FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

THIS IS THE BEGINNING OF MUR # 2333

DATE FILMED 4/13/88 CAMERA NO. 3

CAMERAMAN AS

8 8 0 4 0 5 7 1 4 0 3

PUBLIC RECORD INDEX - MUR 2333

1. Memo, 10 Dec 86, John D. Gibson (Reports Analysis Division) to Charles N. Steele (General Counsel), Subj: Referral of the Project Political Involvement Committee (PPIC), w/atch (RAD Referral Pkg).

2. First General Counsel's Report, 15 Jan 87.

3. Memo, 21 Jan 87, M.W. Emmons to C.N. Steel, Subj: Consr comments on 1st G.C. Report, w/atch (comment sheet).

4. Certification of Commission action, 22 Jan 87.

5. Ltr, dtd 30 Jan 87, Chairman Scott E. Thomas to Glenda M. Ranscher (Treas, PPIC).

6. Ltr, dtd 10 Feb 87, Jane D. Alfano (counsel for PPIC) to FEC, w/atch (Statement of Designation of Counsel).

7. General Counsel's Report, 12 Mar 87.

8. Memo, 18 Mar 87, M.W. Emmons to Lawrence M. Noble (Acting General Counsel), Subj: Cmsn Comments to G.C. Report, w/atch (comment sheet).

9. Certification oc Cmsn Vote, 18 Mar 87.

10. Ltr, dtd 20 Mar 87, L.M. Noble to J.D. Alfano.

11. Ltr, dtd 15 July 87, J.D. Alfano to FEC, w/atch (civil penalty check).

12. General Counsel's Report, 17 Sept 87.

13. Memo, 22 Sept 87, M.W. Emmons to L.M. Noble, Subj: Cmsn comments on G.C. Report, w/atch (comment sheet).

14. Certification of Commission action, 22 Sept 87.

15. Clsg ltr, dtd 25 Sept 87, L.M. Noble to J.D. Alfano, w/atch (Conciliation Agreement).

-END-

NOTE: In preparing its file for the public record, O.G.C. routinely removes those documents in which it perceives little or no public interest, and those documents, or portions thereof, which are exempt from disclosure under the Freedom of Information Act.

89040571404

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

10 December 1986

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

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

SUBJECT: REFERRAL OF THE PROJECT POLITICAL INVOLVEMENT COMMITTEE (PPIC)

This is a referral of the Project Political Involvement Committee (PPIC) ("the Committee"). The Committee failed to file the 1986 October Quarterly Report of Receipts and Disbursements by Election Day, November 4, 1986. According to the 1985-1986 RAD Review and Referral Procedures for Unauthorized Committees (Standard 3), further examination is required by your office.

In addition, please note that a Chronic Late Filer Notice was sent to the Committee on November 19, 1986, for failing to file the 1986 April Quarterly and 1986 October Quarterly Reports in a timely manner. Should the Committee file one (1) additional report in an untimely manner during the election cycle, the Committee will be referred to your office as a Chronic Late Filer.

If you have any questions regarding this matter, please contact Chris Nuland at 376-2480.

Attachment

39040571405

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 10 December 1986

ANALYST: Christopher L. Nuland

I. COMMITTEE: Project Political Involvement Committee (PPIC) (C00048579)
Glenda M. Rauscher, Treasurer
(June 20, 1985 to Present)
Oren Thompson, Treasurer
(January 1, 1985 - June 19, 1985)
P.O. Box 52025
Phoenix, AZ 85072

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

III. BACKGROUND:

Failure to File the 1986 October Quarterly Report by Election Day

The Project Political Involvement Committee (PPIC) ("the Committee") failed to file the 1986 October Quarterly Report of Receipts and Disbursements by Election Day, November 4, 1986.

The Committee was notified on September 19, 1986 that the report was due on October 15, 1986 (Attachment 2). On November 4, 1986, a Non-Filer Notice was sent to the Committee for its failure to file the 1986 October Quarterly Report (Attachment 3). On November 10, 1986, the Committee filed the 1986 October Quarterly Report (Attachment 4).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

89040571406

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-86)

DATE 1DEC86
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS		DISBURSEMENTS		TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
PROJECT POLITICAL INVOLVEMENT COMMITTEE (PPIC)						NON-PARTY QUALIFIED		ID #C00048579
CONNECTED ORGANIZATION: SALT RIVER PROJECT								
1985	MISCELLANEOUS REPORT					28JUN85 TO FEC	2	85FEC/377/0453
	MID-YEAR REPORT	11,381		8,006		1JAN85 -30JUN85	10	85FEC/383/2013
	MID-YEAR REPORT - AMENDMENT	-		-		1JAN85 -30JUN85	4	86FEC/394/0238
	REQUEST FOR ADDITIONAL INFORMATION					1JAN85 -30JUN85	3	85FEC/392/2292
	YEAR-END	10,124		3,546		1JUL85 -31DEC85	10	86FEC/400/2918
1986	STATEMENT OF ORGANIZATION - AMENDMENT					15JUL86	1	86FEC/421/1451
	MISCELLANEOUS NOTICE FROM FEC					19NOV86	1	86FEC/444/3489
	APRIL QUARTERLY	7,370		9,049		1JAN86 -31MAR86	10	86FEC/415/3259
	APRIL QUARTERLY - AMENDMENT	-		-		1JAN86 -31MAR86	4	86FEC/421/1452
	NOTICE OF FAILURE TO FILE					1JAN86 -31MAR86	1	86FEC/413/2968
	1'ST LETTER INFORMATIONAL NOTICE					1JAN86 -31MAR86	2	86FEC/416/1687
	JULY QUARTERLY	4,951		2,259		1APR86 -30JUN86	9	86FEC/423/3880
	PRE-PRIMARY	3,971		15,063		1JUL86 -20AUG86	14	86FEC/432/2521
	PRE-PRIMARY - AMENDMENT	-		-		1JUL86 -20AUG86	3	86FEC/433/4919
	1'ST LETTER INFORMATIONAL NOTICE					1JAN86 -20AUG86	1	86FEC/430/2298
	OCTOBER QUARTERLY	2,494		3,000		21AUG86 -30SEP86	8	86FEC/444/0234
	NOTICE OF FAILURE TO FILE					30SEP86	1	86FEC/443/3965
	TOTAL	40,291	0	40,923	0		84	TOTAL PAGES

All above reports have been reviewed.

Cash on hand as of 9/30/86: $11,040.09

Outstanding debts owed to the committee as of 9/30/86: $0

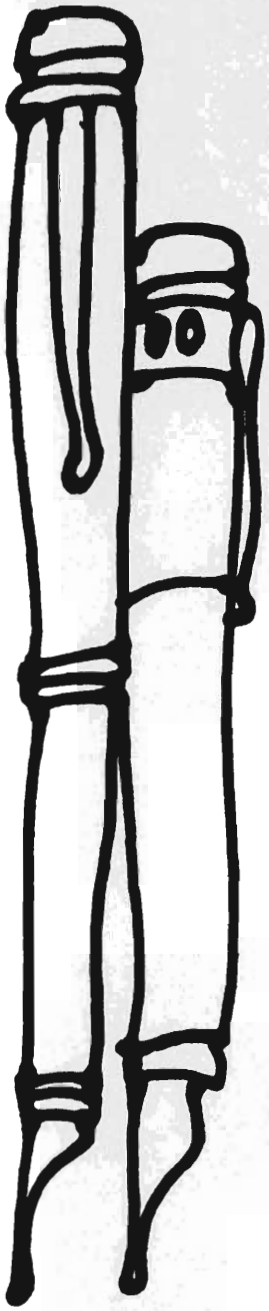
Outstanding debts owed by the committee as of 9/30/86: $0

Attachment 1

QUARTERLY
REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS September 19, 1986



WHO MUST FILE
ALL Party Committees, Nonconnected Committees and Separate Segregated Funds, except those that file monthly (see below), must file a quarterly report by October 15, 1986.

WHAT MUST BE REPORTED
The report must disclose all financial activity that occurred from the close of books for the last report filed through September 30, 1986. Political committees that have not previously filed a financial disclosure report should report all financial activity through September 30, 1986.* For more detailed instructions, consult your campaign guide.

WHEN TO FILE
Reports sent by registered or certified mail must be postmarked no later than midnight October 15, 1986. Reports hand delivered or mailed first class must be received no later than close of business October 15, 1986.

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, 1986, and disclose all financial activity from September 1 through September 30, 1986. (See Monthly Filers on the reverse side.)

COMPLIANCE
Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is also a serious violation. Offending committees are subject to enforcement action. Committees must also submit legible reports which can be clearly reproduced. Illegible reports and reports submitted on non-FEC forms will not be accepted, and 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 or disbursed during the current reporting period. See 11 CFR 104.3(a) and (b).

-over-

REMINDERS

QUARTERLY FILERS
Committees that make contributions or expenditures (including independent expenditures) in connection with an election, and coordinated party expenditures in connection with a general election, must file a pre-election report if this activity has not been previously disclosed. See the January 1986 issue of the Federal Election Commission Record for primary and general election filing requirements.

MONTHLY FILERS
Committees that are filing monthly must file a pre-general election report due on October 23, a post-general election report due on December 4, and a year-end report due January 31, 1987, instead of monthly reports on November 20, December 20 and January 20, 1987. See the schedule below.

REPORT	PERIOD COVERED	REG./CERT. MAILING DATE	FILING DATE
Pre-general	10/01 - 10/15	10/20/86	10/23/86
Post-general	10/16 - 11/24	12/04/86	12/04/86
Year-end	11/25 - 12/31	01/31/87	01/31/87

INDEPENDENT EXPENDITURES
Any independent expenditure aggregating $1,000 or more and made between 2 and 20 days before an election must be reported within 24 hours after the expenditure is made. See 11 CFR 104.4(c)(2) and (3) for information concerning where to file.

A notice explaining general election filing requirements will be sent to you before the general election.

FOR INFORMATION CALL: Information Services Division
800/424-9530 or 202/376-3120

8 8 0 4 0 5 7 1 4 0 9

Attachment 3

FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

RQ-7

November 4, 1986

Glenda M. Rauscher, Treasurer
Project Political Involvement
Committee (PPIC)
P.O. Box 52025
Phoenix, AZ 85072

Identification Number: C00048579

Reference: October Quarterly Report (through 9/30/86)

Dear Ms. Rauscher:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may be in violation of 2 U.S.C. §434(a) for failing to file the above referenced Report of Receipts and Disbursements. You were notified previously of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 999 E 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 the relevant portions should also be filed with the Secretary of State or equivalent State officer. See 2 U.S.C. §439.

Although the Commission may initiate an audit or legal enforcement action concerning this matter, your prompt response and a letter of explanation will be taken into consideration.

If you have any questions, please contact Christopher Nuland on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

John D. Gibson

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Attachment 4
(Page 1 of 2) FEC

86 NOV 12 P12:00

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

(Summary Page)

1. Name of Committee (in Full)
Project Political Involvement Committee

Address (Number and Street)
P. O. Box 52025

City, State and ZIP Code
Phoenix, Arizona 85072-2025

☐ Check here if address is different than previously reported.

2. FEC Identification Number
C00048579

3. ☐ This 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 ____________ in the State of ____________
☐ Termination Report

(b) Is this Report an Amendment? ☐ YES ☐ NO

SUMMARY

5. Covering Period 8/21/86 through 9/30/86

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on hand January 1, 19 86		$ 21,623.41
(b) Cash on Hand at Beginning of Reporting Period	$ 11,545.16	
(c) Total Receipts (from Line 18)	$ 2,494.93	$ 18,788.84
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 14,040.09	$ 40,412.25
7. Total Disbursements (from Line 28)	$ 3,000.00	$ 29,372.16
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 11,040.09	$ 11,040.09
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.

GLENDA M. RAUSCHER
Type or Print Name of Treasurer

Glenda M Rauscher
SIGNATURE OF TREASURER

11-10-86
Date

For further information contact:
Federal Election Commission
999 E Street NW
Washington DC 20463
Toll Free 800-424-9530
Local 202-376-3120

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. §437g.

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

Williams
Project
and Administration

Z 85072-2025

CERTIFIED
P 464 285 941
MAIL

PHOENIX ARIZ.
US POSTAGE
2.06

FIRST CLASS MAIL

Christopher Huland
Federal Election Committee
1325 K. Street N.W.
Washington, D.C. 20463

Attachment 4
(Page 2 of 2)

86 NOV 13 P2:

FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL BY OGC TO THE COMMISSION _____

RAD REFERRAL: 86NF-31
STAFF MEMBER: Deborah Curry

SOURCE OF MUR: INTERNALLY GENERATED

RESPONDENTS' NAMES: Project Political Involvement Committee and Glenda M. Rauscher, as treasurer

RELEVANT STAUTUE: 2 U.S.C. § 434(a)(4)(A)(i)
11 C.F.R. § 104.5(c)(1)(i)(A)

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

GENERATION OF MATTER

This matter was generated by the Reports Analysis Division ("RAD") after a review of the disclosure reports of Project Political Involvement Committee (hereinafter "Project Committee").

SUMMARY OF ALLEGATIONS

The RAD referral reveals that the Project Committee and Glenda M. Rauscher, as treasurer, may have violated 2 U.S.C. § 434(a)(4)(A)(i) by failing to file the 1986 October Quarterly Report in a timely manner.

FACTUAL AND LEGAL ANALYSIS

The Project Committee failed to file the 1986 October Quarterly Report of Receipts and Disbursements by Election Day, November 4, 1986.

The Project Committee was notified on September 19, 1986 that the report was due on October 15, 1986. (Attachment 1,

page 3). On November 4, 1986, a Non-Filer Notice was sent to the Project Committee for its failure to file its 1986 October Quarterly Report (Attachment 1, page 5). On November 10, 1986, the Project Committee filed the 1986 October Quarterly Report (Attachment 1, page 6).

2 U.S.C. § 434(a)(4)(A)(i) requires that political committees, other than authorized committees of the candidates, shall file quarterly reports no later than the 15th day after the last day of the calendar quarter during any year in which a regularly scheduled general election is held. 11 C.F.R. § 104.5(c)(1)(i)(A).

The Project Committee was required to file their 1986 October Quarterly Report by October 15, 1986. The Project Committee, however, did not file the 1986 October Quarterly Report until November 10, 1986. In view of the Project Committee's failure to file the 1986 October Quarterly Report by the required filing date, it is the recommendation of the Office of General Counsel that the Commission open a MUR and find reason to believe the Project Committee and Glenda M. Rauscher, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i).

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RECOMMENDATIONS

1. Open a MUR;

2. Find reason to believe the Project Political Involvement Committee and Glenda M. Rauscher, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and

3. Approve the attached letter and General Counsel's Factual and Legal Analysis.

Charles N. Steele
General Counsel

DATE 1/15/87

BY: Lawrence M. Noble
Lawrence M. Noble
Deputy General Counsel

Attachments
1. Referral Materials
2. Letter
3. General Counsel Factual and Legal Analysis

2 2 0 4 0 6 7 1 4 1 5

93040571416

Attachments to First General Counsel's Report

have been removed from this position in the Public Record File either because they duplicate documents located elsewhere in this file, or because they reflect exempt information.

For Attachment 1 see 1

2 5

FEDERAL ELECTION COMMISSION
WASHINGTON D C 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/ JOSHUA MCFADDEN

DATE: JANUARY 21, 1987

SUBJECT: COMMENTS ON RAD Ref. 86NF-31-1'ST GENERAL COUNSEL'S REPORT
SIGNED JANUARY 15, 1987

Attached is a copy of Commissioner Thomas's vote sheet with comments regarding the above-captioned matter.

Attachment:
copy of vote sheet

88040571417

BALLOT

14

SENSITIVE

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DATE & TIME TRANSMITTED: FRIDAY, JANUARY 16, 1987 2:00

COMMISSIONER: AIKENS, ELLIOTT, JOSEFIAK, McDONALD, McGARRY, THOMAS

RETURN TO COMMISSION SECRETARY BY WEDNESDAY, JANUARY 21, 1987 4:00

SUBJECT: RAD Ref. 86NF-31 - FIRST GENERAL COUNSEL'S REPORT
SIGNED JANUARY 15, 1987

87 JAN 20 P4:39

(✓) I approve the recommendation

( ) I object to the recommendation

COMMENTS: Correct P.O. Box number on letter.

DATE: 1/20/87 SIGNATURE [signature]

A DEFINITE VOTE IS REQUIRED. ALL BALLOTS MUST BE SIGNED AND DATED.

PLEASE RETURN ONLY THE BALLOT TO THE COMMISSION SECRETARY.

PLEASE RETURN BALLOT NO LATER THAN DATE AND TIME SHOWN ABOVE.

3

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	RAD Ref. 86NF-31 (MUR 2333)
Project Political Involvement	)	
Committee and Glenda M. Rauscher,	)	
as treasurer		

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 21, 1987, the Commission decided by a vote of 6-0 to take the following actions in RAD Ref. 86NF-31.

1. Open a MUR.

2. Find reason to believe the Project Political Involvement Committee and Glenda M. Rauscher, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i).

3. Approve the letter and General Counsel's Factual and Legal Analysis, as recommended in the First General Counsel's Report signed January 15, 1987.

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

Attest:

1-22-87
Date

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

Received in the Office of Commission Secretary:	Thurs.,	1-15-87,	4:45
Circulated on 48 hour tally basis:	Fri.,	1-16-87,	2:00
Deadline for vote:	Wed.,	1-21-87,	4:00

8 3 0 4 0 5 7 1 4 1 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 30, 1987

Glenda M. Rauscher, Treasurer
Project Political Involvement
Committee
P.O. Box 52025
Phoenix, AZ 85072

RE: MUR 2333
Project Political Involvement
Committee and Glenda M.
Rauscher, as treasurer

Dear Ms. Rauscher:

On January 21, 1987, the Federal Election Commission determined that there is reason to believe Project Political Involvement Committee and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), a provision 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 fifteen 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 pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so

5

that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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 Deborah Curry, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Scott E. Thomas
Chairman

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

9 3 0 4 0 5 7 1 4 2 1

GCC#2716
RECEIVED AT THE FEC

1:13

SALT RIVER PROJECT
POST OFFICE BOX 52025
PHOENIX, ARIZONA
85072-2025
(602) 236-5900

CERTIFIED MAIL

87 FEB 17 P3:45

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

February 10, 1987

Federal Election Commission
Office of General Counsel
Washington, D.C. 20463
ATTN: Deborah Curry

Re: MUR 2333
Project Political Involvement Committee and
Glenda M. Rauscher as Treasurer

Dear Ms. Curry:

I represent the Project Political Involvement Committee ("PPIC") in the above matter. I have enclosed a statement signed by Richard Hayslip, Chairman of PPIC, designating me as counsel for PPIC and authorizing me to receive notifications and other communications from the Federal Election Commission ("Commission").

By this letter, PPIC is stating its desire to enter into negotiations directed towards reaching a conciliation agreement with the Commission pursuant to 11 C.F.R. §111.18(d).

I have reviewed the general counsel's factual and legal analysis of the Matter Under Review ("MUR"), which was enclosed with the letter to Glenda M. Rauscher as Treasurer of PPIC, dated January 30, 1987. The facts stated therein are correct. PPIC did file its 1986 October quarterly report late. The report was filed on November 10, 1986. Frankly, there is no excuse to justify this failure to file on time, other than the fact that said failure was done neither intentionally nor deliberately, nor with any intent to deceive the Commission or any member of the general public. It was simply an inadvertent mistake on the part of PPIC.

Since its inception in 1976, PPIC has been filing reports with the Commission and, other than the report in question, has consistently filed its reports on time. To its knowledge, no harm has been suffered or claimed to have been suffered by any individual on account of PPIC's late filing of its October report. Therefore, PPIC respectfully requests that this matter be resolved by pre-probable cause conciliation.

3 8 0 4 0 5 7 1 4 2 2

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SALT RIVER PROJECT

I can be reached at (602) 236-2359 for further discussions of this matter.

Very truly yours,

Jane D. Alfano

Jane D. Alfano
Managing Attorney

JDA:sc

Enclosure

cc: Glenda M. Rauscher

8 8 0 4 0 5 7 1 4 2 3

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2333

NAME OF COUNSEL: Jane D. Alfano

ADDRESS: Salt River Project - Law Department
P. O. Box 52025
Phoenix, AZ 85027-2025

TELEPHONE: (602)236-2359

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.

2/5/87
Date

Richard Hayslip
Signature

RESPONDENT'S NAME: Richard M. Hayslip

ADDRESS: Salt River Project - Special Projects
P. O. Box 52025
Phoenix, AZ 85027-2025

HOME PHONE:

BUSINESS PHONE: (602) 236-2896

83040571424

6

SENSITIVE

MAR 13 AO: 27

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Project Political Involvement Committee and Glenda M. Rauscher, as treasurer	)	MUR 2333

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On January 21, 1987, the Commission found reason to believe that Project Political Involvement Committee ("PPIC") and Glenda M. Rauscher, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i). The basis for this finding was a referral from the Reports Analysis Division that showed that Respondents had not filed their 1986 October Quarterly Report, due on October 15, 1986, until November 10, 1986.

II. LEGAL ANALYSIS

Respondents do not contest the allegation that they failed to file the 1986 October Quarterly in a timely manner. In fact Respondents state that "there is no excuse to justify this failure to file on time, other than the fact that said failure was done neither intentionally nor deliberately, nor, with any intent to deceive the Commission or any member of the general public." (Attachment 1 page 1). In short, Respondents characterize the committee's failure to file as "an inadvertent mistake on the part of PPIC." (Attachment 1 page 1).

Respondents request pre-probable cause conciliation (Attachment 1 page 1). The Office of General Counsel recommends that the Commission enter into pre-probable cause conciliation and approve the attached proposed conciliation agreement.

2304067142 5

III. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

8 3 0 4 0 6 7 1 4 2 6

IV. RECOMMENDATIONS

1. Enter into conciliation prior to a finding of probable cause to believe with Project Political Involvement Committee and Glenda M. Rauscher, as treasurer.

2. Approve the attached proposed conciliation agreement.

3. Approve and send attached letter.

Charles N. Steele
General Counsel

3/12/87
Date

BY: Lawrence M. Noble
Lawrence M. Noble
Deputy General Counsel

Attachments
1. Response
2. Proposed Conciliation Agreement
3. Letter to Respondent

8 3 0 4 0 3 7 1 4 2 7

Attachments to General Counsel's Report

have been removed from this position in the Public Record File either because they duplicate documents located elsewhere in this file, or because they reflect exempt information.

For Attachment 1 see 6

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

MEMORANDUM TO: LAWRENCE M. NOBLE
ACTING GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/ JOSHUA MCFADDEN

DATE: MARCH 18, 1987

SUBJECT: COMMENTS TO MUR 2333 - GENERAL COUNSEL'S REPORT SIGNED MARCH 12, 1987

Attached is a copy of Commissioner Thomas's vote sheet with comments regarding the above-captioned matter.

Attachment:
copy of vote sheet

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J.H

BALLOT

SENSITIVE

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DATE & TIME TRANSMITTED: Friday, March 13, 1987, 2:00

COMMISSIONER: AIKENS, ELLIOTT, JOSEFIAK, McDONALD, McGARRY, THOMAS

RETURN TO COMMISSION SECRETARY BY Tuesday, March 17, 1987, 4:00

SUBJECT: MUR 2333 - General Counsel's Report Signed March 12, 1987

87 MAR 18 A8:58

8 7 0 4 0 5 7 1 4 7 0

(✓) I approve the recommendation

( ) I object to the recommendation

COMMENTS: Corrections needed in conciliation agreement and letter

DATE: 3/18/87 SIGNATURE [signature]

A DEFINITE VOTE IS REQUIRED. ALL BALLOTS MUST BE SIGNED AND DATED.

PLEASE RETURN ONLY THE BALLOT TO THE COMMISSION SECRETARY.

PLEASE RETURN BALLOT NO LATER THAN DATE AND TIME SHOWN ABOVE.

8

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Project Political Involvement Committee and Glenda M. Rauscher, as treasurer	)	MUR 2333

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 17, 1987, the Commission decided by a vote of 6-0 to take the following actions in MUR 2333:

1. Enter into conciliation prior to a finding of probable cause to believe with Project Political Involvement Committee and Glenda M. Rauscher, as treasurer.

2. Approve the proposed conciliation agreement, as recommended in the General Counsel's Report signed March 12, 1987.

(continued)

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3. Approve and send the letter, as recommended in the General Counsel's Report signed March 12, 1987.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

3-18-87
Date

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

Received in the Office of Commission Secretary:	Fri.,	3-13-87,	9:27
Circulated on 48 hour tally basis:	Fri.,	3-13-87,	2:00
Deadline for vote:	Tues.,	3-17-87,	4:00

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plm

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 20, 1987

Jane D. Alfano, Esquire
Salt River Project - Law Department
P.O. Box 52025
Phoenix, AZ 85027-2025

RE: MUR 2333
Project Political
Involvement Committee
and Glenda M. Rauscher
as Treasurer

Dear Ms. Alfano:

On January 21, 1987, the Commission found reason to believe that Project Political Action Committee and Glenda M. Rauscher as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i). At your request, the Commission determined on March 17, 1987, 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 you 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. 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 Deborah Curry, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
Acting General Counsel

Enclosures

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GCC 3987

RECEIVED AT THE

JUL 21 A9:0

SALT RIVER PROJECT
POST OFFICE BOX 52025
PHOENIX, ARIZONA
85072-2025
(602) 236-5900

87 JUL 22 P3:06

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

July 15, 1987

Mr. Lawrence M. Noble
Acting General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 2333
Project Political Involvement Committee and
Glenda M. Rauscher, as treasurer

Dear Mr. Noble:

Enclosed is the Conciliation Agreement in the above matter which I have signed on behalf of the Project Political Involvement Committee.

I have also enclosed a check payable to the Federal Election Commission in the amount of $350 as set forth in paragraph VI of the Conciliation Agreement.

Should you have any further questions, please call me at (602) 236-2359.

Very truly yours,

Jane D. Alfano

Jane D. Alfano
Managing Attorney

JDA:sc

Enclosures

cc: Glenda Rauscher

11

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PROJECT POLITICAL INVOLVEMENT COMMITTEE 2-85
P.O. BOX 52025
PHOENIX, AZ 85072-2025

No. 162

7-14 1987

91-7001/3221

FEDERAL ELECTION COMMISSION $350.00xx

THREE HUNDRED FIFTY AND NO/100 DOLLARS

First Federal
LOS ARCOS OFFICE
7201 E. McDowell Rd.
Scottsdale, AZ 85257

Memo W. Roger Davis

Glenda M. Rauscher

W. Roger Davis

⑆322170016⑆0162⑈0187078960⑈

GCC 3987

MEMORANDUM

TO: DEBRA A. TRIMIEW

TO: CECILIA LIEBER

FROM: CECILIA LIEBER

FROM: DEBRA A. TRIMIEW

CHECK NO. 162 { A COPY OF WHICH IS ATTACHED } RELATING TO

MUR 2333 (Cumy) AND NAME Project Political Involvement Cmte., and Glenda M. Rauscher, as Treasurer

WAS RECIEVED ON 7/22/87. PLEASE INDICATE THE ACCOUNT INTO

WHICH IT SHOULD BE DEPOSITED:

/ ✓ / BUDGET CLEARING ACCOUNT { 95F3875.16 }

/ / CIVIL PENALTIES ACCOUNT { 95-1099.160 }

/ / OTHER _____

SIGNATURE Debra A. Trimiew DATE 7/23/87

11

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

87 SEP 17 PM 4:40

In the Matter of)
)
Project Political Involvement) MUR 2333
Committee and Glenda M.)
Rauscher, as treasurer)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Jane D. Alfano, on behalf of Project Political Involvement Committee and Glenda M. Rauscher, as treasurer.

The attached agreement contains no changes from the agreement approved by the Commission on June 23, 1987. A check for the civil penalty ($350) has been received.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Project Political Involvement Committee and Glenda M. Rauscher, as treasurer.

2. Close the file.

3. Approve the attached letter.

9/17/87
Date

Lawrence M. Noble
Acting General Counsel

Attachments
1. Conciliation Agreement
2. Photocopy of civil penalty check
3. Letter to Respondent

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Attachments to General Counsel's Report

have been removed from this position in the Public Record File either because they duplicate documents located elsewhere in this file, or because they reflect exempt information.

For Attachment	1	see 14
	2	10
	3	14

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: LAWRENCE M. NOBLE
ACTING GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JOSHUA MCFADDEN

DATE: SEPTEMBER 22, 1987

SUBJECT: COMMENTS TO MUR 2333 - General Counsel's Report Signed September 17, 1987

Attached is a copy of Commissioner Thomas's vote sheet with comments regarding the above-captioned matter.

Attachment:
copy of vote sheet

13

9304067143 8

BALLOT

SENSITIVE

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DATE & TIME TRANSMITTED: FRIDAY, SEPTEMBER 18, 1987 12:00

COMMISSIONER: AIKENS, ELLIOTT, JOSEFIAK, McDONALD, McGARRY, THOMAS

RETURN TO COMMISSION SECRETARY BY TUESDAY, SEPTEMBER 22, 1987 4:00

SUBJECT: MUR 2333- General Counsel's Report
signed September 17, 1987

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
87 SEP 22 PM 12:56

87040571439

(✓) I approve the recommendation

( ) I object to the recommendation

COMMENTS: Fix zip code in letter

DATE: 9/22/87 SIGNATURE Scott Thomas

A DEFINITE VOTE IS REQUIRED. ALL BALLOTS MUST BE SIGNED AND DATED.

PLEASE RETURN ONLY THE BALLOT TO THE COMMISSION SECRETARY.

PLEASE RETURN BALLOT NO LATER THAN DATE AND TIME SHOWN ABOVE.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Project Political Involvement Committee and Glenda M. Rauscher, as treasurer	)	MUR 2333
	)	
	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 22, 1987, the Commission decided by a vote of 6-0 to take the following actions in MUR 2333:

1. Accept the conciliation agreement with Project Political Involvement Committee and Glenda M. Rauscher, as treasurer, as recommended in the General Counsel's Report signed September 17, 1987.

2. Close the file.

3. Approve the letter, as recommended in the General Counsel's Report signed September 17, 1987.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

9-22-87
Date

Marjorie W Emmons
Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Thurs., 9-17-87, 4:40
Circulated on 48 hour tally basis: Fri., 9-18-87, 12:00
Deadline for vote: Tues., 9-22-87, 4:00

14

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

25 September 1987

Jane D. Alfano, Esquire
Salt River Project - Law Department
P.O. Box 52025
Phoenix, AZ 85072-2025

RE: MUR 2333
Project Political
Involvement Committee
and Glenda M. Rauscher,
as treasurer

Dear Ms. Alfano:

On September 22, 1987, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your client's behalf in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(i), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to Project Political Involvement Committee and Glenda M. Rauscher, as treasurer. This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

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

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

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questions, please contact Deborah Curry, the attorney assigned to this matter at (202) 376-8200.

Sincerely,

Lawrence M. Noble
Acting General Counsel

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Project Political Involvement Committee and Glenda M. Rauscher, as treasurer	)	MUR 2333

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 Project Political Involvement Committee and Glenda M. Rauscher as treasurer ("Respondents") violated 2 U.S.C. § 434(a)(4)(A)(i) by failing to file the 1986 October Quarterly in a timely manner.

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

1. 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. Respondent has 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:

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1. Project Political Involvement Committee (hereinafter "PPIC") is the separate segregated fund of Salt River Project. Glenda M. Rauscher is treasurer of PPIC.

2. Respondents were required by 2 U.S.C. § 434(a)(4)(A)(i) to file their 1986 October Quarterly Report by October 15, 1986.

3. Respondents failed to file the 1986 October Quarterly Report until November 10, 1986.

V. Respondents' failure to file the 1986 October Quarterly Report in a timely manner violated 2 U.S.C. § 434(a)(4)(A)(i).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Three Hundred Fifty Dollars ($350) pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

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

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IX. 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.

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

FOR THE COMMISSION:

Lawrence M. Noble
Acting General Counsel

Date 9/25/87

FOR THE RESPONDENTS:

Jane D. Alfano
Counsel for Respondents

Date 7/15/87

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

THIS IS THE END OF MUR # 2333

DATE FILMED 1/13/88 CAMERA NO. 3

CAMERAMAN AS

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