



FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2058

Date Filmed 3/26/86 Camera No. --- 2

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| _____ (1) Classified Information | _____ (6) Personal privacy |
| _____ (2) Internal rules and practices | _____ (7) Investigatory files |
| _____ (3) Exempted by other statute | _____ (8) Banking information |
| _____ (4) Trade secrets and commercial or financial information | _____ (9) Well information (geographic or geophysical) |
| (5) Internal Documents | |

Signed

date

FEC 9-21-77



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 19, 1986

Robert F. Bauer, Esquire
Perkins, Coie
1110 Vermont Avenue, N.W.
Suite 1200
Washington, D.C. 20005

RE: MUR 2058
Camp, Carmouche, Barsh,
Hunter, Gray, Hoffman, and
Gill PAC
Andrew W. Gray, III, Treasurer

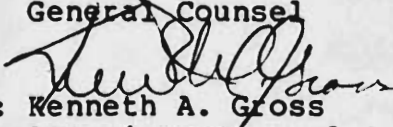
Dear Mr. Bauer:

On March 13, 1986, the Commission accepted the conciliation agreement signed by you on behalf of your clients, in settlement of violations of 2 U.S.C. § 434(a)(4)(A)(iii), 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

35040572740

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Camp, Carmouche, Barsh, Hunter, Gray,)
Hoffman, and Gill PAC)

MUR 2058

Andrew J. Gray, III, Treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal
Election Commission, do hereby certify that on March 13,
1986, the Commission decided by a vote of 6-0 to take
the following actions in MUR 2058:

1. Accept the conciliation agreement, as
recommended in the General Counsel's
Report signed March 5, 1986, in settlement
of this matter.
2. Close the file.

Commissioners Aikens, Elliott, Harris, Josefiak,
McDonald and McGarry voted affirmatively for this decision.

Attest:

3-13-86

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:	Thurs.,	3-6-86,	2:54
Circulated on 48 hour tally basis:	Fri.,	3-7-86,	2:00
Deadline for vote:	Tues.,	3-11-86,	4:00

360407741

200-2707
HAND DELIVERED

85 OCT 18 AM 11:19

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Camp, Carmouche, Barsh, Hunter, Gray,) MUR 2058
Hoffman, and Gill PAC)
Andrew J. Gray, III, Treasurer)

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 Camp, Carmouche, Barsh, Hunter, Gray, Hoffman, and Gill PAC and Andrew J. Gray, III, as treasurer, (hereinafter "the Respondents") violated 2 U.S.C. § 434(a)(4)(A)(iii).

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:

1. Respondent Camp, Carmouche, Barsh, Hunter, Gray, Hoffman, and Gill PAC is a political committee registered with the Commission.

36040572742

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

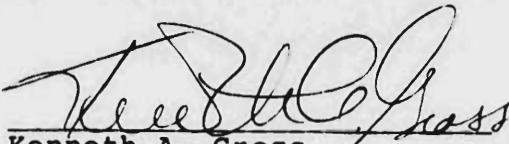
X. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

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:

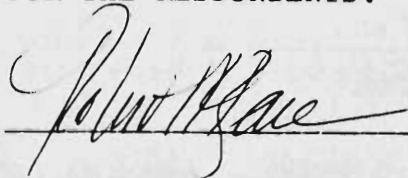
Charles N. Steele
General Counsel

BY:


Kenneth A. Gross
Associate General Counsel

March 18, 1986
Date

FOR THE RESPONDENTS:



10-3-85
Date

SG #1

06040744



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Robert F. Bauer, Esquire
Perkins, Coie
1110 Vermont Avenue, N.W.
Suite 1200
Washington, D.C. 20005

RE: MUR 2058
Camp, Carmouche, Barsh,
Hunter, Gray, Hoffman, and
Gill PAC
Andrew W. Gray, III, Treasurer

Dear Mr. Bauer:

On March 13, 1986, the Commission accepted the conciliation agreement signed by you on behalf of your clients, in settlement of violations of 2 U.S.C. § 434(a)(4)(A)(iii), 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

780
3/17/86

209 3/17/86

36040372743

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Camp, Carmouche, Barsh, Hunter, Gray,)
Hoffman, and Gill PAC)

Andrew J. Gray, III, Treasurer)

MUR 2058

SENSITIVE

2:54

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by counsel for the Camp, Carmouche, Barsh, Hunter, Gray, Hoffman, and Gill PAC, ("the Committee") (Attachment I). The agreement contains no changes from the agreement initially approved by the Commission.

II. RECOMMENDATION

The Office of General Counsel recommends that the Commission accept the agreement in settlement of this matter and close the file.

Charles N. Steele
General Counsel

Date

March 5, 1986

BY:

Kenneth A. Gross
Associate General Counsel

Attachments:

- 1) Conciliation agreement
- 2) Proposed letter

*/ It appears from a review of the files that this matter was not formally closed out previously although we deposited the civil penalty check on October 17, 1985. The approval of this report will achieve that purpose.

36040572745

HARD DELIVERED

85 OCT 18 AM 11:19

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Camp, Carmouche, Barsh, Hunter, Gray,) MUR 2058
Hoffman, and Gill PAC)
Andrew J. Gray, III, Treasurer)

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 Camp, Carmouche, Barsh, Hunter, Gray, Hoffman, and Gill PAC and Andrew J. Gray, III, as treasurer, (hereinafter "the Respondents") violated 2 U.S.C. § 434(a)(4)(A)(iii).

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:

1. Respondent Camp, Carmouche, Barsh, Hunter, Gray, Hoffman, and Gill PAC is a political committee registered with the Commission.

2. Andrew J. Gray, III, is the treasurer of the Camp, Carmouche, Barsh, Hunter, Gray, Hoffman, and Gill PAC.

3. Respondents were required to file the 1984 30 Day Post General Election Report by December 6, 1984. The report was filed on January 28, 1985, 53 days late.

V. Respondents violated 2 U.S.C. § 434(a)(4)(A)(iii) by failing to file timely the 1984 30 Day Post General Election Report.

VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of One Hundred and Seventy-Five Dollars (\$175.00) pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

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

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

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:

Kenneth A. Gross
Associate General Counsel

Date

FOR THE RESPONDENTS:



Date

10-3-85

SG #1

95040572749



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Robert F. Bauer, Esquire
Perkins, Coie
1110 Vermont Avenue, N.W.
Suite 1200
Washington, D.C. 20005

RE: MUR 2058
Camp, Carmouche, Barsh,
Hunter, Gray, Hoffman, and
Gill PAC
Andrew W. Gray, III, Treasurer

Dear Mr. Bauer:

On , 198 , the Commission accepted the conciliation agreement signed by you on behalf of your clients, in settlement of violations of 2 U.S.C. § 434(a)(4)(A)(iii), 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. We remind you that pursuant to the provisions of the conciliation agreement, you are required to submit the civil penalty within 30 days of the execution of this agreement.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

September 20, 1985

Robert F. Bauer, Esquire
Perkins, Coie
1110 Vermont Avenue, N.W.
Suite 1200
Washington, D.C. 20005

RE: MUR 2058
Camp, Carmouche, Barsh,
Hunter, Gray, Hoffman, and
Gill PAC
Andrew J. Gray, III.,
Treasurer

Dear Mr. Bauer:

On July 12, 1985, the Commission found reason to believe that the Camp, Carmouche, Barsh, Hunter, Gray, Hoffman, and Gill PAC violated 2 U.S.C. § 434(a)(4)(A)(iii). At your request, the Commission determined on September 9, 1985, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. Please note 30 day time period in this matter expires on October 21, 1985. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Shelley Garr, the staff member in charge of this matter, at (202) 523-4143.

Sincerely,

Charles N. Steyer
General Counsel


By: Ker

Enclosures



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 20, 1985

Robert F. Bauer, Esquire
Perkins, Cole
1110 Vermont Avenue, N.W.
Suite 1200
Washington, D.C. 20005

RE: MUR 2058
Camp, Carmouche, Barsh,
Hunter, Gray, Hoffman, and
Gill PAC
Andrew J. Gray, III.,
Treasurer

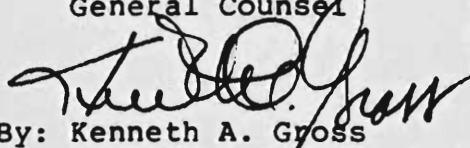
Dear Mr. Bauer:

On July 12, 1985, the Commission found reason to believe that the Camp, Carmouche, Barsh, Hunter, Gray, Hoffman, and Gill PAC violated 2 U.S.C. § 434(a)(4)(A)(iii). At your request, the Commission determined on September 9, 1985, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. Please note 30 day time period in this matter expires on October 21, 1985. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Shelley Garr, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosures

96040572752

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Camp, Carmouche, Barsh, Hunter, Gray,) MUR 2058
Hoffman, and Gill PAC)
Andrew J. Gray, III, Treasurer)

CONCILIATION AGREEMENT

36040372753
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 Camp, Carmouche, Barsh, Hunter, Gray, Hoffman, and Gill PAC and Andrew J. Gray, III, as treasurer, (hereinafter "the Respondents") violated 2 U.S.C. § 434(a)(4)(A)(iii).

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:

1. Respondent Camp, Carmouche, Barsh, Hunter, Gray, Hoffman, and Gill PAC is a political committee registered with the Commission.

2. Andrew J. Gray, III, is the treasurer of the Camp, Carmouche, Barsh, Hunter, Gray, Hoffman, and Gill PAC.

3. Respondents were required to file the 1984 30 Day Post General Election Report by December 6, 1984. The report was filed on January 28, 1985, 53 days late.

V. Respondents violated 2 U.S.C. § 434(a)(4)(A)(iii) by failing to file timely the 1984 30 Day Post General Election Report.

VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of One Hundred and Seventy-Five Dollars (\$175.00) pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

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

3 5 0 4 0 5 7 2 7 5 4

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

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:

Kenneth A. Gross
Associate General Counsel

Date

FOR THE RESPONDENTS:

Date

SG #1

95040572755



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Robert F. Bauer, Esquire
Perkins, Coie
1110 Vermont Avenue, N.W.
Suite 1200
Washington, D.C. 20005

RE: MUR 2058
Camp, Carmouche, Barsh,
Hunter, Gray, Hoffman, and
Gill PAC
Andrew J. Gray, III.,
Treasurer

Dear Mr. Bauer:

On July 12, 1985, the Commission found reason to believe that the Camp, Carmouche, Barsh, Hunter, Gray, Hoffman, and Gill PAC violated 2 U.S.C. § 434(a)(4)(A)(iii). At your request, the Commission determined on September 9, 1985, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. Please note 30 day time period in this matter expires on October 21, 1985. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Shelley Garr, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures

Handwritten signature/initials

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Camp, Carmouche, Barsh, Hunter, Grey)
Hoffman, and Gill PAC) MUR 2058
Andrew J. Gray, III, Treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 9, 1985, the Commission decided by a vote of 5-0 to take the following actions in MUR 2058:

1. Enter into conciliation with the Camp, Carmouche, Barsh, Hunter, Gray, Hoffman, and Gill PAC prior to a finding of probable cause to believe.
2. Approve the proposed conciliation agreement attached to the General Counsel's Report signed September 3, 1985.
3. Approve the letter attached to the General Counsel's Report signed September 3, 1985.

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

Attest:

9-9-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:	Thurs., 9-5-85, 11:03
Circulated on 48 hour tally basis:	Thurs., 9-5-85, 4:00
Deadline for votes:	Mon., 9-9-85, 4:00

III. GENERAL COUNSEL'S RECOMMENDATIONS

1. Enter into conciliation with the Camp, Carmouche, Barsh, Hunter, Gray, Hoffman, and Gill PAC prior to a finding of probable cause to believe.
2. Approve the attached proposed conciliation agreement and letter.

Charles N. Steele
General Counsel

Date

September 3, 1985

BY:

Kenneth A. Gross
Associate General Counsel

Attachments

1. Response
2. Proposed agreement and letter

SG #1

36040012753

CCC# 8232

PERKINS, COIE, STONE, OLSEN & WILLIAMS

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

SEATTLE OFFICE
1800 WASHINGTON BUILDING
SEATTLE, WASHINGTON 98101
TELEPHONE (206) 682-8770
CABLE "PERKINS SEATTLE"
TELEX: 32-0319

1110 VERMONT AVENUE, N.W.
WASHINGTON, D.C. 20005
TELEPHONE: (202) 887-9030
FACSIMILE (GP II, III): (202) 223-2088
TELEX: 44-0277

BELLEVUE OFFICE
ONE BELLEVUE CENTER
SUITE 1800
411 - 108TH AVENUE N.E.
BELLEVUE, WASHINGTON 98004
TELEPHONE (206) 453-6880

ANCHORAGE OFFICE
SUITE 301
430 "L" STREET
ANCHORAGE, ALASKA 99501
TELEPHONE: (907) 279-6561

PLEASE REPLY TO WASHINGTON, D.C. OFFICE

PORTLAND OFFICE
U.S. BANCORP TOWER
SUITE 2500
111 SOUTHWEST FIFTH AVENUE
PORTLAND, OREGON 97204
TELEPHONE (503) 295-4400

August 7, 1985

Mr. Charles Steele
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C.

RE: MUR 2058

Dear Sir:

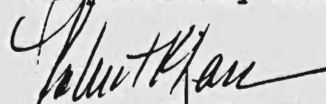
This office represents the Camp, Carmouche, Barsh, Hunter, Gray, Hoffman & Gill Political Action Committee, and its Treasurer, in this matter. As you advised the Committee Treasurer in a letter dated July 19, 1985, the Commission initiated this MUR upon finding "reason to believe" the Committee failed to file timely a 30 day post-general election report covering the period from October 18, 1984 through November 26, 1984.

The Committee accepts responsibility for this late filing which was made on January 28, 1985. For this reason, the Committee requests pre-probable cause conciliation to bring the matter to prompt and appropriate settlement.

For the record, the Committee notes that, at the time the report in question was due, a lapse in communication between the firm's two offices (one in Louisiana, and the other in Washington, D.C.) -- and between and among the relevant personnel -- contributed to the late filing problem. As your report to the Commission in this matter reflects (p. 1), representatives of the Committee have worked directly with the Reports Analysis Division to address this and related reporting problems.

At present, the Committee is conducting a complete review of its operations to assure against repetition of this or any other reporting failures in the future. The Committee is confident that this review will achieve its intended effect.

Respectfully submitted,


Robert F. Bauer

Attachment - page 1

AUG 7 3:58

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2058

NAME OF COUNSEL: Robert F. Bauer, Esq.

ADDRESS: Perkins Coie

1110 Vermont Ave., N.W., Suite 1200

Washington, D.C. 20005

TELEPHONE: (202) 887-9030

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.

August 6, 1985
Date

John C. Camp
Signature

RESPONDENT'S NAME: John C. Camp
ADDRESS: Camp, Carmouche, Barsh, Hunter,
Gray, Hoffman & Gill

2550 M Street, N.W., Suite 275

Washington, D.C. 20037

HOME PHONE: (202) 362-3142

BUSINESS PHONE: (202) 887-5160

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Camp, Carmouche, Barsh, Hunter, Gray,)
Hoffman, and Gill PAC)
Andrew J. Gray, III, Treasurer)

MUR 2058

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 Camp, Carmouche, Barsh, Hunter, Gray, Hoffman, and Gill PAC and Andrew J. Gray, III, as treasurer, (hereinafter "the Respondents") violated 2 U.S.C. § 434(a)(4)(A)(iii).

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:

1. Respondent Camp, Carmouche, Barsh, Hunter, Gray, Hoffman, and Gill PAC is a political committee registered with the Commission.

2. Andrew J. Gray, III, is the treasurer of the Camp, Carmouche, Barsh, Hunter, Gray, Hoffman, and Gill PAC.

3. Respondents were required to file the 1984 30 Day Post General Election Report by December 6, 1984. The report was filed on January 28, 1985, 53 days late.

V. Respondents violated 2 U.S.C. § 434(a)(4)(A)(iii) by failing to file timely the 1984 30 Day Post General Election Report.

VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of

pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

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

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

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:

Kenneth A. Gross
Associate General Counsel

Date

FOR THE RESPONDENTS:

Date

SG #1



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Robert F. Bauer, Esquire
Perkins, Coie
1110 Vermont Avenue, N.W.
Suite 1200
Washington, D.C. 20005

RE: MUR 2058
Camp, Carmouche, Barsh,
Hunter, Gray, Hoffman, and
Gill PAC
Andrew J. Gray, III.
Treasurer

Dear Mr. Bauer:

On July 12, 1985, the Commission found reason to believe that the Camp, Carmouche, Barsh, Hunter, Gray, Hoffman, and Gill PAC violated 2 U.S.C. § 434(a)(4)(A)(iii). At your request, the Commission determined on , 1985, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. Please note 30 day time period in this matter expires on , 1985. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Shelley Garr, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures

SG #1

Attachment II page 6

600# 8232

PERKINS, COIE, STONE, OLSEN & WILLIAMS

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

SEATTLE OFFICE
1900 WASHINGTON BUILDING
SEATTLE, WASHINGTON 98101
TELEPHONE: (206) 882-8770
CABLE "PERKINS SEATTLE"
TELEX: 32-0319

ANCHORAGE OFFICE
SUITE 301
420 "L" STREET
ANCHORAGE, ALASKA 99501
TELEPHONE: (907) 278-8581

1110 VERMONT AVENUE, N.W.
WASHINGTON, D.C. 20005
TELEPHONE: (202) 887-9030
FACSIMILE (GP II, III): (202) 223-2088
TELEX: 44-0277

PLEASE REPLY TO WASHINGTON, D.C. OFFICE

BELLEVUE OFFICE
ONE BELLEVUE CENTER
SUITE 1800
411 - 108TH AVENUE N.E.
BELLEVUE, WASHINGTON 98004
TELEPHONE (206) 483-8890

PORTLAND OFFICE
U.S. BANCORP TOWER
SUITE 2500
111 SOUTHWEST FIFTH AVENUE
PORTLAND, OREGON 97204
TELEPHONE: (503) 295-4400

August 7, 1985

Mr. Charles Steele
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C.

RE: MUR 2058

Dear Sir:

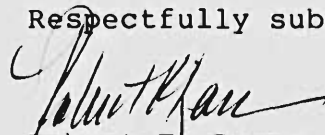
This office represents the Camp, Carmouche, Barsh, Hunter, Gray, Hoffman & Gill Political Action Committee, and its Treasurer, in this matter. As you advised the Committee Treasurer in a letter dated July 19, 1985, the Commission initiated this MUR upon finding "reason to believe" the Committee failed to file timely a 30 day post-general election report covering the period from October 18, 1984 through November 26, 1984.

The Committee accepts responsibility for this late filing which was made on January 28, 1985. For this reason, the Committee requests pre-probable cause conciliation to bring the matter to prompt and appropriate settlement.

For the record, the Committee notes that, at the time the report in question was due, a lapse in communication between the firm's two offices (one in Louisiana, and the other in Washington, D.C.) -- and between and among the relevant personnel -- contributed to the late filing problem. As your report to the Commission in this matter reflects (p. 1), representatives of the Committee have worked directly with the Reports Analysis Division to address this and related reporting problems.

At present, the Committee is conducting a complete review of its operations to assure against repetition of this or any other reporting failures in the future. The Committee is confident that this review will achieve its intended effect.

Respectfully submitted,


Robert F. Bauer

AUG 7 3 58 PM

0040110600

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Camp, Carmouche, Barsh, Hunter,)
Gray, Hoffman, and Gill PAC)
Andrew J. Gray, III, Treasurer)

RAD Referral No. 85NF-117

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 12, 1985, the Commission decided by a vote of 5-0 to take the following actions in RAD Referral No. 85NF-117:

1. Open a MUR.
2. Find reason to believe that the Camp, Carmouche, Barsh, Hunter, Gray, Hoffman and Gill PAC and Andrew J. Gray, III, as Treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii).
3. Approve the letter and factual and legal analysis attached to the First General Counsel's Report signed July 8, 1985.

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

Attest:

7-15-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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

7-10-85, 9:43
7-10-85, 4:00

35040312765

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2058

NAME OF COUNSEL: Robert F. Bauer, Esq.

ADDRESS: Perkins Coie

1110 Vermont Ave., N.W., Suite 1200

Washington, D.C. 20005

TELEPHONE: (202) 887-9030

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.

August 6, 1985
Date

John C. Camp
Signature

RESPONDENT'S NAME: John C. Camp

ADDRESS: Camp, Carmouche, Barsh, Hunter,
Gray, Hoffman & Gill

2550 M Street, N.W., Suite 275

Washington, D.C. 20037

HOME PHONE: (202) 362-3142

BUSINESS PHONE: (202) 887-5160

36040372767

8 6 0 4 0 5 7 2 7 6 8

PERKINS COIE

1110 VERMONT AVENUE, N.W.
WASHINGTON, D.C. 20005

Mr. Charles Steele
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C.

ATTENTION: Ms. Shelley Garr

BY HAND DELIVERY

35 AUG 7 4 P 3: 58

RECEIVED
GENERAL COUNSEL
FEDERAL ELECTION COMMISSION
AUG 7 1997



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 19, 1985

Andrew J. Gray, III, Treasurer
Camp, Carmouche, Barsh, Hunter, Gray,
Hoffman and Gill PAC
2550 M Street, N.W.
Suite 275
Washington, D.C. 20037

RE: MUR 2058
Camp, Carmouche, Barsh, Hunter,
Gray, Hoffman and Gill PAC
Andrew J. Gray, III, Treasurer

Dear Mr. Gray:

On July 12, 1985 the Federal Election Commission determined that there is reason to believe that the Camp, Carmouche, Barsh, Hunter, Gray, Hoffman and Gill PAC and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), by failing to file the 1984 30 Day Post-General Report of Receipts and Disbursements in a timely manner. 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. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such material within 15 days of your receipt of this letter.

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.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be

850403727669

Andrew J. Gray, III, Treasurer
Page 2

pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent will not be entertained.

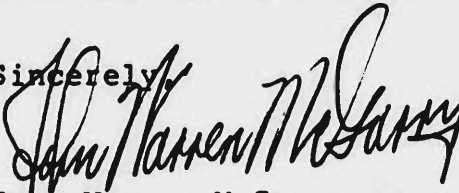
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form 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 Shelley Garr, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,



John Warren McGarry
Chairman

Enclosures

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

03604057270

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 2058
STAFF MEMBER & TEL. NO.
Shelley Garr
523-4143

RESPONDENT Camp, Carmouche, Barsh, Hunter, Gray,
Hoffman and Gill PAC
Andrew J. Gray, III, Treasurer*/

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

SUMMARY OF ALLEGATIONS

The Committee was notified on October 1, 1984, that the report was due on December 6, 1984. On December 28, 1984, a Non-Filer Notice was sent to the Committee for failing to file the 1984 30 Day Post-General Report.

Ms. Roxanne Forrester, a representative of the Committee, met with two Reports Analysis Division ("RAD") analysts on January 15, 1985. Following a discussion of the Committee's problems, the RAD analysts reminded Ms. Forrester that the 30 Day Post-General Report had not yet been filed and stressed the importance of filing the report as soon as possible. Ms. Forrester stated that she was aware of this and hoped to file the report quickly.

Ms. Kate Ross, Assistant Treasurer for the Committee, contacted RAD on January 28, 1985 in response to the Commission's

*/ On May 15, 1985, an Amended Statement of Organization was received informing the Commission that all future correspondence be addressed to Ms. Kate Ross, Assistant Treasurer, in Washington, D.C.; however, the treasurer of record is Mr. Gray.

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notice. During the conversation, Ms. Ross stated that the 1984 30 Day Post-General Report (as well as other amended reports) had been mailed to the Commission. The Commission received the Committee's 30 Day Post-General Election Report on January 28, 1985.

FACTUAL AND LEGAL ANALYSIS

Pursuant to 2 U.S.C. § 434(a)(4)(A)(iii), all political committees other than authorized committees of a candidate are required to file a post-general election report, which shall be filed no later than the 30th day after the general election and which shall be complete as of the 20th day after such general election.

The Committee was required to file a 30 Day Post-General Election Report on December 6, 1984. The Committee filed the report on January 28, 1985, 53 days late. The Committee's failure to file the 30 Day Post-General Election Report in a timely manner is, in the General Counsel's view, a violation of 2 U.S.C. § 434(a)(4)(A)(iii). Thus, it is the recommendation of the Office of General Counsel that the Commission find reason to believe that the Camp, Carmouche, Barsh, Hunter, Gray, Hoffman and Gill PAC and Andrew J. Gray, III, as Treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii).

850407 / 2772

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.

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: _____

260405/2774



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Andrew J. Gray, III, Treasurer
Camp, Carmouche, Barsh, Hunter, Gray,
Hoffman and Gill PAC
2550 M Street, N.W.
Suite 275
Washington, D.C. 20037

RE: MUR 2058
Camp, Carmouche, Barsh, Hunter,
Gray, Hoffman and Gill PAC
Andrew J. Gray, III, Treasurer

Dear Mr. Gray:

On July 12, 1985 the Federal Election Commission determined that there is reason to believe that the Camp, Carmouche, Barsh, Hunter, Gray, Hoffman and Gill PAC and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), by failing to file the 1984 30 Day Post-General Report of Receipts and Disbursements in a timely manner. 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. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such material within 15 days of your receipt of this letter.

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.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be

Reg 7/17/85

Andrew J. Gray, III, Treasurer
Page 2

pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent will not be entertained.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form 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 Shelley Garr, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry
Chairman

Enclosures

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

3 5 0 4 0 5 7 7 5

SENSITIVE

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

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

05 JUL 10 A9:43

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL BY
OGC TO THE COMMISSION _____

RAD Referral No. 85NF-117
STAFF MEMBER
Shelley Garr

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

RESPONDENT'S NAME: Camp, Carmouche, Barsh, Hunter, Gray
Hoffman, and Gill PAC
Andrew J. Gray, III, Treasurer*/

RELEVANT STATUTE: 2 U.S.C. § 434(a)(4)(A)(iii)

INTERNAL REPORTS

CHECKED: FEC Disclosure Documents

FEDERAL AGENCIES

CHECKED: N/A

GENERATION OF MATTER

The Camp, Carmouche, Barsh, Hunter, Gray, Hoffman, and Gill PAC ("the Committee") was referred to the Office of General Counsel by the Reports Analysis Division for failing to file the 1984 30 Day Post-General Report of Receipts and Disbursements in a timely manner.

SUMMARY OF ALLEGATIONS

The Committee was notified on October 1, 1984, that the report was due on December 6, 1984. On December 28, 1984, a Non-

*/ On May 15, 1985, an Amended Statement of Organization was received informing the Commission that all future correspondence be addressed to Ms. Kate Ross, Assistant Treasurer, in Washington, D.C.; however, the treasurer of record is Mr. Gray.

Filer Notice was sent to the Committee for failing to file the 1984 30 Day Post-General Report.

Ms. Roxanne Forrester, a representative of the Committee, met with two Reports Analysis Division ("RAD") analysts on January 15, 1985. Following a discussion of the Committee's problems, the RAD analysts reminded Ms. Forrester that the 30 Day Post-General Report had not yet been filed and stressed the importance of filing the report as soon as possible. Ms. Forrester stated that she was aware of this and hoped to file the report quickly.

Ms. Kate Ross, Assistant Treasurer for the Committee, contacted RAD on January 28, 1985 in response to the Commission's notice. During the conversation, Ms. Ross stated that the 1984 30 Day Post-General Report (as well as other amended reports) had been mailed to the Commission. The Commission received the Committee's 30 Day Post-General Election Report on January 28, 1985.

FACTUAL AND LEGAL ANALYSIS

Pursuant to 2 U.S.C. § 434(a)(4)(A)(iii), all political committees other than authorized committees of a candidate are required to file a post-general election report, which shall be filed no later than the 30th day after the general election and which shall be complete as of the 20th day after such general election.

The Committee was required to file a 30 Day Post-General Election Report on December 6, 1984. The Committee filed the

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report on January 28, 1985, 53 days late. The Committee's failure to file the 30 Day Post-General Election Report in a timely manner is, in the General Counsel's view, a violation of 2 U.S.C. § 434(a)(4)(A)(iii). Thus, it is the recommendation of the Office of General Counsel that the Commission find reason to believe that the Camp, Carmouche, Barsh, Hunter, Gray, Hoffman and Gill PAC and Andrew J. Gray, III, as Treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii).

RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that the Camp, Carmouche, Barsh, Hunter, Gray, Hoffman and Gill PAC and Andrew J. Gray, III, as Treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii).
3. Approve the attached letter and factual and legal analysis.

Charles N. Steele
General Counsel

Date

July 8, 1985

BY:

Kenneth A. Gross
Associate General Counsel

Attachments

1. Referral
2. Proposed letter and factual and legal analysis

850405 / 2779



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 29, 1985

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA *LSI*
STAFF DIRECTOR

FROM: JOHN D. GIBSON *JDG*
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: REFERRAL OF THE CAMP, CARMOUCHE, BARSH, HUNTER, GRAY,
HOFFMAN & GILL PAC

This is a referral of Camp, Carmouche, Barsh, Hunter, Gray, Hoffman & Gill PAC ("the Committee") for failing to file the 1984 30 Day Post-General Report within thirty (30) days from the date of the Non-Filer Notice.

If you have any questions, please call Lisa J. Stolaruk at 523-4048.

Attachment

Attachment I - page 1

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: May 29, 1985

ANALYST: Lisa J. Stolaruk

I. COMMITTEE: Camp, Carmouche, Barsh, Hunter, Gray,
Hoffman & Gill PAC (C00109918),
Andrew J. Gray, III, Treasurer*/
2550 M Street, N.W., Suite 275
Washington, DC 20037

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

III. BACKGROUND:

Failure to File the 1984 30 Day Post-General Report in a Timely Manner.

Camp, Carmouche, Barsh, Hunter, Gray, Hoffman & Gill PAC ("the Committee") failed to file the 1984 30 Day Post-General Report of Receipts and Disbursements in a timely manner. The Committee was notified on October 1, 1984, that the report was due on December 6, 1984 (Attachment 2). On December 28, 1984, a Non-Filer Notice was sent to the Committee for its failure to file the 1984 30 Day Post-General Report (Attachment 3).

Ms. Roxanne Forrester, a representative of the Committee, met with two Reports Analysis Division ("RAD") analysts on January 15, 1985. Following a discussion of the Committee's problems, the RAD analysts reminded Ms. Forrester that the 30 Day Post-General Report had not yet been filed and stressed the importance of filing the report as soon as possible. Ms. Forrester stated that she was aware of this and hoped to file the report quickly (Attachment 4).

*/ On May 15, 1985 an Amended Statement of Organization was received informing the Commission that all future correspondence be addressed to Ms. Kate Ross, Assistant Treasurer, in Washington, D.C.; however, the treasurer of record is Mr. Gray.

CAMP, CARMOUCHE, BARSH, HUNTER,
GRAY, HOFFMAN & GILL PAC
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

Ms. Kate Ross, Assistant Treasurer of the Committee, called the Chief of the Party/Non-Party Branch on January 28, 1985 in response to a Commission notice. During the conversation, Ms. Ross stated that the 1984 30 Day Post-General Report (as well as other amended reports) had been mailed on January 18, 1985. After examining the Committee's FEC index, the Branch Chief called Ms. Ross back and notified her that the aforementioned documents had not been received. In response to a question on the exact date of mailing, Ms. Ross checked with her secretary and stated the information had been sent on January 25, 1985 (Attachment 5).

The Commission received the Committee's 30 Day Post-General Report on January 28, 1985 (Attachment 6).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

Attachments I - pag 3

3 5 0 4 0 5 7 2 7 8 5 .

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

DATE 29MAY85
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILE COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
CAMP, CARMOUCHE, BARSH, HUNTER, GRAY, HOFFMAN & GILL PAC CONNECTED ORGANIZATION: CAMP CARMOUCHE PALMER BARSH & HUNTER				NON-PARTY QUALIFIED	ID #C00109918	
1983	MID-YEAR REPORT	13,339	16,525	1JAN83 -30JUN83	10	83FEC/286/3
	YEAR-END	18,494	22,050	1JUL83 -31DEC83	11	84FEC/295/35
1984	MISCELLANEOUS REPORT			1NOV84 TO FEC	2	84FEC/347/523
	APRIL QUARTERLY	12,468	8,375	1JAN84 -31MAR84	11	84FEC/309/0786
	JULY QUARTERLY	25,078	23,300	1APR84 -30JUN84	12	84FEC/320/1384
	JULY QUARTERLY - AMENDMENT	25,078	23,300	1APR84 -30JUN84	4	84FEC/328/3078
	JULY QUARTERLY - AMENDMENT	25,078	23,300	1APR84 -30JUN84	3	85FEC/359/5284
	REQUEST FOR ADDITIONAL INFORMATION			1APR84 -30JUN84	1	84FEC/327/2020
	OCTOBER QUARTERLY	22,662	20,550	1JUL84 -30SEP84	10	84FEC/339/2053
	OCTOBER QUARTERLY - AMENDMENT	22,662	20,550	1JUL84 -30SEP84	2	84FEC/344/4239
	OCTOBER QUARTERLY - AMENDMENT	22,662	20,550	1JUL84 -30SEP84	2	84FEC/357/0287
	1 ST LETTER INFORMATIONAL NOTICE			1JUL84 -30SEP84	1	84FEC/349/2398
	PRE-GENERAL	8,331	16,750	1OCT84 -17OCT84	12	84FEC/344/4226
	PRE-GENERAL - AMENDMENT	8,331	16,750	1OCT84 -17OCT84	3	84FEC/357/0284
	PRE-GENERAL - AMENDMENT	-	-	1OCT84 -17OCT84	2	85FEC/362/0531
	PRE-GENERAL - AMENDMENT	-	-	1OCT84 -17OCT84	5	85FEC/366/2370
	REQUEST FOR ADDITIONAL INFORMATION			1OCT84 -17OCT84	2	84FEC/357/1541
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT84 -17OCT84	3	85FEC/359/0960
	POST-GENERAL	4,165	4,250	18OCT84 -26NOV84	8	85FEC/362/0538
	POST-GENERAL - AMENDMENT	-	-	18OCT84 -26NOV84	5	85FEC/366/2365
	NOTICE OF FAILURE TO FILE			18OCT84 -26NOV84	1	84FEC/357/4954
	REQUEST FOR ADDITIONAL INFORMATION			18OCT84 -26NOV84	1	85FEC/365/38
	YEAR-END	1,000	0	27NOV84 -31DEC84	5	85FEC/362/05
	YEAR-END - AMENDMENT	-	-	27NOV84 -31DEC84	5	85FEC/366/23
	REQUEST FOR ADDITIONAL INFORMATION			27NOV84 -31DEC84	1	85FEC/366/0252
1985	MISCELLANEOUS NOTICE FROM FEC			18JAN85	1	85FEC/360/3727
	STATEMENT OF ORGANIZATION - AMENDMENT			28JAN85	2	85FEC/362/0546
TOTAL		105,537	0 111,800	0	125	TOTAL PAGES

ALL OF THE REPORTS LISTED ABOVE HAVE BEEN REVIEWED.

CASH-ON-HAND AS OF 12/31/84: \$202.70

DEBTS AND/OR OBLIGATIONS OWED BY THE COMMITTEE AS OF 12/31/84: \$0

DEBTS AND/OR OBLIGATIONS OWED TO THE COMMITTEE AS OF 12/31/84: \$0

ATTACHMENT 1
(1 of 2)

Att. Sheet I - page 4

8 6 0 1 2
FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - 4 (C) (85-86)

DATE 29MAY85
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
CAMP, CARMOUCHE, BARSH, HUNTER, GRAY, HOFFMAN & GILL PAC						
CONNECTED ORGANIZATION: CAMP CARMOUCHE PALMER BARSH & HUNTER						
	1985 STATEMENT OF ORGANIZATION - AMENDMENT			28JAN85	2	85FEC/362/0546
	STATEMENT OF ORGANIZATION - AMENDMENT			15MAY85	2	85FEC/373/2238
	TOTAL	0	0	0	4	TOTAL PAGES

NON-PARTY QUALIFIED

ID #C00109918

ATTACHMENT 1
(2 of 2)

Attaching I-Page 5



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 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 20541

RQ-7

December 28, 1984

A.J. Gray III, Treasurer
Camp Carmouche Palmer Barsh and Hunter
Political Action Committee
P.O. Drawer 2001
Lake Charles, LA 70602

Identification Number: C00109918

Reference: 30 Day Post-General Report (10/18/84-11/26/84)

Dear Mr. Gray:

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 Lisa Stolaruk on our toll-free number (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

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MEMORANDUM TO FILES

MEETING WITH: Roxanne Forrester of Camp, Carmouche, Palmer, et. al.
Political Action Committee;
Lisa J. Stolaruk, Senior Reports Analyst, FEC; and
Paul Kolesa, Reports Analyst, FEC

DATE: 1/15/85

Ms. Forrester began the meeting by expressing concern over the negative ending cash balances that the committee has been reporting during the latter half of 1984. She said that the committee is carrying a positive cash balance in their bank statements, but she was having trouble getting the reports to reconcile.

After reviewing some of the bank statements, we were able to locate a deposit of funds that was not accounted for in the reports. In addition, it was discovered that, during a prior reporting period, the PAC received what was termed as a "PAC Advance". We asked Ms. Forrester what she meant when she used this wording. She responded that, when the PAC did not have sufficient funds to cover its disbursements, another account issued the PAC an advance of payroll deduction funds. We advised Ms. Forrester to find out more details about the other account; in addition, we told Ms. Forrester that she should not be listing individuals' names if indeed the money did not originate from the individuals.

We stressed the importance of filing the 30 Day Post-General Report as soon as possible, as it was due over a month ago. She is aware of this problem, and hopes to get the report to the FEC quickly.] LS

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January 28, 1985

MEMORANDUM TO THE FILE

FROM : MICHAEL FILLER
COMMITTEE : CAMP, CARMOUCHE, PALMER, BARSH & HUNTER PAC
SUBJECT : LATE FILING

Ms. Kate Ross called in response to a Chronic Late Filing Notice. She mentioned that the notice had been sent to the committee's former address in Louisiana. Ms. Ross stated that a letter changing the committee's address to Washington, D.C., and the committee's 1984 Post-General and Year End Reports were mailed on January 18, 1985. I informed Ms. Ross that I would check to see if the Commission had received the documents.

After discussing the matter with Lisa Stolaruk, who did not find any record of the documents in the computer system, I called Ms. Ross. I informed Ms. Ross that the documents had not been received and asked when they had been mailed. Ms. Ross checked with her secretary and stated that the information had been mailed on Friday, January 25th. I told Ms. Ross that I would contact her if the documents were not received by Wednesday, January 30th.

Ms. Ross mentioned that the committee had some problems in the past and had taken appropriate steps to ensure the Act was complied with in the future. She inquired about the filing dates in 1985, and I informed her that the committee could file on a monthly or semi-annual basis.

PHONE: 887-5160

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

ATTACHMENT 6 (page 1 of

(Summary Page)

55 JAN 23 P 1:23
ALIGN AREA

ALIGN AREA

1. Name of Committee (In Full)

Camp, Carmouche, Barsh, Hunter
Gray, Hoffman & Gill PAC

Address (Number and Street)

P.O. Drawer 2001

City, State and ZIP Code

Lake Charles, LA 70602

☐ Check here if address is different than previously reported

2. FEC Identification Number

3 ☐ The committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)

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

on Nov. 6, 1984 in the State of Washington, D.C.

☐ Termination Report

(b) Is this Report an Amendment?

☐ YES

☒ NO

SUMMARY

5. Covering Period Oct. 18, 1984 through Nov. 26, 1984

6. (a) Cash on hand January 1, 1984

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(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 28)

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.

Kathleen B. Ross (Agent)
Type or Print Name of Treasurer

SIGNATURE OF TREASURER

DATE

For further information contact

Federal Election Commission

Tel. File 800-424-9530

Local 202-523-4068

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 18 USC 644.

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

FEC FORM 3X (3-80)

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**DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3X)**

ATTACHMENT 5 (page 2 of 2)

Name of Committee (to Full)

Report Covering the Period

From: 10/18/84

To: 11/26/84

COLUMN A
Total To-Date

COLUMN B
Calendar Year-To-Date

I. RECEIPTS

11 CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than Political Committees

Amount Every Unitemized \$

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))

12 TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES

13 ALL LOANS RECEIVED

14 LOAN REPAYMENTS RECEIVED

15 OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)

**16 REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES
AND OTHER POLITICAL COMMITTEES**

17 OTHER RECEIPTS (Dividends, Interest, etc.)

18 TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)

II. DISBURSEMENTS

19 OPERATING EXPENDITURES

20 TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES

**21 CONTRIBUTIONS TO FEDERAL CANDIDATES AND
OTHER POLITICAL COMMITTEES**

22 INDEPENDENT EXPENDITURES (Use Schedule E)

**23 COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES
(2 U.S.C. 6441 a(d)) (Use Schedule F)**

24 LOAN REPAYMENTS MADE

25 LOANS MADE

26 REFUNDS OF CONTRIBUTIONS TO

(a) Individuals/Persons Other Than Political Committees

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))

27 OTHER DISBURSEMENTS

28 TOTAL DISBURSEMENTS (Add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)

III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES

29 TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)

30 TOTAL CONTRIBUTION REFUNDS from Line 26(d)

31 NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)

32 TOTAL OPERATING EXPENDITURES from Line 19

33 OFFSETS TO OPERATING EXPENDITURES from Line 15

34 NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Andrew J. Gray, III, Treasurer
Camp, Carmouche, Barsh, Hunter, Gray,
Hoffman and Gill PAC
2550 M Street, N.W.
Suite 275
Washington, D.C. 20037

RE: MUR
Camp, Carmouche, Barsh, Hunter,
Gray, Hoffman and Gill PAC
Andrew J. Gray, III, Treasurer

Dear Mr. Gray:

On , 1985 the Federal Election Commission determined that there is reason to believe that the Camp, Carmouche, Barsh, Hunter, Gray, Hoffman and Gill PAC and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), by failing to file the 1984 30 Day Post-General Report of Receipts and Disbursements in a timely manner. 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. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such material within 15 days of your receipt of this letter.

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.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be

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Andrew J. Gray, III, Treasurer
Page 2

pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent will not be entertained.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form 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 Shelley Garr, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry
Chairman

Enclosures

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

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FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. _____
STAFF MEMBER & TEL. NO.
Shelley Garr
523-4143

RESPONDENT Camp, Carmouche, Barsh, Hunter, Gray,
Hoffman and Gill PAC
Andrew J. Gray, III, Treasurer*/

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

SUMMARY OF ALLEGATIONS

The Committee was notified on October 1, 1984, that the report was due on December 6, 1984. On December 28, 1984, a Non-Filer Notice was sent to the Committee for failing to file the 1984 30 Day Post-General Report.

Ms. Roxanne Forrester, a representative of the Committee, met with two Reports Analysis Division ("RAD") analysts on January 15, 1985. Following a discussion of the Committee's problems, the RAD analysts reminded Ms. Forrester that the 30 Day Post-General Report had not yet been filed and stressed the importance of filing the report as soon as possible.

Ms. Forrester stated that she was aware of this and hoped to file the report quickly.

Ms. Kate Ross, Assistant Treasurer for the Committee, contacted RAD on January 28, 1985 in response to the Commission's

*/ On May 15, 1985, an Amended Statement of Organization was received informing the Commission that all future correspondence be addressed to Ms. Kate Ross, Assistant Treasurer, in Washington, D.C.; however, the treasurer of record is Mr. Gray.

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notice. During the conversation, Ms. Ross stated that the 1984 30 Day Post-General Report (as well as other amended reports) had been mailed to the Commission. The Commission received the Committee's 30 Day Post-General Election Report on January 28, 1985.

FACTUAL AND LEGAL ANALYSIS

Pursuant to 2 U.S.C. § 434(a)(4)(A)(iii), all political committees other than authorized committees of a candidate are required to file a post-general election report, which shall be filed no later than the 30th day after the general election and which shall be complete as of the 20th day after such general election.

The Committee was required to file a 30 Day Post-General Election Report on December 6, 1984. The Committee filed the report on January 28, 1985, 53 days late. The Committee's failure to file the 30 Day Post-General Election Report in a timely manner is, in the General Counsel's view, a violation of 2 U.S.C. § 434(a)(4)(A)(iii). Thus, it is the recommendation of the Office of General Counsel that the Commission find reason to believe that the Camp, Carmouche, Barsh, Hunter, Gray, Hoffman and Gill PAC and Andrew J. Gray, III, as Treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii).



FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, DC 20463

THIS IS THE BEGINNING OF MUR # 2058

Date Filmed 3/26/86 Camera No. --- 2

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