

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
 Steele for Maryland, Inc. and Michael) MUR 6447
 Steele for Maryland – Pre-Probable)
 Cause Conciliation)

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on August 17, 2011, the Commission decided by a vote of 5-0 to take the following actions in MUR 6447:

1. Accept the conciliation agreement with Steele for Maryland, Inc. and Michael Steele, in his official capacity as treasurer, and Michael Steele for Maryland and Belinda Cook, in her official capacity as treasurer, as recommended in the General Counsel's Memorandum dated August 4, 2011.
2. Take no action as to Michael Steele, in his individual capacity.
3. Take no action as to Paul Ellington.
4. Take no action as to Belinda Cook, in her individual capacity.
5. Approve the appropriate letters.
6. Close the file.

Commissioners Bauerly, Hunter, McGahn II, Walther, and Weintraub voted affirmatively for the decision. Commissioner Petersen did not vote.

Attest:

August 22, 2011
 Date

Shawn Woodhead Werth
 Shawn Woodhead Werth
 Secretary and Clerk of the Commission

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COMMISSION

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 6447
Monica Turner)

CERTIFICATION

I, Shelley E. Garr, recording secretary for the Federal Election Commission executive session on March 01, 2011, do hereby certify that the Commission decided by a vote of 5-1, on an amended pre-meeting tally, to take the following actions in MUR 6447:

1. Accept the conciliation agreement as recommended in the Pre-Probable Cause Conciliation Memorandum dated January 12, 2011.
2. Approve the appropriate letter.
3. Close the file as to Monica Turner.

Commissioners Bauerly, Hunter, McGahn II, Petersen, and Weintraub voted affirmatively for the decision. Commissioner Walther dissented.

Attest:

March 3, 2011
Date

Shelley E. Garr
Shelley E. Garr
Deputy Secretary of the Commission

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BEFORE THE FEDERAL ELECTION COMMISSION

CELA

In the Matter of)
)
Michael Steele; Michael for Maryland) PRE-MUR 498
and Belinda Cook, in her official capacity)
as Treasurer; Steele for Maryland, Inc.)
and Elisabeth S. Rubin, in her official)
capacity as Treasurer; Monica Turner;)
Paul Ellington; Belinda Cook)

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on December 22, 2010, the Commission decided by a vote of 5-0 to direct the Commission Secretary to include findings No. 1, 2, 4, 7, 8 and 12 contained in the First General Counsel's Report dated October 7, 2010, and the following revised findings in the certification of the December 14, 2010, vote for Pre-MUR 498:

3. Find reason to believe that Steele for Maryland, Inc., and Elisabeth S. Rubin, in her official capacity as Treasurer, knowingly and willfully violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 110.4(c)(2), and violated 2 U.S.C. §§ 434(b), 441a(f), 441i(e)(1)(A) and 11 C.F.R. §110.3(d).
6. Take no action at this time that Michael Steele violated 2 U.S.C. §§ 441a(f), 434(b), 441i(e)(1)(A) and 11 C.F.R. § 110.3(d).
9. Approve the Steele for Maryland Factual and Legal Analysis informally circulated on December 8, 2010, and make appropriate conforming changes to the Factual and Legal Analysis for Monica Turner and Michael for Maryland.

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Federal Election Commission
Certification for Pre-MUR 498
December 22, 2010

10. Enter into conciliation with Monica Turner, Steele for Maryland, Inc., and Elisabeth S. Rubin, in her official capacity as Treasurer, and Michael for Maryland and Belinda Cook, in her official capacity as Treasurer prior to a finding of probable cause to believe.
11. Approve the Conciliation Agreements subject to making the appropriate conforming changes as set forth in the Steele for Maryland Factual and Legal Analysis informally circulated on December 8, 2010.

Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub

voted affirmatively for the decision. Commissioner Bauerly did not vote.

Attest:

December 22, 2010
Date

Shawn Woodhead Werth
Shawn Woodhead Werth
Secretary and Clerk of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AUG 26 2011

Paul Ellington

Fulton, Maryland 20759-2509

Re: Pre-MUR 498

Dear Mr. Ellington:

On April 1, 2010, the Federal Election Commission ("Commission") notified you that the Commission, in the normal course of carrying out its supervisory responsibilities, had ascertained information indicating that you may have violated the Federal Election Campaign Act of 1971, as amended. On August 17, 2011, and after considering all the information, the Commission took no action regarding you, and closed the file in this matter.

Documents related to the case will be placed on the public record within 30 days. See Statement of Policy Regarding Disclosure of Closed Enforcement and Related Files, 68 Fed.Reg. 70426 (Dec. 18, 2003) and Statement of Policy Regarding Placing First General Counsel's Reports on the Public Record, 74 Fed. Reg 66132 (Dec. 14, 2009).

If you have any questions, please contact me at (202) 694-1548.

Sincerely,

A handwritten signature in cursive script that reads "Elena Paoli".

Elena Paoli
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AUG 26 2011

Stefan Passantino
McKenna Long & Aldridge
1900 K Street, N.W.
Washington, DC 20006

Re: Michael Steele and Belinda Cook

Dear Mr. Passantino:

On March 30, 2010, the Federal Election Commission ("Commission") notified Michael Steele and Belinda Cook that the Commission, in the normal course of carrying out its supervisory responsibilities, had ascertained information indicating that they may have violated the Federal Election Campaign Act of 1971, as amended. On August 17, 2011, and after considering all the information, the Commission took no action regarding Michael Steele and Belinda Cook, in their individual capacities, and closed the file in this matter.

Documents related to the case will be placed on the public record within 30 days. See Statement of Policy Regarding Disclosure of Closed Enforcement and Related Files, 68 Fed.Reg. 70426 (Dec. 18, 2003) and Statement of Policy Regarding Placing First General Counsel's Reports on the Public Record, 74 Fed. Reg 66132 (Dec. 14, 2009).

If you have any questions, please contact me at (202) 694-1548.

Sincerely,

A handwritten signature in cursive script that reads "Elena Paoli".

Elena Paoli
Attorney

11044302000



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AUG 26 2011

Ken Wainstein
O'Melveny and Myers LLP
1625 Eye Street, N.W.
Washington, DC 20006

RE: MUR 6447
Monica Turner

Dear Mr. Wainstein:

This is to advise you that the file in this matter has been closed and this matter is now public. Documents related to the case will be placed on the public record within 30 days. *See Statement of Policy Regarding Disclosure of Closed Enforcement and Related Files, 68 Fed. Reg. 70,426 (Dec. 18, 2003) and Statement of Policy Regarding Placing First General Counsel's Reports on the Public Record, 74 Fed. Reg. 66132 (Dec. 14, 2009).*

If you have any questions, please contact me at (202) 694-1548.

Sincerely,

A handwritten signature in cursive script that reads "Elena Paoli".

Elena Paoli
Attorney

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FEDERAL ELECTION
COMMISSION

BEFORE THE FEDERAL ELECTION COMMISSION

2010 DEC 22 PM 4: 39

In the Matter of)
)
Michael Steele; Michael for Maryland)
and Belinda Cook, in her official)
capacity as treasurer; Steele for) Pre-MUR 498
Maryland, Inc. and Elisabeth S. Rubin, in)
her official capacity as treasurer; Monica)
Turner; Paul Ellington; Belinda Cook)

CELA

CERTIFICATION

I, Shawn Woodhead Werth, recording secretary of the Federal Election Commission executive session, do hereby certify that on December 14, 2010, the Commission took the following actions in the above-captioned matter:

1. Failed on a vote of 2-3 to:
 - a. Find reason to believe that Michael Steele violated 2 U.S.C. §§ 441a(f) and 434(b).
 - b. Authorize an investigation.

Commissioners Walther and Weintraub voted affirmatively for the motion.

Commissioners Hunter, McGahn II and Petersen dissented. Commissioner Bauerly did not vote.

2. Decided by a vote of 5-0 to:
 - a. Open a MUR.
 - b. Find reason to believe that Monica Turner violated 2 U.S.C. §§ 441a(a)(1)(A) and 441g.
 - c. Find reason to believe that Steele for Maryland, Inc. and Elisabeth S. Rubin, in her official capacity as Treasurer, knowingly and willfully violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 110.4(c)(2), and violated 2 U.S.C. §§ 434(b), 441a(f), 441i(e)(1)(A) and 11 C.F.R. § 110.3(d).
 - d. Find reason to believe that Michael for Maryland and Belinda Cook, in her official capacity as Treasurer, violated 2 U.S.C. § 441i(e)(1)(A) and 11 C.F.R. § 110.3(d).


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- e. Take no action at this time that Michael Steele violated 2 U.S.C. §§ 441a(f), 434(b), 441i(e)(1)(A) and 11 C.F.R. § 110.3(d).
- f. Take no action at this time that Paul Ellington violated 2 U.S.C. § 441i(e)(1)(A) and 11 C.F.R. § 110.3(d).
- g. Take no action at this time that Belinda Cook violated 2 U.S.C. § 441i(e)(1)(A) and 11 C.F.R. § 110.3(d).
- h. Approve the Steele for Maryland Factual and Legal Analysis informally circulated on December 8, 2010, and make appropriate conforming changes to the Factual and Legal Analyses for Monica Turner and Michael for Maryland.
- i. Enter into conciliation with Monica Turner, Steele for Maryland, Inc. and Elisabeth S. Rubin, in her official capacity as Treasurer, and Michael for Maryland and Belinda Cook, in her official capacity as Treasurer prior to a finding of probable cause to believe.
- j. Approve the Conciliation Agreements subject to making the appropriate conforming changes as set forth in the Steele for Maryland Factual and Legal Analysis informally circulated on December 8, 2010.
- k. Approve the appropriate letters.

Commissioners Hunter, McGahn II, Petersen, Walther and Weintraub voted affirmatively for the decision. Commissioner Bauerly did not vote.

Attest:

December 22, 2010
Date


Shawn Woodhead Werth
Secretary and Clerk of the Commission

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