



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 21, 1998

Robert P. Charrow  
Crowell & Moring, LLP  
1001 Pennsylvania Avenue, NW  
Suite 1100  
Washington, DC 20004-2595

RE: MUR 4844  
Crowell & Moring PAC  
and Karen Hastie Williams, as treasurer

Dear Mr. Charrow:

On December 7, 1998, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your client's behalf in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(i), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). Accordingly, the file has been closed in this matter.

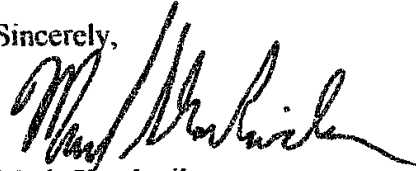
The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

Information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

99.04.391.0191

Enclosed you will find a copy of the fully executed conciliation agreement for your files.  
If you have any questions, please contact me at (202) 694-1650.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark Shonkwiler', written in a cursive style.

Mark Shonkwiler  
Attorney

Enclosure  
Conciliation Agreement

99.04.391.0192

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of )  
 ) MUR: 4844  
Crowell & Moring PAC )  
and Karen Hastie Williams, as treasurer )

**CONCILIATION AGREEMENT**

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Crowell & Moring PAC and Karen Hastie Williams, as treasurer, ("Respondents") violated 2 U.S.C. § 434(a)(4)(A)(i).

NOW, THEREFORE, the Commission and the Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enter voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. The Crowell & Moring PAC is a political committee within the meaning of 2 U.S.C. § 431(4).
2. Karen Hastie Williams is the treasurer of the Crowell & Moring PAC.

3. The Federal Election Campaign Act of 1971, as amended, ("the Act") requires treasurers of political committees other than authorized committees of a candidate to file periodic reports or receipts and disbursements. 2 U.S.C. § 434(a)(1).

4. In any calendar year in which a regularly scheduled general election is held, all political committees that choose not to file on a monthly basis shall file quarterly reports which shall be filed no later than the 15<sup>th</sup> day after the last day of each calendar quarter, except that the report for the quarter ending December 31 of such calendar year shall be filed no later than January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(A)(i).

5. Respondents' 1998 April Quarterly Report was due on April 15, 1998. 2 U.S.C. § 434(a)(4)(A)(i). Respondents filed their 1998 April Quarterly Report on July 15, 1998, 91 days late, disclosing receipts totaling \$7,800 and disbursements totaling \$6,250.

V. Respondents failed to file timely their 1998 April Quarterly Report in violation of 2 U.S.C. § 434(a)(4)(A)(i).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of one thousand three hundred dollars (\$1,300), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

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IX. Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.


FOR THE COMMISSION:

Lawrence M. Noble  
General Counsel

BY:

  
Lois G. Lerner  
Associate General Counsel

12/18/98  
Date

  
(Name) Karen Hastie Williams  
(Position) Treasurer  
Crowell & Moring PAC

12/3/98  
Date

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