

RECORD

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REPORTS

1987 REPORTING SCHEDULE

All Committees: Year-End Report

All political committees must file a year-end report due January 31, 1987. Committees must also meet other reporting requirements, depending on what type of committee they are. Note that a political committee may not terminate its registration and reporting obligations during 1987 until all its debts have been extinguished.

The accompanying charts list filing dates for reports required during the 1987 nonelection year. Since special elections may occur during a nonelection year, the reporting schedule also includes filing requirements for committees active in these elections.

Congressional Candidate Committees

All committees authorized by Congressional candidates must report semiannually: July 31, 1987, and January 31, 1988. Semiannual filers include the authorized committees of candidates retiring campaign debts or running in future elections.

Presidential Candidate Committees

All committees authorized by Presidential candidates must file on either a monthly or a quarterly basis during 1987. The FEC's Reports Analysis Division requests that Presidential committees which change their reporting schedule during 1987 notify the Commission of their intention in writing.

PACs and Party Committees

PACs and party committees are required to file on either a semiannual or a monthly schedule in 1987. Any committee that wishes to change its reporting schedule (for example, from monthly to semiannual reports) must notify the Commission of its intention. The committee may notify the Commission by submitting a letter with the next report due under its current reporting schedule. A committee may not change its filing frequency more than once a year. 11 CFR 104.5(c)

OKLAHOMA RECORDS OFFICE CHANGED

The Oklahoma Ethics Commission has replaced the Oklahoma Secretary of State's Office as the official records office for FEC reports. Federal political committees conducting activity in Oklahoma should therefore file their reports with:

Ethics Commission
118 State Capitol
Oklahoma City, Oklahoma
73105-4802
Telephone: 405/521-3451

Committees Active in Special Elections

All committees authorized by candidates running for Congress in special elections held in 1987 must file pre- and post-election reports, as well as the semiannual reports described above. PACs and party committees that support candidates in special elections must also follow this reporting schedule.* *continued on p. 2*

**A PAC or party committee does not have to file a pre-election report if this activity has been previously disclosed.*

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YEAR-END REPORT 1986

Report	Period Covered	Filing Date*
Year-End	11/25**-12/31	1/31/87

MONTHLY REPORTS 1987

Report	Period Covered	Filing Date*
February	1/1 - 1/31	2/20/87
March	2/1 - 2/28	3/20/87
April	3/1 - 3/31	4/20/87
May	4/1 - 4/30	5/20/87
June	5/1 - 5/31	6/20/87
July	6/1 - 6/30	7/20/87
August	7/1 - 7/31	8/20/87
September	8/1 - 8/31	9/20/87
October	9/1 - 9/30	10/20/87
November	10/1 - 10/31	11/20/87
December	11/1 - 11/30	12/20/87
Year-End 1987	12/1 - 12/31	1/31/88

SEMIANNUAL REPORTS 1987

Report	Period Covered	Filing Date*
First (Mid-Year)	1/1 - 6/30	7/31/87
Second (Year-End)	7/1 - 12/31	1/31/88

QUARTERLY REPORTS 1987

Report	Period Covered	Filing Date*
First Q	1/1 - 3/31	4/15/87
Second Q	4/1 - 6/30	7/15/87
Third Q	7/1 - 9/30	10/15/87
Fourth Q (Year-End)	10/1 - 12/31	1/31/88

WHERE REPORTS ARE FILED

Committees must file all reports and statements simultaneously with the appropriate federal and state officials. 11 CFR 108.5.

Filing with the Federal Government

- o The principal campaign committees (and any other authorized committees) of House candidates and committees supporting or opposing only House candidates file with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515. 11 CFR 104.4(c)(3) and 105.1.
- o The principal campaign committees (and any other authorized committees) of Senate candidates and committees supporting or opposing only Senate candidates file with the Secretary of the Senate, Senate Public Records, Hart Senate Office Building, Room 232, Washington, D.C. 20510. 11 CFR 104.4(c)(2) and 105.2.
- o All other committees, including the authorized committees of Presidential candidates, file with the Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463. 11 CFR 105.3 and 105.4.

Filing with State Governments

- o The authorized committees of Congressional candidates must file a copy of every report and statement with the Secretary of State or the appropriate elections official of the state in which the candidate seeks federal office. 11 CFR 108.3.
- o PACs and party committees making contributions or expenditures in connection with House and Senate races file in the state in which the candidate seeks election. The law requires a copy only of that portion of the report applicable to the candidate(s) being supported.

FORMS AND INFORMATION

During 1987, reporting forms and information will be sent to all registered committees. Questions and requests for additional forms should be addressed to the Information Services Division, 999 E Street, N.W., Washington, D.C. 20463; or call 202/376-3120 or toll free 800/424-9530.

*The filing date is considered the mailing date if the report is sent by registered or certified mail. 11 CFR 104.5(e).

**Or from the closing date of the last report, if that date occurred before 11/25/86.

REGULATIONS

CONTRIBUTION LIMITS: FINAL RULES APPROVED BY COMMISSION

On November 20, 1986, the Commission voted to amend its regulations at 11 CFR 110.1 and 110.2 and send them to Congress in January 1987. Once these amended regulations have been before Congress for 30 legislative days, the Commission will announce their effective date.

The revisions to sections 110.1 and 110.2 clarify the scope of the contribution limits and resolve several issues that have arisen since the regulations were first prescribed in 1977. Major amendments are highlighted below.

The amended regulations, together with the Commission's explanation and justification, will be published in the Federal Register when they are transmitted to Congress. A copy of this material may be obtained by calling 376-3120 or toll-free 800/424-9530.

Contributions by Persons Other Than Multicandidate Committees: 11 CFR 110.1

The revised rules clarify that the contribution limits described in this provision (110.1) apply only to individuals, partnerships, unincorporated associations and political committees other than multicandidate committees.

Designation of Contributions for Particular Elections: 11 CFR 110.1(b)(2)

The election law establishes separate limits for contributions to candidates for primary and general elections. Under the new regulations, to determine the election for which a contribution is intended, the Commission either: 1) relies on the contributor's written statement designating a specific election or 2) in the absence of a designation, presumes that the contribution is for the next election.

Designated Contributions. Although a contributor is not required to indicate in writing the election for which his/her contribution is intended, the revised rules encourage a contributor to supply a written designation. Written designations: 1) ensure that the contributor's intent is clearly conveyed to the recipient candidate committee and 2) promote consistency in reporting by the recipient committee.

Under the new rules, designations must be provided by the contributors, not the recipient committees. If a contributor decides to designate a contribution, he/she must send a written designation to the recipient committee at the time the contribution is made. The contributor may write the designation on the contribution check, instead of providing a separate statement. If a candidate committee solicits contributions for a particular election, the contributor's written designation could consist of his/her signature on a form that clearly indicates the designation and is returned with the contribution.

Undesignated Contributions. Under the current rules, undesignated contributions received after the primary are presumed to be for the general election and count against the limits for that election. To cover a wider variety of situations, the new rules simply state that an undesignated contribution counts against the limits for the next election, even if the next election is not in the same election cycle.

Redesignation and/or Reattribution of Contributions: 11 CFR 110.1(b)(5) and 110.1(k)(3)

Two principal changes in the rules specify how a contributor may redesignate a contribution for a different election or reattribute a contribution to a different contributor, as part of a joint contribution. Under the amended rules, candidate committees may seek a redesignation, a reattribution or a combination of both in a single written request to a contributor.

Under the new rules, the recipient committee may ask a contributor to:

- o Redesignate or reattribute a contribution if the contribution, either by itself or when added to the donor's other contributions, exceeds the donor's limits for a particular election;
- o Redesignate, or redesignate and reattribute, a contribution which cannot be accepted because it was made after the election for which it was designated and there are no net debts outstanding for that election; or
- o Redesignate an undesignated contribution if the candidate wishes to count it toward a previous election for which he/she has debts remaining. (An undesignated contribution would normally count toward the donor's limits for the next election.)

The new rules do not, however, permit redesignation or reattribution of prohibited contributions (e.g., corporate or labor organization contributions).

continued

The Record is published by the Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463. Commissioners are: Joan D. Aikens, Chairman; John Warren McGarry, Vice Chairman; Lee Ann Elliott; Thomas J. Josefiak; Danny Lee McDonald; Scott E. Thomas; Jo-Anne L. Coe, Secretary of the Senate, Ex Officio; Benjamin J. Guthrie, Clerk of the House of Representatives, Ex Officio. For more information, call 202/376-3120 or toll-free 800/424-9530.

Finally, the new rules make clear that a committee does not have to obtain a written redesignation and/or reattribution when a committee accepts a legal contribution for one election, but uses it in another.

Procedures for Making Redesignations and Reattributions. Under the current rules, a candidate committee must deposit or return, within 10 days, contributions that appear to be illegal. Deposited contributions must be refunded "within a reasonable time," if the committee has not determined them to be legal.* Under the new rules, however, a candidate committee has 60 days within which to obtain a redesignation and/or reattribution of a contribution. During this period, the committee must:

- o Determine whether a contribution is excessive or violates the net debts rule;
- o Request a redesignation or reattribution of the contribution in writing; and
- o Receive the written redesignation and/or reattribution statement from the contributor(s).

In the case of joint contributions, each contributor's signature must be included on the written statement. If the redesignation or reattribution is not in writing, or is not received within 60 days, the committee must refund the contribution.

Moreover, the new rules place two restrictions on redesignations and reattributions:

- o A contribution may be redesignated for a different election and/or reattributed, as a joint contribution, to a different contributor only if this does not cause the contributor to exceed his/her limits for that election; and
- o A contribution may be redesignated for a previous election only to the extent that net debts outstanding remain for that election.

Finally, the new rules provide guidelines for reporting redesignated and reattributed contributions and maintaining adequate records of them. (See **Supporting Evidence and Conforming Amendments** below.)

Net Debts Outstanding : 11 CFR 110.1(b)(3)

The amended regulations maintain the long-standing rule that a contribution designated for a particular election, but made after the election, may be accepted by a candidate committee only to the extent that the committee has net debts outstanding for the election. (The contribution counts against the donor's limit for that election.)

The revised rules, however, contain new provisions to explain how a candidate committee,

with no net debts outstanding, should handle contributions that are designated for a particular election but are made after the election. Within 10 days of receiving the contribution(s), the committee treasurer must either deposit or return the contributions. If a contribution is deposited, the committee's treasurer has 60 days in which to: 1) refund* the contribution to the contributor or 2) obtain a reattribution and/or redesignation of the contribution. (See procedures above.) The Commission noted that, if a committee received several contributions on the same date which, together, exceeded the amount needed to retire its net debts outstanding, the committee could either: 1) accept a proportionate amount of each contribution or 2) accept some contributions in full and return, refund or seek redesignations and/or reattributions for the others.

The current rules do not define "net debts outstanding," important for purposes of determining whether a candidate committee may accept designated contributions after an election. However, the new rules specify that a candidate committee's "net debts outstanding" consist of the committee's total unpaid debts and obligations incurred with respect to a particular election minus cash on hand and receivables available to pay those expenses. The committee should calculate its net debts outstanding as of the date of the election and readjust this initial calculation as it receives additional funds or makes additional expenditures for the election.

For purposes of calculating its net debts outstanding, a committee should value its investments at fair market value, not cost.

The explanation and justification for the new rules provide an example of how to calculate net debts outstanding.

Date a Contribution Is Made: 11 CFR 110.1(b)(6)

The amended rules make clear that the "date a contribution is made" is the date the contributor relinquishes control over the contribution, that is, the date the contribution is delivered to the recipient committee or, if the contribution is mailed, the date of the postmark. In-kind contributions are made on the date that the contributor provides the good or services.

The new rules also provide that, if a committee wishes to rely on a postmark for evidence of when a contribution was made, the committee must retain the contribution envelope or a copy of the envelope.

*The Commission noted that the new redesignation rules only apply to committees authorized by candidates because other political committees do not receive contributions on a per election basis. However, the new reattribution rules apply to all political committees.

*The new rules explain that a contribution is "returned" when the written instrument (e.g., a check) is sent back to the contributor instead of being deposited. A contribution is "refunded" when the committee sends the contributor a check, drawn on the committee's account, for the amount of a deposited contribution.

Contributions to Political Party Committees:**11 CFR 110.1(c)**

The new rules clarify that, even if a national party committee acts as the authorized committee of a Presidential nominee in the general election, the committee may still accept contributions of up to \$20,000 per year from donors other than multicandidate committees. However, this contribution limit does not apply to the Presidential nominee.* The national party committee must therefore maintain separate accounts for its own financial activity and that of the Presidential candidate.

Contributions by Partnerships: 11 CFR 110.1(e)

The partnership rules contain the current requirements for dual attribution to both the contributing partner and the partnership. The new rules make clear, however, that: 1) a corporate partner may not make contributions to federal candidates and 2) a corporate partner's portion of the partnership profits or losses must not be affected by the partnership's contributions.

Aggregation of Contributions: 11 CFR 110.1(h)

The new rules continue the Commission's longstanding rule on aggregation, namely, that contributions to certain kinds of political committees supporting the same candidate share a single limit. For example, contributions to a candidate's principal campaign committee and to an unauthorized single candidate committee established on his/her behalf are subject to a single limit.

Contributions by Spouses: 11 CFR 110.1(i)

The amended rules make clear that the contribution limits apply separately to each spouse, even if only one spouse has income.

Application of the Limits**To Particular Elections: 11 CFR 110.1(j)**

General Election Limits. Consistent with the current rules for a primary election which is not held, the revised rules provide that a separate contribution limit applies to a general election that is not held because: 1) the candidate is unopposed or 2) the candidate received a majority of votes in the primary. For purposes of the limits, the date the general election would have been held is considered the date of the election.

Primary Election Limits. The new rules provide that a separate contribution limit does not apply to a primary that is not held because a

candidate was nominated through a convention or caucus. Thus, a candidate's committee must refund or seek redesignations of primary contributions which, when added to contributions made for the caucus or convention, cause the contributor to exceed his/her \$1,000 per election limit.

Joint Contributions: 11 CFR 110.1(k)

FEC rules governing the attribution of joint contributions have been moved from section 104.8(d) of the current rules to this new section of the revised rules. The new section contains the current requirement that joint contributions (other than partnership contributions) must include the signature of each contributor on the contribution check or any accompanying statement. Additionally, the new rules provide that, if the amount attributable to each contributor is not indicated on the contribution, the recipient committee must attribute the contribution equally to each contributor. (In a statement submitted to the committee, the contributors could, however, indicate an alternative attribution of their contribution.) This provision also sets forth the reattribution procedures previously discussed.

This provision is not limited to joint contributions by spouses.

Supporting Evidence: 11 CFR 110.1(i)

The new rules provide recipient committees with guidelines for documenting designated, redesignated and reattributed contributions. Under the new rules, a committee must retain written records of designations, redesignations, and reattributions for at least 3 years. A committee's failure to maintain these records will invalidate the original designation or subsequent redesignation or reattribution, thus resulting in the committee's possible acceptance of excessive contributions.

Contributions by Multicandidate Committees: 11 CFR 110.2

The new rules consolidate in one section those provisions pertaining to the contribution limits for multicandidate committees. The new rules for multicandidate committees follow those for contributions by other persons (highlighted above), except for those provisions setting forth the different contribution limits for multicandidate committees. However, the new provisions concerning reattribution of joint contributions are not contained in this section because multicandidate committees do not make joint contributions and do not seek to reattribute their contributions to other political committees.

Conforming Amendments

To make revisions to 110.1 and 110.2 consistent with other sections of the regulations, the agency also amended its rules at: 100.7(c),

continued

*Presidential nominees in the general election may accept up to \$1,000 from persons. Publicly funded Presidential nominees may accept private contributions only to defray legal and accounting expenses of the campaign.

100.8(c), 102.9, 103.3 and 104.8(d). For example, the procedures political committees must follow when receiving contributions of questionable legality have been revised to reflect the new procedures for redesignating and reattributing contributions. 11 CFR 103.3(b). The amended rules make clear that the contributor, not the candidate, may designate a contribution. 11 CFR 102.9(e).

The new rules explain that the treasurer of a political committee is responsible for: 1) examining all contributions received for any evidence of illegality and 2) aggregating all contributions from the same contributor to determine whether they exceed his/her contribution limits. 11 CFR 103.3.

The amended rules describe the procedures that a treasurer must follow in handling contributions that appear to come from prohibited sources such as corporations or foreign nationals; contributions that are not found to be illegal until after their receipt and deposit; excessive contributions; and contributions received for a particular election by a committee with no debts for that election. The revised regulations prescribe specific time periods within which the treasurer must handle such contributions. For example, the treasurer must refund contributions from prohibited sources within 30 days.

Under the revised rules, a committee treasurer must maintain a written record noting why the committee has questioned the legality of a contribution. The committee's reports must indicate the questionable nature of the contribution, as well as any refund it makes.

Furthermore, the new rules state that contributions of questionable legality may not be used for campaign expenditures and that a committee treasurer must: 1) establish a separate account for such funds or 2) maintain sufficient permissible funds to cover all potential refunds of illegal contributions.

Finally, the conforming amendments spell out procedures for reporting redesignated, reattributed, refunded and joint contributions. 11 CFR 104.8.

ADVISORY OPINIONS

ADVISORY OPINION REQUESTS

The following chart lists recent requests for advisory opinions (AORs). The full text of each AOR is available to the public in the Commission's Office of Public Records.

AOR	Subject
1986-42	Affect of corporate reorganization on PACs' multicandidate status, contribution limits and affiliation with each other. (Date made public: November 26, 1986; Length: 2 pages, plus 58-page supplement)
1986-43	Services provided on fee basis to House campaign by consulting corporation owned by candidate and his family. (Date made public: December 4, 1986; Length: 1 page, plus 24-page supplement)

ADVISORY OPINIONS: SUMMARIES

An Advisory Opinion (AO) issued by the Commission provides guidance with regard to the specific situation described in the AOR. Any qualified person who has requested an AO and acts in accordance with the opinion will not be subject to any sanctions under the Act. Other persons may rely on the opinion if they are involved in a specific activity which is indistinguishable in all material aspects from the activity discussed in the AO. Those seeking guidance for their own activity, however, should consult the full text of an AO and not rely only on the summary given here.

AO 1986-37: Presidential Candidate Appearances at Convention of Nonprofit Corporation

The National Conservative Foundation (the Foundation), a nonprofit corporation with no membership, may not finance a national convention in mid-1987 which would feature appearances by 1988 Presidential candidates and potential candidates before a public audience. The Foundation's financing of the convention would constitute prohibited in-kind contributions because the candidate appearances would not qualify as the type of activity specifically exempted from the Act's prohibition on corporate contributions. See 2 U.S.C. §441b. That is, the candidates' appearances would not qualify as either: 1) partisan or nonpartisan appearances before the Foundation's

restricted class* (11 CFR 114.3 and 114.4) or 2) nonpartisan candidate debates (11 CFR 110.13 and 114.4(e)). Nor would the candidates' appearances be considered noncampaign-related events, which would be beyond the Act's jurisdiction.

Since the Foundation may not sponsor the convention as proposed, the Commission did not address the issue of whether the Foundation could finance the convention with funds from prohibited sources, such as corporations, government contractors and foreign nationals.

The Foundation's Proposed Convention

The Foundation is a nonprofit corporation established to sponsor public forums on domestic and foreign policy issues. The Foundation's proposed national convention (the National Conservative Convention) would be open to the general public and would adopt policy positions on various issues. As part of the convention agenda, the Foundation planned a series of separate addresses by individuals who, at the time of the convention, would be Presidential candidates or potential candidates. The convention would not, however, have any direct relationship to the 1988 Presidential nomination or election process. During the convention, no contributions would be solicited to the candidates' campaigns; their candidacies would not be expressly advocated; and the convention program would not be structured to promote one candidate over another. Nor would the Foundation pay honoraria to candidates or expenses incurred by candidates in connection with the convention.

Not Qualified as Debate

The Act and FEC Regulations prohibit corporations, including nonprofit corporations, from making contributions or expenditures in connection with federal elections. 2 U.S.C. §441b(a). Exceptions to this prohibition include the sponsorship of candidate debates by qualified nonprofit, nonpartisan corporations.** The regulations state that a debate must: 1) include at least two candidates and 2) be nonpartisan (i.e., a debate may not promote one candidate over another). 11 CFR 110.13(a) and (b). As planned, the Foundation's "candidate debates" would not meet the first of these two requirements; rather than participating in face-to-face debates with other candidates, each candidate would address the convention separately. Under the regulations, nonparti-

san debates are the only way a 501(c)(3) organization may finance campaign-related appearances by candidates before the general public.

Not Qualified as Noncampaign Event

The Commission also rejected the idea that the proposed candidate appearances before the convention would constitute noncampaign-related events (which would be outside the Act's jurisdiction). Based on the facts presented in the Foundation's advisory opinion request, the Commission concluded that the candidates' appearances would be campaign-related because:

- o Individuals would be invited to address the convention based on their Presidential candidacy (or potential candidacy) in 1988;
- o Participants could address the convention on any topic and could, therefore, advocate their respective candidacies;
- o In asking whether the participants could be identified as Presidential candidates in introductory comments and convention literature, the Foundation implied that their appearances would be campaign-related.

The Commission noted that its conclusion was not affected by the Foundation's intention to prohibit, during the convention, express advocacy of candidates, floor demonstrations in support of or in opposition to candidates and contribution solicitations or payments to candidates (i.e., honoraria or reimbursements for expenses resulting from their appearances). See AO 1984-13.

The Commission did not express an opinion with regard to the Foundation's tax-exempt status or any other tax issues because they are beyond the agency's jurisdiction. (Date issued: November 10, 1986; Length: 7 pages)

AO 1986-38: Individual's Financing of Media Ads to Promote Conservative Candidates

Payments made exclusively by David Stedman for tv and radio ads which promoted conservative candidates in North Carolina's 1986 general elections constituted election-influencing expenditures. 2 U.S.C. §431(a)(A)(i); 11 CFR 100.8(a)(1). Mr. Stedman's payments for having the ads prepared and aired were not, however, subject to the Act's reporting requirements or contribution limits.

The Commission concluded that, because the ads urged the general public to "vote on November 4th" and "send the right people to Washington," they were designed for the purpose of influencing federal elections. As such, they were expenditures. However, since the ads did not expressly advocate the election of clearly identified candidates, Mr. Stedman's payments for the

continued

*A nonprofit corporation's restricted class is limited to its members and its executive and administrative personnel and their families.

**Defined by FEC Regulations as a tax-exempt organization which does not endorse, support or oppose political candidates or parties. See FEC rules at 11 CFR 110.13(a) and the IRS code at section 501(c)(3).

ads did not constitute independent expenditures, subject to the Act's reporting requirements. 2 U.S.C. §§431(17) and 434(c).

Nor would the ads be considered in-kind contributions to the candidates. If, however, Mr. Stedman had either consulted a candidate or co-sponsored an ad with a candidate, his media payments would have constituted a contribution, subject to the Act's reporting requirements and contribution limits. 2 U.S.C. §441a(a)(7)(B)(i).

Each ad stated that Mr. Stedman paid for it and that the ad was not authorized by any candidate. Nevertheless, the Commission concluded that Mr. Stedman's payments for the ads would not trigger the Act's registration and reporting requirements for political committees* because: 1) He did not make the media expenditures on behalf of any group, 2) He acted on his own, as an individual, using his own funds and 3) He did not solicit or receive contributions from others for the ads. (Date issued: November 21, 1986; Length: 5 pages)

**The Act defines a political committee as "any committee, club, association or other group of persons which receives contributions aggregating in excess of \$1,000 during a calendar year or which makes expenditures aggregating in excess of \$1,000 during a calendar year." 2 U.S.C. section 431(4)(A).*

COURT CASES

NEW LITIGATION

FEC v. Citizens Party

The FEC filed suit against the Citizens Party, a political party committee, and the party's acting treasurer, Kirby Edmonds, for respondents' failure to comply with the terms of a conciliation agreement they had entered into with the Commission on March 20, 1986. Specifically, respondents failed to pay the full amount of the \$1,500 civil penalty stipulated in the agreement.

The FEC therefore asks the court to:

- o Declare that the Citizens Party and its treasurer violated the terms of the conciliation agreement;
- o Order respondents to comply with the agreement by paying the outstanding balance of the penalty within 10 days;
- o Award the Commission interest on the unpaid balance of the penalty, beginning with June 18, 1986, the date the final payment on the penalty was due;
- o Assess an additional \$5,000 civil penalty against both the Citizens Party and Mr. Edmonds for violating the terms of the agreement; and
- o Permanently enjoin defendants from further violations of the agreement.

U.S. District Court for the District of Columbia, Civil Action No. 86-3113, November 12, 1986.

FEDERAL ELECTION COMMISSION
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Official Business

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