

JAN 03 2001

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD REFERRAL: 00NF-13
DATE ACTIVATED: 12/13/00

EXPIRATION OF STATUTE OF
LIMITATIONS: 04/15/2005
STAFF MEMBER: Jack Gould
Wendy S. Peele

SOURCE: INTERNALLY GENERATED

RESPONDENT(S): Citizens for the Republic
Carolyn Robertson, as treasurer

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

INTERNAL REPORTS CHECKED: Disclosure Reports
Referral Material

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred the Citizens for the Republic ("the Committee") and Carolyn Robertson, as treasurer (collectively, "the Respondents"), to the Office of the General Counsel on August 10, 2000. The basis of the RAD referral is the failure of the Committee to timely file its 2000 April Quarterly Report of Receipts and Disbursements covering the period from January 1, 2000 to March 31, 2000.

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III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

POLYMER LETTERS

IV. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe Citizens for the Republic and Carolyn Robertson, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the attached Factual and Legal Analysis, conciliation agreement, and the appropriate letter.

0656-201-10-13
21-01-02-0300

1/3/01
Date

LG by Abigail Shaine
Lois G. Lerner
Acting General Counsel

Attachments:

1. Factual and Legal Analysis
2. Proposed agreement

Staff Assigned:

Jack A. Gould
Wendy Smallwood-Peele



FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel **KCS**

DATE: January 2, 2001

SUBJECT: 00NF-13-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 ☐

96 Hour TALLY VOTE ☒

DISTRIBUTION

COMPLIANCE ☒

Open/Closed Letters ☐

MUR ☐

DSP ☐

STATUS SHEETS ☐

Enforcement ☐

Litigation ☐

PFESP ☐

RATING SHEETS ☐

AUDIT MATTERS ☐

LITIGATION ☐

ADVISORY OPINIONS ☐

REGULATIONS ☐

OTHER ☐