



FEDERAL ELECTION COMMISSION

1125 K STREET NW  
WASHINGTON, D.C. 20463

THIS IS THE END OF FILM # 2028

Date Filmed 12/5/85 Camera No. --- 2

Cameraman AS

850405162886

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
American Medical International ) MUR 2028  
Political Action Committee )  
R. Bruce Andrews, as treasurer )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 11, 1985, the Commission decided by a vote of 5-0 to take the following actions in MUR 2028:

1. Accept the conciliation agreement for the American Medical International Political Action Committee and R. Bruce Andrews, as treasurer, attached to the General Counsel's Report signed September 5, 1985.
2. Close the file.
3. Approve and send the letter attached to General Counsel's Report signed September 5, 1985.

Commissioners Aikens, Elliott, Josefiak, McDonald and McGarry voted affirmatively in this matter; Commissioner Harris did not cast a vote.

Attest:

9-11-85  
Date

Marjorie W. Emmons  
Marjorie W. Emmons  
Secretary of the Commission

Received in Office of Commission Secretary: Fri., 9-6-85, 3:01  
Circulated on 48 hour tally basis: Mon., 9-9-85, 11:00  
Deadline for vote: Wed., 9-11-85, 11:00

85040562887



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 30, 1985

Zoe E. Baird  
O'Melveny & Meyers  
1800 M Street, N.W.  
Washington, D.C. 20036-5857

RE: MUR 2028  
American Medical International  
Political Action Committee  
R. Bruce Andrews, as treasurer  
Your file no. 20,253

Dear Ms. Baird:

On September 11, 1985, the Commission accepted the conciliation agreement signed by you and a check for the civil penalty in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(i) and (ii), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele  
General Counsel

  
By: Kenneth A. Gross  
Associate General Counsel

Enclosure  
Conciliation Agreement

850405628883

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )

American Medical International )

Political Action Committee )

R. Bruce Andrews, as treasurer )

MUR 2028

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the American Medical International Political Action Committee and R. Bruce Andrews, as treasurer, ("Respondents") violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (ii) by failing to file their 1984 October Quarterly and Pre-General Election reports in a timely manner.

NOW, THEREFORE, the Commission and Respondents, having participated in informal methods of conciliation, prior to a finding a 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:

85040562889

1. Respondent, American Medical International Political Action Committee ("AMIPAC"), is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Respondent, R. Bruce Andrews, is the treasurer of AMIPAC.

3. Section 434(a)(4)(A)(i) of Title 2, United States Code, provides that during an election year the treasurer of a political committee is required to file quarterly reports no later than the 15th day following the close of the immediately preceding calendar quarter.

4. Pursuant to 2 U.S.C. § 434(a)(4)(A)(i), the Respondents were required to file their 1984 October Quarterly report on October 15, 1984.

5. The Respondents filed their 1984 Quarterly report on November 19, 1984, which was 35 days late.

6. Section 434(a)(4)(A)(ii) of Title 2, United States Code, provides that the treasurer of a political committee is required to file a pre-election report no later than 12 days before any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election.

7. Pursuant to 2 U.S.C. § 434(a)(4)(A)(ii), the Respondents were required to file a pre-general election report covering the period of October 1 through October 17, 1984, no later than by October 25, 1984.

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8. During the coverage period of the pre-general election report, the Respondents made expenditures of \$750 to Federal candidates. The Respondents did not disclose this information to the Commission until January 22, 1985, on which date the Respondents filed a report disclosing the activity occurring during the period of October 1, 1984, through November 30, 1984.

V. Respondents violated 2 U.S.C. §§ 434 (a) (4) (A) (i) and (ii) by failing to file their 1984 October Quarterly and Pre-General Election reports in a timely manner.

VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of Two Hundred dollars (\$200), pursuant to 2 U.S.C. § 437g(a) (5) (A).

VII. Respondents agree that they shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437(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.

IX. 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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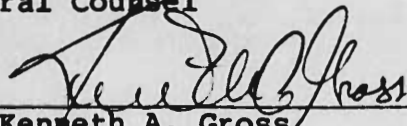


X. Respondents shall have no more than thirty (30) days from the date this agreement become effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.


XI. 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 valid.

FOR THE COMMISSION:

Charles N. Steele  
General Counsel

BY:  September 27, 1985  
Kenneth A. Gross Date  
Associate General Counsel

FOR THE RESPONDENT:

 August 28, 1985  
Zoe E. Baird Date  
Attorney

85040562892

GCC# 8465

MEMORANDUM

TO: RETHA DIXON

TO: JOAN HARRIS

FROM: JOAN HARRIS

FROM: RETHA DIXON

CHECK NO. 4471 (a copy of which is attached) RELATING  
TO MUR 2028 AND NAME Am. Medical Int'l. PAC  
WAS RECEIVED ON Sept. 5, 1985. PLEASE INDICATE THE ACCOUNT INTO  
WHICH IT SHOULD BE DEPOSITED:

☒ BUDGET CLEARING ACCOUNT (#95F3875.16)

☐ / CIVIL PENALTIES ACCOUNT (#95-1099.160)

OTHER

SIGNATURE

Retha L. Dixon

DATE

9-5-85

18505628



8 5 0 4 0 5 6 2 8 9 4

O'MELVENY & MYERS-D.C.  
GENERAL ACCOUNT  
1800 M STREET, N.W.  
WASHINGTON, DC 20036

4471

15-3/540

September 4 1985

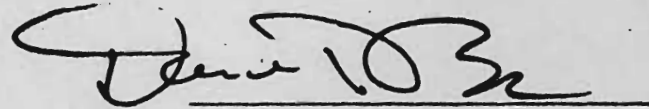
PAY TO THE ORDER OF Treasurer of the United States \$ 200.00\*\*\*\*\*

Two-hundred dollars and no/cents\*\*\*\*\*DOLLARS

The RIGGS NATIONAL BANK  
of WASHINGTON D.C.

10TH AND M STREET  
N.W. WASHINGTON, D.C.

FOR Civil penalty MUR 2028



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**MELVENY & MYERS**

1800 M Street, N. W.

WASHINGTON, D. C. 20036

**First Class Mail**

FROM

**O'MELVENY & MYERS**

1800 M STREET, N.W.

WASHINGTON, D.C. 20036

Beverly Kramer, Esq.  
Office of the General Counsel  
Federal Election Commission  
Washington, D.C. 20463

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) MUR 2028  
American Medical International )  
Political Action Committee )  
R. Bruce Andrews, as treasurer )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 13, 1985, the Commission decided by a vote of 6-0 to take the following actions in MUR 2028:

1. Enter into conciliation with the American Medical International Political Action Committee and R. Bruce Andrews, as treasurer, prior to a finding of probable cause to believe.
2. Approve the proposed conciliation agreement and letter attached to the General Counsel's Report signed August 6, 1985.

Commissioners Aikens, Elliott, Harris, Josefiak, McDonald and McGarry voted affirmatively in this matter.

Attest:

8-14-85

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

Received in Office of Commission Secretary:  
Circulated on 48 hour tally basis:

8-9-85, 10:04  
8-9-85, 2:00

85040562896



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary  
FROM: Office of General Counsel *Ed*  
DATE: August 8, 1985  
SUBJECT: MUR 2028 - General Counsel's Report

The attached is submitted as an Agenda document  
for the Commission Meeting of \_\_\_\_\_  
Open Session \_\_\_\_\_  
Closed Session \_\_\_\_\_

CIRCULATIONS

48 Hour Tally Vote	<input checked="" type="checkbox"/>
Sensitive	<input checked="" type="checkbox"/>
Non-Sensitive	<input type="checkbox"/>
24 Hour No Objection	<input type="checkbox"/>
Sensitive	<input type="checkbox"/>
Non-Sensitive	<input type="checkbox"/>
Information	<input type="checkbox"/>
Sensitive	<input type="checkbox"/>
Non-Sensitive	<input type="checkbox"/>
Other	<input type="checkbox"/>

DISTRIBUTION

Compliance	<input checked="" type="checkbox"/>
Audit Matters	<input type="checkbox"/>
Litigation	<input type="checkbox"/>
Closed MUR Letters	<input type="checkbox"/>
Status Sheets	<input type="checkbox"/>
Advisory Opinions	<input type="checkbox"/>
Other (see distribution below)	<input type="checkbox"/>

85040562897

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
American Medical International )  
Political Action Committee )  
R. Bruce Andrews, as treasurer )

MUR 2028

RECEIVED  
OFFICE OF THE FEC  
COMMISSION SECRETARY

35 AUG 9 A10:04

GENERAL COUNSEL'S REPORT

**SENSITIVE**

I. BACKGROUND

On June 10, 1985, the Commission found reason to believe that the American Medical International Political Action Committee ("AMIPAC") and R. Bruce Andrews, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (ii) by failing to file their 1984 October Quarterly and Pre-General Election reports in a timely manner. Responding to notification, the Respondents request to enter into conciliation prior to a finding of probable cause to believe (Attachment 1).

II. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

35040562893

### III. RECOMMENDATIONS

1. Enter into conciliation with the American Medical International Political Action Committee and R. Bruce Andrews, as treasurer, prior to a finding of probable cause to believe.

2. Approve the attached proposed conciliation agreement and letter.

Charles N. Steele  
General Counsel

August 6, 1955  
Date

BY:

Kenneth A. Gross  
Kenneth A. Gross  
Associate General Counsel

#### Attachments

1. Request
2. Proposed Agreement and letter

85040562897



*Jee*

400 SOUTH HOPE STREET  
LOS ANGELES, CALIFORNIA 90007-0000  
TELEPHONE (213) 600-0000  
TELEX 67-462 - 6007700 WTT

1000 CENTURY PARK EAST  
LOS ANGELES, CALIFORNIA 90067-1000  
TELEPHONE (213) 653-6700  
TELEX 67-462

**O'MELVENY & MYERS**

1800 M STREET, N. W.  
WASHINGTON, D. C. 20036-5557  
TELEPHONE (202) 457-8300  
TELEX 89-622 (202) 633-6672 (200)

July  
9th  
1985

RECEIVED THE FEC  
HAND DELIVERED

85 JUL 10 09:28

610 NEWPORT CENTER DRIVE  
NEWPORT BEACH, CALIFORNIA 92660-0000  
TELEPHONE (714) 790-0000 • (214) 600-0000  
TELEX (714) 790-007 (200) • 600000 WTT

600 FIFTH AVENUE  
NEW YORK, NEW YORK 10010  
TELEPHONE (212) 607-4040  
TELEX 127000

OUR FILE NUMBER

WRITER'S DIRECT TELEPHONE

(202) 457-5901

Mr. John Warren McGarry  
Chairman  
Federal Election Commission  
1325 K St., N.W.  
Washington, D.C. 20463

Re: MUR 2028

Dear Mr. McGarry:

This is in response to your letter of June 18  
1985 to R. Bruce Andrews, Treasurer, American Medical  
International Political Action Committee ("AMIPAC").

As indicated in the enclosed correspondence and  
statement of July 2, 1985, this firm has been designated  
as counsel for AMIPAC in this matter. We would like the  
opportunity to begin the conciliation process as soon as  
possible, even though the Commission has not made a finding  
of probable cause. See 11 C.F.R. § 111.18(d).

Sincerely,

*Zoe Baird*

Zoe E. Baird  
for O'MELVENY & MYERS

Enclosures

cc: Ms. Judy Thedford

Attachment 1

85040562900

*Gross / Baird*  
*forward*

35 JUL 10 11:03

RECEIVED  
GENERAL COUNCIL  
FEDERAL ELECTION COMMISSION

GCC # 8177

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2028

NAME OF COUNSEL: Ms. Zoe E. Baird

ADDRESS: O'MELVENY & MYERS

1800 M Street, N.W., Suite 500 South

Washington, D.C. 20036

TELEPHONE: (202) 457-5901

The above-named individual is hereby designated as my  
counsel and is authorized to receive any notifications and other  
communications from the Commission and to act on my behalf before  
the Commission.

30 July 1985  
Date

R. B. Andrews  
Signature

RESPONDENT'S NAME: R. Bruce Andrews, Treasurer  
and American Medical International  
ADDRESS: Political Action Committee  
414 North Camden Drive  
Beverly Hills, California 90210

HOME PHONE: \_\_\_\_\_

BUSINESS PHONE: (213) 278-6200

5 AUG 1 2:49 PM

RECEIVED  
GENERAL COUNSEL  
OFFICE OF THE  
ATTORNEY GENERAL

85040562901

FROM  
O'MELVENY & MYERS  
1800 M STREET, N.W.  
WASHINGTON, D.C. 20036

Beverly Kramer  
Federal Election Commission  
1325 K St., N.W.  
Washington, D.C.

8 5 0 4 0 5 6 2 9 0 2

05 AUG 1 1969 2:49

RECEIVED  
OFFICE OF THE  
GENERAL COUNSEL

400 SOUTH HOPE STREET  
LOS ANGELES, CALIFORNIA 90071-2899  
TELEPHONE (213) 699-6000  
TELEX 67-483 - 4997798 (ITT)

1800 CENTURY PARK EAST  
LOS ANGELES, CALIFORNIA 90067-1899  
TELEPHONE (213) 683-6700  
TELEX 67-4097

O'MELVENY & MYERS

1800 M STREET, N. W.  
WASHINGTON, D. C. 20036-8857  
TELEPHONE (202) 457-5300  
TELEX 69-622 (202) 633-3672 (DDD)

July  
9th  
1985

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85 JUL 10 4:28  
610 NEWPORT CENTER DRIVE  
NEWPORT BEACH, CALIFORNIA 92660-6429  
TELEPHONE (714) 760-9600 - (213) 699-6000  
TELEX (714) 760-1367 (DDN) - 4728068 (ITT)

660 FIFTH AVENUE  
NEW YORK, NEW YORK 10019  
TELEPHONE (212) 647-4040  
TELEX 187008

OUR FILE NUMBER

WRITER'S DIRECT TELEPHONE

(202) 457-5901

Mr. John Warren McGarry  
Chairman  
Federal Election Commission  
1325 K St., N.W.  
Washington, D.C. 20463

Re: MUR 2028

Dear Mr. McGarry:

This is in response to your letter of June 18  
1985 to R. Bruce Andrews, Treasurer, American Medical  
International Political Action Committee ("AMIPAC").

As indicated in the enclosed correspondence and  
statement of July 2, 1985, this firm has been designated  
as counsel for AMIPAC in this matter. We would like the  
opportunity to begin the conciliation process as soon as  
possible, even though the Commission has not made a finding  
of probable cause. See 11 C.F.R. § 111.18(d).

Sincerely,

*Zoe Baird*

Zoe E. Baird  
for O'MELVENY & MYERS

Enclosures

cc: Ms. Judy Thedford

85040562903

15 JUL 10 11:03 AM

RECEIVED  
GENERAL COUNCIL



O'MELVENY & MYERS

400 SOUTH HOPE STREET  
LOS ANGELES, CALIFORNIA 90071-0000  
TELEPHONE (213) 600-0000  
TELEX 67-452 • 4007700 HTT

1000 CENTURY PARK EAST  
LOS ANGELES, CALIFORNIA 90067-0000  
TELEPHONE (213) 623-0700  
TELEX 67-4007

1800 M STREET, N. W.  
WASHINGTON, D. C. 20036-5857  
TELEPHONE (202) 457-5300  
TELEX 89-822 (202) 833-3872 (800)

610 NEWPORT CENTER DRIVE  
NEWPORT BEACH, CALIFORNIA 92660-0400  
TELEPHONE (714) 780-0000 • (213) 600-0000  
TELEX (714) 720-1307 (800) • 4785000 HTT

660 FIFTH AVENUE  
NEW YORK, NEW YORK 10010  
TELEPHONE (212) 847-4040  
TELEX 127000

July  
2nd  
1 9 8 5

OUR FILE NUMBER  
267,615-020  
WRITER'S DIRECT TELEPHONE  
(202) 457-5901

Ms. Judy Thedford  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Re: MUR 2028

Dear Ms. Thedford:

As we discussed today in response to Chairman McGarry's letter of June 18, 1985 to R. Bruce Andrews, Treasurer, American Medical International Political Action Committee ("AMIPAC"), this firm has been designated as counsel for AMIPAC in this matter. I have enclosed AMIPAC's Statement of Designation of Counsel.

This confirms the understanding you and I reached that we will submit AMIPAC's response to the June 18 letter by Wednesday, July 10, 1985.

Sincerely,

*Zoe E. Baird*

Zoe E. Baird  
for O'MELVENY & MYERS

ZEB:mmm

Enclosure

cc: Mr. R. Jeffrey Taylor

35040562904

**STATEMENT OF DESIGNATION OF COUNSEL**

**MUR** 2028

**NAME OF COUNSEL:** Ms. Zoe E. Baird

**ADDRESS:** O'MELVENY & MYERS

1800 M Street, N.W.

Suite 500 South

**TELEPHONE:** Washington, D.C. 20036

(202) 457-5901

The above-named individual is hereby designated as my  
counsel and is authorized to receive any notifications and other  
communications from the Commission and to act on my behalf before  
the Commission.

July 2, 1985  
**Date**

Zoe Baird  
**Signature \***

\* Per authorization of R. Jeffrey Taylor,  
Group Vice President, Associate General  
Counsel, American Medical International

**RESPONDENT'S NAME:** American Medical International

**ADDRESS:** Political Action Committee

414 North Camden Drive

Beverly Hills, California 90210

**HOME PHONE:** \_\_\_\_\_

**BUSINESS PHONE:** (213) 278-6200

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GCC# 7970

400 SOUTH HOPE STREET  
LOS ANGELES, CALIFORNIA 90071-2899  
TELEPHONE (213) 666-6000  
TELEX 67-4122 - 4997798 (ITT)  
  
1800 CENTURY PARK EAST  
LOS ANGELES, CALIFORNIA 90067-1889  
TELEPHONE (213) 663-6700  
TELEX 67-4097

O'MELVENY ~~REMYERED~~  
1800 M STREET  
WASHINGTON, D.C. 20036  
TELEPHONE (202) 457-5500  
TELEX 86-822 (202) 833-3673 (DDD)

840 NEWPORT CENTER DRIVE  
NEWPORT BEACH, CALIFORNIA 92660-8428  
TELEPHONE (714) 780-8600 • (213) 666-6000  
TELEX (714) 780-1387 (DDD) • 4782088 (ITT)  
  
680 FIFTH AVENUE  
NEW YORK, NEW YORK 10018  
TELEPHONE (212) 847-4040  
TELEX 127008

July 18 1985  
9th  
1985  
AIO: 42

OUR FILE NUMBER

WRITER'S DIRECT TELEPHONE

(202) 457-5901

Mr. John Warren McGarry  
Chairman  
Federal Election Commission  
1325 K St., N.W.  
Washington, D.C. 20463

Re: MUR 2028

Dear Mr. McGarry:

This is in response to your letter of June 18, 1985 to R. Bruce Andrews, Treasurer, American Medical International Political Action Committee ("AMIPAC").

As indicated in the enclosed correspondence and statement of July 2, 1985, this firm has been designated as counsel for AMIPAC in this matter. We would like the opportunity to begin the conciliation process as soon as possible, even though the Commission has not made a finding of probable cause. See 11 C.F.R. § 111.18(d).

Sincerely,

*Zoe Baird*

Zoe E. Baird  
for O'MELVENY & MYERS

Enclosures

cc: Ms. Judy Thedford

85040562906

RECEIVED  
GENERAL COUNSEL  
JUL 18 11:52

O'MELVENY & MYERS

400 SOUTH HOPE STREET  
LOS ANGELES, CALIFORNIA 90071-2000  
TELEPHONE (213) 600-0000  
TELEX 67-4022 - 4007700 (ITT)

1800 CENTURY PARK EAST  
LOS ANGELES, CALIFORNIA 90067-1000  
TELEPHONE (213) 600-0700  
TELEX 67-4007

1800 M STREET, N. W.  
WASHINGTON, D. C. 20036-2857  
TELEPHONE (202) 457-8300  
TELEX 60-022 (202) 833-3672 (000)

610 NEWPORT CENTER DRIVE  
NEWPORT BEACH, CALIFORNIA 92660-0400  
TELEPHONE (714) 780-0000 - (213) 600-0000  
TELEX (714) 780-1387 (000) - 4722000 (ITT)

600 FIFTH AVENUE  
NEW YORK, NEW YORK 10010  
TELEPHONE (212) 607-0000  
TELEX 187000

July  
2nd  
1985

OUR FILE NUMBER  
267,615-020  
WRITER'S DIRECT TELEPHONE  
(202) 457-5901

Ms. Judy Thedford  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Re: MUR 2028

Dear Ms. Thedford:

As we discussed today in response to Chairman McGarry's letter of June 18, 1985 to R. Bruce Andrews, Treasurer, American Medical International Political Action Committee ("AMIPAC"), this firm has been designated as counsel for AMIPAC in this matter. I have enclosed AMIPAC's Statement of Designation of Counsel.

This confirms the understanding you and I reached that we will submit AMIPAC's response to the June 18 letter by Wednesday, July 10, 1985.

Sincerely,

*Zoe E. Baird*

Zoe E. Baird  
for O'MELVENY & MYERS

ZEB:mmm

Enclosure

cc: Mr. R. Jeffrey Taylor

85040562907

**STATEMENT OF DESIGNATION OF COUNSEL**

**MUR** 2028

**NAME OF COUNSEL:** Ms. Zoe E. Baird

**ADDRESS:** O'MELVENY & MYERS

1800 M Street, N.W.

Suite 500 South

**TELEPHONE:** Washington, D.C. 20036

(202) 457-5901

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

July 2, 1985  
**Date**

Zoe Baird  
**Signature \***

\* Per authorization of R. Jeffrey Taylor,  
Group Vice President, Associate General  
Counsel, American Medical International

**RESPONDENT'S NAME:** American Medical International

**ADDRESS:** Political Action Committee

414 North Camden Drive

Beverly Hills, California 90210

**HOME PHONE:**

**BUSINESS PHONE:** (213) 278-6200

35040562908

85040562909

FROM  
O'MELVENY & MYERS  
1800 M STREET, N.W.  
WASHINGTON, D.C. 20036

Mr. John Warren McGarry  
Chairman  
Federal Election Commission  
1325 K St., N.W.  
Washington, D.C. 20463

546



400 SOUTH HORN STREET  
LOS ANGELES, CALIFORNIA 90071-8888  
TELEPHONE (213) 688-8000  
TELEX 67-4122 - 4887788 (ITT)  
1800 CENTURY PARK EAST  
LOS ANGELES, CALIFORNIA 90067-1588  
TELEPHONE (213) 883-6700  
TELEX 67-4087

O'MELVENY & MYERS  
1800 M STREET, N. W.  
WASHINGTON, D. C. 20036-5857  
TELEPHONE (202) 467-8300  
TELEX 88-682 (202) 833-3672 (DDD)

July  
2nd  
1985

RECEIVED AT THE FEC  
200 #7940  
85 JUL 8 AM: 01  
210 NEWPORT CENTER DRIVE  
NEWPORT BEACH, CALIFORNIA 92660-6400  
TELEPHONE (714) 780-8800 - (213) 688-8000  
TELEX (714) 780-1387 (DDD) - 4728088 (ITT)  
680 FIFTH AVENUE  
NEW YORK, NEW YORK 10018  
TELEPHONE (212) 847-4040  
TELEX 127008

OUR FILE NUMBER  
267,615-020  
WRITER'S DIRECT TELEPHONE  
(202) 457-5901

RECEIVED  
GENERAL COUNSEL  
85 JUL 8  
PI2: 00

Ms. Judy Thedford  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Re: MUR 2028

Dear Ms. Thedford:

As we discussed today in response to Chairman McGarry's letter of June 18, 1985 to R. Bruce Andrews, Treasurer, American Medical International Political Action Committee ("AMIPAC"), this firm has been designated as counsel for AMIPAC in this matter. I have enclosed AMIPAC's Statement of Designation of Counsel.

This confirms the understanding you and I reached that we will submit AMIPAC's response to the June 18 letter by Wednesday, July 10, 1985.

Sincerely,

*Zoe Baird*

Zoe E. Baird  
for O'MELVENY & MYERS

ZEB:mmm

Enclosure

cc: Mr. R. Jeffrey Taylor

85040562910

**STATEMENT OF DESIGNATION OF COUNSEL**

MUR 2028

NAME OF COUNSEL: Ms. Zoe E. Baird

ADDRESS: O'MELVENY & MYERS

1800 M Street, N.W.

Suite 500 South

TELEPHONE: Washington, D.C. 20036

(202) 457-5901

35 JUL 8 12:01  
RECEIVED  
OFFICE OF THE  
GENERAL COUNSEL

The above-named individual is hereby designated as my  
counsel and is authorized to receive any notifications and other  
communications from the Commission and to act on my behalf before  
the Commission.

July 2, 1985  
Date

Zoe Baird  
Signature \*

\* Per authorization of R. Jeffrey Taylor,  
Group Vice President, Associate General  
Counsel, American Medical International

RESPONDENT'S NAME: American Medical International

ADDRESS: Political Action Committee

414 North Camden Drive

Beverly Hills, California 90210

HOME PHONE: \_\_\_\_\_

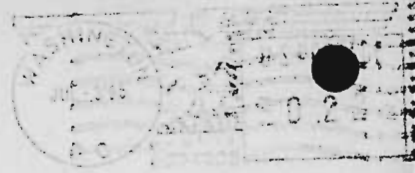
BUSINESS PHONE: (213) 278-6200

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85040562912

Ms. Judy Thedford  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463



85 JUL 8

A10:



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 18, 1985

R. Bruce Andrews, Treasurer  
American Medical International  
Political Action Committee  
414 North Camden Drive  
Beverly Hills, California 90210

RE: MUR 2028  
American Medical International  
Political Action Committee

Dear Mr. Andrews:

On June 10, 1985, the Federal Election Commission determined that there is reason to believe the American Medical International Political Action Committee, and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (ii), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within ten days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form

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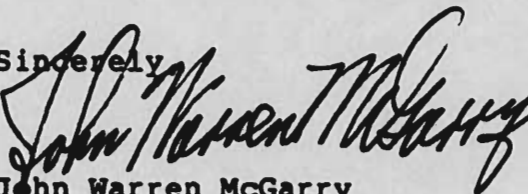
Letter to R. Bruce Andrews, Treasurer  
page 2

stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Judy Thedford, at (202) 523-4000.

Sincerely,

  
John Warren McGarry  
Chairman

Enclosures

General Counsel's Factual and Legal Analysis  
Procedures  
Designation of Counsel Statement

85040562914

**GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS**

**MUR NO. 2028**

**RESPONDENT:** American Medical International  
Political Action Committee  
R. Bruce Andrews, Treasurer

**SUMMARY OF ALLEGATIONS**

The American Medical International Political Action Committee ("AMIPAC") failed to file the 1984 October Quarterly and 12 Day Pre-General Election Reports by Election Day, November 6, 1984.

AMIPAC was notified on September 21, 1984, that the October Quarterly Report was due on October 15, 1984. The report was received on November 19, 1984.

AMIPAC was notified on October 1, 1984 that all committees that have made contributions or expenditures in connection with the general election during the period ending October 17, 1984 must file a 12 Day Pre-General Report by October 25, 1984, if such activity has not previously been reported.

Since AMIPAC had not submitted a 30 Day Post-General Report, a Non-Filer Notice was mailed on December 28, 1984. Margaret Carr, a representative of AMIPAC, contacted the RAD analyst on January 9, 1985. Ms. Carr stated that she would be sending in the 30 Day Post-General Report in the next couple of days. The RAD analyst then asked Ms. Carr why the report had not been filed. Ms. Carr responded by stating that certain personal problems had arose that had required her immediate attention.

85040562915

AMIPAC filed a letter of explanaton and a 30 Day Post-General Report covering the period October 1, 1984 through November 30, 1984, on January 22, 1985. The cover letter attributes the tardiness of the report to a heavy workload and a general misinterpretation of FEC reporting procedures. Based upon two (2) itemized contributions to Federal candidates totalling \$750, that were made between October 1, 1984 and October 17, 1984, it appears that AMIPAC was required to file a 12 Day Pre-General Report.

#### FACTUAL BASIS AND LEGAL ANALYSIS

2 U.S.C. § 434(a)(4)(A)(i) and (ii) requires a political committee, other than an authorized committee of a candidate, to file, in an election year, quarterly reports and pre-election reports. The quarterly reports are due no later than the 15th day after the last day of each calendar quarter. The pre-election reports are due no later than the 12th day before any election in which the committee makes contributions to or expenditures on behalf of a candidate in such election.

AMIPAC filed its 1984 October Quarterly Report on November 19, 1984. The report was due October 15, 1984; and, therefore, was filed 35 days late.

From a review of AMIPAC's 1984 30 Day Post-General Election Report, it was revealed that AMIPAC should have filed a 12 Day Pre-General Election Report. Specifically, AMIPAC made contributions totalling \$750 to 2 federal candidates in the general election on October 3, and 9, 1984. The 1984 pre-general

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election reporting period covered October 1, through 17, 1984. Therefore, AMIPAC should have filed a 12 day pre-general election report on October 25, 1984. Instead, this activity was disclosed on its 1984 30 Day Post-General Election Report filed on January 22, 1985, 89 days late.<sup>1/</sup>

The Office of General Counsel recommends opening a MUR, and finding reason to believe AMIPAC and R. Bruce Andrews, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (ii).

<sup>1/</sup> It should be noted that AMIPAC's 30 Day Post-General Election Report was also filed late. However, since the referral only addresses the late filing of the October Quarterly and the 12 Day Pre-General Election Reports, AMIPAC will not be pursued for the late filing of the 30 Day Post-General Election Report in this matter.

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DESCRIPTION OF PRELIMINARY PROCEDURES  
FOR PROCESSING POSSIBLE VIOLATIONS DISCOVERED BY THE  
FEDERAL ELECTION COMMISSION

Possible violations discovered during the normal course of the Commission's supervisory responsibilities shall be referred to the Enforcement Division of the Office of General Counsel where they are assigned a MUR (Matter Under Review) number, and assigned to a staff member.

Following review of the information which generated the MUR, a recommendation on how to proceed on the matter, which shall include preliminary legal and factual analysis, and any information compiled from materials available to the Commission shall be submitted to the Commission. This initial report shall recommend either: (a) that the Commission find reason to believe that a possible violation of the Federal Election Campaign Act (FECA) may have occurred or is about to occur and that the Commission conduct an investigation of the matter; or (b) that the Commission find no reason to believe that a possible violation of the FECA has occurred and that the Commission close the file on the matter.

Thereafter, if the Commission decides by an affirmative vote of four (4) Commissioners that there is reason to believe that a violation of the Federal Election Campaign Act (FECA) has been committed or is about to be committed, the Office of the General Counsel shall open an investigation into the matter. Upon notification of the Commission's finding(s), within 15 days a respondent(s) may submit any factual or legal materials relevant to the allegations. During the investigation, the Commission shall have the power to subpoena documents, to subpoena individuals to appear for depositions, and to order answers to interrogatories. The respondent(s) may be contacted more than once by the Commission in its investigation.

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If, during this period of investigation, the respondent(s) indicate a desire to enter into conciliation, the Office of General Counsel staff may begin the conciliation process prior to a finding of probable cause to believe a violation has been committed. Conciliation is an informal method of conference and persuasion to endeavor to correct or prevent a violation of the Federal Election Campaign Act (FECA). Most often, the result of conciliation is an agreement signed by the Commission and the respondent(s). The Conciliation Agreement must be adopted by four votes of the Commission before it becomes final. After signature by the Commission and the respondent(s), the Commission shall make public the Conciliation Agreement.

[If the investigation warrants], and no conciliation agreement is entered into prior to a probable cause to believe finding, the General Counsel must notify the respondent(s) of his intent to proceed to a vote on probable cause to believe that a violation of the Federal Election Campaign Act (FECA) has been committed or is about to be committed. Included with the notification to the respondent(s) shall be a brief setting forth the position of the General Counsel on the legal and factual issues of the case. Within 15 days of receipt of such brief, the respondent(s) may submit a brief posing the position of respondent(s) and replying to the brief of the General Counsel. Both briefs will then be filed with the Commission Secretary and will be considered by the Commission. Thereafter, if the Commission determines by an affirmative vote of four (4) Commissioners, that there is probable cause to believe that a violation of the FECA has been committed or is about to be committed conciliation must be undertaken for a period of at least 30 days but not more than 90 days. If the Commission is unable to correct or prevent any violation of the FECA through conciliation the Office of General Counsel may recommend that the Commission file a civil suit against the respondent(s) to enforce the Federal Election Campaign Act (FECA). Thereafter, the Commission may, upon an affirmative vote of four (4) Commissioners, institute civil action for relief in the District Court of the United States.

See 2 U.S.C. § 437g, 11 C.F.R. Part 111.

November 1980

85040562919

**STATEMENT OF DESIGNATION OF COUNSEL**

**MUR** \_\_\_\_\_

**NAME OF COUNSEL:** \_\_\_\_\_

**ADDRESS:** \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**TELEPHONE:** \_\_\_\_\_

The above-named individual is hereby designated as my  
counsel and is authorized to receive any notifications and other  
communications from the Commission and to act on my behalf before  
the Commission.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature

**RESPONDENT'S NAME:** \_\_\_\_\_

**ADDRESS:** \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**HOME PHONE:** \_\_\_\_\_

**BUSINESS PHONE:** \_\_\_\_\_

85040562920

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
American Medical International ) RAD Referral 85NF-112  
Political Action Committee )  
R. Bruce Andrews, treasurer )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 10, 1985, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 85NF-112:

1. Open a MUR.
2. Find reason to believe American Medical International Political Action Committee and R. Bruce Andrews, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (ii).
3. Approve and send the letter and factual and legal analysis attached to the First General Counsel's Report signed June 5, 1985.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter.

Attest:

6-12-85  
Date

Marjorie W. Emmons  
Marjorie W. Emmons  
Secretary of the Commission

Received in Office of Commission Secretary:  
Circulated on 48 hour tally basis:

6-6-85, 11:00  
6-6-85, 4:00

85040562921



# FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

## MEMORANDUM

TO: Office of the Commission Secretary  
FROM: Office of General Counsel *red*  
DATE: June 6, 1985  
SUBJECT: RAD Ref. 85NF-112: First General Counsel's Rpt.

The attached is submitted as an Agenda document  
for the Commission Meeting of \_\_\_\_\_  
Open Session \_\_\_\_\_  
Closed Session \_\_\_\_\_

### CIRCULATIONS

48 Hour Tally Vote [x]  
Sensitive [x]  
Non-Sensitive [ ]

24 Hour No Objection [ ]  
Sensitive [ ]  
Non-Sensitive [ ]

Information [ ]  
Sensitive [ ]  
Non-Sensitive [ ]

Other [ ]

### DISTRIBUTION

Compliance [x]

Audit Matters [ ]

Litigation [ ]

Closed MUR Letters [ ]

Status Sheets [ ]

Advisory Opinions [ ]

Other (see distribution below) [ ]

850405629222



RECEIVED  
SEN  
OFFICE OF THE FEC  
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION  
1325 K Street, N.W.  
Washington, D.C. 20463

FIRST GENERAL COUNSEL'S REPORT 6 All: 00

DATE AND TIME OF TRANSMITTAL BY  
OGC TO THE COMMISSION \_\_\_\_\_

RAD REFERRAL: 85NF-112  
STAFF MEMBER: Thedford

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

RESPONDENTS' NAMES: American Medical International  
Political Action Committee  
R. Bruce Andrews, Treasurer

RELEVANT STATUTES: 2 U.S.C. § 434(a)(4)(A)(i) and (ii)

INTERNAL REPORTS

CHECKED: American Medical International  
Political Action Committee by RAD

FEDERAL AGENCIES

CHECKED: None

GENERATION OF MATTER

This matter was referred to the Office of General Counsel by the Reports Analysis Division ("RAD") on May 28, 1985.

SUMMARY OF ALLEGATIONS

The American Medical International Political Action Committee ("AMIPAC") failed to file the 1984 October Quarterly and 12 Day Pre-General Election Reports by Election Day, November 6, 1984.

AMIPAC was notified on September 21, 1984, that the October Quarterly Report was due on October 15, 1984. The report was received on November 19, 1984.

AMIPAC was notified on October 1, 1984 that all committees that have made contributions or expenditures in connection with the general election during the period ending October 17, 1984

85040562923

must file a 12 Day Pre-General Report by October 25, 1984, if such activity has not previously been reported.

Since AMIPAC had not submitted a 30 Day Post-General Report, a Non-Filer Notice was mailed on December 28, 1984. Margaret Carr, a representative of AMIPAC, contacted the RAD analyst on January 9, 1985. Ms. Carr stated that she would be sending in the 30 Day Post-General Report in the next couple of days. The RAD analyst then asked Ms. Carr why the report had not been filed. Ms. Carr responded by stating that certain personal problems had arose that had required her immediate attention.

AMIPAC filed a letter of explanaton and a 30 Day Post-General Report covering the period October 1, 1984 through November 30, 1984, on January 22, 1985. The cover letter attributes the tardiness of the report to a heavy workload and a general misinterpretation of FEC reporting procedures. Based upon two (2) itemized contributions to Federal candidates totalling \$750, that were made between October 1, 1984 and October 17, 1984, it appears that AMIPAC was required to file a 12 Day Pre-General Report.

#### **FACTUAL BASIS AND LEGAL ANALYSIS**

2 U.S.C. § 434(a)(4)(A)(i) and (ii) requires a political committee, other than an authorized committee of a candidate, to file, in an election year, quarterly reports and pre-election reports. The quarterly reports are due no later than the 15th day after the last day of each calendar quarter. The pre-election reports are due no later than the 12th day before any

election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election.

AMIPAC filed its 1984 October Quarterly Report on November 19, 1984. The report was due October 15, 1984; and, therefore, was filed 35 days late.

From a review of AMIPAC's 1984 30 Day Post-General Election Report, it was revealed that AMIPAC should have filed a 12 Day Pre-General Election Report. Specifically, AMIPAC made contributions totalling \$750 to 2 federal candidates in the general election on October 3, and 9, 1984. The 1984 pre-general election reporting period covered October 1, through 17, 1984. Therefore, AMIPAC should have filed a 12 day pre-general election report on October 25, 1984. Instead, this activity was disclosed on its 1984 30 Day Post-General Election Report filed on January 22, 1985, 89 days late.<sup>1/</sup>

The Office of General Counsel recommends opening a MUR, and finding reason to believe AMIPAC and R. Bruce Andrews, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (ii).

#### RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe American Medical International Political Action Committee and R. Bruce Andrews, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (ii).

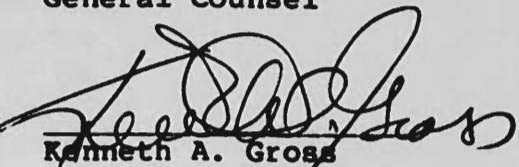
<sup>1/</sup> It should be noted that AMIPAC's 30 Day Post-General Election Report was also filed late. However, since the referral only addresses the late filing of the October Quarterly and the 12 Day Pre-General Election Reports, AMIPAC will not be pursued for the late filing of the 30 Day Post-General Election Report in this matter.

3. Approve and send the attached letter and factual and legal analysis.

Charles N. Steele  
General Counsel

June 5, 1985  
date

BY:

  
Kenneth A. Gross  
Associate General Counsel

Attachments

1. Referral
2. Proposed letter
3. General Counsel's Factual and Legal Analysis

85040562926

## REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: May 28, 1985ANALYST: Michael D. Butterfield

I. COMMITTEE: American Medical International Political  
Action Committee (C00109207)  
R. Bruce Andrews, Treasurer  
414 North Camden Drive  
Beverly Hills, CA 90210

II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(A)(i) and (ii)  
11 CFR 104.5(c)(1)(i) and (ii)

## III. BACKGROUND:

Failure to Timely File the 1984 October Quarterly and 12 Day  
Pre-General Reports

The American Medical International Political Action  
Committee ("AMIPAC") failed to file the 1984 October  
Quarterly and 12 Day Pre-General Reports by Election Day,  
November 6, 1984.

AMIPAC was notified on September 21, 1984, that the  
October Quarterly Report was due on October 15, 1984  
(Attachment 2). The report was received on November 19,  
1984 (Attachment 3).

AMIPAC was notified on October 1, 1984 that all  
committees that have made contributions or expenditures in  
connection with the general election during the period  
ending October 17, 1984 must file a 12 Day Pre-General  
Report by October 25, 1984, if such activity has not  
previously been reported (Attachment 4).

Since AMIPAC had not submitted a 30 Day Post-General  
Report, a Non-Filer Notice was mailed on December 28, 1984  
(Attachment 5). Margaret Carr, a representative of AMIPAC,  
contacted the RAD analyst on January 9, 1985. Ms. Carr  
stated that she would be sending in the 30 Day Post-General  
Report in the next couple of days. The RAD analyst then  
asked Ms. Carr why the report had not been filed. Ms. Carr  
responded by stating that certain personal problems had  
arose that had required her immediate attention (Attachment  
6).

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(1)



AMERICAN MEDICAL INTERNATIONAL  
POLITICAL ACTION COMMITTEE  
REPORTS ANALYSIS OGC REFERRAL  
PAGE 2

AMIPAC filed a letter of explanation and a 30 Day Post-General Report covering the period October 1, 1984 through November 30, 1984, on January 22, 1985 (Attachments 7 and 8). The cover letter attributes the tardiness of the report to a heavy workload and a general misinterpretation of FEC reporting procedures. Based upon two (2) itemized contributions to Federal candidates totalling \$750, that were made between October 1, 1984 and October 17, 1984, it appears that AMIPAC was required to file a 12 Day Pre-General Report (Attachment 8, page 3).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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(2)

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FEDERAL ELECTION COMMISSION  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (83-84)

DATE 10MAY85  
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
AMERICAN MEDICAL INTERNATIONAL PAC CONNECTED ORGANIZATION: AMERICAN MEDICAL INTERNATIONAL INC				NON-PARTY QUALIFIED		ID #C00109207
1983	MID-YEAR REPORT	4,118	3,501	1JAN83 -30JUN83	7	83FEC/279/3111
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN83 -30JUN83	2	83FEC/280/5047
	YEAR-END	38,374	3,024	1JUL83 -31DEC83	26	84FEC/296/1593
1984	APRIL QUARTERLY	4,691	3,522	1JAN84 -31MAR84	5	84FEC/309/4347
	JULY QUARTERLY	2,120	7,100	1APR84 -30JUN84	5	84FEC/329/4983
	OCTOBER QUARTERLY	1,596	7,500	1JUL84 -30SEP84	5	84FEC/349/0632
	POST-GENERAL	13,618	2,750	1OCT84 -30NOV84	15	85FEC/360/4909
	NOTICE OF FAILURE TO FILE			1OCT84 -26NOV84	1	84FEC/357/4922
	YEAR-END	8,034	-	30NOV84 -31DEC84	7	85FEC/365/4293
	YEAR-END - AMENDMENT	8,034	-	30NOV84 -31DEC84	7	85FEC/367/3548
	REQUEST FOR ADDITIONAL INFORMATION			30NOV84 -31DEC84	1	85FEC/367/1000
	TOTAL	72,551	0	27,397	0	81 TOTAL PAGES

Cash on Hand as of 12/31/84: \$94,033.00  
Debts and Obligations Owed by the Committee: \$-0-  
All reports reviewed through 12/31/84

(3)

8 5 0 4 0 5 6 2 9 3 0

FEDERAL ELECTION COMMISSION  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-86)DATE 22MAY85  
PAGE 1

## NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
AMERICAN MEDICAL INTERNATIONAL PAC				NON-PARTY QUALIFIED		ID #C00109207
CONNECTED ORGANIZATION:	AMERICAN MEDICAL INTERNATIONAL INC					
	1985 APRIL QUARTERLY	7,298	500	1JAN85 -31MAR85	7	85FEC/371/0884
	TOTAL	7,298	0	500	0	7 TOTAL PAGES

Cash on Hand as of 3/31/85: \$100,832.46  
 Debts and Obligations Owed by the Committee: \$-0-  
 No reports have been reviewed.



**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

September 21, 1984

**OCTOBER REPORTING NOTICE FOR UNAUTHORIZED COMMITTEES**

**WHO MUST FILE**

ALL unauthorized political committees, except those that file monthly, must file a quarterly report by October 15, 1984. (See Monthly Filers below.)

**WHAT MUST BE REPORTED**

All financial activity must be disclosed from the last report filed through September 30, 1984. Political committees which have not previously filed a financial disclosure report should report all financial activity from the date of registration,\* through September 30, 1984.

**WHEN TO FILE**

Reports sent by registered or certified mail must be postmarked no later than October 15, 1984. Reports hand delivered or mailed first class must be received no later than close of business October 15, 1984.

**WHERE AND HOW TO FILE**

Committees should consult the instructions on the enclosed FEC Form 3X for details.

**MONTHLY FILERS**

Committees that file on a monthly schedule must file their next report by October 20, 1984, and disclose all financial activity of their committee from September 1 through September 30, 1984. Monthly reports are due by the twentieth of each month and should cover all financial activity of the previous month.

**COMPLIANCE**

Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is a serious violation. Committees are subject to enforcement action for late filing. Illegible reports which can not be clearly reproduced and reports submitted on non-FEC forms will not be accepted. Committees filing such documents will be required to refile.

\*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received during the current reporting period. See 11 CFR 104.3(a) and (b).

**FOR INFORMATION CALL: Office of Public Communications**  
800/424-9530 or 202/523-4068

5

**Attachment 3**  
**REPORT OF RECEIPTS AND DISBURSEMENTS**  
For a Political Committee Other Than an Authorized Committee

(Summary Page)

31 NOV 1984 4:41  
FBI ALBUQUERQUE

**1. Name of Committee (In Full)**  
**AMERICAN MEDICAL INTERNATIONAL, INC POLITICAL ACTION COMMITTEE (AMIPAC)**

**2. Address (Number and Street)**  
**414 North Camden Drive**

**3. City, State and ZIP Code**  
**Beverly Hills, CA 90210**

☐ Check here if address is different than previously reported

**4. TYPE OF REPORT (Check appropriate boxes)**

☐ April 15 Quarterly Report ☒ October 15 Quarterly Report

☐ July 15 Quarterly Report ☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non Election Year Only)

☐ Monthly Report for \_\_\_\_\_

☐ Twelfth day report preceding \_\_\_\_\_ (Type of Election)

election on \_\_\_\_\_ in the State of \_\_\_\_\_

☐ Thirtieth day report following the General Election

on \_\_\_\_\_ in the State of \_\_\_\_\_

☐ Termination Report

**5. F.E.C. Identification Number**  
**C00109207**

☐ This committee qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_ Date \_\_\_\_\_

**6. Is this Report an Amendment?**  
☐ YES ☒ NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year to Date
<b>5. Covering Period</b> <b>7/1/84</b> through <b>9/30/84</b>			
<b>6. a. Cash on hand January 1, 1984</b>			\$ 84,844.45
<b>b. Cash on hand at Beginning of Reporting Period</b>	\$ 81,033.67		
<b>c. Total Receipts from Line 12</b>	\$ 1,596.74	\$ 8,408.54	
<b>d. Subtotal: add Lines 6 b and 6 c for Column A and Lines 6 a and 6 c for Column B</b>	\$ 82,630.41	\$ 93,252.99	
<b>e. Total Disbursements from Line 20</b>	\$ 7,500.00	\$ 18,122.58	
<b>f. Cash on hand at Close of Reporting Period: subtract Line 7 from Line 6 d</b>	\$ 75,130.41	\$ 75,130.41	
<b>g. Assets and Liabilities Owed TO the Committee</b> Itemize on Schedule C or Schedule D	\$		
<b>h. Assets and Liabilities Owed BY the Committee</b> Itemize on Schedule C or Schedule D	\$		

**R. BRUCE ANDREWS**

*[Signature]* **10/9/84**  
Date

For further information contact \_\_\_\_\_

(6)

85040562932





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20540

October 1, 1984

**GENERAL ELECTION FILING NOTICE  
FOR UNAUTHORIZED COMMITTEES**

**WHO MUST FILE THE PRE-GENERAL ELECTION REPORT**

All committees that file monthly reports must file the pre-general election report due October 25, 1984.

In addition all quarterly filing committees that have made contributions or expenditures (including independent expenditures) in connection with the general election must file a pre-election report, if such activity has not previously been reported. See below for post-general filing information.

**WHAT MUST BE REPORTED**

The report must disclose all financial activity of the committee from the later of, the last report filed or the date of registration\* through October 17, 1984. (Monthly filers must disclose all financial activity from the later of October 1 or the date of registration\* through October 17, 1984.)

**WHEN TO FILE**

Pre-general election reports sent registered or certified mail must be postmarked no later than October 22, 1984. Reports hand delivered or mailed first class must be received no later than close of business October 25, 1984.

\* \* \* \* \*

**WHO MUST FILE THE POST-GENERAL ELECTION REPORT**

All committees must file the post-general election report due December 6, 1984, regardless of election activity.

**WHAT MUST BE REPORTED**

The post-general election report must cover all financial activity of the committee from either the date of the last report filed or the date of registration, whichever is later\* through November 26, 1984.

**WHEN TO FILE**

Post-general election reports sent by registered or certified mail must be postmarked no later than December 6, 1984. Reports hand delivered or mailed first class must be received no later than close of business December 6, 1984.

\*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received during the current reporting period. See 11 CFR 104.3(a) and (b).

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**WHERE AND HOW TO FILE**

Committees should consult the instructions on the enclosed FEC form 3X, for details.

**QUARTERLY FILERS**

Name of Report	Period Covered	Reg./Cert. Mailing Date	Filing Date
3rd Q-Report	07/01* - 09/30	10/15/84	10/15/84
Pre-General	10/01 - 10/17	10/22/84	10/25/84
Post-General**	10/18 - 11/26	12/06/84	12/06/84
Year-end	11/27 - 12/31	01/31/85	01/31/85

\*Or from date of registration, or the close of books of the last report filed, whichever is later.

\*\*Reports filed by committees that did not file the pre-General report should cover all financial activity from the last report filed through November 26, 1984.

\*\*\*

**MONTHLY FILERS**

Name of Report	Period Covered	Reg./Cert. Mailing Date	Filing Date
Oct. Monthly	09/01 - 09/30	10/20/84	10/20/84
Pre-General	10/01 - 10/17	10/22/84	10/25/84
Post-General	10/18 - 11/26	12/06/84	12/06/84
Year-end	11/27 - 12/31	01/31/85	01/31/85

**COMPLIANCE**

Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is a serious violation. Committees are subject to enforcement action for late filing. Illegible reports which can not be clearly reproduced and reports submitted on non-FEC forms will not be accepted. Committees filing such documents will be required to refile.

FOR INFORMATION CALL: Office Of Public Communications  
800/424-9530 or 202/523-4068

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**FEDERAL ELECTION COMMISSION**  
WASHINGTON, DC 20463

BQ-7

December 28, 1984

**R. Bruce Andrews, Treasurer**  
**American Medical International PAC**  
**414 North Camden Drive**  
**Beverly Hills, CA 90210**

**Identification Number: C00109207**

**Reference: 30 Day Post-General Report (10/01/84-11/26/84)**

**Dear Mr. Andrews:**

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Report of Receipts and Disbursements as required by the Federal Election Campaign Act. You were previously notified of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 1325 K Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (see 11 CFR 108.2, 108.3, 108.4).

The failure to file this report may result in an audit or legal enforcement action.

If you have any questions regarding this matter, please contact Michael D. Butterfield on our toll-free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

A handwritten signature in cursive script, reading "John D. Gibson".

**John D. Gibson**  
**Assistant Staff Director**  
**Reports Analysis Division**

85040562935  
9403374922

**ANALYST:** Michael D. Butterfield

**CONVERSATION WITH:** Margaret Carr

**COMMITTEE:** American Medical International, Inc.

**DATE:** 1/9/85

**SUBJECT(S):** Non-Filer

Ms. Margaret Carr called to inform the analyst that she will be sending in the 30 Day Post-General Election Report in the next couple of days. The analyst inquired why the report had not been filed. Ms. Carr informed the analyst that certain personal problems had arose that required immediate attention.

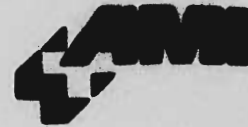
8 5 0 4 0 5 6 2 9 3 6

AMM, 431 North Lincoln Drive, Beverly Hills, California 90210 | 213 278-6200

Margaret A. Carr

HAND CARRIED  
55 JAN 22 411:03

January 18, 1985



Mike Butterfield  
Federal Election Commission  
1325 K Street, Northwest  
Washington, D.C. 20463

Re: American Medical International  
Political Action Committee (AMIPAC)  
ID #C00109207  
30-Day Post General Report, 10/1/84 through 11/30/84

Dear Mr. Butterfield:

Please find attached AMIPAC's 30-day Post General Report for the period October 1, 1984 through November 30, 1984. This report is delinquent due to the fact that the person assigned to filing the AMIPAC reports does so on a quarterly basis and overlooked the requirement of the Post General Election Report.

Mr. R. Bruce Andrews received your notice of December 28, 1984 after the New Year at which time he forwarded this notice to me. The person responsible for filing the reports was on vacation and was not expected to return until Monday, January 14th. Due to the heavy work load that our office handles during this period of time - ie. SEC Quarterly Reporting, Board of Directors Report, Rating Agency Reports, etc. I was not able to allocate this duty to anyone else in our department. At this time, I called you to indicate that we were aware of the problem and would complete the filing as soon as the responsible person returned from vacation. On January 14th, this person did return from vacation but was unfortunately notified that her father had passed away. It has, therefore, taken the balance of this week to locate the various records and information and to complete this filing.

Sincerely,

MARGARET A. CARR  
Custodian, AMIPAC

MPC/na  
Attachments

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85040562937  
3:13:00



**REPORT OF RECEIPTS AND DISBURSEMENTS**  
For a Political Committee Other Than an Authorized Committee

Attachment 8

**HAND DELIVERED**

Page 1 of 3  
05/23/22 ALL 03

(Summary Page)

ALIGN AREA

1. Name of Committee (in Full)

**AMERICAN MEDICAL INTERNATIONAL, INC.  
POLITICAL ACTION COMMITTEE  
(AMIPAC)**

Address (Number and Street)

**414 North Camden Drive**

City, State and ZIP Code

**Beverly Hills, CA 90210**

☐ Check here if address is different than previously reported.

2. FEC Identification Number

**C00109207**

3. ☐ This committee qualified as a multicandidate committee during the Reporting Period on \_\_\_\_\_

**Not applicable**

4. TYPE OF REPORT (Check appropriate boxes)

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report

☐ July 15 Quarterly Report ☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-Election Year Only)

☐ Monthly Report for \_\_\_\_\_

☐ Twelfth day report preceding \_\_\_\_\_ (Type of Election)

election on \_\_\_\_\_ in the State of \_\_\_\_\_

☒ Thirtieth day report following the General Election

**November 6, 1994** in the State of **(All)**

☐ Termination Report

Is this Report an Amendment?

☐ YES

☒ NO

**SUMMARY**

5. Covering Period **10/1/94** through **11/30/94**

6. (a) Cash on hand January 1, 19 **94**

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 1b)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 2b)

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

**R. BRUCE ANDREWS**

Type or Print Name of Treasurer

SIGNATURE OF TREASURER

**1/18/95**  
Date

NOTE: Submission of false or misleading or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 5317.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

For further information contact:

Federal Election Commission

Toll Free 800-243-9530

Local 202-523-6288

FEC FORM 3, 3a

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Report: Generating the Report	
From: 04/30/2004	To: 11/30/2004
COLUMN A Total Ytd Period	COLUMN B Calendar Year To Date

## 24 NET OPERATING EXPENDITURES (Subtract Line 23 from Line 32)

M.B. ☐

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**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

Attachment 8

Page 3 of 3

Page 1 of 1 for  
LINE NUMBER 21  
(Use separate schedules for each  
category of the Detailed  
Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee

Name of Committee (in Full)

**AMERICAN MEDICAL INTERNATIONAL, INC. POLITICAL ACTION COMMITTEE (AMIPAC)**

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement <b>Contribution</b>	Date (month, day, year)	Amount of Each Disbursement This Period
<b>COHEN FOR SENATOR</b> P. O. BOX 1379 Portland, ME 04104	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/3/84	\$ 500.00
<b>LINDY BOGGS CAMPAIGN</b> 111 One Shell Square New Orleans, LA 80130	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/9/84	\$ 250.00
<b>SENATOR DAVID PRYOR</b> U. S. Senate Washington, D.C. 20510	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/23/84	\$1,000.00
<b>JACK HANCOCK FOR CONGRESS</b> 215 East Missouri El Paso, Texas 79901	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/23/84	\$ 500.00
<b>TON DELAY</b> 1234 Longworth Washington, D.C. 20515	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/23/84	\$ 500.00
<b>F. Full Name, Mailing Address and ZIP Code</b>	Purpose of Disbursement <b>Contribution</b>	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
<b>G. Full Name, Mailing Address and ZIP Code</b>	Purpose of Disbursement <b>Contribution</b>	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
<b>H. Full Name, Mailing Address and ZIP Code</b>	Purpose of Disbursement <b>Contribution</b>	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
<b>I. Full Name, Mailing Address and ZIP Code</b>	Purpose of Disbursement <b>Contribution</b>	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
<b>SUBTOTAL of Disbursements This Page (optional)</b>			
<b>TOTAL This Period (last page this line number only)</b>			<b>\$ 2,750.00</b>

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

R. Bruce Andrews, Treasurer  
American Medical International  
Political Action Committee  
414 North Camden Drive  
Beverly Hills, California 90210

RE: MUR \_\_\_\_\_  
American Medical International  
Political Action Committee

Dear Mr. Andrews:

On \_\_\_\_\_, 1985, the Federal Election Commission determined that there is reason to believe the American Medical International Political Action Committee, and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (ii), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within ten days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form

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Letter to R. Bruce Andrews, Treasurer  
page 2

stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Judy Thedford, at (202) 523-4000.

Sincerely,

John Warren McGarry  
Chairman

Enclosures

General Counsel's Factual and Legal Analysis  
Procedures  
Designation of Counsel Statement

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GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. \_\_\_\_\_

RESPONDENT: American Medical International  
Political Action Committee  
R. Bruce Andrews, Treasurer

SUMMARY OF ALLEGATIONS

The American Medical International Political Action Committee ("AMIPAC") failed to file the 1984 October Quarterly and 12 Day Pre-General Election Reports by Election Day, November 6, 1984.

AMIPAC was notified on September 21, 1984, that the October Quarterly Report was due on October 15, 1984. The report was received on November 19, 1984.

AMIPAC was notified on October 1, 1984 that all committees that have made contributions or expenditures in connection with the general election during the period ending October 17, 1984 must file a 12 Day Pre-General Report by October 25, 1984, if such activity has not previously been reported.

Since AMIPAC had not submitted a 30 Day Post-General Report, a Non-Filer Notice was mailed on December 28, 1984. Margaret Carr, a representative of AMIPAC, contacted the RAD analyst on January 9, 1985. Ms. Carr stated that she would be sending in the 30 Day Post-General Report in the next couple of days. The RAD analyst then asked Ms. Carr why the report had not been filed. Ms. Carr responded by stating that certain personal problems had arose that had required her immediate attention.

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AMIPAC filed a letter of explanaton and a 30 Day Post-General Report covering the period October 1, 1984 through November 30, 1984, on January 22, 1985. The cover letter attributes the tardiness of the report to a heavy workload and a general misinterpretation of FEC reporting procedures. Based upon two (2) itemized contributions to Federal candidates totalling \$750, that were made between October 1, 1984 and October 17, 1984, it appears that AMIPAC was required to file a 12 Day Pre-General Report.

#### FACTUAL BASIS AND LEGAL ANALYSIS

2 U.S.C. § 434(a)(4)(A)(i) and (ii) requires a political committee, other than an authorized committee of a candidate, to file, in an election year, quarterly reports and pre-election reports. The quarterly reports are due no later than the 15th day after the last day of each calendar quarter. The pre-election reports are due no later than the 12th day before any election in which the committee makes contributions to or expenditures on behalf of a candidate in such election.

AMIPAC filed its 1984 October Quarterly Report on November 19, 1984. The report was due October 15, 1984; and, therefore, was filed 35 days late.

From a review of AMIPAC's 1984 30 Day Post-General Election Report, it was revealed that AMIPAC should have filed a 12 Day Pre-General Election Report. Specifically, AMIPAC made contributions totalling \$750 to 2 federal candidates in the general election on October 3, and 9, 1984. The 1984 pre-general

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election reporting period covered October 1, through 17, 1984. Therefore, AMIPAC should have filed a 12 day pre-general election report on October 25, 1984. Instead, this activity was disclosed on its 1984 30 Day Post-General Election Report filed on January 22, 1985, 89 days late.<sup>1/</sup>

The Office of General Counsel recommends opening a MUR, and finding reason to believe AMIPAC and R. Bruce Andrews, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (ii).

<sup>1/</sup> It should be noted that AMIPAC's 30 Day Post-General Election Report was also filed late. However, since the referral only addresses the late filing of the October Quarterly and the 12 Day Pre-General Election Reports, AMIPAC will not be pursued for the late filing of the 30 Day Post-General Election Report in this matter.

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# FEDERAL ELECTION COMMISSION

1125 K STREET N.W.  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2028

Date Filmed 12/5/85 Camera No. ---2

Cameraman AS