shoulders of one person. Our August Report was filed on August 3, the September Report was filed on time and the October Report was Federal Expressed today to assure the filing took place within the FEC guidelines. I would hope that this would at least demonstrate to your office that we have in fact taken action to adhere strickly to FEC regulations.

I would like to respectfully request that no action be taken against LAPAC at this time and that you provide us with a period of time to demonstrate that we have resolved our internal problems and are adhering to the code.

Please keep in mind that my involvement with LAPAC is on a volunteer basis and that during the time I was dealing with my medical problems I was also trying to at least partially function with my normal job.

I do appreciate the importance of staying on top of the FEC requirements and

Paid for and Authorized by LAPAC

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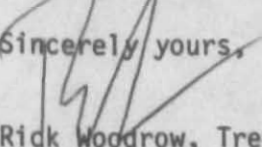
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we have taken major steps to assure the continuation of the pattern that was set with the timely filing of our August, September and October reports. I would hope that these actions would at least be a consideration in your decision making process.

I will be in Washington, D.C. November 11 - 15 and would very much appreciate the opportunity to meet with you and anyone else from your office that you think would be appropriate to discuss the resolution on this matter as well as any other issues of concern that need to be addressed. I realize that a number of situations have been created and it is my hope that all of these matters can be resolved and that we can go into 1989 with a clean slate and a system firmly in place that will prevent any future violations of FEC code.

Thank you for any assistance you can render regarding these matters and I do look forward to meeting with you in a few weeks.

Sincerely yours,


Rick Woodrow, Treasurer
LAPAC

CC: Kate Henry
Robert W. Bonham, III

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Life Amendme Political Action Committee, Inc.

"The Nation's Oldest Pro-Life Political Action Committee"

P.O. Box 5490 Everett, WA 98206

(206) 252-8983

(206) 672-9415

August 1, 1988

Mr. Mark F. Eilers
Federal Election Commission
Washington, D.C. 20463

Dear Mark:

Enclosed are a number of Monthly Reports as well as responses to several letters from you. Due to the lateness of all of this I realize that we find ourselves in a very difficult situation with the FEC and I'd like to at least try to explain what has happened.

I have been out of the office the majority of the time the last several months due to illness. In fact, in just a few hours I will be having surgery which I hope will be the conclusion of a long and tedious string of medical problems.

It was my understanding that most of this information had been forwarded to you shortly after we spoke on the phone. It has become apparent that the individual responsible for taking care of this failed to do so and I have just recently become aware of the situation. I have terminated that employee and now, at 3:30am have hopefully updated all of our reports and responses.

As you will see, also included with this information is an amendment to our Statement of Organization naming Gina Frane as Assistant Treasurer. As I will be out of the office for awhile recovering from surgery, would you please contact Gina at my office and advise her as to any other outstanding responses that might exist. She will be running things back and forth from the hospital and we will get right on any additional responses you need.

I realize that we are in a major violation of the election code by not having this information to you long before now and I can only hope that your office will understand the situation that has developed. If it would be helpful in the Commission's consideration of this matter, I would be happy to provide any medical documentation you might require as to the fact that I have been unable to work much time at all the last several months.

Please contact Gina at your earliest opportunity and advise her as to what course of action we should take next. Thanks for any understanding your department can give regarding this matter. We look forward to hearing from you.

Yours Truly,

Rick Woodrow
Treasurer

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BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of
Life Amendment Political
Action Committee, Inc.
and Rick Woodrow, as
treasurer

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MURS 2525, 2613, and
2648

EXECUTIVE SESSION

DEC 13 1988

GENERAL COUNSEL'S REPORT

I. BACKGROUND

A. MUR 2525

On August 20, 1987, the Commission found reason to believe in MUR 2525 that Life Amendment Political Action Committee, Inc. (the "Committee or LAPAC") and Rick Woodrow, as treasurer, violated 2 U.S.C. §§ 432(c)(1), (2), (3), and (5), 432(d), and 434(b)(2), (4), (5), (6), and (8), and 11 C.F.R. §§ 104.11 and 104.14(b). The Commission based this decision on an audit of the Committee covering the period from January 1, 1983, to December 31, 1984, which disclosed the Committee's failure to maintain bank records, the misstatement of financial activity by the Committee, the failure of the Committee to maintain contributor records, the failure of the Committee to maintain receipt or disbursement records, the failure of the Committee to properly report disbursements, and the failure of the Committee to properly report debts and obligations.

Because of the Committee's failure to produce the documents required for a proper audit, the Commission was eventually forced to issue a subpoena and order requiring the Committee to produce documents and answer written questions concerning the matters

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involved in this MUR. On March 22, 1988, a response to the interrogatories and request for documents was received by the Commission. This reply was extremely vague, but essentially corroborated the validity of the accused violations.

On June 15, 1988, this office notified the Committee that after consideration of all the evidence available to the Commission, the Office of the General Counsel was prepared to recommend that the Commission find probable cause to believe violations of the Act had occurred based upon an investigation of the facts in MUR 2525. A copy of the General Counsel's Brief discussing the basis for probable cause was forwarded along with the notification. No response to this notification and brief was submitted by the Committee.

B. MUR 2613

On June 14, 1988, the Commission found reason to believe in MUR 2613 that Life Amendment Political Action Committee, Inc. and Rick Woodrow, as treasurer, knowingly and willfully violated 2 U.S.C. §§ 432(c)(1), (2), and (3), and 432(d), and 11 C.F.R. § 104.14(b). In reaching this conclusion the Commission relied on an audit covering the period from January 1, 1985, to December 31, 1986. This audit revealed that the Committee was unable to provide large segments of the Committee's bank records. The Committee failed to maintain records regarding more than 80% of its contributions in 1985, and it neglected to maintain records as to approximately 8.5% of its contributions for 1986. The Committee failed to maintain adequate records with regard to its debts and obligations during

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the entire period being audited. Because of the Committee's past history of similar violations (it was also audited for the 1979-80, 1981-82, and 1983-84 election cycles), and the fact that employees of the Commission discussed these similar violations with the Committee treasurer, Mr. Woodrow, at exit conferences following the previous audits, Mr. Woodrow and the Committee were aware of the Act's requirements. Thus, the Commission determined that there is reason to believe that the violations involved in MUR 2613 were knowing and willful.

On September 8, 1988, this office notified the Committee that after consideration of all the evidence available to the Commission, the Office of the General Counsel was prepared to recommend that the Commission find probable cause to believe knowing and willful violations of the Act had occurred based on the facts presented in MUR 2613. The Committee submitted a response to this notification, which was received by the Commission on October 25, 1988.

C. MUR 2648

In MUR 2648 the Commission found on July 14, 1988, that there is reason to believe that Life Amendment Political Action Committee, Inc. and Rick Woodrow, as treasurer, knowingly and willfully violated 2 U.S.C. § 434(a)(4)(B). Originally, the Reports Analysis Division ("RAD") referred the violations involved in this MUR to the Office of the General Counsel because the Committee failed to file the 1988 April Monthly Report. Not until August 3, 1988, did the Committee file that April Monthly Report, along with late monthly reports for May, June, and July.

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The Committee had previously been referred for the non-filing and the chronic late filing of the 1985 Mid-Year, 1985 Year End, 1986 October Quarterly, the 1986 12 Day Pre-General Reports, and the 1986 Year End Report. Because of these and other circumstances, the Committee was found to have knowingly and willfully violated 2 U.S.C. § 434(a)(4)(B).

On July 26, 1988, the Committee was notified of the reason to believe finding. At that time an offer to enter into a conciliation agreement was proposed. The Committee was notified on September 29, 1988, of the General Counsel's intention to recommend to the Commission a finding of probable cause to believe violations of the Act occurred due to the matters involving this MUR. On October 24, 1988, the Commission received a response from the Committee regarding MUR 2648.

Because of the interrelatedness of these three MURS, and in an effort to judiciously and appropriately deal with the overall problems that the Commission has encountered when dealing with this Committee, the Office of the General Counsel recommends that these three MURS be merged.

II. ANALYSIS

The legal analysis of the Office of the General Counsel is set out in its probable cause briefs for MUR 2525, MUR 2613, and MUR 2648 circulated to the Commission on June 15, 1988, September 8, 1988, and September 20, 1988, respectively.

As noted, the Committee filed responses concerning MURS 2613 and 2648, but the Committee failed to respond to the allegations contained in MUR 2525. In the Committee's response to the

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recommendation for a finding of probable cause in MUR 2613, Mr. Woodrow outlines several explanations for the alleged violations. In regards to missing bank records and records of debts and obligations, the Committee blames a former employee for absconding with these in an effort to hide his embezzlement of LAPAC funds. The Committee also claims certain records were lost during the move of the Committee's offices from Washington, D.C. to Oregon. These problems still do not account for the Committee's failure to obtain replacements for the lost records from the banks involved. The Committee attributes missing contributor records in 1985 and 1986 to the theft of the Committee's computer containing the lists, and inept recording by volunteers. In response to the finding that the violations are knowing and willful, Mr. Woodrow claims that as treasurer of LAPAC he would never intentionally violate the Act because to do so "would be extremely stupid."

None of these explanations sufficiently explain or excuse the Committee, or Mr. Woodrow, from responsibility for the repeated failure to maintain records with sufficient safeguards to avoid possible problems. The Committee's response delineates procedures that have supposedly been implemented to insure no recurrence of the problems that arose in MUR 2613. These precautions include: computerization of LAPAC bank records; computer keying-in being done by full-time staff only; and placement of information upon back-up computer discs. Mr. Woodrow goes on in his response to disclaim responsibility for any reporting violations on the basis that he is involved

with LAPAC "on a volunteer basis." While such volunteer status may be technically correct, Mr. Woodrow continues to receive payments from LAPAC in his position as a consultant. Furthermore, his position as Committee treasurer imposes responsibilities upon him to insure compliance with the Act, despite his volunteer status.

In responding to MUR 2648, and the several late filings involved in that MUR, Mr. Woodrow asks the Commission to consider that he was working a limited schedule due to medical problems and unable to meet the reporting deadlines. As a display of the Committee's good faith attempt to meet regulatory filing deadlines, Mr. Woodrow points to the timely filing of the August, September, and October Monthly Reports. The response requests that the Commission take no action against LAPAC and provide the Committee with a period of time to demonstrate an ability to adhere to the Act and Commission Regulations.

These explanations, while perhaps valid, do not excuse the Committee's responsibility to abide by the Act. Overall, there appears to be insufficient effort put forth by the Committee to overcome obstacles in the way of their meeting FECA reporting obligations of which they were clearly aware. In addition to these failures, the Committee and Mr. Woodrow, have been slow to respond or totally unresponsive when the Commission has previously attempted to resolve these matters. Furthermore, the record of these three matters demonstrates the Committee's frequent and recurring violations of the Act and regulations.

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III.

DISCUSSION OF CONCILIATION AND CIVIL PENALTY

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IV. RECOMMENDATIONS

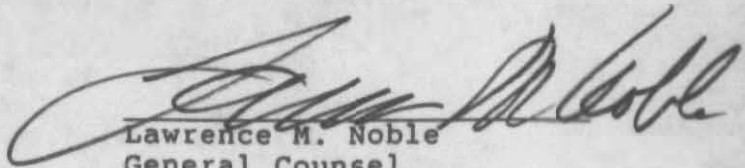
1. Merge MUR 2525 and MUR 2613 with MUR 2648.
2. Find probable cause to believe that Life Amendment Political Action Committee, Inc. and Rick Woodrow, as treasurer, violated 2 U.S.C. §§ 432(c)(1), (2), (3), and (5); 432(d); and 434(b)(2), (4), (5), (6), and (8); and 11 C.F.R. §§ 104.11; and 104.14(b) in relation to the period from January 1, 1983, to December 31, 1984.
3. Find probable cause to believe that the Life Amendment Political Action Committee, Inc. and Rick Woodrow, as treasurer, knowingly and willfully violated

2 U.S.C. §§ 432(c)(1), (2), and (3); 432(d);
434(a)(4)(B); and 11 C.F.R. § 104.14(b) in relation to
the period from January 1, 1985, to July 20, 1988.

4. Approve the attached conciliation agreement and
letter.

Date

12/2/88


Lawrence M. Noble
General Counsel

Attachments:

1. Conciliation Agreement
2. Letter

Staff assigned: J. Albert Brown

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Life Amendment Political Action) MURS 2525, 2613
) and 2648
Committee, Inc. and)
Rick Woodrow, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of December 13, 1988, do hereby certify that the Commission decided by a vote of 4-0 to take the following actions with respect to the above-captioned matters:

1. Merge MUR 2525 and MUR 2613 with MUR 2648.
2. Find probable cause to believe that Life Amendment Political Action Committee, Inc. and Rick Woodrow, as treasurer, violated 2 U.S.C. §§ 432(c)(1), (2), (3), and (5); 432(d); and 434(b)(2), (4), (5), (6), and (8); and 11 C.F.R. §§ 104.11; and 104.14(b) in relation to the period from January 1, 1983, to December 31, 1984.
3. Find probable cause to believe that the Life Amendment Political Action Committee, Inc. and Rick Woodrow, as treasurer, knowingly and willfully violated 2 U.S.C. §§ 432(c)(1), (2), and (3); 432(d); 434(a)(4)(B) and 11 C.F.R. § 104.14(b) in relation to the period from January 1, 1985, to July 20, 1988.

(continued)

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Federal Election Commission
Certification for MURS 2525, 2613,
and 2648
December 13, 1988

Page 2

4. Approve the conciliation agreement and letter attached to the General Counsel's report dated December 2, 1988.

Commissioners Aikens, Elliott, McDonald, and McGarry voted affirmatively for the decision; Commissioners Josefiak and Thomas were not present at the time of the vote.

Attest:

12/13/88

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 16, 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Rick Woodrow, Treasurer
Life Amendment Political Action Committee
P.O. Box 5490
Everett, WA. 98206-5490

RE: MUR 2648
Life Amendment Political
Action Committee and
Rick Woodrow, as treasurer

Dear Mr. Woodrow:

On December 13, 1988, the Federal Election Commission found that there is probable cause to believe Life Amendment Political Action Committee ("LAPAC") and you, as treasurer, violated 2 U.S.C. § 432(c)(1), (2), (3), and (5); 2 U.S.C. § 432(d); 2 U.S.C. 434(b)(2), (4), (5), (6), and (8); 11 C.F.R. § 104.11; and 11 C.F.R. 104.14(b), provisions of the Federal Election Campaign Act of 1971, as amended, and Commission regulations. This finding was based on the following events relevant to the 1983 and 1984 reporting period: LAPAC's failure to maintain adequate and accurate bank records, LAPAC's failure to maintain appropriate contributor records, LAPAC's failure to maintain and report appropriate disbursement records, and LAPAC's failure to properly report debts and obligations. Also on December 13, 1988, the Federal Election Commission found that there is probable cause to believe LAPAC and you, as treasurer, knowingly and willfully violated 2 U.S.C. § 432(c)(1), (2), (3); 2 U.S.C. § 432(d); and 11 C.F.R. § 104.14(b), provisions of the Federal Election Campaign Act of 1971, as amended, and Commission regulations. These violations were found to be in connection with LAPAC's failure during 1985 and 1986 to maintain, and have available for audit inspection, certain bank information, contributor records, and records with regard to debts and obligations. Finally, the Commission found that there is probable cause to

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Rick Woodrow, Treasurer

-Page 2-

believe LAPAC and you, as treasurer, knowingly and willfully violated 2 U.S.C. § 434(a)(4)(B), a provision of the Federal Election Campaign Act of 1971, as amended, in connection with LAPAC's failure to file the 1988 April, May, June, and July Monthly Reports no later than the 20th day after the last day of the reported month.

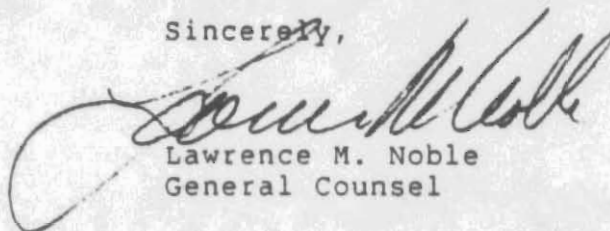
On December 13, 1988, the Commission also voted to merge MUR 2525 and MUR 2613 with MUR 2648. Henceforth, these matters will now be known as only MUR 2648.

The Commission has a duty to attempt to correct such violations for a period of 30 to 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement during that period, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty.

Enclosed is a conciliation agreement that the Commission has approved 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 accept the agreement. Please make your check for the civil penalty payable to the Federal Election Commission.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Jim Brown, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

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END OF MUR 2648

93040932721

BEGINNING OF MUR 2799

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 19 September 1988

ANALYST: Kate Henry

I. COMMITTEE: Life Amendment Political Action
Committee, Inc. (C00082297)
Rick Woodrow, Treasurer
P.O. Box 5490
Everett, WA 98206

II. RELEVANT STATUTE: 2 U.S.C. §434(b)(3)(A) and (B)
11 CFR 104.3(a)(4)(i) and (ii)

III. BACKGROUND:

Failure to Provide Supporting Schedules

Life Amendment Political Action Committee, Inc. ("the Committee") disclosed \$29,536.50 in total contributions received on Line 11(d) of the Detailed Summary Page of the 1987 Mid-Year Report (Attachment 2). The Committee failed to provide a specific breakdown of the category(s) of receipts, as required on the Detailed Summary Page. Schedule A supporting Line 11 itemized \$3,205 in contributions from individuals (Attachment 3), resulting in a total of \$26,331.50 in unidentified contributions.

A Request for Additional Information ("RFAI") was sent to the Committee on November 4, 1987 (Attachment 4). The RFAI noted the discrepancy between the Line 11(d) total and the Schedule A total and requested that the Committee amend its report to clarify the discrepancy. On November 25, 1987 the Committee was sent a Second Notice for failure to respond to the November 4, 1987 RFAI (Attachment 5).

The Committee's treasurer, Mr. Rick Woodrow, filed a letter dated August 1, 1988, stating that he was submitting a number of monthly reports as well as responses to several outstanding RFAIs (Attachment 6). However, the only amendment included was in response to an RFAI for the 1988 February Monthly Report.

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LIFE AMENDMENT POLITICAL ACTION
COMMITTEE, INC.
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

On August 12, 1988, the Chief of the Unauthorized Branch ("The Branch Chief") called Ms. Gina Frane, the Committee's assistant treasurer and point of contact per Mr. Woodrow's request in the August 1, 1988 letter. The Branch Chief informed Ms. Frane that we had not received a response to the RFAIs for the 1987 Mid-Year, Year End, and 1988 March Monthly Reports. The Branch Chief addressed each problem with Ms. Frane and recommended that the Committee respond as soon as possible. Ms. Frane stated that the Committee was in the process of moving its offices and that their records were in boxes, but she indicated that she would prepare the responses as soon as she was able (Attachment 7).

On September 6, 1988, the Reports Analysis Division ("RAD") analyst tried to reach Ms. Frane. When the call had not been returned by the end of the workday, the analyst called a second time and was informed that Ms. Frane had been given the message to return the call and would be asked again to do so (Attachment 8).

As of this date, Ms. Frane has not contacted the Reports Analysis Division and no response has been received from the Committee regarding this matter.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGE(S)	MICROFILM LOCATION
						TYPE OF FILER
LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.				ID #C00082297 NON-PARTY QUALIFIED		
CONNECTED ORGANIZATION: NONE						
1987	MID-YEAR REPORT	29,536	33,215	1JAN87 -30JUN87	21	87FEC/484/0535
	NOTICE OF FAILURE TO FILE			1JAN87 -30JUN87	1	87FEC/484/0813
	REQUEST FOR ADDITIONAL INFORMATION			1JAN87 -30JUN87	2	87FEC/492/5122
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN87 -30JUN87	3	87FEC/495/1129
	YEAR-END	23,892	23,713	1JUL87 -31DEC87	41	88FEC/510/3939
	NOTICE OF FAILURE TO FILE			31DEC87	1	88FEC/510/2908
	REQUEST FOR ADDITIONAL INFORMATION			1JUL87 -31DEC87	1	88FEC/515/1079
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL87 -31DEC87	2	88FEC/518/5021
1988	MISCELLANEOUS REPORT TO FEC			24FEB88	1	88FEC/510/3938
	MISCELLANEOUS REPORT FROM FEC			4MAY88	1	88FEC/524/1422
	MISCELLANEOUS NOTICE FROM FEC			13MAY88	1	88FEC/525/1707
	STATEMENT OF ORGANIZATION - AMENDMENT			3AUG88	2	88FEC/540/4844
	FEBRUARY MONTHLY	7,105	7,304	1JAN88 -31JAN88	32	88FEC/510/3986
	FEBRUARY MONTHLY - AMENDMENT	7,105	7,304	1JAN88 -31JAN88	15	88FEC/540/4943
	REQUEST FOR ADDITIONAL INFORMATION			1JAN88 -31JAN88	2	88FEC/525/0591
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN88 -31JAN88	5	88FEC/528/3106
	MARCH MONTHLY	3,801	3,889	1FEB88 -29FEB88	20	88FEC/515/1390
	REQUEST FOR ADDITIONAL INFORMATION			1FEB88 -29FEB88	2	88FEC/525/0588
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1FEB88 -29FEB88	5	88FEC/528/3101
	APRIL MONTHLY	4,170	4,585	1MAR88 -31MAR88	20	88FEC/540/4922
	NOTICE OF FAILURE TO FILE			1MAR88 -31MAR88	1	88FEC/524/4961
	MAY MONTHLY	7,074	7,853	1APR88 -30APR88	18	88FEC/540/4884
	NOTICE OF FAILURE TO FILE			1APR88 -30APR88	1	88FEC/528/4694
	JUNE MONTHLY	4,372	3,131	1MAY88 -31MAY88	18	88FEC/540/4903
	NOTICE OF FAILURE TO FILE			1MAY88 -31MAY88	1	88FEC/532/4893
	JULY MONTHLY	5,470	5,171	1JUN88 -30JUN88	18	88FEC/540/4865
	AUGUST MONTHLY	6,132	5,826	1JUL88 -30JUL88	17	88FEC/540/4847
	TOTAL	91,552	0 94,687 0		252	TOTAL PAGES

All reports have been reviewed.

Cash on hand as of 7/30/88: \$780

Debts and Obligations Owed to the Committee: \$0

Debts and Obligations Owed by the Committee: \$86,020

93040932724

DETAILED SUMMARY PAGE

of Receipts and Disbursements
(Page 2, F.E.C. FORM 302)

Attachment 2

Name of Committee (in full) LIFE REPAIRMENT PAC		Report Covering the Period From Jan 1, 1987 To June 30, 1987	
		COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
I. RECEIPTS			
11 CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			
(i) Remitted (use Schedule A)			
(ii) Unremitted			
(iii) Total of contributions from individuals			
(L) Political Party Committees			
(c) Other Political Committees (such as PACs)			
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))		\$ 29,536.50	\$ 29,536.50
12 TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES			
13 ALL LOANS RECEIVED			
14 LOAN REPAYMENTS RECEIVED			
15 OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			
16 REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			
17 OTHER RECEIPTS (Dividends, Interest, etc.)			
18 TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)		\$ 29,536.50	\$ 29,536.50
II. DISBURSEMENTS			
19 OPERATING EXPENDITURES		\$ 17,005.23	\$ 17,005.23
20 TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			
21 CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			
22 INDEPENDENT EXPENDITURES (use Schedule E)		\$ 16,210.12	\$ 16,210.12
23 COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)			
24 LOAN REPAYMENTS MADE			
25 LOANS MADE			
26 REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees			
(b) Political Party Committees			
(c) Other Political Committees (such as PACs)			
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))			
27 OTHER DISBURSEMENTS			
28 TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)		\$ 33,215.35	\$ 33,215.35
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES			
29 TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))		\$ 29,536.50	\$ 29,536.50
30 TOTAL CONTRIBUTION REFUNDS (from Line 26(d))		\$ 0	\$ 0
31 NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)		\$ 29,536.50	\$ 29,536.50
32 TOTAL OPERATING EXPENDITURES (from Line 19)		\$ 17,005.23	\$ 17,005.23
33 OFFSETS TO OPERATING EXPENDITURES (from Line 15)			
34 NET OPERATING EXPENDITURES (subtract Line 33 from 32)			

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370513

SCHEDULE A

ITEMIZED RECEIPTS
1987 Mid-Year Report

Any information collected from such reports and statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Life Amendment Political Action Committee

A. Full Name, Mailing Address and ZIP Code Mary Thomas 1516 43rd St Rock Island, IL 61201	Name of Employer Occupation	Date (month, day, year) 1-20-87 3-2-87 3-30-87 4-24-87 6-3-87	Amount of Each Receipt this Period 50.00 15.00 10.00 15.00 25.00
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Aggregate Year-to-Date > \$ 615.00		500.00
B. Full Name, Mailing Address and ZIP Code Mr. & Mrs. Roland Burkhead 602 Anita St. Chula Vista, CA 92011	Name of Employer Occupation	Date (month, day, year) 3-25-87 4-17-87 4-13-87 6-1-87 6-17-87	Amount of Each Receipt this Period 100.00 30.00 30.00 20.00 20.00
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Aggregate Year-to-Date > \$ 250.00		50.00
C. Full Name, Mailing Address and ZIP Code Agnes A. Kelleher 4193 Willow Grove Dallas, Tx 75220	Name of Employer Occupation	Date (month, day, year) 1-12-87 2-9-87 2-23-87 3-24-87 5-26-87	Amount of Each Receipt this Period 75.00 75.00 50.00 50.00 75.00
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Aggregate Year-to-Date > \$ 325.00		
D. Full Name, Mailing Address and ZIP Code Grace Mackenzie 4700 NW Elliot St. NW Washington, D.C. 20016	Name of Employer Occupation	Date (month, day, year) 2-6-87 3-20-87 5-28-87 6-25-87	Amount of Each Receipt this Period 100.00 50.00 50.00 100.00
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Aggregate Year-to-Date > \$ 300.00		
E. Full Name, Mailing Address and ZIP Code Mary Ryan 4305 Everett St. Wheat Ridge, CO 80033	Name of Employer Occupation	Date (month, day, year) 1-20-87 3-2-87 6-5-87	Amount of Each Receipt this Period 100.00 50.00 50.00
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Aggregate Year-to-Date > \$ 200.00		
F. Full Name, Mailing Address and ZIP Code Terry Hoffman 7118 West River Brooklyn, MN 55430	Name of Employer Occupation	Date (month, day, year) 1-26-87 3-23-87 2-26-87	Amount of Each Receipt this Period 50.00 100.00 50.00
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Aggregate Year-to-Date > \$ 200.00		
G. Full Name, Mailing Address and ZIP Code Diane Shannon N 7213 Lk Cushman RD Hoodspport, WA 98548	Name of Employer Occupation	Date (month, day, year) 3-18-87	Amount of Each Receipt this Period 240.00
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Aggregate Year-to-Date > \$ 240.00		

SUBTOTAL of Receipts This Page (optional)

2,130.00

TOTAL This Period (last page this line number only)

SCHEDULE A

ITEMIZED RECEIPTS

1987 Mid-Year Report

Use this form to report
for each category of the
Detailed Summary Page

Page **2** of **2**
\$1987 1987 Rev. 5/87

Any format on cushion from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Life Amendment Political Action Committee

A. Full Name, Mailing Address and ZIP Code James Clark 338-A Concord Ave Greensburg, PA 15601	Name of Employer Occupation	Date (month, day, year) 1-12-87 2-4-87 3-5-87 4-6-87	Amount of Each Receipt this Period 50.00 50.00 50.00 50.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ See Below		
B. Full Name, Mailing Address and ZIP Code James Clark Cont.	Name of Employer Occupation	Date (month, day, year) 5-4-87 6-4-87	Amount of Each Receipt this Period 25.00 50.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$275.00		
C. Full Name, Mailing Address and ZIP Code Herbert F McVay 12485 Conquistador Way San Diego, CA 92128	Name of Employer Occupation	Date (month, day, year) 3-5-87 3-20-87 5-27-87	Amount of Each Receipt this Period 100.00 100.00 200.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$400.00		
D. Full Name, Mailing Address and ZIP Code Mr. & Mrs. Norm Sonju 5402 Harbor Town Dallas, Tx 75252	Name of Employer Occupation	Date (month, day, year) 4-20-87 5-29-87	Amount of Each Receipt this Period 100.00 100.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$200.00		
E. Full Name, Mailing Address and ZIP Code Margaret Brown 1120 Lake Shore Dr. #3-A Chicago, IL 60611	Name of Employer Occupation	Date (month, day, year) 1-26-87	Amount of Each Receipt this Period 200.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$200.00		
F. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		

SUBTOTAL of Receipts This Page (optional)

1,075.00

TOTAL This Period (last page this line number only)

3,205.00

97304993332727



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

NOV 4 1987

Rick Woodrow, Treasurer
Life Amendment Political
Action Committee, Inc.
P.O. Box 5490
Everett, MA 98206

Identification Number: C00082297

Reference: Mid-Year Report (1/1/87-6/30/87)

Dear Mr. Woodrow:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The identification of each contributor, including the person's occupation and name of employer, must be provided if the person has contributed in excess of \$200 in the aggregate during the calendar year. Please amend Schedule A supporting Line 11(a)(i) for each entry lacking a contributor's occupation and name of employer.

Note: If your committee has made at least one effort per solicitation, either by a written request or by an oral request documented in writing to obtain this information from the contributor, your committee may have exercised "best efforts." If you believe that your committee satisfies the "best efforts" provision, you should provide a copy of your solicitation or an explanation of the method(s) used to obtain contribution information. Clarification regarding "best efforts" should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. 11 CFR 104.3(a)(4)(i) and 104.7.

-Please provide the total for Line 10, Column A of the Summary Page.

-Line 11(d) of the Detailed Summary Page of your report discloses a total of \$29,536.50 in total contributions. The sum of the entries itemized on Schedule A, however,

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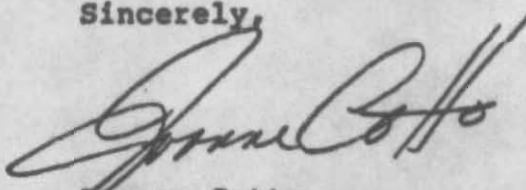
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[indicates the total to be \$3,205. Please amend your report to clarify the discrepancy.] *AKH*

-Please provide clarification regarding the forgiven loan by Doris Storms.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,



Ivonne Cotto
Reports Analyst
Reports Analysis Division

87034925123
93040932729



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

HQ-3

November 25, 1987

Rick Woodrow, Treasurer
 Life Amendment Political
 Action Committee, Inc.
 P.O. Box 5490
 Everett, WA 98206

Identification Number: C00082297

Reference: Mid-Year Report (1/1/87-6/30/87)

Dear Mr. Woodrow:

This letter is to inform you that as of November 24, 1987, the Commission has not received your response to our request for additional information, dated November 4, 1987. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Ivonne Cotto on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,

John D. Gibson
 John D. Gibson
 Assistant Staff Director
 Reports Analysis Division

Enclosure

97034951122

Life Amendment Political Action Committee, Inc.

"The Nation's Oldest Pro-Life Political Action Committee"

P.O. Box 5490 Everett, WA 98206

(206) 252-8983

(206) 672-9415

August 1, 1988

89 AUG -3 AM 9:35

RECEIVED
FEDERAL ELECTION COMMISSION

Mr. Mark F. Eilers
Federal Election Commission
Washington, D.C. 20463

HAND DELIVERED

Dear Mark:

Enclosed are a number of Monthly Reports as well as responses to several letters from you. Due to the lateness of all of this I realize that we find ourselves in a very difficult situation with the FEC and I'd like to at least try to explain what has happened.

I have been out of the office the majority of the time the last several months due to illness. In fact, in just a few hours I will be having surgery which I hope will be the conclusion of a long and tedious string of medical problems.

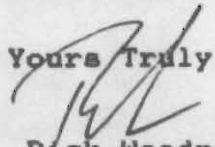
It was my understanding that most of this information had been forwarded to you shortly after we spoke on the phone. It has become apparent that the individual responsible for taking care of this failed to do so and I have just recently become aware of the situation. I have terminated that employee and now, at 3:30am have hopefully updated all of our reports and responses.

As you will see, also included with this information is an amendment to our Statement of Organization naming Gina Frane as Assistant Treasurer. As I will be out of the office for awhile recovering from surgery, would you please contact Gina at my office and advise her as to any other outstanding responses that might exist. She will be running things back and forth from the hospital and we will get right on any additional responses you need.

I realize that we are in a major violation of the election code by not having this information to you long before now and I can only hope that your office will understand the situation that has developed. If it would be helpful in the Commission's consideration of this matter, I would be happy to provide any medical documentation you might require as to the fact that I have been unable to work much time at all the last several months.

Please contact Gina at your earliest opportunity and advise her as to what course of action we should take next. Thanks for any understanding your department can give regarding this matter. We look forward to hearing from you.

Yours Truly,


Rick Woodrow
Treasurer

ANALYST: Lisa J. Stolaruk
CONVERSATION WITH: Ms. Gina Frane
COMMITTEE: Life Amendment PAC
DATE: August 12, 1988
SUBJECT(S): Failure to Respond to Requests for
Additional Information

I called Ms. Frane this afternoon regarding Mr. Rick Woodrow's letter of August 1, 1988. The letter indicated that Mr. Woodrow was under the impression that all outstanding matters requested by the Commission had been addressed by the committee.

I explained to Ms. Frane that the committee has yet to answer questions raised regarding the 1987 Mid Year, Year End and 1988 March Monthly Reports. I addressed each problem with Ms. Frane and recommended that the committee submit responses as soon as possible. Ms. Frane stated that the committee was in the process of moving its offices and that all of the records are currently in boxes. She asked when responses would need to be filed. I stated that all responses were due to be filed several months ago and urged that priority should be given to answering our inquiries. She indicated that she would prepare the responses as soon as she could get around to it.

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ANALYST: Kate Henry

CONVERSATION WITH: Unknown

COMMITTEE: Life Amendment PAC

DATE: September 6, 1988

SUBJECT(S): Failure to Respond to Requests for Additional Information

I attempted to reach Ms. Gina Frane. There was no one in the office, so I left a message for Ms. Frane to return the call.

I called a second time at the end of the workday. I was informed that Ms. Frane had received my first message and that she would be asked a second time to return the call.

93040932733

RECEIVED
FEDERAL ELECTION COMMISSION
SECRET

88 DEC -2 AM 9:27

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD Referral: # 88-L-21
STAFF MEMBER: J. Albert Brown

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

RESPONDENT: Life Amendment Political Action, Inc., and Rick Woodrow, as treasurer

RELEVANT STATUTES: 2 U.S.C. § 434(b)(3)(A) and (B)
11 C.F.R. 104.3(a)(4)(i) and (ii)

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: NONE

I. GENERATION OF MATTER

On September 19, 1988, the Reports Analysis Division ("RAD") made a referral of alleged violations to the Office of the General Counsel. Attachment 1. The referral alleges that Life Amendment Political Action Committee, Inc., and Rick Woodrow, as treasurer, ("the Committee"), failed to clarify a discrepancy between the sum of contributions received, which are disclosed on Schedule A, and the total amount of contributions disclosed on Line 11(d) of the Detailed Summary Page of its 1987 Mid-Year Report.

II. FACTUAL AND LEGAL ANALYSIS

The Law

The Federal Election Campaign Act of 1971, as amended, at Sections 434(b)(3)(A) and (B) requires treasurers of political committees to disclose in periodic reports filed with the FEC

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the identity of each person and political committee which make contributions of greater than \$200 within a calendar year to the committee. The treasurer may also report "any lesser amount if the reporting committee should so elect, together with the date and amount of any such contribution." See 2 U.S.C. § 434(b)(3)(A) and (B). The Commission Regulations also detail the same requirements at 11 C.F.R. 104.3(a)(4)(i) and (ii).

Analysis

Life Amendment Political Action Committee disclosed \$29,536.50 in total contributions received, on Line 11(d) of the Detailed Summary Page of the 1987 Mid-Year Report. (Attachment I, pg 5). The Committee failed to provide a specific breakdown of the categories of receipts, as required on the Detailed Summary Page. Schedule A, supporting Line 11, itemized \$3,205 in contributions from individuals. (Attachment I, pg 2). This results in a total of \$26,331.50 in unidentified contributions. Such a failure to report information explicitly violates Section 434(b)(3)(A) and (B) of the Act and Section 104.3(a)(4)(i) and (ii) of Commission regulations.

A Request for Additional Information ("RFAI") was sent to the Committee on November 4, 1987. (Attachment I, pg 8). The RFAI noted the discrepancy between the Line 11(d) total and the Schedule A total and requested that the Committee amend its report to clarify the discrepancy. On November 25, 1987, the Committee was sent a second notice of failure to respond to the

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November 4, 1987, RFAI. (Attachment I, pg 10).

The Committee's treasurer, Rick Woodrow, filed a letter dated August 1, 1988, stating that he was submitting a number of monthly reports, as well as responses to several outstanding RFAIs. (Attachment I, pg 11). However, the only amendment included was in response to an RFAI for the 1988 February Monthly Report.

On August 12, 1988, RAD called Gina Frane, the Committee's assistant treasurer, and point of contact per Mr. Woodrow's request in the August 1, 1988, letter. RAD informed Ms. Frane that a response to the RFAIs for the 1987 Mid-Year, Year End, and 1988 March Monthly reports had not been received. RAD addressed each problem with Ms. Frane and recommended that the Committee respond as soon as possible. Ms. Frane stated that the Committee was in the process of moving its offices and that their records were in boxes, but she indicated that she would prepare the responses as soon as she was able. (Attachment I, pg 12).

On September 6, 1988, the RAD analyst tried to reach Ms. Frane. When the call had not been returned by the end of the workday, the analyst called a second time and was informed that Ms. Frane had been given the message to return the call and would be asked again to do so. (Attachment I, pg 13). As of the RAD referral, September 19, 1988, and up until the present, neither Ms. Frane nor the committee has contacted RAD regarding this matter.

Therefore, this Office recommends that the Commission find

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reason to believe Life Amendment Political Action Committee, Inc. and Rick Woodrow, as treasurer, violated 2 U.S.C. § 434(b)(3)(A) and (B) by failing to clarify a discrepancy between the sum of contributions received and the total amount of contributions disclosed in its 1987 Mid Year Report as discussed above.

III. RECOMMENDATIONS

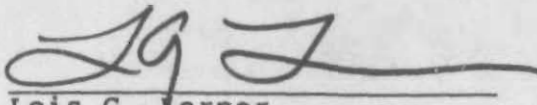
1. Open a MUR.
2. Find reason to believe that Life Amendment Political Action Committee, Inc. and Rick Woodrow, as treasurer, violated 2 U.S.C. § 434(b)(3)(A) and (B).
3. Approve the attached letter (1) and Factual and Legal Analysis.

Lawrence M. Noble
General Counsel

93040932737
Date

12-1-88

BY:


Lois G. Lerner
Associate General Counsel

Attachments:

1. Referral Materials
2. Proposed Letters and Factual and Legal Analysis

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Life Amendment Political Action, Inc.,)
and Rick Woodrow, as treasurer)

RAD Ref. 88L-21

(MUR 2799)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on December 6, 1988, the Commission decided by a vote of 4-0 to take the following actions in RAD Ref. 88L-21:

1. Open a MUR.
2. Find reason to believe that Life Amendment Political Action Committee, Inc. and Rick Woodrow, as treasurer, violated 2 U.S.C. § 434(b)(3)(A) and (B).
3. Approve the letter (l) and Factual and Legal Analysis, as recommended in the First General Counsel's report signed December 1, 1988.

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

Attest:

12/6/88

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Fri., 12-2-88, 9:27
Circulated on 48 hour tally basis: Fri., 12-2-88, 12:00
Deadline for vote: Tues., 12-6-88, 4:00

93040932738



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 9, 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Rick Woodrow, Treasurer
Life Amendment Political
Action Committee, Inc.
P.O. Box 5490
Everett, WA. 98206

RE: MUR 2799

Dear Mr. Woodrow:

On December 6, 1988, the Federal Election Commission found that there is reason to believe Life Amendment Political Action Committee, Inc. and you, as treasurer, violated 2 U.S.C. § 434(b)(3)(A) and (B), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Life Amendment Political Action Committee, Inc. and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office 15 days after your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against Life Amendment Political Action Committee, Inc. and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission

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either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

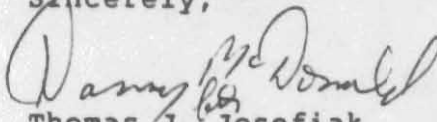
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jim Brown, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,


Thomas J. Josefiak
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form

93040932740

89 JAN 30 AM 9:27

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of

Life Amendment Political
Action, Inc., and Rick Woodrow,
as treasurer

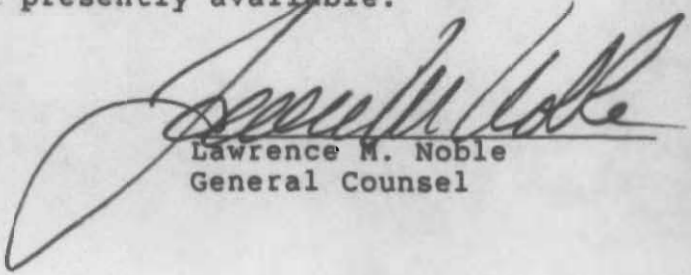
)
)
) MUR 2799
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)

GENERAL COUNSEL'S REPORT

The Office of the General Counsel is prepared to close the investigation in this matter as to Life Amendment Political Action, Inc., and Rick Woodrow, as treasurer, based on the assessment of the information presently available.

Date

1/27/89


Lawrence M. Noble
General Counsel

93040932741



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 30, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Rick Woodrow, Treasurer
Life Amendment Political Action
Committee, Inc.
P.O. Box 5490
Everett, WA. 98206

RE: MUR 2799
Life Amendment Political
Action Committee, Inc. and
Rick Woodrow, as treasurer

Dear Mr. Woodrow:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on December 6, 1988, the Federal Election Commission found reason to believe that Life Amendment Political Action Committee, Inc. (the "Committee") and you, as treasurer, violated 2 U.S.C. §§ 434(b)(3)(A) and (B), 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.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten 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 the 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 whether there is probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days,

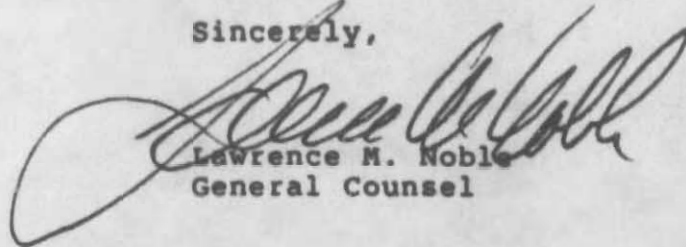
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you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Jim Brown, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

93040932743

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Life Amendment Political
Action, Inc., and Rick Woodrow,
as treasurer

)
) MUR 2799
)
)
)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On December 6, 1988, the Commission found reason to believe in MUR 2799 that Life Amendment Political Action Committee, Inc. (the "Committee or LAPAC") and Rick Woodrow, as treasurer, violated 2 U.S.C. § 434(b)(3)(A) and (B), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Commission based this decision on the failure of the Committee to respond to repeated requests for additional information to provide a specific breakdown of the categories of receipts, as required on the Detailed Summary Page. This failure to provide a breakdown of the categories of receipts occurred despite disclosure of total contributions of \$29,536.50 received on Line 11(d) of the Detailed Summary Page of LAPAC's 1987 Mid-Year Report.

II. ANALYSIS

The Federal Election Campaign Act of 1971, as amended, at Sections 434(b)(3)(A) and (B) requires treasurers of political committees to disclose in periodic reports filed with the Commission the identity of each person and political committee which make contributions of greater than \$200 within a calendar year to the committee. The treasurer may also report "any lesser amount if the reporting committee should so elect, together with

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the date and amount of any such contribution." See
2 U.S.C. § 434(b)(3)(A) and (B). Likewise, the Commission
Regulations also detail the same requirements at 11 C.F.R.
§ 104.3(a)(4)(i) and (ii).

Life Amendment Political Action Committee, Inc. and
Rick Woodrow, as treasurer, disclosed \$29,536.50 in total
contributions received on Line 11(d) of the Detailed Summary Page
of its 1987 Mid-Year Report. The Committee failed to provide a
specific breakdown of the categories of receipts, as required on
the Detailed Summary Page. Schedule A, supporting Line 11,
itemized \$3,205 in contributions from individuals. This results
in a total of \$26,331.50 in unidentified contributions. Such a
failure to report information explicitly violates Sections
434(b)(3)(A) and (B) of the Act.

A Request for Additional Information ("RFAI") was sent to the
Committee on November 4, 1987. The RFAI noted the discrepancy
between the Line 11(d) total and the Schedule A total and
requested that the Committee amend its report to clarify the
discrepancy. On November 25, 1987, the Committee was sent a
second notice of failure to respond to the November 4, 1987,
RFAI.

The Committee's treasurer, Mr. Rick Woodrow, filed a letter
August 1, 1988, stating that he was submitting a number of
monthly reports as well as responses to several outstanding
RFAIs. However, the only amendment included was in response to
an RFAI for the 1988 February Monthly Report.

On August 12, 1988, RAD called Ms. Gina Frane, the

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Committee's assistant treasurer and point of contact per Mr. Woodrow's request in the August 1, 1988, letter. RAD informed Ms. Frane that the Commission had not received a response to the RFAIs for the 1987 Mid-Year, Year End, and 1988 March Monthly reports. RAD addressed each problem with Ms. Frane and recommended that the Committee respond as soon as possible. Ms. Frane stated that the Committee was in the process of moving its offices and that their records were in boxes, but she indicated that she would prepare the responses as soon as she was able.

On September 6, 1988, RAD analyst tried to reach Ms. Frane. When the call had not been returned by the end of the workday, the analyst called a second time and was informed that Ms. Frane had been given the message to return the call and would be asked again to do so. As of the present time, Ms. Frane has not contacted the Reports Analysis Division and no response has been received from the Committee regarding this matter.

Accordingly, the Office of the General Counsel recommends that the Commission find probable cause to believe that Life Amendment Political Action Committee, Inc. and Rick Woodrow as Treasurer, violated 2 U.S.C. § 434(b)(3)(A) and (B).

III. GENERAL COUNSEL'S RECOMMENDATION

Find probable cause to believe that Life Amendment Political Action Committee, Inc. and Rick Woodrow, as treasurer, violated 2 U.S.C. §§ 434(b)(3)(A) and (B).

Date

1/27/89


Lawrence M. Noble
General Counsel

RECEIVED
FEDERAL ELECTION COMMISSION

89 MAR 20 PM 1:50

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Life Amendment Political
Action, Inc., and Rick Woodrow,
as treasurer

)
) MUR 2799
)

SENSITIVE
EXECUTIVE SESSION
MAR 28 1989

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On December 6, 1988, the Commission found reason to believe in MUR 2799 that Life Amendment Political Action Committee, Inc. (the "Committee or LAPAC") and Rick Woodrow, as treasurer, violated 2 U.S.C. § 434(b)(3)(A) and (B), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Commission based this decision on the failure of the Committee to respond to requests for additional information regarding a specific breakdown of the categories of receipts, as required on the Detailed Summary Page. This failure to provide a breakdown of the categories of receipts occurred despite disclosure of total contributions of \$29,536.50 received on Line 11(d) of the Detailed Summary Page of LAPAC's 1987 Mid-Year Report. Schedule A, supporting Line 11, itemized \$3,205 in contributions from individuals. This resulted in a total of \$26,331.50 in unidentified contributions.

On December 9, 1988, the Committee was sent a certified letter notifying it of the Commission's finding of reason to believe a violation of the Act had occurred. This notification contained a copy of the Factual and Legal Analysis supporting the Commission's finding and informed the Committee of the opportunity to respond or pursue pre-probable cause conciliation. No response was received to this notification, other than the

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return receipt acknowledgment card. The Office of the General Counsel notified the Committee on January 30, 1989, that it was prepared to recommend that the Commission find probable cause to believe a violation of the Act had occurred based upon an investigation of the facts in MUR 2799. A copy of the General Counsel's Brief discussing the basis for probable cause was forwarded along with this letter. Again, no response to any of these notification materials was submitted by the Committee.

II. ANALYSIS

The Federal Election Campaign Act of 1971, as amended, at Sections 434(b)(3)(A) and (B) requires treasurers of political committees to disclose in periodic reports filed with the FEC the identity of each person and political committee which make contributions of greater than \$200 within a calendar year to the committee. The treasurer may also report "any lesser amount if the reporting committee should so elect, together with the date and amount of any such contribution." See 2 U.S.C. § 434(b)(3)(A) and (B). Likewise, the Commission Regulations also detail the same requirements at 11 C.F.R. 104.3(a)(4)(i) and (ii).

Life Amendment Political Action Committee, Inc. and Rick Woodrow, as treasurer, disclosed \$29,536.50 in total contributions received on Line 11(d) of the Detailed Summary Page of its 1987 Mid-Year Report. The Committee failed to provide a specific breakdown of the categories of receipts, as required on

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the Detailed Summary Page. Schedule A, supporting Line 11, itemized \$3,205 in contributions from individuals. This results in a total of \$26,331.50 in unidentified contributions. Such a failure to report information explicitly violates Sections 434(b)(3)(A) and (B) of the Act.

A Request for Additional Information ("RFAI") was sent to the Committee on November 4, 1987. The RFAI noted the discrepancy between the Line 11(d) total and the Schedule A total and requested that the Committee amend its report to clarify the discrepancy. On November 25, 1987, the Committee was sent a second notice of failure to respond to the November 4, 1987, RFAI.

The Committee's treasurer, Mr. Rick Woodrow, filed a letter August 1, 1988, stating that he was submitting a number of monthly reports as well as responses to several outstanding RFAIs. However, the only amendment included was in response to an RFAI for the 1988 February Monthly Report.

On August 12, 1988, RAD called Ms. Gina Frane, the Committee's assistant treasurer and point of contact per Mr. Woodrow's request in the August 1, 1988, letter. RAD informed Ms. Frane that the Commission had not received a response to the RFAIs for the 1987 Mid-Year, Year End, and 1988 March Monthly reports. RAD addressed each problem with Ms. Frane and recommended that the Committee respond as soon as possible. Ms. Frane stated that the Committee was in the process of moving its

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offices and that their records were in boxes, but she indicated that she would prepare the responses as soon as she was able.

On September 6, 1988, RAD analyst tried to reach Ms. Frane. When the call had not been returned by the end of the workday, the analyst called a second time and was informed that Ms. Frane had been given the message to return the call and would be asked again to do so. As of the present time, Ms. Frane has not contacted the Reports Analysis Division and no response has been received from the Committee regarding this matter.

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The Committee has failed to respond to this Office's December 9, 1988 notification of the Commission's finding of reason to believe a violation of the Act occurred in this situation. There has also been no response to this Office's January 30, 1989 letter informing the Committee that the Office of the General Counsel was prepared to recommend that the Commission find probable cause to believe a violation of the Act had occurred based upon an investigation of the facts in MUR 2799. Accordingly, the Office of the General Counsel recommends that the Commission find probable cause to believe that Life Amendment Political Action Committee, Inc. and Rick Woodrow, as treasurer, violated 2 U.S.C. § 434(b)(3)(A) and (B).

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

In light of the preceding discussion, the Office of the General Counsel recommends that the Commission approve the attached proposed conciliation agreement with the Committee and

Mr. Rick Woodrow, its treasurer.

IV. RECOMMENDATIONS

1. Find probable cause to believe that Life Amendment Political Action Committee, Inc. and Rick Woodrow, as treasurer, violated 2 U.S.C. §§ 434(b)(3)(A) and (B).
2. Approve the attached conciliation agreement and letter.

Date

3/20/89


Lawrence M. Noble
General Counsel

Attachments:

1. Conciliation Agreement
2. Letter

Staff assigned: J. Albert Brown

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Life Amendment Political) MUR 2799
Action, Inc., and Rick)
Woodrow, as treasurer)

CERTIFICATION

I, Hilda Arnold, recording secretary for the Federal Election Commission executive session on March 28, 1989, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in MUR 2799:

1. Find probable cause to believe that Life Amendment Political Action Committee, Inc. and Rick Woodrow, as treasurer, violated 2 U.S.C. §§ 434(b)(3)(A) and (B).
2. Approve the conciliation agreement and letter attached to the General Counsel's report dated March 20, 1989.

Commissioners Aikens, Josefiak, McDonald, McGarry and Thomas voted affirmatively for this decision. Commissioner Elliott was not present.

Attest:

March 29, 1989

Date

Hilda Arnold

Hilda Arnold
Administrative Assistant

93040932752



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 30, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Rick Woodrow, Treasurer
Life Amendment Political Action Committee
P.O. Box 5490
Everett, WA. 98206-5490

RE: MUR 2799
Life Amendment Political
Action Committee and
Rick Woodrow, as treasurer

Dear Mr. Woodrow:

On March 28, 1989, the Federal Election Commission found that there is probable cause to believe Life Amendment Political Action Committee and you, as treasurer ("LAPAC"), violated 2 U.S.C. §§ 434(b)(3)(A) and (B), provisions of the Federal Election Campaign Act of 1971, as amended (the "Act"). This finding was based on the failure of LAPAC to provide a specific breakdown of the categories of certain receipts in the Schedule A, supporting Line 11(d) of the Detailed Summary Page of the 1987 Mid-Year Report. Due to this failure there was a discrepancy between the itemized contributions received and reported, which are disclosed on Schedule A, and the total amount of contributions disclosed on Line 11(d) of the Detailed Summary Page of LAPAC's 1987 Mid-Year Report.

The Commission has a duty to attempt to correct such violations for a period of 30 to 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement during that period, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty.

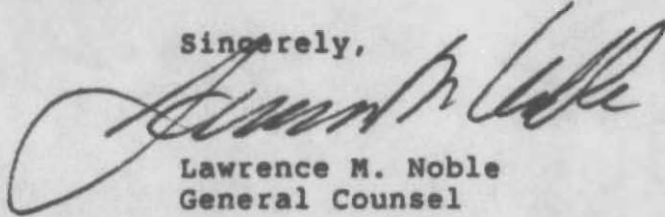
Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission within ten days. I will then recommend that the Commission accept the agreement. Please make your check for the civil penalty payable to the Federal Election Commission.

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Rick Woodrow, Treasurer
MUR 2799
Page 2

If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Jim Brown, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

93040932754



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 26, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Rick Woodrow, Treasurer
Life Amendment Political Action Committee
P.O. Box 5490
Everett, WA. 98206-5490

RE: MUR 2799
Life Amendment Political
Action Committee and
Rick Woodrow, as treasurer

Dear Mr. Woodrow:

On March 30, 1989, you were notified that the Federal Election Commission found that there is probable cause to believe Life Amendment Political Action Committee and you, as treasurer ("LAPAC"), violated 2 U.S.C. § 434(b)(3)(A) and (B), provisions of the Federal Election Campaign Act of 1971, as amended (the "Act"). On that same date you were sent a conciliation agreement offered by the Commission in settlement of this matter.

Please note that after a finding of probable cause the Commission has a duty to attempt to correct such violations for a period limited to a minimum of 30 days or to a maximum of 90 days. To date, you have not responded to the proposed agreement. The 30 day minimum period for negotiations will soon expire. Unless we receive a response from you within five days, this Office will consider these negotiations terminated and will recommend to the Commission the filing of a civil suit in United States District Court.

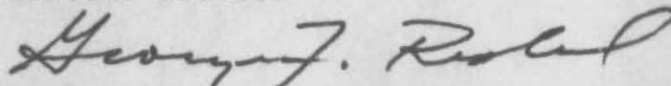
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Rick Woodrow, Treasurer
Page 2

Should you have any questions, please contact Jim Brown,
the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel



BY: George F. Rishel
Acting Associate General Counsel

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SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Life Amendment Political Action)
Committee, Inc. and Rick)
Woodrow, as treasurer)

EXECUTIVE SESSION

MURs 2648 and 2799

June 20, 1989

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On December 13, 1988, the Commission found probable cause to believe that Life Amendment Political Action Committee, Inc. (the "Committee" or "LAPAC"), and Rick Woodrow, as treasurer violated the following provisions of the Federal Election Campaign Act of 1971, as amended, and Commission regulations as a result of the Committee activities outlined in MUR 2648: 2 U.S.C. § 432(c)(1), (2), (3), and (5); 2 U.S.C. § 432(d); 2 U.S.C. § 434 (b)(2), (4), (5), (6), and (8); 11 C.F.R. § 104.11; and 11 C.F.R. 104.14(b). On that same date, the Commission further found probable cause to believe that the Committee knowingly and willfully violated 2 U.S.C. § 432(c)(1), (2), (3); 2 U.S.C. § 432(d); 2 U.S.C. § 434(a)(4)(B) and 11 C.F.R. § 104.14(b) during a subsequent time period. LAPAC was notified of the Commission's determinations by certified mail and a copy of the Commission approved conciliation agreement was included in that correspondence. The letter explicitly stated if the Commission failed to receive a signed conciliation agreement, it might institute a civil suit for relief in United States District Court seeking payment of a civil penalty. According to a return receipt, Respondents

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received the certified mail letter sometime prior to December 23, 1988. The Commission has attempted to settle this matter by informal methods of conference, conciliation, and persuasion for the 90 days allowed under the Act. See 2 U.S.C. § 437g(a)(4)(A)(i). To date, no response has been received from Respondents.

In MUR 2799 the Commission found probable cause to believe that LAPAC, and Rick Woodrow, as treasurer, violated 2 U.S.C. §§ 434(b)(3)(A) and (B) by failing to provide a specific breakdown of the categories of certain receipts in the Schedule A, supporting Line 11(d) of the Detailed Summary Page of the 1987 Mid-Year Report. Respondents were notified of the Commission's determinations by certified mail sent on March 30, 1989, and a copy of the Commission approved conciliation agreement was included in that correspondence. That letter explicitly stated if the Commission failed to receive a signed conciliation agreement, it might institute a civil suit for relief in United States District Court seeking payment of a civil penalty. On April 26, 1989, a reminder letter was sent to the Respondents informing them that the 30 day minimum period for negotiated settlements was about to expire and that this Office would recommend filing of a civil suit in United States District Court in this matter if a response was not received within five days of receipt of that letter. The return receipt demonstrates that the Respondents received this settlement expiration notification on May 2, 1989. To date no response has been received by the Commission from Respondents in regards to

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this matter.

Repeated attempts to reach Mr. Woodrow via telephone concerning the above violations have been unsuccessful. In the past Mr. Woodrow has failed to return telephone calls or attend pre-arranged meetings.

Because these two MURs concern related reporting violations by the same committee, it is appropriate to merge them. Under the circumstances, the General Counsel's Office recommends that the Commission merge MUR 2648 with MUR 2799 and authorize this Office to file a civil suit for relief in United States District Court against the Respondents.

II. RECOMMENDATIONS

1. Merge MUR 2648 with MUR 2799.
2. Authorize the Office of the General Counsel to file a civil suit for relief in these matters in United States District Court against Life Amendment Political Action Committee, Inc. and Rick Woodrow, as treasurer.
3. Approve the attached letter.

Date

6/6/88

Lawrence M. Noble
General Counsel

LM Noble (LJZ)

Attachments

1. Proposed letter to Respondents.

Staff Assigned: J. Albert Brown

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Life Amendment Political Action) MURS 2648 and 2799
Committee, Inc. and Rick)
Woodrow, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the
Federal Election Commission executive session of June 20, 1989,
do hereby certify that the Commission decided by a vote of
6-0 to take the following actions with respect to MURS 2648
and 2799:

1. Merge MUR 2648 with MUR 2799.
2. Authorize the Office of the General Counsel to
file a civil suit for relief in these matters
in United States District Court against Life
Amendment Political Action Committee, Inc. and
Rick Woodrow, as treasurer.
3. Approve the letter attached to the General
Counsel's report dated June 6, 1989.

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

Attest:

6-20-89
Date

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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 23, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Rick Woodrow, Treasurer
Life Amendment Political
Action Committee
P.O. Box 5490
Everett, WA 98206-5490

RE: MUR 2799
Life Amendment Political
Action Committee and
Rick Woodrow, as
treasurer

Dear Mr. Woodrow:

You were previously notified, in regards to MUR 2648, that on December 13, 1988, the Federal Election Commission found probable cause to believe that Life Amendment Political Action Committee ("the Committee") and you, as treasurer, violated 2 U.S.C. § 432(c)(1), (2), (3), and (5); 2 U.S.C. § 432(d); 2 U.S.C. 434(b)(2), (4), (5), (6), and (8); 11 C.F.R. § 104.11; and 11 C.F.R. 104.14(b), provisions of the Federal Election Campaign Act of 1971, as amended and the Commissions regulations. On that same date the Federal Election Commission found that there is probable cause to believe the Committee and you, as treasurer, knowingly and willfully violated 2 U.S.C. § 432(c)(1), (2), (3); 2 U.S.C. § 432(d); 2 U.S.C. § 434(a)(4)(B) and 11 C.F.R. § 104.14(b). Subsequently you were notified in regards to MUR 2799 that on March 28, 1989, the Federal Election Commission found probable cause to believe the Committee and you, as treasurer, also violated 2 U.S.C. § 434(b)(3)(A) and (B).

On June 20, 1989, the Commission voted to merge MUR

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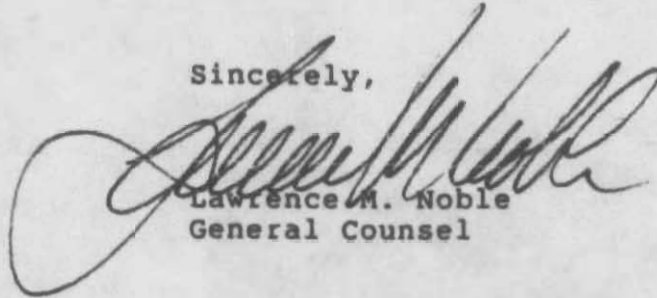
Rick Woodrow, Treasurer
-Page 2-

2648 with MUR 2799. Henceforth, these matters will be known only as MUR 2799.

As a result of our inability to settle these matters through conciliation within the allowable time period, the Commission has authorized the General Counsel to institute a civil action for relief in the United States District Court.

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

Sincerely,

A large, stylized handwritten signature in dark ink, likely belonging to Lawrence M. Noble, is written over the typed name and title.

Lawrence M. Noble
General Counsel

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FEDERAL ELECTION COMMISSION

JAN 29 1990

FILED ENTERED
LODGED RECEIVED

90 JAN 29 AM 11:01

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
DEPUTY

JAN 24 1990

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
DEPUTY

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

FEDERAL ELECTION COMMISSION,)
)
Plaintiff,)
)
v.)
)
LIFE AMENDMENT POLITICAL ACTION)
COMMITTEE, INC., et al.,)
)
Defendants.)

No. C89-1429WD
FINAL ORDER AND
DEFAULT JUDGMENT

90 JAN 29 PM 4:05

RECEIVED
FEDERAL ELECTION COMMISSION

FINAL ORDER AND DEFAULT JUDGMENT

Upon consideration of the plaintiff Federal Election Commission's motion for default judgment against defendants Life Amendment Political Action Committee and Rick Woodrow, as treasurer of Life Amendment Political Action Committee,

IT IS HEREBY ORDERED that the plaintiff's motion be and the same hereby is granted.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that:

1. Defendants Life Amendment Political Action Committee and Rick Woodrow, as treasurer of Life PAC, violated:

(a) 2 U.S.C. §§ 432(c)(1), (2) and (3) by failing to maintain adequate records with respect to

Final Order and
Default Judgment
Page 1

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

20

1
2 contributions received from individuals in 1983
3 and 1984;

4 (b) 2 U.S.C. § 432(d) by failing to preserve for
5 three (3) years the records defendants were
6 required by 2 U.S.C. §§ 432(c)(1), (2) and (3) to
7 maintain with respect to contributions received
8 by Life PAC during 1983 and 1984;

9 (c) 2 U.S.C. § 432(c)(5) by failing to maintain
10 adequate records for 129 disbursements by Life PAC
11 in 1983 totaling \$72,201.49;

12 (d) 11 C.F.R. § 104.14(b) by failing to maintain
13 Life PAC's bank records from 1983 and 1984 for
14 at least three years, and by failing to make
15 those records available for audit, inspection or
16 examination by the Commission;

17 (e) 2 U.S.C. § 434(b)(2) by misreporting the total
18 amount of Life PAC's receipts during 1984;

19 (f) 2 U.S.C. § 434(b)(4) by misreporting the total
20 amount of Life PAC's disbursements during 1984;

21 (g) 2 U.S.C. § 434(b)(5) by failing to properly
22 disclose on the periodic reports of receipts and
23 expenditures filed by defendants all the
24 disbursements for candidate and/or committee

1 operating expenses made by Life PAC in 1983
2 and 1984 to persons who, in the aggregate,
3 received in excess of \$200 in such disbursements
4 from Life PAC during the calendar year;

5 (h) 2 U.S.C. § 434(b)(6) by failing to properly
6 disclose on the periodic reports of receipts
7 and expenditures filed by defendants all the
8 disbursements in connection with independent
9 expenditures made by Life PAC in 1983 and 1984 to
10 persons who, in the aggregate, received in excess
11 of \$200 in such disbursements from Life PAC during
12 the calendar year;

13 (i) 2 U.S.C. § 434(b)(8) by failing to properly
14 disclose on the periodic reports of receipts and
15 expenditures filed by defendants in 1983 and 1984
16 the outstanding debts and other obligations owed
17 by Life PAC;

18 (j) 11 C.F.R. § 104.11 by failing to continuously
19 report until extinguishment debts and other
20 obligations incurred by Life PAC during calendar
21 years 1983 or 1984; and

22 (k) 2 U.S.C. §§ 434(b)(3)(A) and (B) by failing to
23 identify the Committee's contributors in its 1987
24

1
2 Mid-Year Report;

3 (2) For the foregoing violations, defendants Life Amendment
4 Political Action Committee, Inc., and Rick Woodrow, as treasurer
5 of Life PAC, shall pay to the plaintiff Federal Election
6 Commission, with fifteen (15) days from the date of entry of this
7 default judgment, a civil penalty in the amount of fifty five
8 thousand dollars (\$55,000), for which defendants Life PAC and
9 Rick Woodrow shall be jointly and severally liable, see 2 U.S.C.
10 § 437g(a)(6)(B);

11 (3) Defendants Life Amendment Political Action Committee,
12 Inc., and Rick Woodrow, as treasurer of Life PAC, knowingly and
13 willfully violated

14 (a) 2 U.S.C. §§ 432(c)(1), (2) and (3) by failing to
15 maintain adequate records with respect to
16 contributions received from individuals in 1985
17 and 1986;

18 (b) 2 U.S.C. § 432(d) by failing to preserve for
19 three (3) years the records defendants were
20 required by 2 U.S.C. §§ 432(c)(1), (2) and (3) to
21 maintain with respect to contributions received by
22 Life PAC during 1985 and 1986;

23 (c) 11 C.F.R. § 104.14(b) by failing to maintain Life
24 PAC's bank records from 1985 and 1986 for at least

1
2 three years, and failing to make those records
3 available for audit, inspection or examination by
4 the Commission;

5 (d) 2 U.S.C. § 434(a)(4)(B) by failing to file
6 Life PAC's April 1988 Monthly Report in a timely
7 manner;

8 (e) 2 U.S.C. § 434(a)(4)(B) by failing to file
9 Life PAC's May 1988 Monthly Report in a timely
10 manner;

11 (f) 2 U.S.C. § 434(a)(4)(B) by failing to file
12 Life PAC's June 1988 Monthly Report in a timely
13 manner; and

14 (g) 2 U.S.C. § 434(a)(4)(B) by failing to file
15 Life PAC's July 1988 Monthly Report in a timely
16 manner;

17 (4) For the foregoing knowing and willful violations,
18 defendants Life Amendment Political Action Committee, Inc., and
19 Rick Woodrow, as treasurer of Life PAC, shall pay to the
20 plaintiff Federal Election Commission, within fifteen (15) days
21 from the date of entry of this default judgment, a civil penalty
22 in the amount of seventy thousand dollars (\$70,000), for which
23 defendants Life PAC and Rick Woodrow shall be jointly and
24 severally liable, see 2 U.S.C. § 437g(a)(6)(C);

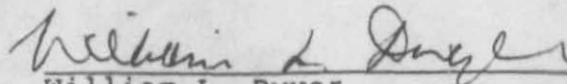
1
2 (5) Defendants Life Amendment Political Action Committee
3 and Rick Woodrow, as treasurer of Life PAC, shall, within fifteen
4 (15) days from the date of entry of this default judgment, amend
5 the periodic reports of receipts and disbursements previously
6 filed by defendants to correct the foregoing violations of
7 2 U.S.C. §§ 434(b)(2), (3), (4), (5), (6), and (8), and 11 C.F.R.
8 § 104.11.

9 (6) Defendants Life Amendment Political Action Committee
10 and Rick Woodrow, as treasurer of Life PAC, are permanently
11 enjoined from future violations of the following provisions of
12 the Federal Election Campaign Act of 1971, as amended, and
13 accompanying Commission regulations: 2 U.S.C. §§ 432(c)(1)-(3),
14 432(c)(5), 432(d), 434(a)(4)(B), 434(b)(2)-(6), 434(b)(8); and
15 11 C.F.R. §§ 104.11, 104.14(b).

16 (7) Defendants Life Amendment Political Action Committee
17 and Rick Woodrow, as treasurer of Life PAC, shall pay the
18 plaintiff Federal Election Commission, within fifteen (15) days
19 from the date of entry of this default judgment, the additional
20 sum of \$33.88. This amount represents the total costs which
21 have been incurred to date by and/or on behalf of the Commission
22
23
24

1
2
3 in this action.
4

5 Jan. 24, 1990
6 Date

7 
8 William L. Dwyer
9 United States District Judge

10 Copies to: Robert W. Bonham, III
11 Office of the General Counsel
12 FEDERAL ELECTION COMMISSION
13 999 E Street, N.W.
14 Washington, D.C. 20463
15 (Counsel for Plaintiff),

16 and

17 LIFE AMENDMENT POLITICAL ACTION COMMITTEE, INC.
18 (Rick Woodrow, Treasurer)
19 P.O. Box 5490
20 Everett, WA 98206
21 (Defendant),

22 and

23 RICK WOODROW, AS TREASURER of Life Amendment
24 Political Action Committee, Inc.
25 P.O. Box 5490
26 Everett, WA 98206
27 (Defendant).

FILED ENTERED
LOGGED RECEIVED

JAN 1 1990

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

FILED ENTERED
LOGGED RECEIVED

JAN 2 1990

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

FEDERAL ELECTION COMMISSION,

Plaintiff,

v.

LIFE AMENDMENT POLITICAL ACTION
COMMITTEE, INC., et al.,

Defendants.

No. C89-1429WD

ORDER OF DEFAULT

ORDER OF DEFAULT

It appearing from the records in the above-captioned action that summonses and complaints have been served upon defendants Life Amendment Political Action Committee, Inc. ("Life PAC") and Rick Woodrow as treasurer of Life PAC, and it further appearing from the affidavit of counsel for the plaintiff Federal Election Commission and other evidence as required by Federal Rule of Civil Procedure 55(a) that both defendants have failed to defend themselves in this action as directed in said summonses and required by the Federal Rules of Civil Procedure,

Order Of Default
Page 1


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

17

1
2 Therefore, on request of plaintiff, the DEFAULT of defendants
3 Life Amendment Political Action Committee, Inc. ("Life PAC") and
4 Rick Woodrow as treasurer of Life PAC is hereby ENTERED.

5
6 Date

1/22/90


Bruce Rifkin
Clerk

7
8 Copies to:

9 Robert W. Bonham, III
10 Office of the General Counsel
11 FEDERAL ELECTION COMMISSION
12 999 E Street, N.W.
13 Washington, D.C. 20463
14 (Counsel for Plaintiff),

15 and

16 LIFE AMENDMENT POLITICAL ACTION
17 COMMITTEE, INC.
18 (Rick Woodrow, Treasurer)
19 P.O. Box 5490
20 Everett, WA 98206
21 (Defendant),

22 and

23 RICK WOODROW, AS TREASURER of Life
24 Amendment Political Action
25 Committee, Inc.
26 P.O. Box 5490
27 Everett, WA 98206
28 (Defendant).



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2525, 2613, 2648, 2799

DATE FILMED 3-1-93 CAMERA NO. 3

CAMERAMAN E.S.

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