



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 1, 1999

Benjamin L. Ginsberg, Esq.
Patton Boggs, L.L.P.
2550 M Street, N.W.
Washington, D.C. 20037-1350

RE: MUR 4648
New York Republican Federal Campaign
Committee and Lewis B. Stone, as treasurer;
William D. Powers; Jeffrey T. Buley;
David R. Dudley; Mary F. Obwald;
Gregory V. Serio; Arthur Bramwell; and
Luther Mook

Dear Mr. Ginsberg:

On February 23, 1999, the Federal Election Commission took several actions with respect to your clients in the above-captioned matter. The Commission determined to take no further action against David R. Dudley; Mary F. Obwald; Gregory V. Serio; and Luther Mook, at this time, with respect to violations of 2 U.S.C. § 432(h)(1). In addition the Commission decided to take no further action against the New York Republican Federal Campaign Committee ("the Committee") and Lewis B. Stone, as treasurer, with respect to the violation of 2 U.S.C. § 441b(a).

Further, the Commission found reason to believe that the Committee and Louis B. Stone, as treasurer, knowingly and willfully violated 2 U.S.C. § 432(c)(5) and 11 C.F.R. § 102.9(b)(1), (2), by failing to keep an account of the name and address of every person to whom the Committee made a disbursement, along with the date, amount, and purpose of the disbursement, including a receipt, invoice, or canceled check for each disbursement in excess of \$200. These findings relate to the \$82,500 which the Committee originally reported as having been disbursed for "election day expenses" on its 1994 and 1996 30-Day Post-General Reports.

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 findings of probable cause to believe. Enclosed is a joint conciliation agreement that the Commission has approved, which addresses the violations by the Committee, William D. Powers, Jeffrey T. Buley and Arthur Bramwell. As the agreement indicates, the Commission believes that the violations at issue by these Respondents should be treated as having been made knowingly and willfully.

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 have the Respondents sign and return the agreement, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to findings 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 have any questions, please contact Tony Buckley, the attorney assigned to this matter, at (202) 694-1650.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott E. Thomas".

Scott E. Thomas
Chairman

Enclosure
Conciliation Agreement