



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2390

DATE FILMED _____ CAMERA NO. _____

CAMERA MAN K.A.U.

88040705462



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

20 February 1987

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: *[Signature]* JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: REFERRAL OF THE FOOTWEAR DISTRIBUTORS POLITICAL
ACTION COMMITTEE

This is a combined Non-Filer/Chronic Late Filer referral of the Footwear Distributors Political Action Committee ("the Committee"). During the 1985-86 election cycle, the Committee failed to file eight (8) Reports of Receipts and Disbursements in a timely manner. One of these filings, the 12 Day Pre-General Report, was not filed by Election Day, November 4, 1986. According to the RAD Review and Referral Procedures for Unauthorized Committees (Standards 3 and 4), further examination is required by your office.

For your information, the Committee was referred for chronic late filing in the 1983-84 election cycle (see 85L-16, closed MUR 2056).

If you have any questions on this matter, please contact Joseph Rawson at 376-2480.

Attachment

88040705463

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 20 February 1987

ANALYST: Joseph Rawson

I. COMMITTEE: Footwear Distributors Political Action Committee
(C00121947)
Robert B. Campbell, Treasurer^{1/}
P.O. Box 2313
GPO New York, NY 10116

II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(A)(ii) and (B)
11 CFR 104.5(c)(1)(ii)
and (3)(i) and(ii)

III. BACKGROUND:

Chronic Late Filing of Reports and Failure to File the 1986
12 Day Pre-General Report by Election Day

The Footwear Distributors Political Action Committee ("the Committee") failed to file eight (8) Reports of Receipts and Disbursements in a timely manner for the 1985-86 election cycle (see chart on page 3). The reports were filed between eight (8) and one hundred thirty-four (134) calendar days late. In addition, the Committee failed to file the 12 Day Pre-General Election Report by Election Day, November 4, 1986.

On September 16, 1986, a Chronic Late Filing Notice was sent to the Committee for failing to file the 1985 February Monthly and 1986 May, July and August Monthly Reports in a timely manner. (Attachment 12).^{2/} The Notice advised the Committee that any additional late filing of reports may result in legal enforcement action.

^{1/}Although Robert Campbell is the treasurer of record, contact has been through Douglas R. Stevens, counsel, at 2550 M Street, N.W., Suite 405, Washington, DC 20037.

^{2/}The 1985 March and April Monthly Reports were not included in the Chronic Late Filing Notice.

38040705464

LATE FILING HISTORY

REPORT TYPE	PRIOR NOTICE	DATE DUE	NON-FILER NOTICE	DATE FILED
1985 February Monthly (1/1/85-1/31/85)	2/11/85 (Attachment 2)	2/20/85	N/A	3/1/85 (Attachment 3)
1985 March Monthly (2/1/85-2/28/85) ^{1/}	2/11/85 (Attachment 2)	3/20/85	4/10/85 (Attachment 4)	8/1/85 (Attachment 6)
1985 April Monthly (3/1/85-3/31/85) ^{2/}	2/11/85 (Attachment 2)	4/20/85	5/15/85 (Attachment 5)	8/1/85 (Attachment 6)
1986 May Monthly (4/1/86-4/30/86)	3/21/86 (Attachment 7)	5/20/86	N/A	5/29/86 (Attachment 8)
1986 July Monthly (6/1/86-6/30/86)	6/20/86 (Attachment 9)	7/20/86	N/A	7/28/86 (Attachment 10)
1986 August Monthly (7/1/86-7/31/86)	6/20/86 (Attachment 9)	8/20/86	9/11/86 (Attachment 11)	9/19/86 (Attachment 13)
1986 October Monthly (9/1/86-9/30/86)	9/19/86 (Attachment 11)	10/20/86	N/A	11/3/86 (Attachment 16)
1986 12 Day Pre-General (10/1/86-10/15/86)	9/29/86 (Attachment 15)	10/23/86	N/A	11/12/86 (Attachment 17)

^{1/} On May 17, 1985, the Committee submitted a letter informing the Commission of its intent to file semi-annually rather than monthly in 1985. A Non-Filer Notice was therefore not sent for the 1985 May Monthly Report. The next report submitted, the 1985 Mid-Year Report was filed on August 1, 1985 and covered the January 1, 1985 through June 30, 1985 reporting period. The date stamp on the report incorrectly noted the date of receipt as July 1, 1985.

^{2/} Ibid.

FOOTWEAR DISTRIBUTORS POLITICAL
ACTION COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

The Committee was notified on September 29, 1986 that all committees which file monthly reports must file a 12 Day Pre-General Report by October 23, 1986 (Attachment 15).

Subsequent to the mailing of the Chronic Late Filing Notice, the Committee failed to file the 1986 October Monthly and 12 Day Pre-General Reports in a timely manner (Attachments 16 and 17).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

38040705466

3 3 0 4 0 7 0 5 4 6 7
FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-86)

DATE 20FEB87
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
FOOTWEAR DISTRIBUTORS POLITICAL ACTION COMMITTEE				NON-PARTY QUALIFIED		ID #C00121947
CONNECTED ORGANIZATION: NONE						
1985	MISCELLANEOUS REPORT			17MAY85 TO FEC	2	85FEC/373/3394
	FEBRUARY MONTHLY	0	0	1JAN85 -31JAN85	3	85FEC/367/1459
	NOTICE OF FAILURE TO FILE			1FEB85 -28FEB85	1	85FEC/370/0502
	NOTICE OF FAILURE TO FILE			1MAR85 -31MAR85	1	85FEC/373/2648
	MID-YEAR REPORT	0	15,977	1JAN85 -30JUN85	4	85FEC/383/0827
	MID-YEAR REPORT - AMENDMENT	0	15,977	1JAN85 -30JUN85	5	85FEC/386/2116
	MID-YEAR REPORT - AMENDMENT	0	15,977	1JAN85 -30JUN85	9	86FEC/444/0342
	REQUEST FOR ADDITIONAL INFORMATION			1JAN85 -30JUN85	1	86FEC/417/1096
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN85 -30JUN85	4	86FEC/419/3996
	YEAR-END	0	15,260	1JUL85 -31DEC85	5	86FEC/398/0294
1986	MISCELLANEOUS REPORT			21APR86 TO FEC	2	86FEC/411/3787
	MISCELLANEOUS REPORT			16JUN86 FROM FEC	1	86FEC/416/4643
	MISCELLANEOUS REPORT			17JUL86 TO FEC	2	86FEC/423/0630
	MISCELLANEOUS REPORT			15SEP86 TO FEC	2	86FEC/430/3380
	MISCELLANEOUS NOTICE FROM FEC			16SEP86	2	86FEC/430/3599
	APRIL QUARTERLY	15,000	11,950	1JAN86 -31MAR86	6	86FEC/410/4932
	APRIL QUARTERLY - AMENDMENT	15,000	11,950	1JAN86 -31MAR86	9	86FEC/424/3473
	REQUEST FOR ADDITIONAL INFORMATION			1JAN86 -31MAR86	2	86FEC/417/1072
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN86 -31MAR86	1	86FEC/419/4000
	MAY MONTHLY	0	0	1APR86 -30APR86	3	86FEC/415/4644
	JUNE MONTHLY	0	0	1MAY86 -31MAY86	3	86FEC/417/4572
	JULY MONTHLY	10,000	4,490	1JUN86 -30JUN86	5	86FEC/424/5366
	JULY MONTHLY - AMENDMENT	10,700	11,090	1JUN86 -30JUN86	7	86FEC/430/5492
	AUGUST MONTHLY	15,000	3,550	1JUL86 -31JUL86	5	86FEC/430/5499
	NOTICE OF FAILURE TO FILE			1JUL86 -31JUL86	1	86FEC/430/1986
	SEPTEMBER MONTHLY	500	10,350	1AUG86 -31AUG86	6	86FEC/431/2312
	OCTOBER MONTHLY	3,000	4,110	1SEP86 -30SEP86	5	86FEC/443/2763
	PRE-GENERAL	0	0	1OCT86 -15OCT86	2	86FEC/444/0623
	POST-GENERAL	455	7,000	16OCT86 -24NOV86	5	86FEC/449/2060
	POST-GENERAL - AMENDMENT	455	7,000	16OCT86 -24NOV86	7	87FEC/460/4107
	REQUEST FOR ADDITIONAL INFORMATION			16OCT86 -24NOV86	1	87FEC/452/3358
	REQUEST FOR ADDITIONAL INFORMATION 2ND			16OCT86 -24NOV86	2	87FEC/455/3057
	YEAR-END	200	260	25NOV86 -31DEC86	5	87FEC/453/4306
1987	MISCELLANEOUS REPORT			15JAN87 TO FEC	2	87FEC/454/0645
	MISCELLANEOUS REPORT			21JAN87 FROM FEC	1	87FEC/455/0253
	MISCELLANEOUS REPORT			12FEB87 TO FEC	2	87FEC/460/3783
TOTAL		44,855	0 79,547	0	124	TOTAL PAGES

All reports have been reviewed.
Ending cash-on-hand as of 12/31/86: \$4,367
Debts owed to and by the committee as of 12/31/86: \$0

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 11, 1985

REPORTING NOTICE FOR MONTHLY FILERS
NON-ELECTION YEAR 1985

The Commission's records indicate that your committee will file monthly reports during 1985. This notice will assist you in complying with the monthly filing requirements.

* * * *

MONTHLY REPORTS

Monthly reports must be filed no later than 20 days after the last day of each month. 11 CFR 104.5(c)(3) Each report must include all financial activity that occurred during the previous month. For example, the first monthly report this year should be filed by February 20, 1985, and should include all financial activity which occurred between January 1 and January 31, 1985. (See the chart below.)

If you send a report by registered or certified mail, it must be postmarked no later than the filing date in order to be timely filed. If you have your report hand-delivered or mailed first class, it must be received by the close of business on the filing date.

You are required to use FEC Form 3X to file all reports. These forms may be duplicated. Two of them have been enclosed for your use. Should you need additional forms call the Office of Public Communications.

MONTHLY REPORTS 1985

Report	Period Covered	Filing Date*
February	1/1 - 1/31	2/20/85
March	2/1 - 2/28	3/20/85
April	3/1 - 3/31	4/20/85
May	4/1 - 4/30	5/20/85
June	5/1 - 5/31	6/20/85
July	6/1 - 6/30	7/20/85
August	7/1 - 7/31	8/20/85
September	8/1 - 8/31	9/20/85
October	9/1 - 9/30	10/20/85
November	10/1 - 10/31	11/20/85
December	11/1 - 11/30	12/20/85
Year-End	12/1 - 12/31	1/31/86

* The reports that are sent by registered or certified mail are considered filed on the date of the U.S. Postmark.

8 4 6 5 0 7 0 4 0 3 8

SPECIAL ELECTIONS DURING 1985

Committees that make contributions or expenditures in connection with any special election are not required to file pre-election reports or post-general election reports. Rather, these committees should continue to file reports on a monthly schedule.

CHANGING FILING FREQUENCY

Committees may change from a monthly filing schedule to a semi-annual filing schedule only once during 1985. Should you choose to make this change, you must notify the Commission at the time you file a monthly report.

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
(202) 523-4068
(800) 424-9530

3 8 0 4 0 7 0 5 4 6 9

REPORT OF RECEIPTS AND DISBURSEMENTS

For a Political Committee Other Than an Authorized Committee

(Blottery Page)

B5 MAR 1 AG: 27

[illegible]

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period	1/1/85 Through 1/31/85		
6. (a) Cash on Hand January 1, 1985			\$ 23,905
(b) Cash on Hand at Beginning of Reporting Period		\$ 23,905	
(c) Total Receipts (from Line 1B)		\$ -0-	\$ -0-
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 5(a) and 5(c) for Column B)		\$ 23,905	\$ 23,905
7. Total Disbursements (from Line 2B)		\$ -0-	\$ -0-
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))		\$ 23,905	\$ 23,905
9. (a) Liabilities Owed TO the Committee (from Schedule C or Schedule D)		\$ -0-	
(b) Liabilities Owed BY the Committee (from Schedule C or Schedule D)		\$ -0-	

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

For further information, contact

Federal Election Commission
Toll Free 800 424 9530
Local 202 573 4068

ROBERT B. CAMPBELL

Type a Print Name of Issuer:

3073 Engle
SIGNATURE OF TREASURER

February 17, 1985

One

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U S C 5432b.

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

[illegible]



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

RQ-7

April 10, 1985

Robert Campbell, Treasurer
Footwear Distributors Political
Action Committee
P.O. Box 2313/General Post Office
New York, NY 10116

Identification Number: C00121947

Reference: March Monthly Report (2/1/85-2/28/85)

Dear Mr. Campbell:

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 Hunter Bryan on our toll-free number (800) 424-9530. Our local number is (202) 523-4049.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

8 3 0 4 0 7 5 4 9 7 1



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20543

10-7

May 15, 1963

**Robert Campbell, Treasurer
Footwear Distributors Political
Action Committee
P.O. Box 2313/General Post Office
New York, NY 10116**

Identification Number: C00121947

Reference: April Monthly Report (3/2/85-3/31/85)

Dear Mr. Campbell:

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 100.2, 100.3, 100.4).

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

Sincerely,

John A. C. C.

John D. Gibson
Assistant Staff Director
Reports Analysis Division

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee
(Summary Page)

RECEIVED FEB 6

85 JUL 1 A 9: 09

<p>1. Name of Committee (in Full) Footwear Distributors Political Action Committee</p> <p>Address (Number and Street) P.O. Box 2313</p> <p>City, State and ZIP Code GPO N.Y. N.Y. 10166</p> <p><input type="checkbox"/> Check if address is different than previously reported.</p> <p>2. FEC Identification Number C00121947</p> <p>3. <input type="checkbox"/> This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)</p>	<p>4. TYPE OF REPORT</p> <p>(a) <input type="checkbox"/> April 15 Quarterly Report <input type="checkbox"/> July 15 Quarterly Report <input type="checkbox"/> October 15 Quarterly Report <input type="checkbox"/> January 31 Year End Report <input checked="" type="checkbox"/> July 31 Mid Year Report (Non-election year) <input type="checkbox"/> Monthly Report for _____ <input type="checkbox"/> Twelfth day report preceding _____ election on _____ in the State of _____ <input type="checkbox"/> Thirtieth day report for _____ on _____ in the State of _____ <input type="checkbox"/> Termination Report</p> <p>(b) Is this Report an Amendment? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p>
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SUMMARY	Column A This Period	Column B Calendar Year to Date
5. Covering Period 1/1/85 Through 6/30/85		
6. (a) Cash on Hand January 1, 19 _____		\$ 39,059
(b) Cash on Hand at Beginning of Reporting Period _____	\$ 39,059	
(c) Total Receipts (from Line 18) _____	\$ -0-	\$ -0-
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B) _____	\$ 39,059	\$ 39,059
7. Total Disbursements (from Line 28) _____	\$ 15,977	\$ 15,977
Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) _____	\$ 23,082	\$ 23,082
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D) _____	\$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D) _____	\$ -0-	

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

Robert B. Campbell

(Signature)
SIGNATURE OF TREASURER

July 30, 1985

Date

NOTE: Submission of false, erroneous, or incomplete information may subject the persons responsible to the payment of a civil penalty.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should not be used.

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FEC FORM 3 (1984)

88040705473

QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

March 21, 1986

WHO MUST FILE

ALL Party Committees, Non-connected Committees and Separate Segregated Funds, except those filing monthly (see below), must file a quarterly report by April 15, 1986.

WHAT MUST BE REPORTED

The report must disclose all financial activity that occurred from the close of books for last report filed through March 31, 1986. Political committees that have not previously filed a financial disclosure report should report all financial activity through March 31, 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 April 15, 1986. Reports hand delivered or mailed first class must be received no later than close of business April 15, 1986.

WHERE AND HOW TO FILE

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

MONTHLY FILERS

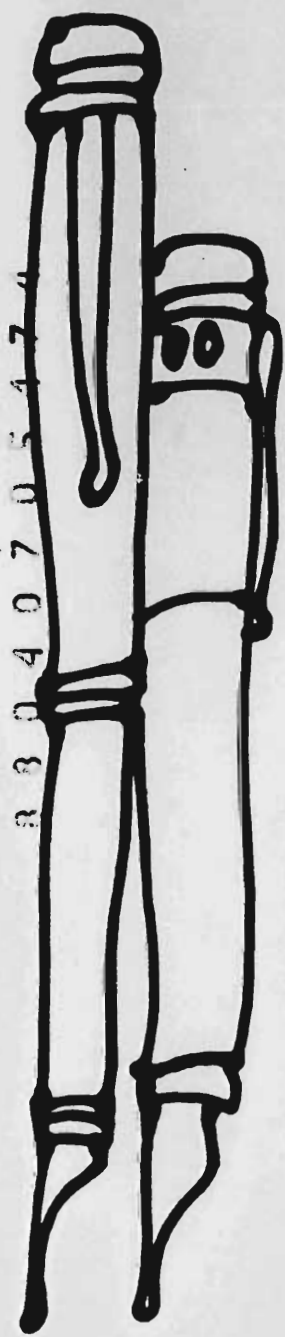
Committees that file on a monthly schedule must file their next report by April 20, 1986, and disclose all financial activity of their committee from March 1 through March 31, 1986. (See the schedule of monthly reports on the reverse side.)

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-



REGULATIONS**QUARTERLY FILERS**

Committees that make contributions or expenditures (including independent expenditures) in connection with an 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 election filing requirements.

MONTHLY FILERS

Committees that file monthly must follow the schedule below. Pre-general election reports sent by registered or certified mail must be postmarked no later than midnight October 20, 1986. All other reports sent by registered or certified mail must be postmarked no later than midnight on the filing date in order to be timely. Reports hand delivered or mailed first class must be received by close of business on the filing date.

REPORT	PERIOD COVERED		FILING DATE
February	01/01	- 01/31	02/20/86
March	02/01	- 02/28	03/20/86
April	03/01	- 03/31	04/20/86
May	04/01	- 04/30	05/20/86
June	05/01	- 05/31	06/20/86
July	06/01	- 06/30	07/20/86
August	07/01	- 07/31	08/20/86
September	08/01	- 08/31	09/20/86
October	09/01	- 09/30	10/20/86
Pre-election	10/01	- 10/15	10/23/86
Post-election	10/16	- 11/24	12/04/86
Year-End	11/25	- 12/31	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.

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

88040705475

RECEIVED 21 THE FEC

REPORT OF RECEIPTS AND DISBURSEMENTS

For a Political Committee Other Than an Authorized Candidate

MAY 20 11:08

(Summary Page)

1. Name of Committee (in Full) Footwear Distributors Political Action Committee <hr/> Address (Number and Street) P.O. Box 2313 <hr/> City, State and ZIP Code GPO N.Y. N.Y. 10166 <hr/> <input type="checkbox"/> Check if address is different than previously reported.	4. TYPE OF REPORT (check appropriate boxes) (a) <input type="checkbox"/> April 15 Quarterly Report <input type="checkbox"/> July 15 Quarterly Report <input type="checkbox"/> October 15 Quarterly Report <input type="checkbox"/> January 31 Year End Report <input type="checkbox"/> July 31 Mid Year Report (Non-election Year Only) <input checked="" type="checkbox"/> Monthly Report for <u>April, 1986</u> <input type="checkbox"/> Twelfth day report preceding _____ election on _____ in the State of _____ <input type="checkbox"/> Thirtieth day report following the General Election on _____ in the State of _____ <input type="checkbox"/> Termination Report (b) Is this Report an Amendment? YES NO XXNO
2. FEC Identification Number C000121947	
3. This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)	

SUMMARY		Column A This Period	Column B Calendar Year to Date
5. Covering Period	<u>April 1, 1986 Through April 30, 1986</u>		
6. (a) Cash on Hand January 1, 19____			\$ 7,822
(b) Cash on Hand at Beginning of Reporting Period		\$ 10,872	
(c) Total Receipts (from Line 18)		\$ -0-	\$ 15,000
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)		\$ 10,872	\$ 22,822
7. Total Disbursements (from Line 28)		\$ -0-	\$ 11,950
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))		\$ 10,872	\$ 10,872
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)		\$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		\$ -0-	

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

For further information, contact

Federal Election Commission
 Toll Free 800-424-9530
 Local 202-527-4268

Robert B. Campbell

Treasurer

SIGNATURE OF TREASURER

5/14/86

Date

NOTE: Submission of false, erroneous or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. § 4371.

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

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FEC FORM 3, 1985

88040705476

QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

June 20, 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 July 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 June 30, 1986. Political committees that have not previously filed a financial disclosure report should report all financial activity through June 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 July 15, 1986. Reports hand delivered or mailed first class must be received no later than close of business July 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 July 20, 1986, and disclose all financial activity of their committee from June 1 through June 30, 1986. (See the schedule of monthly reports 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 CFP 104.3(a) and (b).

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REMINDERS**QUARTERLY FILERS**

Committees that make contributions or expenditures (including independent expenditures) in connection with an 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 election filing requirements.

MONTHLY FILERS

Committees that file monthly reports must follow the schedule below. Pre-general election reports sent by registered or certified mail must be postmarked no later than mid-night October 20, 1986. All other reports sent by registered or certified mail must be postmarked no later than midnight on the filing date in order to be timely. Reports hand delivered or mailed first class must be received by close of business on the filing date.

REPORT	PERIOD COVERED	FILING DATE
February	01/01 - 01/31	02/20/86
March	02/01 - 02/28	03/20/86
April	03/01 - 03/31	04/20/86
May	04/01 - 04/30	05/20/86
June	05/01 - 05/31	06/20/86
July	06/01 - 06/30	07/20/86
August	07/01 - 07/31	08/20/86
September	08/01 - 08/31	09/20/86
October	09/01 - 09/30	10/20/86
Pre-election	10/01 - 10/15	10/23/86
Post-election	10/16 - 11/24	12/04/86
Year-End	11/25 - 12/31	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.

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

83040705478

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

(Summit, Page)

JUL 20 1948

<p>1 Name of Committee (in full)</p> <p>Footwear Distributors Political Action Committee</p>	<p>4 TYPE OF REPORT (check appropriate boxes)</p> <p>(a) <input type="checkbox"/> April 15 Quarterly Report</p> <p><input type="checkbox"/> July 15 Quarterly Report</p> <p><input type="checkbox"/> October 15 Quarterly Report</p> <p><input type="checkbox"/> January 31 Year End Report</p> <p><input type="checkbox"/> July 31 Mid Year Report (Non-election Year Only)</p> <p><input type="checkbox"/> Monthly Report for <u>June, 1986</u></p> <p><input type="checkbox"/> Twelfth day report preceding _____ (Date of _____) election on _____ in the State of _____</p> <p><input type="checkbox"/> Thirtieth day report following the General _____ on _____ in the State of _____</p> <p><input type="checkbox"/> Termination Report</p>
<p>Address (Number and Street)</p> <p>P.O. Box 2313</p>	
<p>City, State and ZIP Code</p> <p>GPO N.Y. N.Y. 10166</p> <p><input type="checkbox"/> Check if address is different than previously reported</p>	
<p>2 FEC Identification Number</p> <p>C000121947</p>	
<p>3 <input type="checkbox"/> This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)</p>	<p>(b) Is this Report an Amendment?</p> <p><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p>

SUMMARY		Column A This Period	Column B Calendar Year to Date
5	Covering Period <u>June 1, 1986</u> Through <u>June 30, 1986</u>		
6	(a) Cash on Hand January 1, 19__		\$ 7,822
	(b) Cash on Hand at Beginning of Reporting Period	\$ 10,672	
	(c) Total Receipts (from Line 18)	\$ 10,000	\$ 25,000
	(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 20,672	\$ 32,822
7	Total Disbursements (from Line 28)	\$ 4,490	\$ 16,440
8	Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 16,382	\$ 16,382
9	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	
10	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	

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

For further information, contact:

Federal Election Commission
Tel. Free 800-474-6530
Line 202-552-4068

Robert E. Campbell

... ..

Booth Englett
SECRETARY OF THE TREASURY

July 17, 1986

Long

1. The first step is to identify the problem or question that needs to be answered. This involves understanding the context and the specific requirements of the task.

A: previous versions of FIC (FOR 1) and FIC (FOR 2) are obsolete and should no longer be used

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FEDERAL ELECTION COMMISSION
WASHINGTON DC 20541

HQ-7

September 11, 1986

Robert Campbell, Treasurer
Footwear Distributors Political
Action Committee
P.O. Box 2313/General Post Office
New York, NY 10116

Identification Number: C00121947

Reference: August Monthly Report (7/1/86-7/31/86)

Dear Mr. Campbell:

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 Joseph Rawson on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

8362430751498805



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20541

MS-L

SEP 16 1986

Robert Campbell, Treasurer
Footwear Distributors Political
Action Committee
P.O. Box 2313/GPO
New York, NY 10116

Identification Number: C00121947

Reference: 1985-1986 Election Cycle Reports

Dear Mr. Campbell:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may have violated 2 U.S.C. §434(a), by failing to timely file Reports of Receipts and Disbursements. The following is a list of the reports in question.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
February Monthly Report (1/1/85-1/31/85)	2/20/85	3/1/85
May Monthly Report (4/1/86-4/30/86)	5/20/86	5/29/86
July Monthly Report (6/1/86-6/30/86)	7/20/86	7/28/86
August Monthly Report (7/1/86-7/31/86)	8/20/86	not filed

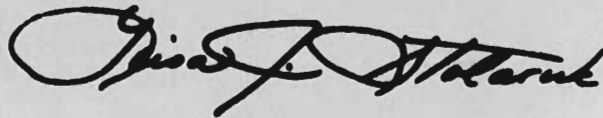
Timely filing is a specific requirement of the Federal Election Campaign Act ("the Act") and is essential to fulfilling the public disclosure concept embodied in that law. The Commission views the untimely filing of reports as a serious violation of the Act. This communication is to advise you that, notwithstanding any matters which may be pending before the Commission, any additional report which is not submitted in a timely manner by your committee may result in the Commission initiating legal enforcement or audit action.

You may submit a letter of explanation in response to this notification. If, however, you have any questions, please feel

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free to contact Joseph Rawson on our toll-free number, (800) 424-9530. Our local number is (202) 376-2400.

Sincerely,



Lisa J. Stolaruk
Chief, Party/Non-Party Branch
Reports Analysis Division

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For further info. or contact:

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September 17, 1967

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4. The results of the TIC-TOBY and TIC-TOBY 2 are shown in Table 1 and Figure 1. The results of the TIC-TOBY 2 are shown in Table 1 and Figure 1.

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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).

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 24, 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.

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

*See General
Election Notice*

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

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GENERAL ELECTION REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PAGE

September 29, 1986

WHO MUST FILE THE PRE-GENERAL ELECTION REPORT

ALL COMMITTEES that file monthly reports must file the pre-general election report due October 23, 1986.

All **COMMITTEES** that file quarterly that have made contributions or expenditures (including independent expenditures and coordinated party 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

Quarterly filers must disclose all financial activity from the close of books of the last report, or from the date of registration* (whichever is later), through October 15, 1986. (Monthly filers must disclose all financial activity from October 1 or from the date of registration* (whichever is later), through October 15, 1986.) For more detailed instructions, consult your campaign guide.

WHEN TO FILE

Pre-general election reports sent registered or certified mail must be postmarked no later than midnight October 20, 1986. Reports hand delivered or mailed first class must be received no later than close of business October 23, 1986.

WHO MUST FILE THE POST-GENERAL ELECTION REPORT

ALL COMMITTEES must file the post-general election report due December 4, 1986, regardless of election activity.

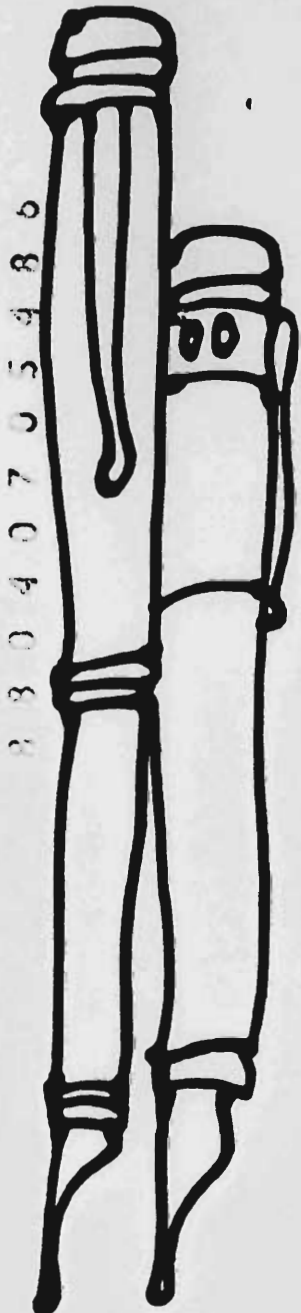
WHAT MUST BE REPORTED

The report must disclose all financial activity from the close of books of the last report, or the date of registration* (whichever is later), through November 24, 1986.

WHEN TO FILE

Post-general election reports sent by registered or certified mail must be postmarked no later than midnight December 4, 1986. Reports hand delivered or mailed first class must be received no later than close of business December 4, 1986.

*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).



QUARTERLY FILERS

<u>Name of Report</u>	<u>Period Covered</u>	<u>Reg./Cert. Mailing Date</u>	<u>Filing Date</u>
Oct. Quarterly	07/01 ¹ - 09/30	10/15/86	10/15/86
Pre-General	10/01 - 10/15	10/20/86	10/23/86
Post-General ² /	10/16 - 11/24	12/04/86*	12/04/86*
Year-End	11/25 - 12/31	01/31/87	01/31/87

MONTHLY FILERS

<u>Name of Report</u>	<u>Period Covered</u>	<u>Reg./Cert. Mailing Date</u>	<u>Filing Date</u>
Oct. Monthly	09/01 ¹ - 09/30	10/20/86	10/20/86
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

*Follow these dates for mailing and filing the post-general report. Disregard dates shown on the October Quarterly Report Notice dated September 19, 1986.

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.

WHERE AND HOW TO FILE

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

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.

¹/Or from date of registration, or the close of books of the last report filed, whichever is later.

²/Reports filed by committees that did not file the pre-general election report should cover all financial activity from the closing date of the last report or from the date of registration (whichever is later), through November 24, 1986. See the footnote on the reverse side.

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

88040705487

REPORT OF RECEIPTS AND DISBURSEMENTS

For a Political Committee Other Than an Authorized Committee

FEC

(Summary Page)

86 NOV 3 AM: 11

<p>1. Name of Committee (in Full)</p> <p>Footwear Distributors Political Action Committee</p> <hr/> <p>Address (Number and Street)</p> <p>P.O. Box 2313</p> <hr/> <p>City, State and ZIP Code</p> <p>GPO NY, NY 10166</p> <hr/> <p><input type="checkbox"/> Check if address is different than previously reported.</p> <p>2. FEC Identification Number</p> <p>COC121947</p> <hr/> <p>3. <input type="checkbox"/> This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)</p>	<p>4. TYPE OF REPORT (check appropriate boxes)</p> <p>(a) <input type="checkbox"/> April 15 Quarterly Report</p> <p><input type="checkbox"/> July 15 Quarterly Report</p> <p><input type="checkbox"/> October 15 Quarterly Report</p> <p><input type="checkbox"/> January 31 Year End Report</p> <p><input type="checkbox"/> July 31 Mid Year Report (Election Year Only)</p> <p><input type="checkbox"/> Monthly Report for September 1986</p> <p><input type="checkbox"/> Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____</p> <p><input type="checkbox"/> Thirtieth day report following the General Election on _____ in the State of _____</p> <p><input type="checkbox"/> Termination Report</p> <p>(b) Is this Report an Amendment?</p> <p><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p>
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SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period	9/1/86 Through 9/30/86		
6. (a) Cash on Hand January 1, 1986			\$ 7,822
(b) Cash on Hand at Beginning of Reporting Period		\$ 12,082	
(c) Total Receipts (from Line 18)		\$ 3,000	\$ 44,200
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)		\$ 15,082	\$ 52,022
7. Total Disbursements (from Line 28)		\$ 4,110	\$ 41,050
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))		\$ 10,972	\$ 10,972
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)		\$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		\$ -0-	

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9630
Local 202-577-4068

Type or Print Name of Treasurer

Boyd B. Engle

SIGNATURE OF TREASURER

10/19/86

Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. § 170.

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

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FEC FORM 3A (10-80)

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REPORT OF RECEIPTS AND DISBURSEMENTS

For a Political Committee Other Than an Authorized Committee

(Summary Page)

RECEIVED THE FEC
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<p>1. Name of Committee (in Full)</p> <p>Footwear Distributors Political Action Committee</p> <hr/> <p>Address (Number and Street)</p> <p>P.O. Box 2313</p> <hr/> <p>City, State and ZIP Code</p> <p>GPO New York, NY 10166</p> <hr/> <p><input type="checkbox"/> Check if address is different than previously reported.</p>	<p>4. TYPE OF REPORT (check appropriate below)</p> <p>(a) <input type="checkbox"/> April 15 Quarterly Report</p> <p><input type="checkbox"/> July 15 Quarterly Report</p> <p><input type="checkbox"/> October 15 Quarterly Report</p> <p><input type="checkbox"/> January 31 Year End Report</p> <p><input type="checkbox"/> July 31 Mid Year Report (Re-election Year Only)</p> <p><input type="checkbox"/> Monthly Report for _____</p> <p><input checked="" type="checkbox"/> Twelfth day report preceding <u>general election</u> election on <u>1986</u> in the State of _____ (Type of Election)</p> <p><input type="checkbox"/> Thirtieth day report following the General Election on _____ in the State of _____</p> <p><input type="checkbox"/> Termination Report</p> <p>(b) Is this Report an Amendment? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p>
<p>2. FEC Identification Number</p> <p>C00121947</p>	
<p>3. <input type="checkbox"/> This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)</p>	

SUMMARY		Column A This Period	Column B Calendar Year to Date
5. Covering Period	<u>10/1/86</u> Through <u>10/15/86</u>		
6. (a) Cash on Hand January 1, 1986			\$ 7,822
(b) Cash on Hand at Beginning of Reporting Period		\$ 10,972	
(c) Total Receipts (from Line 12)		\$ -0-	\$ 44,200
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)		\$ 10,972	\$ 52,022
7. Total Disbursements (from Line 28)		\$ -0-	\$ 41,050
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))		\$ 10,972	\$ 10,972
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)		\$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		\$ -0-	

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

For further information, contact

Robert B. Campbell

Federal Election Commission
 Toll Free 800-424-9630
 Local 202-527-4088

Type or Print Name of Treasurer

Robert B. Campbell

10/25/86

SIGNATURE OF TREASURER

Date

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.

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FEC FORM 3 (1985)

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SENSITIVE

**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: #87NF-50
STAFF MEMBER: Petersen

RESPONDENTS' NAMES: Footwear Distributors Political Action
Committee and Robert B. Campbell, as
treasurer

RELEVANT STATUTES: 2 U.S.C. § 434(a)(4)(B)

INTERNAL REPORTS
CHECKED: Public Records

FEDERAL AGENCIES
CHECKED: None

GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred the Footwear Distributors Political Action Committee and Robert B. Campbell, as treasurer, (the "Committee") to the Office of General Counsel on February 20, 1987. The basis of the attached referral is the Committee's failure to file eight (8) Reports of Receipts and Disbursements in a timely manner. One of the filings, the 12 Day Pre-General Report, was not filed by Election Day, November 4, 1986.

FACTUAL AND LEGAL ANALYSIS

The Act requires all political committees other than authorized committees of a candidate to file on either a quarterly or a monthly basis. Those opting to file monthly must file monthly reports in all calendar years. 2 U.S.C. § 434(a)(4)(B). These monthly reports shall be filed no later

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WASHINGTON
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than the 20th day after the last day of the month, except that, in lieu of filing the reports otherwise due in November and December of any year in which a regularly scheduled general election is held, a pre-general election report shall be filed in accordance with paragraph (2)(A)(i), a post-general election report shall be filed in accordance with paragraph (2)(A)(ii), and a year end report shall be filed no later than January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(B).

8 3 0 4 0 7 0 5 4 9 1
In the instant case the Committee failed to meet the Act's reporting requirements. The Committee filed its 1985 February Monthly 9 days late, its 1985 March Monthly^{1/} 134 days late, its 1985 April Monthly 103 days late, its 1986 May Monthly 9 days late. The Committee also filed its 1986 July Monthly 8 days late, its 1986 August Monthly 30 days late, and its 1986 October Monthly 14 days late. In addition, the Committee failed to file its 1986 12 Day Pre-General Report in a timely manner. The Committee filed the 12 Day Pre-General Report 20 days late and 8 days after the general election.^{2/} Therefore, this Office recommends that the Commission open a MUR and find reason to believe the Footwear Distributors Political Action Committee and Robert B. Campbell, as treasurer, violated 2 U.S.C. § 434(a)(4)(B).

^{1/} RAD sent the Committee a non-filer notice pertaining to the 1985 March Monthly on April 10, 1985. RAD also sent the Committee a non-filer notice for the Committee's 1985 April Monthly on May 15, 1985 and a non-filer notice pertaining to the 1986 August Monthly on September 11, 1986.

^{2/} The Committee was previously referred for chronic late filing in the 1983-84 election cycle. See closed MUR 2056.

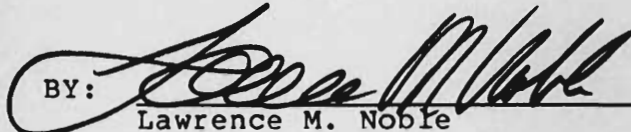
RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe the Footwear Distributors Political Action Committee and Robert B. Campbell, as treasurer, violated 2 U.S.C. § 434(a)(4)(B).
3. Approve the attached letter and factual and legal analysis.

Date

4/2/97

BY:



Lawrence M. Noble
Acting General Counsel

Attachments

1. RAD Referral
2. Factual and Legal Analysis
3. Proposed Letter

83040705492



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: LAWRENCE M. NOBLE
ACTING GENERAL COUNSEL

FROM: MARJORIE W. EMMONS / JOSHUA MCFADDEN *JM*

DATE: APRIL 7, 1987

SUBJECT: OBJECTION TO RAD Ref. 87NF-50: FIRST G.C. REPORT
SIGNED APRIL 2, 1987

The above-captioned document was circulated to the Commission on Thursday, April 2, 1987 at 4:00 P.M.

Objections have been received from the Commissioners as indicated by the name(s) checked:

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner Josefiak	_____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Thomas	_____ X

This matter will be placed on the Executive Session agenda for April 21, 1987.

Please notify us who will represent your Division before the Commission on this matter.

88040705493

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Footwear Distributors Political
Action Committee and Robert
B. Campbell, as treasurer

)
)
)
)
)

RAD 87NF-50

(*muB*
2390)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the
Federal Election Commission executive session of April 22,
1987, do hereby certify that the Commission decided by a
vote of 6-0 to take the following actions in the above-
captioned matter:

1. Open a Matter Under Review.
2. Find reason to believe the Footwear
Distributors Political Action Committee
and Robert B. Campbell, as treasurer,
violated 2 U.S.C. § 434(a)(4)(B).
3. Approve the letter and factual and legal
analysis attached to the General Counsel's
report dated April 2, 1987.

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

Attest:

4-23-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

38040705494



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 1, 1987

Robert B. Campbell
Footwear Distributors Political Action
Committee
P.O. Box 2313
GPO New York, NY 10116

Re: MUR 2390
Footwear Distributors
Political Action
Committee and Robert B.
Campbell, as treasurer

Dear Mr. Campbell:

On April 22, 1987, the Federal Election Commission determined that there is reason to believe the Footwear Distributors Political Action Committee and you, as treasurer, violated 2 U.S.C § 434(a)(4)(B), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The 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 the Committee and you, as treasurer. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the Office of the General Counsel within fifteen days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against you, 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

38040705495

Plan

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 will not be entertained after briefs on probable cause have been mailed to the respondent.

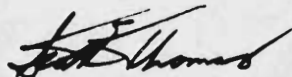
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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 Chris Petersen, 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

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SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Footwear Distributors Political)
Action Committee and)
Robert B. Campbell, as treasurer)

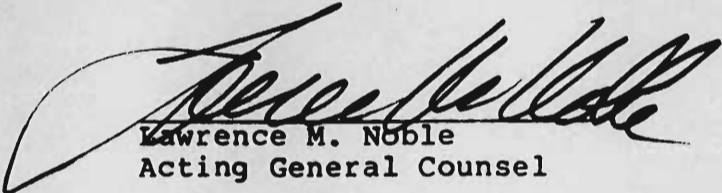
MUR 2390

GENERAL COUNSEL'S REPORT

The Office of the General Counsel is prepared to close the investigation in this matter, based on the assessment of the information presently available.

Date

5/27/87


Lawrence M. Noble
Acting General Counsel

07 MAY 28 1987
A 9:52

RECEIVED
FEDERAL ELECTION COMMISSION
MAY 28 1987

88040705497

GCC# 3524

STATEMENT OF DESIGNATION OF COUNSELNUR 2390

NAME OF COUNSEL:

Douglas R. Stevens

ADDRESS:

2550 M. Street, N.W., Suite 405Washington, DC 20037

TELEPHONE:

(202) 775-0500

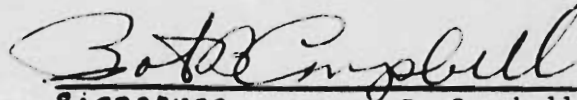
87 JUN 2 P 2: 28

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JUN 2 1987

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.

June 1, 1987

Date



Signature

Robert B. Campbell

RESPONDENT'S NAME:

Robert B. Campbell, Treasurer

ADDRESS:

P.O. Box 2313GPO New York, NY 10116

HOME PHONE:

(212) 249-5454

BUSINESS PHONE:

(212) 594-2865

87 JUN 2 P 3: 55

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JUN 2 1987

88040705498



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

97 JUN 4 11:32

June 4, 1987

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble *[Signature]*
Acting General Counsel

SUBJECT: MUR #2390

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondents of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on June 4, 1987. Following receipt of the respondents' reply to this notice, this Office will make a further report to the Commission.

Attachments

- 1-Brief
- 2-Letter to respondents

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 4, 1987

**Robert B. Campbell, Treasurer
Footwear Distribution Political
Action Committee
P.O. Box 2313
GPO New York, NY 10116**

**RE: MUR 2390
Footwear Distributors
Political Action Committee
and Robert B. Campbell,
as treasurer**

Dear Mr. Campbell:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on April 22, 1987, found reason to believe that the Footwear Distributors Political Action Committee, and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(B) and instituted an investigation in this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

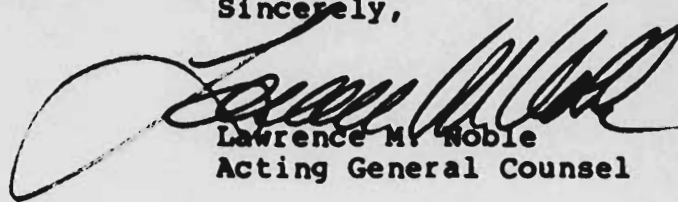
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If you are unable to file a responsive brief within 15 days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extensions beyond 20 days. All requests for extension of time must be submitted in writing five days prior to the due date. Further, good cause must be shown.

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact John Drury, the attorney assigned to handle this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
Acting General Counsel

Enclosure
Brief

88040705501

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Footwear Distributors Political) MUR 2390
Action Committee and)
Robert B. Campbell, as treasurer)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

The Reports Analysis Division ("RAD") referred the Footwear Distributors Political Action Committee (the "Committee") and Robert B. Campbell, as treasurer, to the Office of General Counsel on February 20, 1987. The basis of the attached referral is the Committee's failure to file eight (8) Reports of Receipts and Disbursements in a timely manner. One of the filings, the 12 Day Pre-General Election Report, was not filed by Election Day, November 4, 1986.

On April 22, 1987, the Commission found that there is reason to believe the Committee violated 2 U.S.C. § 434(a)(4)(B). On May 1, 1987, the Commission forwarded a letter to the respondents notifying them of this finding. Enclosed with this letter was the Factual and Legal Analysis upon which the Commission based its determination. The Committee has not responded to the Commission's notification.

II. ANALYSIS

The Act requires all political committees other than authorized committees of a candidate to file on either a quarterly or a monthly basis. Those opting to file monthly must file monthly reports in all calendar years. 2 U.S.C. § 434(a)(4)(B). These monthly reports shall be filed no later

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than the 20th day after the last day of the month, except that, in lieu of filing the reports otherwise due in November and December of any year in which a regularly scheduled general election is held, a pre-general election report shall be filed in accordance with paragraph (2)(A)(i), a post-general election report shall be filed in accordance with paragraph (2)(A)(ii), and a year end report shall be filed no later than January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(B).

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In the instant case the Committee failed to meet the Act's reporting requirements. The Committee filed its 1985 February Monthly 9 days late, its 1985 March Monthly^{1/} 134 days late, its 1985 April Monthly 103 days late, and its 1986 May Monthly 9 days late. The Committee also filed its 1986 July Monthly 8 days late, its 1986 August Monthly 30 days late, and its 1986 October Monthly 14 days late. In addition, the Committee failed to file its 1986 12 Day Pre-General Election Report in a timely manner. The Committee filed the 12 Day Pre-General Election Report 20 days late and 8 days after the general election.^{2/} Therefore, this Office recommends that the Commission find probable cause to believe the Footwear Distributors Political Action Committee and Robert B. Campbell, as treasurer, violated 2 U.S.C. § 434(a)(4)(B).

1/ RAD sent the Committee a non-filer notice pertaining to the 1985 March Monthly on April 10, 1985. RAD also sent the Committee a non-filer notice for the Committee's 1985 April Monthly on May 15, 1985 and a non-filer notice pertaining to the 1986 August Monthly on September 11, 1986.

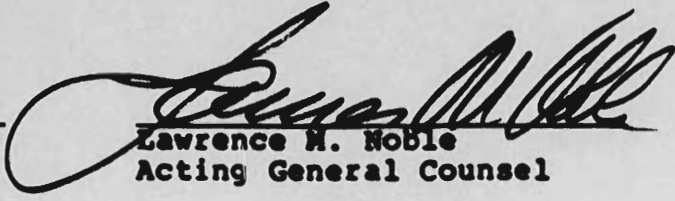
2/ The Committee was previously referred for chronic late filing in the 1983-84 election cycle. See closed MUR 2056.

III. GENERAL COUNSEL'S RECOMMENDATION

1. Find probable cause to believe that Footwear Distributors Political Action Committee and Robert B. Campbell, as treasurer, violated 2 U.S.C. § 434(a)(4)(B).

Date

6/1/87


Lawrence M. Noble
Acting General Counsel

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87 JUN 11 P 4: 17

RECEIVED

Douglas R. Stevens
Attorney at Law

2550 M Street, N. W., Suite 405
Washington, D. C. 20037

202-775-0500

57 Linden Street
Manhattan, New York 10030

5408 Woodacre Drive
Laithland, Maryland 20023

Suite 7600, 8500 Leesburg Pike
Vienna, Virginia 22180

Please reply to
Washington, D.C. Office

June 3, 1987

Scott E. Thomas
Chairman
Federal Election Commission
Washington, DC 20463

ATTN: Chris Peterson

In re: MUR 2390, Footwear Distributors Political
Action Committee

Dear Chairman Thomas:

My offices represent the Footwear Distributors Political
Action Committee in connection with MUR 2390.

This is to inform you that my client wishes to enter
into pre-probable cause conciliation at this time.

The Committee contends that the dates regarding to the
untimely filing are not accurately recounted in the summary of
allegations.

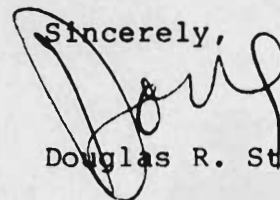
However, in an effort to resolve this matter, my client
would like to dispose of it in conciliation.

I am enclosing a statement of designation of counsel.

You will note that the Committee's recent filings are
all up to date.

I look forward to hearing from you in this matter.

Sincerely,



Douglas R. Stevens

DRS/jas
enclosure

98040705505

87 JUN 10 P 5: 17

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STATEMENT OF DESIGNATION OF COUNSEL

NR 2390

NAME OF COUNSEL: Douglas R. Stevens

ADDRESS: 2550 M. Street, N.W., Suite 405

Washington, DC 20037

TELEPHONE: (202) 725-0500

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.

June 1, 1987
Date

Robert B. Campbell
Signature Robert B. Campbell

RESPONDENT'S NAME: Robert B. Campbell, Treasurer

ADDRESS: P.O. Box 2313

GPO New York, NY 10116

HOME PHONE: (212) 249-5454

BUSINESS PHONE: (212) 594-2865

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Douglas R. Stevens
Attorney at Law

87 JUL 27 AM: 46

2550 M Street, N. W., Suite 405

Washington, D. C. 20037

202-775-0500

*57 Linden Street
Manhasset, New York 11030*

*5408 Woodacre Drive
Scottland, Maryland 20023*

*Suite 7600, 8500 Leesburg Pike
Vienna, Virginia 22180*

*Please reply to
Washington, D.C. Office*

July 22, 1987

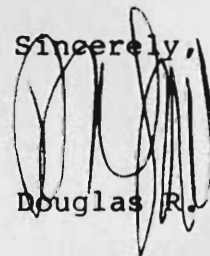
Lawrence M. Noble, Esquire
ATTN: John Drury, Esquire
Federal Election Commission
Washington, DC 20463

In re: MUR 2390

Dear Mr. Noble and Mr. Drury:

This will confirm that the Committee notified you that it wishes to engage in preprobable cause conciliation in this matter and that I am waiting to hear from you with regard to such conciliation.

Sincerely,


Douglas R. Stevens

DRS/jas

87 JUL 27 P 2: 26

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GENERAL INVESTIGATIVE
DIVISION
JUL 27 1987

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BEFORE THE FEDERAL ELECTION COMMISSION

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FEDERAL ELECTION COMMISSION
SECRETARIAT

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In the Matter of)
)
Footwear Distributors Political)
Action Committee)
Robert B. Campbell, as treasurer)

MUR 2390

SENSITIVE
EXECUTIVE SESSION

DEC 01 1987

GENERAL COUNSEL'S REPORT

I. BACKGROUND

The Reports Analysis Division ("RAD") referred the Footwear Distributors Political Action Committee (the "Committee") and Robert B. Campbell, as treasurer, to the Office of General Counsel on February 20, 1987. The basis of the referral was the Committee's failure to file eight (8) reports of receipts and disbursements in a timely manner. One of the filings, the 12 Day Pre-General Election Report, was not filed by Election Day, November 4, 1986.

On April 22, 1987, the Commission found that there is reason to believe the Committee violated 2 U.S.C. § 434(a)(4)(B). On May 1, 1987, the Commission forwarded a letter to the respondents notifying them of this finding. Enclosed with this letter was the Factual and Legal Analysis upon which the Commission based its determination. On June 4, 1987, this Office forwarded its brief in this matter to the respondents. Thus far the respondents have not filed a responsive brief. However, this Office has spoken with the respondents in connection with this matter and have discussed the current status of MUR 2390 with the respondents since the brief was mailed to them.

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II. ANALYSIS

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The Act requires all political committees other than authorized committees of a candidate to file on either a quarterly or a monthly basis. Those opting to file monthly must file monthly reports in all calendar years. 2 U.S.C. § 434(a)(4)(B). These monthly reports shall be filed no later than the 20th day after the last day of the month, except that, in lieu of filing the reports otherwise due in November and December of any year in which a regularly scheduled general election is held, a pre-general election report shall be filed in accordance with paragraph (2)(A)(i), a post-general election report shall be filed in accordance with paragraph (2)(A)(ii), and a year end report shall be filed no later than January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(B).

In the instant case, the Committee failed to meet the Act's reporting requirements. The Commission filed its 1985 February Monthly 9 days late, its 1985 March Monthly^{1/} 134 days late, its 1985 April Monthly 103 days late, and its 1986 May Monthly 9 days late. The Committee also filed its 1986 July Monthly 8 days late, its 1986 August Monthly 30 days late, and its 1986 October Monthly 14 days late. In addition, the Committee failed to file its 1986 12 Day Pre-General Election Report in a timely manner. The Committee filed the 12 Day Pre-General Election Report 20

^{1/} RAD sent the Committee a non-filer notice pertaining to the 1985 March Monthly on April 10, 1985. RAD also sent the Committee a non-filer notice for the Committee's 1985 April Monthly on May 15, 1985 and a non-filer notice pertaining to the 1986 August Monthly on September 11, 1986.

days late and 8 days after the general Election. Therefore, this Office recommends that the Commission find probable cause to believe the Footwear Distributors Political Action Committee and Robert B. Campbell, as treasurer, violated 2 U.S.C. § 434(a)(4)(B).

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

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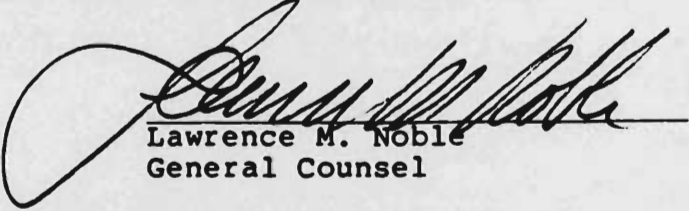
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IV. RECOMMENDATIONS

1. Find probable cause to believe that Footwear Distributors Political Action Committee and Robert B. Campbell, as treasurer, violated 2 U.S.C. § 434(a)(4)(B).
2. Approve the attached conciliation agreement and letter.

Date

11/23/87


Lawrence M. Noble
General Counsel

Attachments

1. Proposed Conciliation Agreement
2. Letter

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Footwear Distributors Political) MUR 2390
Action Committee)
Robert B. Campbell, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the
Federal Election Commission executive session of December 1,
1987, do hereby certify that the Commission decided by a
vote of 6-0 to take the following actions in MUR 2390:

1. Find probable cause to believe that Footwear
Distributors Political Action Committee and
Robert B. Campbell, as treasurer, violated
2 U.S.C. § 434(a)(4)(B).
2. Approve the conciliation agreement and
letter attached to the General Counsel's
report dated November 23, 1987.

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

Attest:

12-1-87
Date

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

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

07 December 1987

Douglas R. Stevens, Esquire
2550 M Street, N.W.
Washington, D.C. 20036

RE: MUR 2390
Footwear Distributors
Political Action
Committee and Robert B.
Campbell, as treasurer

Dear Mr. Stevens:

On December 1, 1987, the Federal Election Commission found that there is probable cause to believe your clients Footwear Distributors Political Action Committee and Robert B. Campbell, as treasurer, violated 2 U.S.C. § 434(a)(4)(B), a provision of the Federal Election Campaign Act of 1971, as amended in connection with failing to file eight reports of receipts and disbursements in a timely manner, viz. the 1985 February, March and April Monthly Reports, 1986 May, July, August and October Monthly Reports and 1986 12 Day Pre-General Election Reports.

The Commission has a duty to attempt to correct such violations for a period of 30 to 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement during that period, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty.

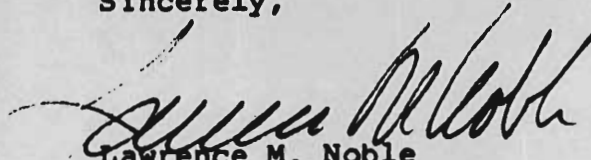
Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission within 10 days. I will then recommend that the Commission approve the agreement. Please make your check for the civil penalty payable to the Federal Election Commission.

88040705516

plm

If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact John Drury, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

88040705517



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 19, 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Douglas R. Stevens, Esquire
2550 M Street, N.W.
Suite 405
Washington, D.C. 20037

RE: MUR 2390
Footwear Distributors
Political Action
Committee and Robert B.
Campbell,
as treasurer

Dear Mr. Stevens:

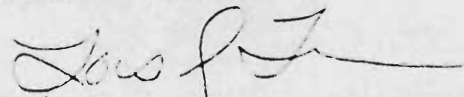
On December 7, 1987, you were notified that the Federal Election Commission found probable cause to believe that your clients, Footwear Distributors Political Action Committee and Robert B. Campbell, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(B). On that same date, you were sent a conciliation agreement offered by the Commission in settlement of this matter.

Please note that pursuant to 2 U.S.C. § 437g(a)(4)(A)(i), the conciliation period in this matter may not extend for more than 90 days, but may cease after 30 days. Insofar as more than 30 days have elapsed without a response from you, a recommendation concerning the filing of civil suit will be made to the Commission by the Office of the General Counsel unless we receive a response from you within 10 days.

Should you have any questions, please contact Beverly Kramer, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

By: 
Lois G. Lerner
Associate General Counsel

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88 MAY 31 AM 10:36

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Footwear Distributors Political)
Action Committee and)
Robert B. Campbell, as treasurer)

MUR 2390

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Respondents signed the Commission's proposed final agreement without modification and on May 25, 1988, submitted the agreement to this Office. Attachment 1. Accordingly, the Office of the General Counsel recommends the acceptance of this agreement and the closing of the file.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Footwear Distributors Political Action Committee and Robert B. Campbell, as treasurer.

88040705519

2. Close the file.
3. Approve the attached letter.

Lawrence M. Noble
General Counsel

Date

5/26/88

By:


Lois G. Lerner
Associate General Counsel

Attachments

1. Conciliation Agreement
2. Letter to Respondents

Staff Member: Beverly Kramer

88040705520

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Footwear Distributors Political) MUR 2390
Action Committee and Robert B.)
Campbell, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 2, 1988, the Committee decided by a vote of 5-0 to take the following actions in MUR 2390:

1. Accept the conciliation agreement with Footwear Distributors Political Action Committee and Robert B. Campbell, as treasurer, as recommended in the General Counsel's Report signed May 28, 1988.
2. Close the file.
3. Approve the letter as recommended in the General Counsel's Report signed May 28, 1988.

Commissioners Aikens, Elliott, Josefiak, McDonald, and Thomas voted affirmatively for the decision.
Commissioner McGarry did not cast a vote.

Attest:

6-2-88

Date

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

Received in the Office of Commission Secretary: Tues., 5-31-88, 10:36
Circulated on 48 hour tally basis: Tues., 5-31-88, 4:00
Deadline for vote: Thurs., 6-02-88, 4:00

83040705521



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 9, 1988

Douglas R. Stevens, Esquire
2550 M. Street, N.W., Suite 405
Washington, D.C. 20037

RE: MUR 2390
Footwear Distributors
Political Action
Committee and Robert B.
Campbell, as treasurer

Dear Mr. Stevens:

On June 2, 1988, the Federal Election Commission accepted the signed conciliation agreement submitted on your clients' behalf in settlement of a violation of 2 U.S.C. § 434(a)(4)(B), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter. 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 questions, please contact Beverly Kramer, the staff member assigned to this matter at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

88040705522

GOC# 9367

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

88 MAY 25 AM 9:59

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Footwear Distributors Political)
Action Committee and) MUR 2390
Robert B. Campbell, as, treasurer)

CONCILIATION AGREEMENT

83040705523
This matter was initiated by the Federal Election Commission ("the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found probable cause to believe that Footwear Distributors Political Action Committee and Robert B. Campbell, as treasurer ("Respondents"), violated 2 U.S.C. § 434(a)(4)(B).

NOW, THEREFORE, the Commission and the Respondents, having duly entered into conciliation pursuant to 2 U.S.C.

§ 437g(a)(4)(A)(i), do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents, and the subject matter of this proceeding.

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, Footwear Distributors Political Action Committee ("the Committee"), is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Respondent, Robert B. Campbell, is the treasurer of the Committee.

3. Pursuant to 2 U.S.C. § 434(a)(4)(B) a political committee is required, through its treasurer, to file in an election year, monthly reports no later than 20 days after the last day of the month. In lieu of monthly reports due in November and December, a pre-election report must be filed no later than 12 days before the general election and a post-election report must be filed no later than 30 days after a general election. During a non-election year, a political committee may elect to change the frequency of its reporting from monthly to semi-annually only after notifying the Commission in writing of its intention at the time it filed a required report under its current filing frequency. Such committee is then required to file the next required report under its new filing frequency. 11 C.F.R. § 104.5(c).

4. The Committee's 1985 February Monthly Report, which was due February 20, 1985, was stamped filed on March 1, 1985.

5. The Committee did not file 1985 March and April Monthly reports which were due March 20 and April 20, 1985, respectively. In lieu of these reports, the Committee sent a letter dated April 19, 1985, which was stamped received May 17, 1985, notifying the Commission of its intent to change its filing frequency from monthly to semi-annually.

88040705524

6. The Committee's 1985 Mid Year report covering the period 1/1/85 through 6/30/85 (including the March and April 1985 monthly reporting periods) was stamped filed on August 1, 1985.

7. During the 1986 election year, the Committee elected to file monthly reports.

8. The Committee's 1986 May Monthly report, which was due May 20, 1986, was stamped filed on May 29, 1986.

9. The Committee's 1986 July Monthly report, which was due July 20, 1986, was stamped filed on July 28, 1986.

10. The Committee's 1986 August Monthly report which was due August 20, 1986, was stamped filed on September 29, 1986.

11. The Committee's 1986 October Monthly report, which was due October 20, 1986, was stamped filed on November 3, 1986.

12. The Committee's 1986 Election Report, which was due October 23, 1986, was stamped filed on November 12, 1986.

V. Respondents failed to timely file their 1985 February, March and April Monthly, 1986 May, July, August and October Monthly, and 1986 Pre-Election Reports, in violation of 2 U.S.C. § 434(a)(4)(B).

VI. Respondents contend that the violations were not knowing and willful.

VII. Respondents will pay a civil penalty to the Federal Election Commission in the amount of One Thousand Three Hundred dollars (\$1,300), pursuant to 2 U.S.C. § 437g(a)(5)(A), such penalty to be paid as follows:

1. One initial payment of \$300 due on July 1, 1988;
2. Thereafter, beginning on August 1, 1988, four

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consecutive monthly installment payments of \$250 each;

3. Each installment shall be paid on the first day of the month in which it becomes due.

4. In the event that any installment payment is not received by the Commission by the fifth day of the month in which it becomes due, the Commission may, at its discretion, accelerate the remaining payments and cause the entire amount to become due upon ten days written notice to the Respondents. Failure by the Commission to accelerate the payments with regard to any overdue installment shall not be construed as a waiver of its right to do so with regard to future overdue installments.

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 same and the Commission has approved the entire agreement.

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

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oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

By: Lois G. Lerner
Lois G. Lerner
Associate General Counsel

6/8/88
Date

FOR THE RESPONDENTS:

Douglas R. Stevens
Douglas R. Stevens
Attorney

May 20, 1988
Date

88040705527



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2390

DATE FILMED _____ CAMERA NO. _____

CAMERAMAN K.A.U.

88040705528



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

✓ N 8.25.88

THE FOLLOWING MATERIAL IS BEING ADDED TO THE
PUBLIC FILE OF CLOSED MUR 2390 .

118040712721

6CC#9644

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

88 JUN 29 AM 9:16

Douglas R. Stevens
Attorney at Law

2550 M Street, N.W., Suite 405

Washington, D.C. 20037

202-775-0500

*57 Linden Street
Manhattan, New York 10030*

*5408 Woodson Drive
Suitland, Maryland 21023*

*Suite 1600, 8500 Leesburg Pike
Vienna, Virginia 22180*

*Please reply to
Washington, D.C. Office*

June 22, 1988

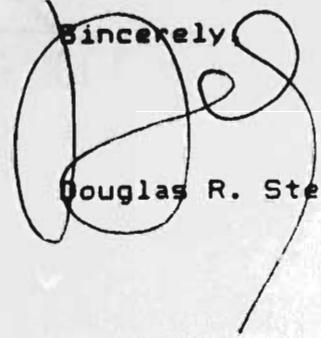
Ms. Beverly Kramer
Federal Election Commission
999 E Street, N.W.
Washington, DC 20004

In re: MUR 2390

Dear Ms. Kramer:

Enclosed please find a check payable to the Federal Election Commission in the amount of \$300 for the initial payment in the above MUR.

Sincerely,



Douglas R. Stevens

DRS/lag
enclosure

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK

88 JUN 30 AM 10:30

1130407127222

6CC #9892

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

88 JUL 21 AM 9:24

Douglas R. Stevens
Attorney at Law

2550 M Street, N.W., Suite 405

Washington, D.C. 20037

202-775-0500

57 Linden Street
Manhattan, New York 11030

5408 Woodacre Drive
Switzland, Maryland 20023

Suite 7600, 8500 Leesburg Pike
Vienna, Virginia 22180

Please reply to
Washington, D.C. Office

July 13, 1988

Beverly Kramer
Federal Election Commission
999 E Street, N.W.
Washington, DC 20004

In re: MUR 2390

Dear Ms. Kramer:

Enclosed please find a check in the amount of \$1,000.00 which is the balance of the amount due in the above MUR.

If any other action is required of me or of my client, I hope you will let me know.

Sincerely,


Douglas R. Stevens

DRS/jas
enclosure

88 JUL 22 PM 2:13

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK

33040712723

CLOSED



DOUGLAS R. STEVENS
ATTORNEY-AT-LAW
TRUST ACCOUNT
2550 M STREET, N.W.
WASHINGTON, D.C. 20037

2870

PAY
TO THE
ORDER OF

Federal Election Commission

\$ 1,000.00

One thousand

DOLLARS

RIGGS

The Riggs National Bank of Washington, D.C.
WASHINGTON OFFICE
2014 M STREET, N.W.
WASHINGTON, D.C. 20007-1201

FOR MUR 2390 balance

[Signature]

⑈002870⑈ ⑆054000030⑆ 28⑈14503549⑈

CCC # 9892

MEMORANDUM

TO: DEBRA A. TRIMIEW

TO: CECILIA LIEBER

FROM: CECILIA LIEBER

FROM: DEBRA A. TRIMIEW

CHECK NO. 2870 { A COPY OF WHICH IS ATTACHED } RELATING TO

MUR 2390 AND NAME Footwear Distributors PAC

(Kramer)
WAS RECIEVED ON 7/22/88. 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 7/22/88

88 JUL 22 PM 2:12

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK