

JUN 07 2000

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD REFERRAL: 99L-06
DATE ACTIVATED: MAY 31, 2000

STAFF MEMBER: William Messenger

SOURCE: INTERNALLY GENERATED

RESPONDENTS: Bob Greenlee for Congress Committee and
Ms. Clair Beckmann, as Treasurer

RELEVANT STATUTE(S): 2 U.S.C. § 434(a)(6)
11 CFR § 104.5(f)

INTERNAL REPORTS CHECKED: Disclosure Report

FEDERAL AGENCIES CHECKED: None

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT
2000 JUN -7 A 11:16

I. GENERATION OF MATTER

The Office of the General Counsel received a referral from the Reports Analysis Division ("RAD") on June 23, 1999. The basis for the referral is the failure of the Bob Greenlee for Congress Committee ("Committee") and Clair Beckmann, as treasurer, to file 48-Hour Notifications ("48-Hour Notices") for multiple contributions totaling \$30,000.66. The candidate, Bob Greenlee, lost the 1998 General Election for the House of Representatives in Colorado with forty seven percent (47%) of the vote.

II. FACTUAL AND LEGAL ANALYSIS

Based on the Factual and Legal Analysis, see Attachment 1, this Office recommends the Commission find reason to believe the respondents violated 2 U.S.C. § 434(a)(6).

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

In addition to the reason to believe recommendation, this Office 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 approval is a proposed conciliation agreement

IV. RECOMMENDATIONS

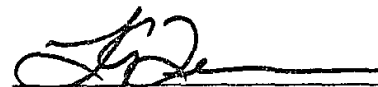
1. Open a MUR.
2. Find reason to believe that the Bob Greenlee for Congress Committee and Clair Beckmann, as treasurer, violated 2 U.S.C. §434(a)(6) and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the attached Factual and Legal Analysis, proposed conciliation agreement, and the appropriate letter.

Lawrence M. Noble
General Counsel

Date

6/6/00

BY:


Lois G. Lerner
Associate General Counsel

Attachments:

1. Factual and Legal Analysis
2. Proposed Conciliation Agreement



FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel *KCS*

DATE: June 7, 2000

SUBJECT: RAD 99L-06- First General Counsel's Report

The attached is submitted as an Agenda document for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

SENSITIVE
NON-SENSITIVE

☒
☐

72 Hour TALLY VOTE ☒

24 Hour TALLY VOTE ☐

24 Hour NO OBJECTION ☐

INFORMATION ☐

DISTRIBUTION

COMPLIANCE ☒

Open/Closed Letters ☐

MUR ☐

DSP ☐

STATUS SHEETS ☐

Enforcement ☐

Litigation ☒

PFESP ☐

RATING SHEETS ☐

AUDIT MATTERS ☐

LITIGATION ☐

ADVISORY OPINIONS ☐

REGULATIONS ☐

OTHER ☐